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FINAL ENVIRONMENTAL IMPACT REPORT  
VOLUME II OF III

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*JESUIT HIGH SCHOOL STADIUM  
LIGHTING*



*Control Number: PLNP2021-00262  
State Clearinghouse Number: 2022100645  
February 2024*

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COUNTY OF SACRAMENTO  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
PLANNING AND ENVIRONMENTAL REVIEW  
827 7<sup>TH</sup> STREET, ROOM 225  
SACRAMENTO, CALIFORNIA 95814







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# FINAL ENVIRONMENTAL IMPACT REPORT VOLUME II OF III

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## *JESUIT HIGH SCHOOL STADIUM LIGHTING*

*Control Number: PLNP2021-00262*

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This Environmental Impact Report has been prepared pursuant to the California Environmental Quality Act of 1970 (Public Resources Code Division 13). An Environmental Impact Report is an informational document which, when this Office requires its preparation shall be considered by every public agency prior to its approval or disapproval of a project. The purpose of an Environmental Impact Report is to provide public agencies with detailed information about the effect that a proposed project is likely to have on the environment; to list ways in which any adverse effects of such a project might be minimized; and to suggest alternatives to such a project.

Prepared by the  
COUNTY OF SACRAMENTO  
PLANNING AND ENVIRONMENTAL REVIEW  
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**ATTACHMENT**

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Attachment 1      Annotated Original Comment Letters

**Mitigation Monitoring and Reporting Program**

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## 15 RTC RESPONSE TO COMMENTS

The Draft Environmental Impact Report (Draft EIR) was released on September 15, 2023 for a 45-day public review period. The review period closed on October 30, 2023. During the comment period, a total of 58 written comment letters were received: 56 comments from individuals, one comment by a non-governmental organization (Save the American River Association), and one comment by a public agency (Sacramento County Parks). In addition, 15 individuals provided oral comments before the Sacramento County Planning Commission on October 23, 2023. The original comment letters are located Attachment 1, Annotated Original Comment Letters.

Each letter or oral public testimony has been given a numeric designation (e.g. Letter 1 or PM-1), as identified in the tables below.

**Table RTC-1: Written Comments**

Letter #	Commenter	Letter #	Commenter
1	Tara Ahlberg, September 15, 2023	30	Elizabeth Hughes, November 7, 2023
2	Tara Ahlberg, September 16, 2023	31	Kelly Hughes, October 19, 2023
3	Tara Ahlberg, September 18, 2023	32	Jill, October 20, 2023
4	Anonymous, October 26, 2023	33	Leibovitz, October 29, 2023
5	Anonymous, November 1, 2023	34	Craig Milligan, October 30, 2023
6	Steven Berke, September 25, 2023	35	Wendy Milligan, October 30, 2023
7	Stephanie Christensen, October 30, 2023	36	Patrick Moore, October 2, 2023
8	Betty Cooper, October 2, 2023	37	Gaylord Moulds, October 8, 2023
9	Jim Daugherty, October 17, 2023	38	Gaylord Moulds, October 30, 2023
10	Joan Daugherty, October 29, 2023	39	Susan Myers, October 5, 2023
11	Severiano ("Del") and Constance Del Real, October 8, 2023	40	Susan Myers, October 22, 2023
12	Barbara Dugal, October 15, 2023	41	Susan Myers, October 25, 2023
13	Barbara Dugal, October 17, 2023	42	Joy Hiroko Nishida, October 22, 2023
14	Barbara Dugal, October 21, 2023 (1)	43	Richard Paleski, October 8, 2023
15	Barbara Dugal, October 21, 2023 (2)	44	Lisa Phenix, October 18, 2023
16	Barbara Dugal, October 28, 2023	45	Marybeth Primeau, October 26, 2023
17	Barbara Dugal, October 30, 2023	46	Kanwal Randhawa, November 5, 2023
18	Molly Dugdale, October 23, 2023	47	Sacramento County Parks, October 27, 2023

<b>Letter #</b>	<b>Commenter</b>	<b>Letter #</b>	<b>Commenter</b>
19	Larry Galizio & Janice O'Malley Galizio, September 16, 2023	48	Save the American River Association, October 16, 2023
20	Thayer Goodenow, October 30, 2023	49	Mary Ann Shepperd, September 1, 2023
21	Thomas Guilderson, October 30, 2023	50	Mary Ann Shepperd, October 22, 2023
22	Dave Higgins, Jr., October 30, 2023	51	Maryam Mehrkhist Smitheman, October 27, 2023 (1)
23	Elizabeth Hughes, October 08, 2023	52	Maryam Mehrkhist Smitheman, October 27, 2023 (2)
24	Elizabeth Hughes, October 15, 2023 (1)	53	Todd Sperber, September 26, 2023
25	Elizabeth Hughes, October 15, 2023 (2)	54	Steve, October 28, 2023
26	Elizabeth Hughes, October 18, 2023 (1)	55	David Tait, October 30, 2023
27	Elizabeth Hughes, October 18, 2023 (2)	56	Dale and Darlene Vaira, October 18, 2023
28	Elizabeth Hughes, October 23, 2023	57	Carole & Philip Vercruyssen, October 30, 2023
29	Elizabeth Hughes, November 6, 2023	58	Nick Vinciguerra & Brian O'Neill, October 29, 2023

**Table RTC-2: List of Public Meeting Testimonies**

<b>Public</b>	<b>Commenter</b>	<b>Public</b>	<b>Commenter</b>
PM-1	William Pevack	PM-9	Cole Spake
PM-2	Elizabeth Hughes	PM-10	Craig Milligan
PM-3	Jennifer Hall	PM-11	Kris Kobach
PM-4	Tim Lynch	PM-12	Jim Barnes
PM-5	Michael Armstrong	PM-13	Dana Flags
PM-6	Gaylord Moulds	PM-14	Ms. Alberg
PM-7	Nora Hamilton	PM-15	Kelly Hughes
PM-8	Barbara Dugal		

Each Draft EIR comment letter is detailed below with the text of the submitted comments and a response to each comment.



## MASTER RESPONSES

This section presents “master responses” addressing a number of similar or recurring topics in the comments received on the Draft EIR. The intent of the master responses is to avoid repetition within this document and improve readability by giving a single, comprehensive response to these comments. Responses to the individual comments that raise these recurring topics refer the reader to the master responses in this section.

### **MASTER RESPONSE 1: CONSISTENCY WITH APPLICABLE ZONING AND OTHER REGULATIONS GOVERNING SCENIC QUALITY**

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*Several comments suggested that the proposed project lighting would not be consistent with applicable zoning, land use designations, and other regulations governing scenic quality, and that the Draft EIR should address this issue.*

The Draft EIR contains an analysis of project consistency with applicable zoning and other regulations governing scenic quality, in Chapter 5, “Aesthetics,” Impact AE-1. The project site and immediately surrounding development are zoned RD-4 (Residential Development). Private schools are an allowable use under the Sacramento County Zoning Code in areas zoned RD-4, with a conditional use permit. Jesuit High School operates as a private school under a conditional use permit from the County (Draft EIR page 5-16). The Sacramento County Zoning Code allows outdoor nighttime lighting at schools with a conditional use permit (Draft EIR page 5-16). The proposed outdoor lighting (both the pole-mounted lighting and the small wall-mounted bleacher aisle lighting to provide for public safety) were reviewed by the County’s Design Review Advisory Committee (DRAC) in 2022 (Draft EIR page 5-17). This review process is mandated by Sacramento County Zoning Code Section 6.3, Design and Site Plan Review (Draft EIR page 5-11). The DRAC’s review was conducted on April 21, 2022 by virtual teleconference. The DRAC members asked the applicant team to elaborate on the details and technology of the proposed stadium lights because there are initial concerns about the effect of the light source on the surrounding properties. The applicant’s team provided additional information about the stadium lighting technology, which includes a design that masks the light source, reduces glare, has reduced number of fixtures, and has more precision on the light direction. It was also noted that the design was sent to the International Dark-Sky Association (IDA) for review and the IDA provided a letter confirming the design meets their protocol. After deliberation, the DRAC recommended the Planning Commission find the project in substantial compliance with the *Sacramento Countywide Design Guidelines* (Sacramento County 2022), which supplement the County Zoning Regulations with design criteria that supports and implements the goals and policies of the County (Draft EIR page 5-17). The Design Review Administrator’s letter transmitting the DRAC’s recommendation is included as an attachment in the project hearing package.

From the perspective of new lighting and glare, the Draft EIR also determined that the proposed stadium lighting would meet County Zoning standards and Design Guidelines (e.g., Zoning Code Chapter 5 Development Standards—Table 5.13 Commercial Lot and

Commercial and Institutional Project Development Standards; avoid spillover lighting, use LED lighting), and would be consistent with the policies contained in the County General Plan (e.g., Policy LU-31, reduce light pollution) and the American River Parkway Plan (i.e., Policy 7.24 discourage intrusive lighting) (Draft EIR page 5-21).

Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality, and this impact would be less than significant (Draft EIR page 5-17).

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## **MASTER RESPONSE 2: NIGHTTIME LIGHT AND GLARE IMPACTS**

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*A number of comments suggested that the Draft EIR should address potential nighttime light and glare impacts to surrounding residents, particularly the potential for sleep deprivation from nighttime lighting shining into residential windows. Several comments also suggested that nighttime light and glare impacts should be evaluated from nearby public viewpoints, including local streets (particularly American River Drive) and the American River Parkway. Finally, several comments also suggested that a variety of mitigation measures should be imposed to reduce the potential light and glare impacts.*

The Draft EIR contains a thorough analysis related to potential nighttime light and glare impacts in Chapter 5, “Aesthetics,” Impact AE-2. As discussed on Draft EIR page 5-14, off-site effects of light pollution for any project may include light trespass, glare, and skyglow. All of these issues are functions of the light fixture or luminaire design and installation. A Lighting Report containing a Backlight, Uplight, and Glare (BUG) lighting analysis to determine (via computer modeling) the amount of light trespass, glare, and skyglow that could be generated at the project site, and to determine the appropriate lighting fixtures and shielding to reduce these issues, was performed as part of the project’s lighting design and engineering. The Lighting Report relied on the suggested standards contained in the Model Lighting Ordinance proposed by the International Dark-Sky Association (IDA) and the Illuminating Engineering Society of North America (IES) (IDA-IES) in 2011. Although the Model Lighting Ordinance was not adopted by Sacramento County or most other jurisdictions throughout the U.S., it is used in the lighting industry as a framework for lighting design and analysis (Draft EIR page 5-9). The analysis of nighttime light and glare impacts in the Draft EIR relied on the findings contained in the Lighting Report prepared by M. Neils Engineering, Inc. (2023), which was attached to the Draft EIR as Appendix B.

As noted in the Draft EIR (page 5-2), under CEQA, an evaluation of a project’s potential visual change as viewed from private property is not required (*Mira Mar Mobile Community v. City of Oceanside*, 119 Cal.App.4th 477 [Cal. Ct. App. 2004]). Nevertheless, the project applicant elected to provide a comparison of nighttime lighting changes from the surrounding private residences, which was included in the project’s Lighting Report and summarized in Draft EIR Impact AE-2.

The proposed lighting plan for the Jesuit High School stadium was submitted to the IDA for validation that it meets the criteria adopted in the IDA’s Community Friendly Outdoor Sports Lighting program. The IDA assigns either a “pass” or “fail” rating when

performing its review. As shown in Appendix B to the Lighting Report, the IDA assigned a “pass” rating to the project’s proposed stadium lighting, indicating the backlight, uplight, and glare generated by the proposed stadium lighting would meet the IDA’s standards to reduce glare to a level that would not cause annoyance or disruption, and would reduce skyglow to a low level (Draft EIR page 5-21).

As described in detail on Draft EIR page 5-18, modeling results contained in the Lighting Report demonstrate that light levels from the proposed stadium lighting at the Jesuit High School property boundaries to the east and south (approximately 550 and 225 feet away, respectively) would be 0.0 footcandle—meaning there would be no additional nighttime lighting generated by the proposed stadium lights at these locations. Furthermore, nearly all of the modeled light levels at the High School’s western property boundary (ranging from 181 to 237 feet) generated by the proposed stadium lighting would be 0.0 footcandle. Along the boundary between the Jesuit High School property and the backyards of the three houses directly west of the stadium, the proposed stadium lighting would generate 0.049 to 0.1 footcandles (variations are due to the amount of rounding incorporated into the modeling programs); this represents only slightly more light than is generated by moonlight. Therefore, the proposed lighting would meet the standards suggested by the Electric Power Research Institute for Environmental Zone E3 (Medium ambient brightness – 0.8 footcandle), where the project site and surrounding area are located. The proposed lighting would also meet the more stringent standards suggested by the Electric Power Research Institute for Environmental Zone E2 (Low ambient brightness – 0.3 footcandle). Visual simulations demonstrating the nighttime lighting at the Jesuit High School stadium as viewed from American River Drive (the primary public viewpoint) and from a residence immediately west of the Jesuit High School property boundary (private viewpoint) were excerpted from the Lighting Report and provided in the Draft EIR on pages 5-19 and 5-20. The American River Parkway is approximately one-half mile south of the project site, and the intervening land area is composed of residences and tall landscape trees. Furthermore, the topography within the Parkway slopes steeply downhill away from the project site. The project site is situated at an elevation of approximately 54 feet above mean sea level (amsl). The top of the levee along the American River, which borders the Parkway on the north side, is approximately 61 feet amsl. The Jedediah Smith Memorial Trail within the Parkway (which is approximately 2,258–2,400 feet south of the proposed light standards) is situated at elevations ranging from 52–53 feet amsl. The land within the Parkway continues to slope down to the southeast to the American River, which is situated at an elevation of approximately 27 feet amsl. As discussed in the Lighting Report, modeling results indicate that due to the intervening distance, topography, tall trees, and residences, the proposed nighttime lighting at the Jesuit High School stadium would not be visible from the Parkway. Furthermore, the Parkway is only open from sunrise to sunset; thus, recreationists are not allowed within the Parkway during nighttime hours and therefore nighttime impacts to recreationists within the Parkway would not occur.

In summary, based on the modeling performed for the Lighting Report, the proposed project would result in zero light trespass off-site at both public (American River Drive, Tennyson Way, and American River Parkway) and private (neighboring residences)

viewpoints. Modeling also demonstrated that glare and skyglow would be reduced to levels that meet IDA standards. Therefore, the proposed stadium lighting would also meet County Zoning standards and Design Guidelines (e.g., Zoning Code Chapter 5 Development Standards—Table 5.13 Commercial Lot and Commercial and Institutional Project Development Standards; avoid spillover lighting, use LED lighting), and would be consistent with the policies contained in the County General Plan (e.g., Policy LU-31, reduce light pollution) and the American River Parkway Plan (i.e., Policy 7.24 discourage intrusive lighting) (Draft EIR page 5-21).

However, the Draft EIR acknowledged that the ambient nighttime lighting environment at the project site and from off-site public views of the project site would change as a result of the proposed stadium lighting. In order to be conservative, the Draft EIR therefore concluded that the nighttime generation of new visually perceptible light sources altering existing nighttime views from the proposed stadium lighting would result in a potentially significant impact (Draft EIR page 5-21). The Draft EIR further concluded that the proposed Jesuit High School stadium lighting has been designed to reduce light trespass, glare, and skyglow to the maximum extent feasible using modern technology. There would be no light trespass off the project site. However, there are no feasible mitigation measures available that would further reduce or completely eliminate the project's nighttime glare and skyglow effects as viewed from off-site looking towards Jesuit High School. Therefore, this impact was considered significant and unavoidable (Draft EIR page 5-21).

Finally, several comments suggested that a variety of mitigation measures should be imposed to reduce the impacts from nighttime light as glare, as follows:

1. Limit the time for the end of nighttime activities to 10pm rather than 11pm.
2. Hold games in the morning rather than at night.
3. Have fewer games during the year.
4. Have County staff monitor and impose penalties for lights left on beyond 10pm with a penalty of \$25,000 per event, payable to the resident association.

Revised Draft EIR Mitigation Measure NOI-1: Ambient Noise Reduction Strategies (Draft EIR page 9-24) requires nighttime stadium events to be scheduled to conclude by 10 pm, but recognizing that events such as football games may occasionally go into overtime. For most games—which generally do not require overtime play—this represents a 1-hour reduction of the time period during which nighttime stadium lighting would occur as compared to the original proposal (which was 11 pm). Although this mitigation measure would not reduce the amount of light emitted, it would, in most cases, reduce the time period during which nearby public and private viewers would experience the proposed visual change.

Suggested mitigation measure No. 2 was discussed as a potential alternative to the proposed project in Draft EIR Chapter 4, “Alternatives.” The potential alternative to hold athletic games in the stadium in the morning instead of at night was discussed on Draft EIR page 4-5, but rejected for detailed analysis because it would not accommodate the

necessary athletic games during the weekday due to conflicts with school classroom hours.

Suggested mitigation measure No. 3 is infeasible because it does not meet the project objectives to support the school’s outdoor athletic program.

Suggested mitigation measure No. 4 is not feasible because some sporting events may occasionally go into overtime play, requiring the stadium lights to be on for a slightly longer period of time past 10 pm as noted in Revised Draft EIR Mitigation Measure NOI-1. Furthermore, if permit violations were to occur and were reported to the County for investigation, and the County determined that violations were indeed occurring, the County has the ability to issue warnings to the applicant that the permit terms and conditions must be complied with. If permit violations were to continue despite multiple County warnings, the County would have the option to revoke the conditional use permit. The County’s Code Enforcement Division is the entity responsible for investigating any reported permit violations.

### **MASTER RESPONSE 3: PROJECT APPROVAL WHERE THERE ARE SIGNIFICANT AND UNAVOIDABLE IMPACTS**

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*A number of comments suggested that the project cannot or should not be approved because significant and unavoidable impacts (related to nighttime lighting and noise) were identified in the Draft EIR.*

CEQA provides that a lead agency (in this case, Sacramento County) may approve a project even where an EIR finds there may be significant and unavoidable impacts. Public Resources Code Section 21081 and the State CEQA Guidelines Section 15093 require the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.” In this event, as required by the State CEQA Guidelines Section 15093, the County must prepare a Statement of Overriding Conditions providing the specific reasons to support its action based on the FEIR and/or other information in the record. A Statement of Overriding Conditions is not required to be circulated for public review and comment; however, it is recorded as part of the CEQA project record associated with the EIR. Before making a decision on whether or not to approve the proposed project, the County will hold a public hearing, and members of the public may provide comments related to the potential environmental impacts of the proposed project at that hearing.

## **MASTER RESPONSE 4: TRAFFIC HAZARDS**

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*A number of comments suggested that the increased traffic generated by the proposed project would further exacerbate existing hazardous conditions. More specifically, commenters express concern about the dangers associated with increased vehicular and pedestrian traffic at night.*

Transportation-related impacts are comprehensively reported in the Draft EIR and include those related to increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access. Potential impacts related to the social inconvenience of traffic congestion, typically measured according to delay (level of service), are not generally relevant for environmental analysis under CEQA. Therefore, the Draft EIR evaluates impacts related to traffic-related hazards in Impact TR-3 (Substantially Increase Hazards Due to a Geometric Design Feature or Incompatible Use) (Draft EIR page 10-14) to the extent that the proposed project would generate vehicular activity that could exacerbate existing hazards related to pedestrians crossing American River Drive to attend games.

As discussed in Impact TR-3, the proposed project is expected to result in increased stadium attendance on Friday nights. This increase in attendance would thereby increase vehicular traffic along American River Drive. Increased attendance would also result in an increase of pedestrians crossing American River Drive at night in the vicinity of the project site. Additionally, there is currently no marked pedestrian crossing to facilitate the safe crossing of pedestrians across American River Drive at Tennyson Way and at Jacob Lane. Under the proposed project, this hazard would be increased because football games would occur on Friday nights, some attendees parking off-site would therefore need to cross American River Drive. The hazard associated with an anticipated increase in pedestrian activity is considered in the Draft EIR to be a potentially significant impact. The Draft EIR includes Mitigation Measure TR-2: Pedestrian Safety Improvements to Site Plans, which would require installation of pedestrian crossing infrastructure with enhanced safety features at Tennyson Way and American River Drive, as well as Jacob Lane and American River Drive. Page 3-10 of the Draft EIR states that the project would be installing a pedestrian crossing and enhanced safety features. This proposed work is a result of the requirements of Mitigation Measure TR-2. Because the baseline condition does not include a pedestrian crossing, the project analysis of potential impacts analyzes the project conditions without the pedestrian crossing. The final design would require the review and approval by the Sacramento County Transportation Department. Implementation of Mitigation Measure TR- would reduce hazards to pedestrians associated with increased traffic and impaired vision of drivers, by making the crossing of pedestrians more organized and visible. With the implementation of Mitigation Measure TR-2, this potentially significant impact would be less than significant.

Commenters also raise concern for hazards to pedestrians associated with illegal traffic maneuvers, such as illegal U-turns on American River Drive and failure to stop at stop signs, as well as exceeding posted speed limits. As discussed, Mitigation Measure TR-2 would reduce hazard risks associated with pedestrians crossing American River Drive

by providing visible crossing facilities. However, the Applicant is not responsible for enforcing traffic laws such as violating speed limits, illegal U-turns, or failure to stop at stop signs. The County cannot speculate as to the future frequency of illegal driving maneuvers.

### **MASTER RESPONSE 5: ATTENDANCE ESTIMATES**

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*A number of comments expressed concerns about the attendance estimates used within the EIR analysis. Specifically, a few comments expressed concerns that the attendance estimates provided in the EIR were too low and that actual attendance numbers for daytime and nighttime games are and will be substantially higher. Additionally, a few comments expressed concern that the data on attendance provided by the Applicant were not confirmed by a third party. Finally, a few comments express concern that the total stadium capacity was not used as the worst-case attendance estimate.*

The Draft EIR estimated that, with the addition of lights for nighttime football games, regular season attendance would increase from approximately 1,200 to 1,500 people and playoff game attendance would remain unchanged with an average of 2,500 and a maximum attendance of 3,000 people (Draft EIR pages 3-13, 10-1, 11-6).

The 1,200-person average utilized in the analysis was based upon information that Jesuit High School provided indicating that regular season games typically have an attendance range of 800-1,500 people. These attendance estimates provided by Jesuit High School are derived from data collected on ticket sales, complimentary tickets, staff attendance, and number of student athletes. The attendance figure of 1,200 was selected to represent typical attendance. Additional data gathered during the 2023 season confirmed that the use of 1,200 for typical attendance in the Draft EIR is reasonable. Three Saturday daytime regular season games were played in 2023, on September 23, October 14, and October 21, 2023. The attendance at these daytime regular-season games averaged 1,150 people, nearly identical to the 1,200-person existing regular season, daytime game attendance that was used to support the analysis in the Draft EIR.

Additionally, the EIR assumed that regular season game attendance would increase to an average of 1,500 with the installation of the lights and the shift to Friday night.

Two Friday night football games were played on August 25 and September 1, 2023, under temporary lighting authorized by the Jesuit High School's current temporary use permit. The attendance at these games averaged 2,640 persons, which is closer to the anticipated attendance for a playoff game analyzed in the Draft EIR as 3,000. This attendance, however, is not anticipated with regular season games once the lights are installed and all games are played on Friday evenings. Rather, the attendance numbers associated with the temporary permit more closely reflect what the Draft EIR assumes for playoff games, which these two special events more closely resembled.

To elaborate, the two games played pursuant to the temporary permit would not be considered representative of a typical regular-season nighttime football game that would occur with the project. Rather, they were more akin to a nighttime playoff game than a regular season game because they were the first night football games held at Jesuit High School for any of the current student population, i.e. other than those two games, none of the current students had ever experienced a nighttime home game. As such, there was substantial fanfare for such a unique event. Additionally, the Jesuit High School took steps to make the games more of a community event by including food trucks and complimentary tickets, and supporters of the opposing teams were bused in to boost attendance. There was also considerable social media advertising for the game, and free tickets were provided to residents in the surrounding neighborhood and to many Jesuit supporters. In sum, these two games are better characterized as special events and reflect attendance numbers that more closely align with what Jesuit is likely to see in a rivalry playoff game than at a regular season game once all games occur on Friday evenings with the project.

As discussed in Chapter 3 “Project Description”. The total maximum capacity for Marauder Stadium is approximately 3,000 persons (Draft EIR page 3-4). The Draft EIR and supporting technical studies state that, under the proposed project, postseason playoff games held on Friday nights are expected to have up to 3,000 attendees (Draft EIR pages 3-13, 10-11, 10-12, and 11-6). The transportation analyses use the projected attendance of 3,000 people to assess impacts. For thorough discussion on potential impacts related to transportation that may occur from Marauder Stadium reaching capacity, please see Chapter 10 of the Draft EIR, “Transportation.”

In summary, the attendance data supports the baseline assumptions utilized in the Draft EIR, the two night games authorized by the temporary use permit are more reflective of a playoff game, the impacts of which are analyzed in the Draft EIR.

## **MASTER RESPONSE 6: PARKING AVAILABILITY**

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*A number of comments express concern for the amount of available parking, as well as concern about the temporary parking areas proposed to increase parking availability for high-attendance events.*

The Draft EIR analyzes parking availability to the extent that off-site parking may result in an increase in traffic-related hazards. Inadequate parking availability by itself is not considered an impact under CEQA (see Appendix G: Environmental Checklist Form, CEQA Statute and Guidelines). As discussed, adequate parking will be available during regular-season games. Parking demand may exceed availability during playoff games, which could occur up to twice a year. During these events, attendees would be expected to park off-site at locations which may include public streets, the Rio Americano High School parking lot, or the Arden Hills Wellness Resort parking lot (Draft EIR page 10-10, 10-13, and 10-14).

To supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project. W-Trans conducted a survey of



parking activity related to a nighttime football game at Jesuit High School. The parking surveys were conducted on a non-football Friday in August 2023 and on the evening of a night football game held under portable lighting in September 2023. Based on those surveys, W-Trans estimated that the vehicle occupancy for the nighttime game in September was approximately 3.22 people per vehicle, which is nearly identical to the 3.24 people per vehicle assumed in the Draft EIR. Additionally, Jesuit High School allowed vehicles to park on the grass field south of the football field and on the rugby field south of the Jesuit Chapel. Further, signage was posted along the residential streets that read “No Event Parking.” The survey found that these measures effectively prevented attendees from parking on residential streets, with the only public street to have experienced an increase in parking due to the night football game was American River Drive. This survey supports the assumptions made in the Draft EIR pertaining to average vehicle occupancy and available parking. The Parking Survey Memorandum prepared by W-Trans can be found in Appendix H of this document. Hazards associated with off-site parking are discussed in Chapter 5, “Transportation,” Section TR-3 will be mitigated by Mitigation Measure TR-2 (Draft EIR page 10-13 and 10-14). This is also discussed in Master Response 4: Traffic Hazards.

## **COMMENT LETTERS**

This section contains copies of the written comment letters (including emails) received from agencies, organizations and individuals, and copies of the public meeting transcripts.

Individual comments addressing separate subjects within each letter are labeled in this chapter based on the letter's numeric designation and comment number (e.g. 1-1). Note that the preface language of the letters is often excluded (where the text consists of salutations and brief descriptions of the commenting organization).

In some cases, the response to comment is "comment noted" or a similar response. Pursuant to Sections 15088 and 15204 of the CEQA Guidelines, no written responses are provided for those letters or comments that do not address significant environmental issues. While no response to the comment is provided, the comment letters are forwarded to the Planning Commission for their consideration.

**LETTER 1**

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Tara Ahlberg (September 15, 2023).

**COMMENT 1-1**

I've been reading the draft EIR for the Jesuit Light Proposal.

Will the county be considering property value decline in a separate report?

I haven't heard back on seeing if our properties can be assessed to determine this neighborhood impact.

Please include this email in public comments.

**RESPONSE 1-1**

Regarding changes in property values, CEQA requires an analysis of physical impacts to the environment; it does not require analysis of social and economic impacts. Under CEQA, "an economic or social change by itself shall not be considered a significant effect on the environment." (14 CCR §§ 15131 & 15382.) Effects analyzed under CEQA must be related to a physical change. (14 CCR § 15358(b).) Social and economic impacts alone do not constitute a significant effect on the environment. (14 CCR §§ 15064(e), 15131 & 15382.) The comment is included in the Final EIR for consideration by the Planning Commission.

## **LETTER 2**

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Tara Ahlberg (September 16, 2023).

### **COMMENT 2-1**

I didn't see any consideration of gas emissions on individual neighborhood health when Jesuit event goes and team buses are idling outside our homes at night. This happens during the day too but in the evening and at night we open windows. The fumes then get into our rooms and lungs. This is more than a general environmental issue when the gas fumes are filling our bedrooms and children's bedrooms. Why wasn't this considered?

### **RESPONSE 2-1**

The Draft EIR evaluated potential impacts associated with criteria air pollutant and toxic air contaminant emissions that could occur on- and off-site in Chapter 6, "Air Quality." The Draft EIR estimates the daily and total emissions that could result from project implementation using the California Emissions Estimator Model (CalEEMod), which accounts for area, energy, mobile and stationary emissions sources, as applicable to a project. Operation-related emissions, which may result from vehicle use, idling, and fuel combustion, are considered in CalEEMod to comprehensively assess greenhouse gas (GHG) and air pollutant emissions associated with the proposed project. The modeling accounts for private and commercial vehicle and truck (including buses) trips to the site, as informed by the traffic study conducted for the proposed project and explained in the Air Quality analysis of Draft EIR (pages 6-13 and 6-18). The emissions rates for vehicle travel include starting, running, and idling emissions, as informed by the California Air Resources Board (CARB) EmFAC databased, which is one of the data sources used to inform the CalEEMod emissions estimates. EmFAC inherently accounts for various aspects related to bus operations, including idling, as part of CalEEMod.

As identified in Table AQ-3 and Table AQ-4 in Chapter 6, "Air Quality" of the Draft EIR, the criteria air pollutant and toxic air contaminant concentrations in the vicinity of the proposed project, including the increase in traffic from the proposed project, would not exceed established threshold levels. Impact AQ-3 (pages 6-19 through 6-22 of the Draft EIR) discusses the potential health effects associated with criteria air pollutant and toxic air contaminant emissions. The Draft EIR determines that operational activities resulting from the proposed project would not expose sensitive receptors to substantial pollutant concentrations. The Draft EIR is focused on potentially significant environmental effects associated with the proposed project, including emissions from an incremental increase in trips to and from the project site attributable to the proposed project.

### **COMMENT 2-2**

I have video of this happening I will share separately. I have video of both busses and cars idling in front of my home on 1050 Jacob Lane. In one instance three cars were idling at the same time! In another instance two buses were idling in back to back time periods.

**RESPONSE 2-2**

See response 2-1 for discussion on emissions related to idling. Additionally, Jesuit's Protocol for Night Events would be implemented for all night-time events and includes measures to reduce parking and traffic on neighborhood streets. The protocol includes methods for communicating parking instructions to students, families, and visiting teams; identifies a team of volunteers that will be responsible for directing vehicles to appropriate parking; identifies signage to discourage parking in residential areas; and shared parking agreements with nearby Rio Americano High School for high-attendance events. As reported in the Parking Survey conducted by W-Trans, these measures were largely effective in preventing event attendees from parking on residential streets (see The Parking Survey Memorandum prepared by W-Trans in Appendix H of this document).

### **LETTER 3**

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Tara Ahlberg (September 18, 2023).

#### ***COMMENT 3-1***

I would like to add that if homeowners lose money due to Jesuit getting lights it will directly impact their health and well-being. For this reason, wouldn't a degrade in property value fall under "general welfare" of homeowners and the county (the county due to tax collection)? Aren't taxes to provide for the health and well-being of the tax payers? The degradation of the neighborhood would have a significant impact.

Please let me know.

#### ***RESPONSE 3-1***

See Response 1-1.

## **LETTER 4**

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Anonymous (October 26, 2023).

### **COMMENT 4-1**

Sac County disguised the facts to Planning Commission, regarding notification to citizens, living in the opposite CPAC boundaries of Arden, next to Carmichael CPAC designation. Especially Kimber’s incomplete and misleading response to Commissioner(s) - “we notified Arden CPAC”.

Can you confirm if neighbors in “Arden” received written notice from Sac County of Jesuits Project? If no one received notices, then Kimbers responded incorrectly and must be corrected.

She didn’t tell the 5 Commissioner’s that the Arden CPAC -didn’t cause Sac County to send out notices to landowners during 2022-23, so there was no Sac County notice sent to all residents that will be impacted by a mega Jesuit Stadium 3,000 capacity, then Rio stadium lights project with their own 1,923 student enrollment.

### **RESPONSE 4-1**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

### **COMMENT 4-2**

Maybe get legal minds to declare a Cequa “piecemeal” perpetrated by Sac County Staff before October 30th, that knew the citizen notification deficiencies and abetted the separation of notice to citizens in both CPAC areas!

### **RESPONSE 4-2**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

### **COMMENT 4-3**

Did anyone in Arden CPAC area receive notices of all the CPAC meetings and hearings from Sac County? This is a mega project that deserves mega input from all 1,000 residents that will be impacted forever. We are not talking about a 7-11 changing their light bulbs, we’re dealing with the complete eradication of a 60 year old communities identity, a safe, place to live and raise young kids.

### **RESPONSE 4-3**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration. Please see the staff report for this item for more details on CPAC meetings and noticing.

**COMMENT 4-4**

Maybe time to revisit and request all Sac County Staff and Commissions and Supervisors to swear in and attest to “conflict of interest “ policies and ask Sac County staff and Commissions to declare all dates, including weekends, of all contacts and specific discussions with friends and proponents Jesuit light projects.

**RESPONSE 4-4**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.



## **LETTER 5**

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Anonymous (November 1, 2023).

### **COMMENT 5-1**

Previous traffic, air pollution and parking studies, completed 8 years ago, are outdated and were based on pre-Covid student drop-off practices. Student drop off/pick up zones have drastically increased traffic and car idling on American River Drive involving Jesuit students and non-students, until 8 pm.

### **RESPONSE 5-1**

The studies supporting the analysis on the Draft EIR were prepared in 2023. The *Vehicle Miles Travelled (VMT) Analysis* and *Local Transportation Analysis* conducted by Kimley-Horn for the proposed project were completed on March 10, 2023, and can be found in Appendix E and Appendix F of the Draft EIR. Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix I of Final EIR). The technical reports that were referenced to support the analysis in Chapter 10 “Transportation” of the Draft EIR reflect current conditions. The air quality and GHG modeling was conducted in 2023, the results of which are located in Appendix C. No change to the Draft EIR is necessary.

### **COMMENT 5-2**

Jesuit High School currently competes in the Delta League (Elk Grove) and traffic and parking demand studies do not reflect the new reality that in 2024 Jesuit moves to the Sierra Foothill League. The average driving distance to Delta League Schools was 13 miles compared to Sierra Foothill League schools of 22 miles, a 41% increase. The same holds true for the time required to drive to the Sierra Foothill League schools, the average drive time is 35 minutes, a 41% increase, and this increase does not take into account traffic delays of up to 15 minutes during peak Friday afternoon and evening commuter drive time.

### **RESPONSE 5-2**

Jesuit High School would move to the Sierra Foothill League with or without implementation of the proposed project. Any increase in traffic related to this change would not result from the proposed project. Therefore, any increase in VMT related to this change is outside of the scope of this Draft EIR. Additionally, pursuant to SB 743, beginning July 1, 2020, potential impacts related to the social inconvenience of traffic congestion, typically measured according to level of service (LOS), are not generally relevant for environmental analysis under CEQA. Transportation-related impacts analysis and comprehensively reported in the Draft EIR include those related to increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access.

**COMMENT 5-3**

Consider this- (In my humble opinion, approval conditions encouraging walking and bicycling and promotions to encourage carpooling, public transportation and alternative parking sites will never be enforceable and become a distraction from the real issues. The majority of Jesuit students use their own cars to drive to school and this won't change for night time events. What will change is visitor's attendance, miles driven, unsafe driving, and on campus parking demands that the school is not currently prepared to supply or direct. If the county planning commission wishes to support this project, don't they have an obligation to the citizens to require the applicant to provide on campus parking based on full attendance before approving the project and protect the residents from becoming the permanent nighttime parking lot for all Jesuit High School events by approving Resident Permit Parking Only signs?)

**RESPONSE 5-3**

Transportation related impacts including VMT impacts, traffic hazards, and parking demands have been evaluated in detail in Chapter 10 "Transportation" of the Draft EIR. This analysis is supported by the *Vehicle Miles Travelled (VMT) Analysis* and *Local Transportation Analysis* conducted by Kimley-Horn and the survey of parking activity conducted by W-Trans (see Appendix H). CEQA generally does not require consideration of parking availability. Chapter 10 "Transportation" of the Draft EIR, though, does include an analysis of the potential impact of the potential impact of parking availability on traffic. In Impact TR-3, the Draft EIR evaluates the extent to which overflow parking from shifting games to evening hours would exacerbate existing safety hazards to pedestrians and bicyclists who cross American River Drive to attend games. Mitigation Measure TR-2 (Pedestrian Safety Improvements to Site Plans) would reduce this impact to a less-than-significant level by requiring a marked and lighted pedestrian crossing at the intersection of Tennyson Way and American River Drive across from Jesuit High School's southern parking lot. Additionally, Mitigation Measure TR-2 has been amended to require the installation of basic yellow crosswalks at all legs of the intersection of Jacob Lane and American River Drive.

**COMMENT 5-4**

The County issued a Temporary Use Permit PLNP2023-00190 on August 25, 2023, signed by Julie Newton, Environmental Coordinator of Sacramento County and endorsed by Donna Allred, Clerk Recorder granting Jesuit High School a temporary use permit to erect two, 117-foot booms, each with 15 separate spotlights, directed down onto the field rather than shining horizontally. The Notice states, among other reasons why the project is exempt that- "In accordance with CEQA Section 15303...the project would result in temporary installation of small facilities (two light arrays)." And "Therefore, the project is exempt from provisions of CEQA."

**RESPONSE 5-4**

The comment is noted. The Draft EIR evaluates proposed permanent stadium lighting.

**COMMENT 5-5**

In 2022, a San Francisco Appeals Court and Justice Stuart Pollak ruled that new 90 foot tall stadium lights did not meet the definition of a ‘minor alteration’ and “small structures”. Justice Pollak wrote, “A 90-foot tall light standard does not qualify as “small” within the meaning of the exemption.” I think this fact needs to be acknowledged by county officials and county counsel.

**RESPONSE 5-5**

Please see Response 17-2. The County has prepared an EIR for this project, rather than use a CEQA exemption.

**COMMENT 5-6**

Todd Smith, Planning Director, approved the Temporary Use Permit effective August 18, 2023, which allowed for a ‘written notice of appeal, no later than 10 calendar days after the decision is made.’ It is a fact that the Temporary lights were installed and used for a nighttime football game on Friday, August 25, 2023, seven days after the Permit effective date, not the full 10 calendar days required in the Appeal Process to allow comments and appeals. And the Notice of Exemption issued by Julie Newton was endorsed August 25, 2023, the same date that the 117 foot tall light booms were erected and used for a night time football game on the Jesuit High School campus, 3 full days before the appeal deadline expired August 28, 2023, without notice to all the residents in the neighborhood.

**RESPONSE 5-6**

Page 3-2 (2<sup>nd</sup> paragraph) in the Project Description has been updated to note that the County granted a temporary Use Permit on August 18, 2023 for temporary lighting for two events scheduled for August 25, 2023 and September 1, 2023 between the hours of 4:00 PM to 10:30 PM. The comment regarding the noticing and appeal process for the temporary Use Permit is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT 5-7**

This appears to be a violation of due process and notification, indicating favoritism towards the school at the expense of concerned citizens. Is this what we should expect in the future?

**RESPONSE 5-7**

Please see Response 5-6.

## **LETTER 6**

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Steven Berke (September 25, 2023).

### ***COMMENT 6-1***

**Who is the author of the “Jesuit Stadium Lighting DEIR” and what is their responsibility?**

I see it is prepared by the County of Sacramento. But I would like to know who is the author and their responsibility as I have questions and input.

In the meantime, I am sharing input in this email and including you.

I am not aware of what “CEQA” is but I am also including the email address which sent me the correspondence.

### ***RESPONSE 6-1***

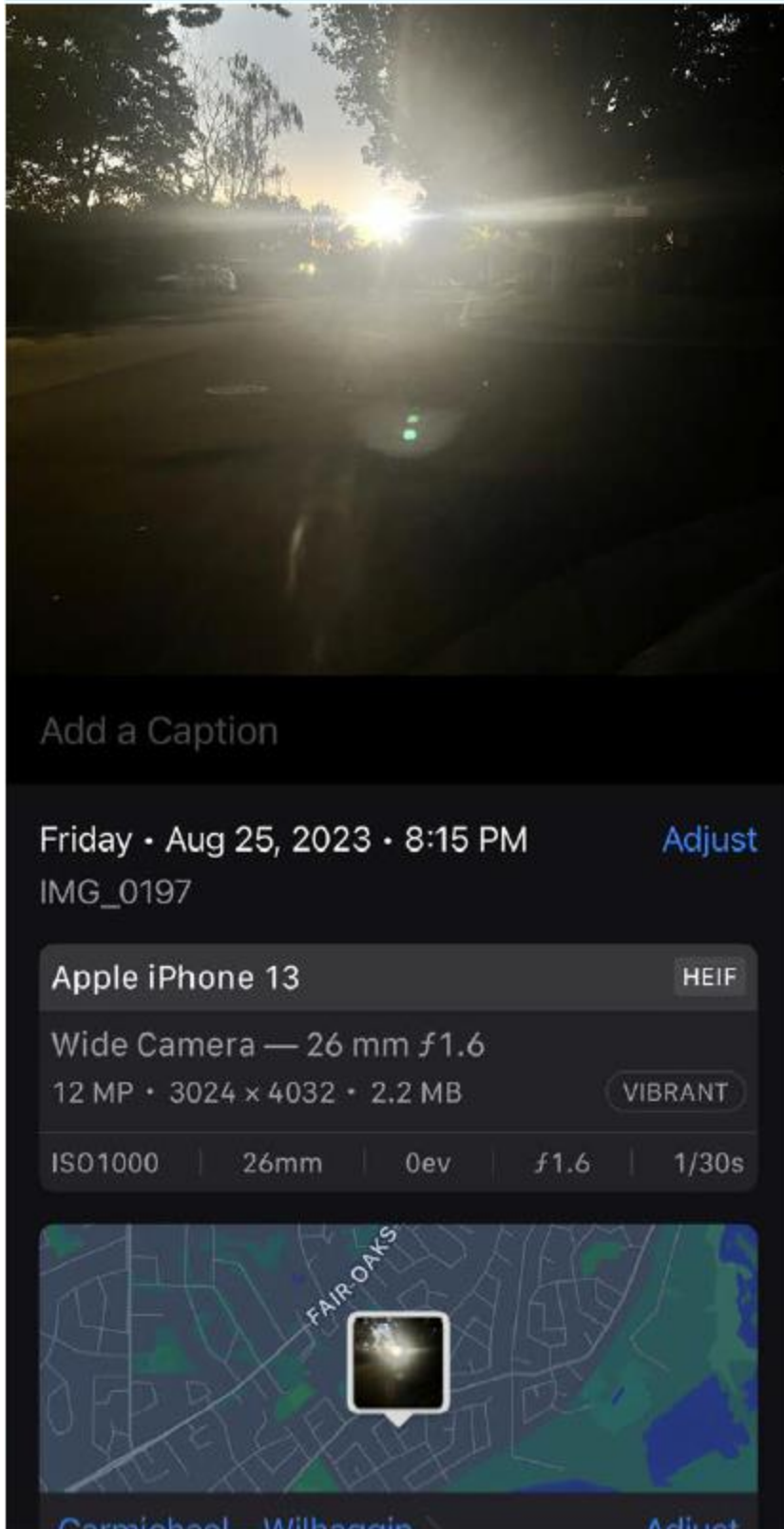
The Draft EIR was prepared by County staff with the assistance of AECOM. The list of individual contributors is located in Chapter 14, Acknowledgements.

### ***COMMENT 6-2***

**Can the photo on the title page be removed?**

The photo on the cover shows a perspective of this project. As someone who opposed the permit it seems like an advertisement for the project which I think is biased.

Alternately, could the current photo be replaced with the attached photo (below) which shows another perspective of this project. This photo below was taken while facing North on Tennyson Way and Chaucer CT facing North at 8:15PM on August 25th and is a picture of the lighting used for an evening event at the Jesuit stadium. In my opinion, the lighting was uncomfortable, unappealing, out of place, and not appropriate for the neighborhood.



**RESPONSE 6-2**

The photo on the front cover of the Draft EIR is a visual simulation performed by the lighting consultant, M. Neils Engineering, showing an overhead aerial view of the proposed stadium light standards and luminaires at night, as provided on page 12 of the lighting report (attached to the Draft EIR as Appendix B).

**COMMENT 6-3**

**What is the scope of the usage of Jesuit Stadium night events?**

The “PLNP2021-00262\_Project Description-Justification” cites:

Proposed Hanson McClain Stadium and Practice Field Uses and Accommodations

The proposed stadium lighting would allow for an enhanced community atmosphere and student athlete experience by allowing evening football games. Stadium lighting would also allow Jesuit High School soccer to play its home games at reasonable hours without adversely impacting academic attendance.

which implies the scope of night events is for Jesuit High School events.

I did not see where in the “Jesuit High School Stadium Lighting DEIR” where this scope is cited. I did see the “Jesuit High School Stadium Lighting DEIR” cite non Jesuit High School events which did not seem relevant and I am looking for clarification on the scope of the project use and that being accurately cited in the “Jesuit High School Stadium Lighting DEIR”.

**RESPONSE 6-3**

Plate PD-5 (Anticipated Event Lighting Schedule) on page 3-12 of the Draft EIR shows the games and practices that would occur in the evening with the proposed installation of the permanent stadium lights.

## **LETTER 7**

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Stephanie Christensen (October 30, 2023).

### **COMMENT 7-1**

My husband, Tom, and I moved to 4848 Sherlock Way in August of 2022 from Arden Park after 44 years. Two reasons we moved - closer to the American River Bike Trail which we daily utilize and a quieter community. We give to the Parkway in both monetary and volunteerism. We were aware there'd be some early Jesuit High School evening games and activities, but we had no idea, Jesuit was working on installing permanent stadium lights resulting in additional traffic, pollution, noise and later games and activities. We feel duped. I wrote an email to the County Planning Commission a few months ago when we heard about the permanent lightening proposal objecting for the above reasons. Tom and I have been following the County process and told Tom this is a done deal. Confirmation was affirmed on October 23rd when I attended the County Planning Commission meeting when no Commission members asked any questions of Jesuit representatives. About a dozen Wilhaggin homeowners (representing 200) expressed their objections to the Jesuit permanent lightening proposal. My daughters attended Rio Americano many years ago and now our three grandchildren — two grandsons - as we're not a wealthy family. (I was employed as administrative assistant for Correctional Health Services for 11 years under the Sheriff's Department and Tom, a retired stationary engineer for private industry.) Anyway, I chuckled when I gazed around the room during the October 23rd meeting and observed seniors on one side of the aisle and on the other side, lawyers and well-financed people. One attorney made reference to "Their Team." We homeowners left feeling dejected. Anyway, I asked myself, what has Jesuit High School invested in our community besides the education of young men, not unimportant, but not much. Jesuit doesn't even contribute to help fund the HOA for our Sheriff security patrol. Our neighborhood pays a lot of taxes to Sacramento County and Jesuit pays zero as a non-profit and is tax exempt. From what I understand, Jesuit grosses \$30M yearly. Money talks. This situation is definitely a David and Goliath moment and David isn't going to win this one. I left a message last week for Jessica Brandt, no response. I guess this is the way the County now rolls.

### **RESPONSE 7-1**

This is not a comment on the Draft EIR, but is provided here for decision maker consideration.

## **LETTER 8**

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Betty Cooper (October 2, 2023).

### ***COMMENT 8-1***

The purpose of this email is to present my opposition to this project. I believe it will adversely affect the quality of life and property values in our neighborhood due to excessive noise at late hours as well as increased traffic and parking problems. Both of these issues are present during daytime games and will be even more objectionable if they are allowed to go well into evening hours. Even if the events end at 10pm, there will still be noise, traffic and undesirable activity in what has traditionally been a quiet, residential neighborhood. The amount of off-street parking that is available for the current level of athletic activities is already highly inadequate. I support these alternative solutions in this order:

### ***RESPONSE 8-1***

Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024. Regarding changes in property values, CEQA requires an analysis of physical impacts to the environment; it does not require analysis of social and economic impacts. Under CEQA, “an economic or social change by itself shall not be considered a significant effect on the environment.” (14 CCR §§ 15131 & 15382.) Effects analyzed under CEQA must be related to a physical change. (14 CCR § 15358(b).) Social and economic impacts alone do not constitute a significant effect on the environment. (14 CCR §§ 15064(e), 15131 & 15382.). Noise and traffic are evaluated in Chapters 9 and 10 of the Draft EIR, respectively.

Parking supply and demand are not typically issues subject to evaluation under CEQA, but a Local Transportation Analysis was prepared to support the proposed project, and this includes an analysis of parking and queueing. Transportation technical analysis can be found in Appendix E and Appendix F of the Draft EIR. See also Master Response 6: Parking Availability. W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix H). In Impact TR-3, the Draft EIR evaluates the extent to which overflow parking from shifting games to evening hours would exacerbate existing safety hazards to pedestrians and bicyclists who cross American River Drive to attend games – an impact that is mitigated to a less-than-significant level by Mitigation Measure TR-2, which requires a marked and lighted pedestrian crossing at the intersection of Tennyson Way and American River Drive across from Jesuit High School’s southern parking lot. Additionally, Mitigation Measure TR-2 has been amended to require the installation of basic yellow crosswalks at all legs of the intersection of Jacob Lane and American River Drive. See also Master Response 4: Traffic Hazards.



**COMMENT 8-2****ALTERNATIVE 2: SHADE STRUCTURE AT MARAUDER STADIUM**

This alternative would construct a shade structure over the bleachers and field at Marauder Stadium. The shade structure could also potentially be constructed over another field at Jesuit High School. By providing shade over the field, this structure would help make afternoon practices more tolerable for players during the hotter months of early fall and late spring. Alternative 2 would not include lighting to illuminate the field and seating areas after dark.

**RESPONSE 8-2**

The comment is a restatement of the description of Alternative 2 (Shade Structure at Marauder Stadium), which is evaluated in Chapter 4 of the Draft EIR. The commenter's support for this alternative is noted.

**COMMENT 8-3****ALTERNATIVE 1: ALTERNATE STADIUM LOCATIONS**

Under this alternative, Jesuit High School would arrange for the use of another facility for practices and games that cannot be accommodated between the end of classes and sundown. Two existing lighted stadiums have been identified:

**Hughes Stadium.** This facility is located at 3835 Freeport Boulevard, Sacramento, at Sacramento City College. It is approximately 10 miles from Jesuit High School. The stadium is surrounded by campus facilities and commercial land uses. The nearest residence is approximately 500 feet to the south.

**Hornet Stadium.** This facility is located at 6000 Jed Smith Drive, Sacramento, at California State University, Sacramento. It is approximately 6 miles from Jesuit High School. The stadium is surrounded by campus facilities and commercial land uses. The nearest residence is approximately 1,000 feet to the west.

**RESPONSE 8-3**

The comment is a restatement of the description of Alternative 1 (Alternate Stadium Locations), which is evaluated in Chapter 4 of the Draft EIR. The commenter's support for Alternative 1 is noted.

## **LETTER 9**

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Jim Daugherty (October 17, 2023).

### **COMMENT 9-1**

I oppose the request to amend zoning regulations that have served our community well for over 60 years. I am deeply disappointed that the CPAC voted 3-2 to recommend this project without completing basic due diligence regarding several issues, in particular adequate parking when the stadium is at full capacity of 3,500 attendees.

### **RESPONSE 9-1**

Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024. As noted on page 3-4 of the Draft EIR, the total capacity of Marauder Stadium is approximately 3,000 persons. The project does not propose to change the capacity of the stadium.

### **COMMENT 9-2**

The applicant verbally represented to CPAC that they have adequate parking based on “parking agreements “ with other property owners (Arden Hills Tennis Club) and a public High School (Rio Americano HS). CPAC made no request to view these agreements to verify their existence, enforceability and durability prior to voting. Wednesday, October 11, 2023 the owners of Arden Hills Tennis Club announced the sale of their property, which would render null and void any existing parking agreements.

### **RESPONSE 9-2**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration. See Master Response 6: Parking Availability.

### **COMMENT 9-3**

Prior to your hearing, I strongly suggest that you require both Jesuit HS and Rio American HS to submit written, dated and executed copies of their parking agreements with Certification of Authority and Incumbency to Execute these agreements. If Rio American HS applies and receives approval for stadium lights, then what? Anything less than Jesuit supplying peak parking requirements is sufficient reason to decline the requested zoning amendments. Even if a publicly operated, Rio Americano HS parking lot was available, the lot is 1/2 mile away from Jesuit’s stadium and game attendees will not use the lot because it is too far away. Instead, people park on residential streets next to the stadium that were never designed by county planners for night event parking. In addition, Sacramento County Sheriffs have responded to many complaints and moving vehicle violations at the public high school. Night events will only exacerbate an existing problem at both schools and the entire neighborhood and stretch Sheriff staffing.

**RESPONSE 9-3**

Parking supply and demand are discussed in the Local Transportation Analysis Memorandum (March 10, 2023) that was prepared by Kimley-Horn and is contained in Appendix F of the Draft EIR. Parking is also discussed on pages 10-4 and 10-5 of the Draft EIR. In Impact TR-3, the Draft EIR evaluates the extent to which overflow parking from shifting games to evening hours would exacerbate existing safety hazards to pedestrians and bicyclists who cross American River Drive to attend games. Mitigation Measure TR-2 (Pedestrian Safety Improvements to Site Plans) would reduce this impact to a less-than-significant level by requiring a marked and lighted pedestrian crossing at the intersection of Tennyson Way and American River Drive across from Jesuit High School's southern parking lot. Additionally, Mitigation Measure TR-2 has been amended to require the installation of basic yellow crosswalks at all legs of the intersection of Jacob Lane and American River Drive. It should be noted that the lack of parking is not, in and of itself, an environmental impact under CEQA. See Master Response 4: Traffic Hazards and Master Response 6: Parking Availability.

**COMMENT 9-4**

As you know, Jesuit HS, no one else, should supply all types of on-campus parking for handicapped, over-sized trucks, electric vehicle and bikes on their campus based on peak attendance of 3,500 attendees. Recent events shows parking agreements come and go, but the parking requirements at a 3,500 capacity stadium will be there forever. To ensure that the school shoulders this responsibility, I request that you support the posting of "Resident Permit Parking Only, 1 pm to 11 pm, daily" on the four, narrow, residential streets that adjoin the stadium and the main pedestrian entrance at Tennyson Way and American River Drive. Otherwise, require Jesuit HS to close and lock the Tennyson gate parking and pedestrian entrance for all events that take place after 1 pm.

**RESPONSE 9-4**

See Response 9-3. See Master Response 6: Parking Availability.

**COMMENT 9-5**

This application to amend the zoning benefits only one entity, at the expense of 1,000's of residents. This is a big deal! It will cancel over 60 years of Sacramento County planning which has successfully built a balanced, thriving community of over 500 homes and thousands of residents.

**RESPONSE 9-5**

It should be noted that the applicant is not requesting a change to the R-4 zoning designation. The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium.

**COMMENT 9-6**

The 60 year old plan works because it set strong, durable and fair boundaries for property owners in an R-4 zone and guaranteed their personal rights to use their homes and enjoy evening in their back yards. The R-4 zoning allowed county services to be delivered at a consistent and affordable level. This amendment to allow four, gigantic, 100 foot tall commercial lights in a R-4 zone, will drastically change and strip away 1,000s of residents' existing entitled land rights, to enjoy safe, quiet evenings at home.

Common sense tells us, it's just not right, so I urge you, say no to the lights.

**RESPONSE 9-6**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

## LETTER 10

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Joan Daugherty (October 29, 2023).

### **COMMENT 10-1**

My name is Joan Daugherty and this is my letter in opposition to Jesuit’s proposed amendment to their current RD4 zoning. I live approximately 200 yards from the football field on Marlborough Way near the intersection of American River Drive and Tennyson Way. We have lived here 30+ years. We expected some extra traffic and noise during the day from both high schools near us. However, since Jesuit has increased the use of their fields to accommodate other entities than the high school, the number of times of increased traffic has greatly increased in our area on weekends due to close proximity to the fields. My husbands and both sons graduated from Jesuit and played sports there including football. They all have a very positive experience and we have supported Jesuit for 46 years. There are several members on the Carmichael CPAC, Planning Commission and Board of Supervisors that have ties to Jesuit High School. As of now, no one has recused themselves from voting on this issue and I will assume that they will be unbiased and objective.

### **RESPONSE 10-1**

Noise and traffic are evaluated in Chapters 9 and 10 of the Draft EIR, respectively. With regard to past increases to activity at the Jesuit High School campus, the Draft EIR is specifically focused on addressing all direct and reasonably foreseeable indirect effects associated with the proposed changes to the campus – namely, the proposed permanent stadium lighting. Please see Chapter 3 of the Draft EIR for a comprehensive description of the proposed changes that are the subject of analysis in the Draft EIR.

### **COMMENT 10-2**

Jesuit has stated six objectives for this project.

**Develop the capability to host evening athletic events on campus and allow for athletic practices and competitions to occur after the peak afternoon temperatures to protect the health and safety of student-athletes coaches and spectators.**

Jesuit already hosts swimming events and lighted batting practice at night. According to weather.com (charts included on future pages), there were zero days this year of 100 degrees or higher during school days (school started on the 18th of August). In the past, Jesuit has been able to mitigate the few days of high heat with misters and increased water breaks. What concerns me regarding the health and safety of the student-athletes is the use of artificial turf and moving the JV football game to 4pm. The JV team would be playing at the hottest time of the day and they are younger and less able to withstand the heat from the field. According the government website NIH, artificial turf can get up to 60 degrees hotter than turf and there are concerns regarding the toxicity of plastic dust, lead and propensity to cause injuries. Spectators have other viewing options to see the games on websites such as NFHS or Jesuit can stream their games and charge

a viewing fee. Jesuits could also choose one of the alternatives mentioned in the DEIR and erect a shade structure. In addition, there are no restrictions on Jesuit allowing other entities to use their field at night or during the day. This would greatly increase the number of activities Jesuit has planned.

**RESPONSE 10-2**

The commenter refers to some of the project objectives, which are presented in their entirety on page 3-7 of the Draft EIR. The information about heat, artificial turf, and other viewing options does not pertain to the analysis presented in the Draft EIR related to potentially significant impacts of the project, but the text is included here for decision maker consideration. With regard to other entities using the field at night or during the day, the project applicant anticipates the use of the proposed lighting for Jesuit athletic activities only, including football, soccer, lacrosse, and track and field. The timing of all other school-affiliated sporting activities that do not utilize the stadium for practices or games would remain the same. Please see Plate PD-5 for a detailed anticipated event lighting schedule, which provides a summary of the anticipated uses of the stadium after the lights are installed.

**COMMENT 10-3**

**Provide a feasible location at which to increase the athletic opportunities for Jesuit High School students.**

Jesuit appears to be capable of providing multiple opportunities for their students through competitive and intramural activities which they have utilized for the last fifty years.

**RESPONSE 10-3**

The statement the comment refers to is a project objective. The comment does not identify a deficiency in the environmental analysis.

**COMMENT 10-4**

**Provide sufficient time, particularly for Fall and Winter sports, to train and compete without requiring student-athletes to miss excessive classroom instruction multiple times per month.**

It would be beneficial to know which sports and how many students miss class time. There are multiple fields available for practice. There are no facts to support their statement.

**RESPONSE 10-4**

The statement the comment refers to is a project objective. The comment does not identify a deficiency in the environmental analysis.

**COMMENT 10-5**

**Spread out on-campus activities over a broader period of time to reduce the number of individuals and vehicles concurrently utilizing school facilities.**

By reducing the number of individuals and vehicles concurrently utilizing school facilities they are increasing the number of individuals and vehicles utilizing our neighborhood streets.

**RESPONSE 10-5**

The statement the comment refers to is a project objective. The comment does not identify a deficiency in the environmental analysis.

**COMMENT 10-6**

**Enhance the overall high school athletic experience for students, parents, alumni and the Sacramento community.**

Having night games and practices is a small part of the high school athletic experience and is confined to only a few sports.

**RESPONSE 10-6**

The statement the comment refers to is a project objective. The comment does not identify a deficiency in the environmental analysis.

**COMMENT 10-7**

**Continue to build upon Jesuit’s reputation for athletic excellence by providing facilities that allow athletes to achieve peak performance.**

Jesuit has continuously produced elite athletes without stadium lights.

**RESPONSE 10-7**

The statement the comment refers to is a project objective. The comment does not identify a deficiency in the environmental analysis.

**COMMENT 10-8**

It is stated in the DEIR that Alternative 1, (Alternate stadium locations), “would meet most of the basic project objectives. However, it may not meet the objective of enable greater participation/attendance by students and their families due to the significantly greater (6-10 mile) travel distance from Jesuit High School.” A large number of students do not live near Jesuit so this would not be a factor. For students remaining on campus, Jesuits could bus these students to the game.

**RESPONSE 10-8**

The comment is noted. A large number of students also live in the vicinity of Jesuit High School. Therefore, the statement in the Draft EIR that Alternative 1 may not meet the

objective of enable greater participation/attendance by students and their families due to the significantly greater (6-10 mile) travel distance from Jesuit High School is valid. In addition, students who have traveled to campus from outside the area would already be on campus prior to the start of evening events. On the other hand, students from the local area who would be bussed to alternate stadium locations would lose time that could be spent on campus. The out-of-the-area locations would also likely reduce participation of families who live in the local area even if their students were sent to the games by bus.

**COMMENT 10-9**

According to the Sacramento Planning Code: Planning and Environmental Review (Amended January 15, 2023), “Residential Zoning Districts are established to promote and protect the public health, safety, and general welfare...They are to protect residential areas against...offensive noise, glare and other objectionable influences”. The DEIR stated that aesthetics (glare) and noise would have an unavoidable significant impact on the surrounding community.

**RESPONSE 10-9**

The comment is correct that the Draft EIR identified significant and unavoidable impacts for aesthetics (Impact AE-2. Create a New Source of Substantial Light or Glare that Would Adversely Affect Day or Nighttime Views in The Area) and noise (Impact NOI-1. 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).

Table 3.1 of the Zoning Code permits private schools in the RD-4 (Residential 4) zoning district subject to issuance of a Conditional Use Permit from the Zoning Administrator. In this case, Jesuit High School has obtained a series of Use Permits for various improvements associated with the school. Pursuant to Zoning Code Section 6.4.3.E.1, to grant a Conditional Use Permit, the appropriate authority shall find and record in writing that the establishment, maintenance, or operation of the use, building, or structure applied for will not under the circumstances of the project be detrimental to the health, safety, peace, morals, comfort, or general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

Based on staff’s evaluation of the project and relevant Zoning Code development standards, the Planning Commission can find the project consistent with the Zoning Code. In terms of operating characteristics, the proposed stadium lighting has been designed to reduce light trespass, glare, and skyglow to the maximum extent feasible using modern technology. Photometric summaries indicate there would be no light trespass off the project site. Sport practices and games at the stadium are proposed to have different hours of operation from existing conditions and a Protocol for Night Events has been prepared to provide procedure to how night games are managed by Jesuit High School. Several other operating conditions of approval are also included to minimize external impacts to the surrounding area including, but not limited to,



pedestrian circulation and safety, traffic control, hours of operation, noise, and lighting (refer to Conditions of Approval 9 - 19).

See also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality. Finally, please see Master Response 3: Project Approval Where There Are Significant and Unavoidable Impacts.

**COMMENT 10-10**

Traffic and safety are a major concern and stated to have a significant impact which can be mitigated by an enhanced crosswalk. However, an enhanced crosswalk will not prevent jaywalking, and parking on residential streets (oftentimes in front of fire hydrants and on corners).

**RESPONSE 10-10**

Mitigation Measure TR-1 (Pedestrian Safety Improvements To Site Plans), as revised, would require the installation of two crosswalks on American River Drive: a lighted crosswalk at Tennyson Drive and marked crosswalk at Jacob Lane. To the extent that jaywalking currently occurs on American River Drive because of a lack of crosswalks, this mitigation measure would provide opportunities for pedestrians to cross safely, without jaywalking. Regarding parking on residential streets, the comment does not identify an environmental issue. See also Master Response 4: Traffic Hazards.

**COMMENT 10-11**

I would like to enjoy my evenings in my backyard or with my windows open and not have to listen to announcers, bands and spectators. I would like to have friends and family over without having them park down the street because cars are parked all along the front of my house.

**RESPONSE 10-11**

The comment does not identify a deficiency in the environmental analysis. See Chapter 9 of the Draft EIR for a comprehensive analysis of noise impacts of the proposed project. See Master Response 4: Traffic Hazards and Master Response 6: Parking Availability.

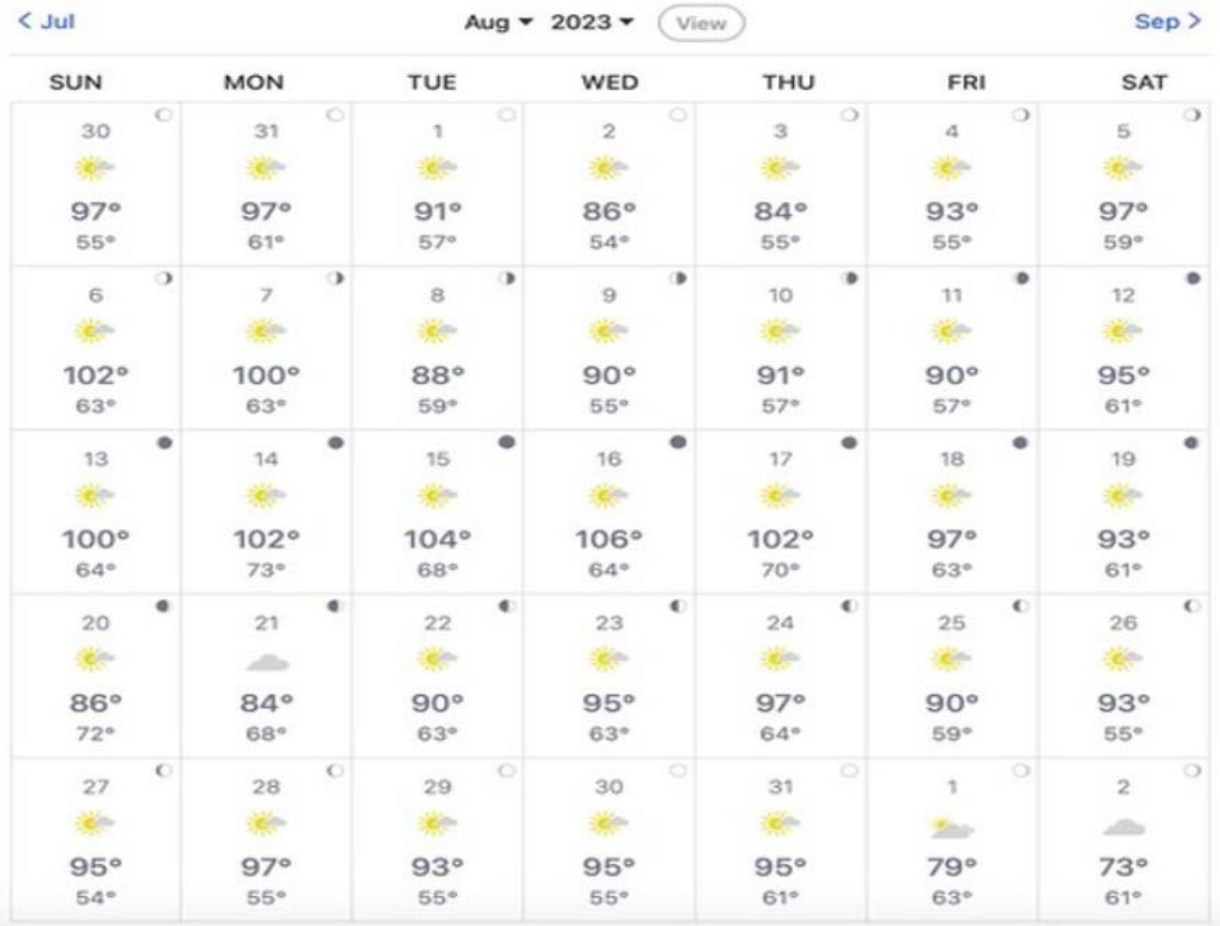
**COMMENT 10-12**

Jesuit has a lot of wants but not needs. They want stadium lighting but it is not needed to continue their reputation as an excellent school with thriving athletic teams. There are multiple schools in the area without lights who also have a successful athletic program. Jesuit built their school in a residential area with RD4 restrictions that apply to all of us. Rio Americano High School is now looking to obtain lighting for their field. I don't know how you could allow Jesuit to have lights and not Rio. This would have a huge negative cumulative effect on the neighborhood. I don't believe this is what the city planners had envisioned for this area and is why they zoned the playing fields RD4. The significant impacts outlined in the DEIR are not a minor inconvenience but an infringement on our

rights as stipulated by the zoning codes. Please continue to protect our rights to enjoy our RD4 community and decline Jesuit’s request.

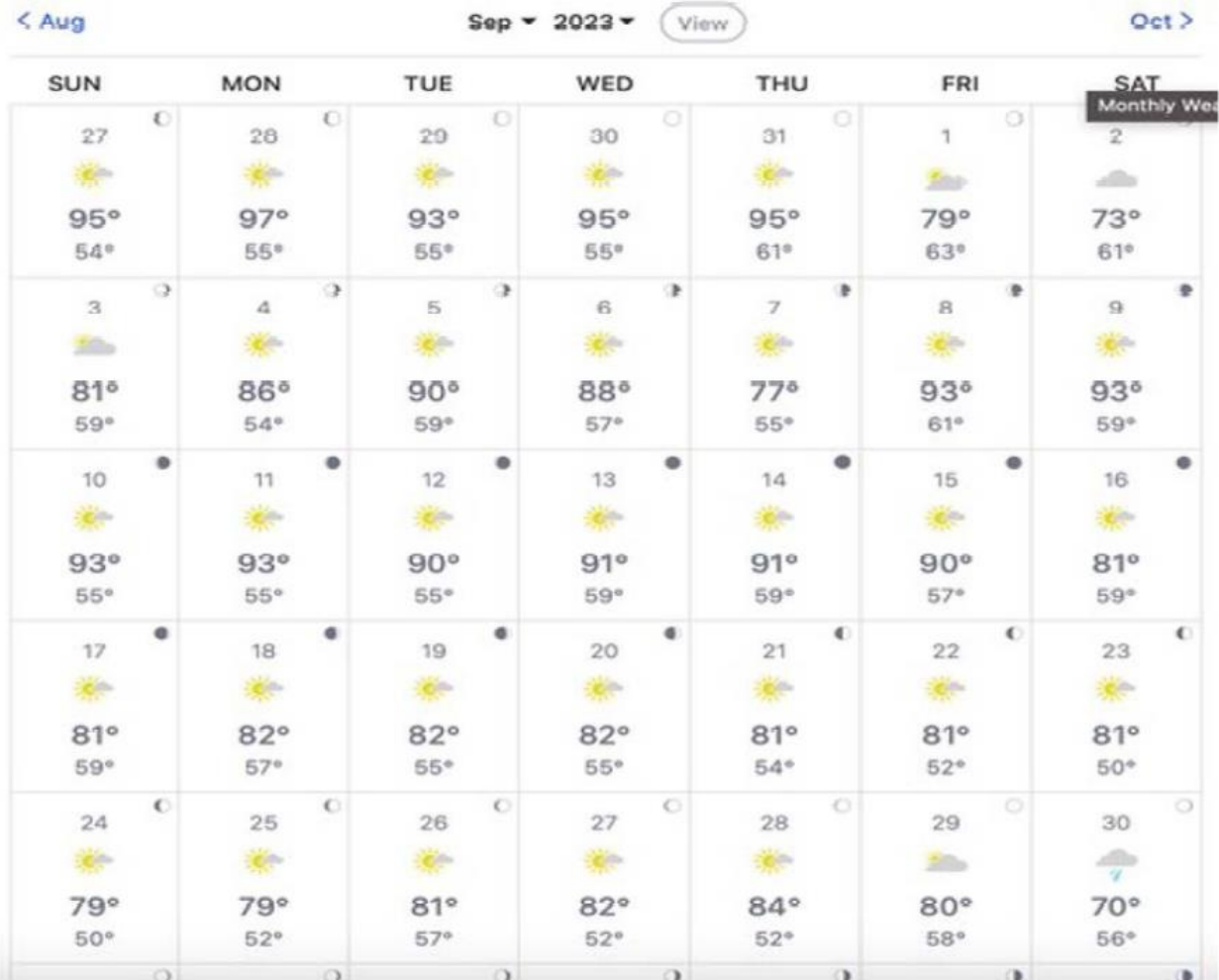
### Monthly Weather - Carmichael, CA

As of 6:37 pm PDT



### Monthly Weather - Carmichael, CA

As of 6:37 pm PDT



### Monthly Weather - Carmichael, CA

As of 6:37 pm PDT

< Sep      Oct ▼ 2023 ▼      View      Nov >

SUN	MON	TUE	WED	THU	FRI	SAT
1  77° 50°	2  81° 52°	3  84° 56°	4  91° 60°	5  93° 59°	6  94° 60°	7  95° 59°
8  93° 54°	9  72° 59°	10  73° 51°	11  74° 48°	12  79° 51°	13  80° 60°	14  81° 53°
15  87° 54°	16  83° 53°	17  85° 55°	18  89° 55°	19  93° 56°	20  88° 55°	21  76° 55°
22  69° 57°	23  76° 54°	24  77° 52°	25  67° 46°	26  69° 39°	27  69° 39°	28  -- 43°
29  72° 39°	30  71° 40°	31  72° 40°	1  74° 46°	2  72° 51°	3  71° 51°	4  72° 51°

**RESPONSE 10-12**

See Responses 10-9 and 12-9.

## **LETTER 11**

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Severiano (“Del”) and Constance Del Real (October 8, 2023).

### **COMMENT 11-1**

We are very concerned neighbors in opposition to the Jesuit High School Stadium Lights and Sports Complex Expansion. We definitely and adamantly prefer that Jesuit play its football games (as it has long been its rich and proud standing tradition) and have other types of games, events, activities, and associated practices during the day. Our neighborhood, having two high schools (Jesuit and Rio Americano) within walking distance, currently experiences streams of day traffic on and around American River Drive and, therefore, seeks at least to have peaceful, quiet, and safe nights. If Jesuit prefers night football games, they can (as they have done with the Holy Bowl and as Rio has done) play those games at existing lighted fields.

### **RESPONSE 11-1**

Alternative 1 (pages 4-6 and 4-7 of the Draft EIR) evaluates Jesuit High School conducting night games at two existing lighted stadiums—Hughes Stadium and Hornet Stadium. The Draft EIR concluded that this alternative would meet most of the basic project objectives. However, it may not meet the objective of enabling greater participation/attendance by students and their families due to the significantly greater (6-10 mile) travel distance from Jesuit High School. See Response 10-8.

### **COMMENT 11-2**

It is unreasonable to duplicate existing resources readily available at other school sites. We do foresee that if this proposed Jesuit expansion project is approved it will be fuel for Rio to once again pursue their own lighted football field request, which request was denied by a lawsuit in 2008. One can easily foresee that such expansion(s) will result in the never ending nightly noise pollution, air pollution, trash, cars blocking driveways, guests unable to visit for lack of public parking and emergency vehicles denied swift access. But also that “under the cover of darkness” some misguided individuals could inflict bodily injury and/or cause personal and/or property damage. Such negative consequences could be exacerbated by these two schools having night games, as well as night events and activities on the same dates.

### **RESPONSE 11-2**

Comments for or against the proposed project will be considered by the Planning Commission when a hearing is conducted in early 2024. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project. Regarding potential stadium lighting at Rio American High School, please see Response 12-9. The County considers scenarios involving the operation of stadium lighting at both schools to be speculative.

**COMMENT 11-3**

In addition, if Jesuit and/or Rio are successful with their expansions they will not be trusted or able to do the necessary and required expensive policing. I understand that those living close to Jesuit now experience lack of policing from Jesuit and/or the Sheriff's office. For your information we live closer to Rio and have been informed that Rio has a closed campus but yet we regularly see students wandering the streets during school hours. Last year we saw students smoking marijuana and/or vaping next to our home and were told that proper policing was not in their budget but would be this year. If it is in their current budget they have failed again to keep students on campus. Therefore, requests from the community (based on past policing requests to the two schools and/or Sheriff's office) have and will continue to fall into the least of priorities for the "stretched" Sheriff's team and that of the two schools resulting in a failure to properly and adequately do its policing.

**RESPONSE 11-3**

Comments for or against the proposed project will be considered by the Planning Commission when a hearing is conducted in early 2024. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project.

**COMMENT 11-4**

Lastly, when you "follow the money" it's obvious that the "deep pockets" of Jesuit, (which I have been informed has an annual revenue of \$30 million and is a private business operating in a residential neighborhood) have and can afford to push through any "road blocks" in quest of their desired goal of continuing to prosper financially.

**RESPONSE 11-4**

Comments for or against the proposed project will be considered by the Planning Commission when a hearing is conducted in early 2024. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project.

## **LETTER 12**

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Barbara Dugal (October 15, 2023).

### **COMMENT 12-1**

While I have many comments on the DEIR and will be providing those to the County, my comments tonight are generally limited to Jesuit’s Justification and Protocol for Night-time Events. If you have just read the DEIR or listened to how Jesuit describes the activities taking place on the Campus, you would not understand how it is to live near the Campus. I have lived on Ashton Drive for over 36 years and during this time, the neighborhood has not changed much, it is Jesuit, through its changes in the historic use of the campus that have changed the character and nature of the neighborhood community. It feels like the neighborhood has been and will be forever transformed from a nice sleepy neighborhood into something right next to a commercial sports stadium complex. It is a constant bombardment of noise and traffic, every day of the week, not just during typical school days or hours, but on the weekends and evenings too. Living near two high schools can be challenging, but you learn to schedule appointments, etc., around school schedules to avoid traffic and you also grow accustomed to the noise of students, bells, etc., generated during school hours. What isn’t mentioned in Jesuit’s justification, are the activities that already are taking place and have an impact on the neighborhood, i.e., Junior Marauders (begins later part of July and is 5 evenings a week from 6-8 PM, then in August 3 nights a week 6-8 PM, and the use of diesel lights), Camp Marauders, Nike Basketball Camp, etc., add these and other after school activities that take place on the sports fields and on the Campus, and the opportunity to relax and enjoy our yards, homes or neighborhood becomes difficult or impossible. These are cumulative impacts that effects our rights as homeowners to the quiet use and enjoyment of our homes and neighborhood.

### **RESPONSE 12-1**

The analysis presented in the Draft EIR considers all the proposed project's direct and reasonably foreseeable indirect impacts and acknowledges the use of the project site facilities by sports teams and the existing activities that occur (see Schedule of Uses on page 3-11 of the Draft EIR). The Draft EIR includes an analysis of the visual character, historical use, and existing activities. Chapter 5 “Aesthetics,” of the Draft EIR, concludes that the visual character would have a less-than-significant impact. The analysis acknowledges the ongoing athletic activities and provides details under the No Project Alternative stating athletic activities would continue to occur as they are presently occurring, including sports practices and games ending before sundown, and that no evening or nighttime events would occur at the stadium.

Noise and traffic are evaluated in Chapters 9 and 10 of the Draft EIR supported by an Environmental Noise Assessment and transportation technical analysis in Appendices D, E and F of the Draft EIR. As part of the environmental noise assessment, an ambient noise study was conducted, which included 10 days of 24-hour monitoring from Friday, September 30th through Monday, October 10, 2022, capturing any activities that took place in the stadium during this period. As discussed previously, the EIR addressed the

worst-case scenario of a Friday night football game with operation of the PA system and the school band performing. There is no “cumulative” noise impact of the sort referenced by the commenter that has not already been addressed in the EIR, in part because the Junior Marauders would not be operating at the same time as a Friday night football game. Please refer to the Schedule of Uses on page 3-11 of the Draft EIR, which details the activities for which the proposed lighting would be used.

Moreover, and regarding transportation, W-Trans prepared a supplemental traffic analysis for the proposed project, including a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix H). The Draft EIR evaluates cumulative impacts on pages 11-27 through 11-31.

**COMMENT 12-2**

- 1) Page 2 of Jesuits Projection Description states in part...”the stadium lights will be utilized on select evenings to accommodate athletic practices and competitions, primarily during the winter months when the sun sets early or during home football games. Yet on page 4 of Jesuit’s Project Description, it states in part that...”the lights will serve to better protect the health and safety of student athletes...” during Sacramento’s hottest months June through September. During practices there will be noise generated from coaches, whistles, and staff. Changing the times for practices will generate noise outside of current general school hours. Page 3 states “that the start times for high school competitions are regulated by the CA Interscholastic Federation (CIF)” This is wrong, only playoffs times are regulated by the CIF.

**RESPONSE 12-2**

The comment’s reference to pages 2-4 of Jesuit’s Project Description does not correspond to the project description (Chapter 3) in the Draft EIR. As stated on Page 3-11 of the Draft EIR, the stadium lights are anticipated to be used between 7 to 10 times per year for evening competitions with near capacity crowds, and between 20 to 25 times per year for evening competitions with smaller crowds (which would have minimal or no amplified sound). The lights would also be used to facilitate practices on select evenings, primarily during the winter months when the sun sets early. However, these practices would not have spectators and would not make use of the stadium’s PA system.

Regarding the description of CIF regulations for sporting events within the Jesuit High School of Sacramento Stadium Lighting Project Description (dated September 2022), please see page 3-9 of the Draft EIR under Operations Plan.

**COMMENT 12-3**

- 2) Project Objectives: “Provide a feasible location at which to increase athletic opportunities for Jesuit students.” Any increase in athletic opportunities will negatively affect and be at the expense of the surrounding neighborhood, not Jesuit.



**RESPONSE 12-3**

The Draft EIR comprehensively addresses all of the proposed project's direct and reasonably foreseeable indirect impacts, including those impacts related to the surrounding neighborhood.

**COMMENT 12-4**

3) Conclusion: The justification states that the Project will not alter/or affect the PA system. However, the 2023 Bollard analysis states that ...”because this analysis concludes that evening activities and sporting events held under the lights at Jesuit could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods, consideration of noise mitigation for the project is warranted.” Therefore, Jesuit’s conclusion that the lights will not increase any impacts associated with the school’s prior use authorizations, such as the PA system or authorized capacity is incorrect since the 2023 Bollard study concludes that substantial increases in ambient noise will occur. Further additional noise will be created by amplifying games that are not currently amplified. Jesuit’s conclusion also states that the project will reduce existing traffic, circulation, and parking issues for the surrounding community. This conclusion is incorrect. If the lights are installed, practices will begin later in the afternoon/evening, yet school gets out at 3:00 (more or less). Unless students are required to stay on campus, it will increase traffic and daily trips when students leave the campus only to return later in the day or evening for practice or games.

**RESPONSE 12-4**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. As stated in the conclusions of Chapter 9 of the Draft EIR, it has been determined that the project would result in a significant and unavoidable impact related to noise, even with the inclusion of mitigation. The significant and unavoidable noise impact is due to the shift in timing of activities at the stadium into the relatively more noise-sensitive evening hours. However, an updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system. Implementation of this mitigation measure would effectively reduce noise levels in the vicinity of the project site. However, the County and applicant cannot control the main source of noise during well-attended activities – crowd noise. Therefore, the County has determined that this impact would be significant and unavoidable.

Transportation-related impacts are comprehensively reported in Chapter 10 of the Draft EIR and include those related to increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access. The Draft EIR does not state that the proposed project would reduce existing traffic, circulation, or parking issues for the surrounding community. In analyzing increase in VMT resulting from the proposed project, a 10-percent “Stay After School

Reduction” was applied to the daily trip totals to account for the Friday night game attendees that would contribute to the proposed project’s increase in attendance, but would not contribute to any sort of increase in VMT. These attendees may include Freshman or Junior Varsity football players or staff that would stay on campus in between school ending and the football game starting. While this 10-percent reduction is applied to the proposed project conditions and is not applicable to the existing conditions (Saturday afternoon football games), the total VMT generated for the proposed project would still be greater than the VMT generated under existing conditions. While the proposed project would contribute to an increase in VMT, as discussed in Impact TR-2, this impact would be less than significant.

The conservative assumptions used in the analysis ensures a cautious estimation of vehicle miles traveled and associated impacts that may overestimate actual impacts. Given the comprehensive overview of existing and proposed project vehicle trip patterns in the traffic study, the assessment provides a valid representation of the potential impacts of operational emissions and vehicle trips.

**COMMENT 12-5**

1) Game Day General – Behavior: It is stated that no tailgating is permitted in parking lots, overflow parking lots or on adjacent public streets, but there was tailgating at the August 25, 2023 football game.

**RESPONSE 12-5**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project. It should be noted that Jesuit’s Protocol for Night Events would be implemented for all night-time events and includes measures prohibiting tailgating in parking lots, overflow parking lots or on adjacent public streets. These provisions would be enforced by paid off-duty police/sheriffs as well as Jesuit’s volunteer Community Care Team.

**COMMENT 12-6**

2) Tech, Sound, and Lighting: When and under what authorization(s) was the WIFI installed?

**RESPONSE 12-6**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT 12-7**

3) Food Service and Vendors: Food trucks were operating on the August 25, 2023 football game. Were all permits and/or licenses obtained in advance to operate the food trucks?

**RESPONSE 12-7**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT 12-8**

Despite Jesuit’s assertions, the proposed project will not reduce existing traffic, circulation, and parking issues for the surrounding community. Further, Jesuit’s statements that the state-of-the-art technology for the new lighting system will minimize and avoid impacts to the nearby neighborhoods by limiting glare and spillover, is not supported by the DEIR. Finally, Jesuit states that the installation of the new system “which isn’t defined” will not increase any impacts associated with the school’s prior use authorizations, such as the PA system is incorrect. At the May 21, 2021 Good Neighbor meeting, Ms. Juli Nauman (Jesuit), stated in part that...“if any significant impacts to the neighborhood by the project are identified, they must be analyzed and then mitigated to a level that is “less than significant” or the project cannot be moved ahead.” As there two significant and unavoidable environmental impacts, Aesthetics and Noise, identified in the DEIR that cannot be mitigated to a level of insignificance, because of these and other reasons, I am opposed to Jesuit’s Stadium Lighting Project and the CPAC should recommend denial of a permit amendment.

**RESPONSE 12-8**

Please see Master Response 3: Project Approval Where There are Significant and Unavoidable Impacts Master Response 6: Parking Availability. See Response to Comment 5-1 with respect to parking in the vicinity of the project site. See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 12-9**

The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. As the County and Jesuit know, over ten years ago, the Rio Americano High School boosters (Rio) proposed a football field improvement project that also included lights. While portions of that proposed project were ultimately approved and installed, the lights were not included. On October 24, 2022, some residents near Rio were provided with a copy of a letter that stated that Rio would begin using portable lighting on the football field. While neighbors are attempting to understand what permits, if any, have been issued for the portable lights at Rio, if the Jesuit light component is approved a precedent would be set and the County should anticipate receiving an application from Rio for lighting. Therefore, in my comments to the County on the DEIR,

I will be requesting that the County study the potential for all Cumulative Impacts (not just Arden Hills, which I understand is not moving forward). The same regards noise, traffic, etc., impacts. Attached is a screenshot from the Rio Boosters announcing that lights are being proposed for Rio.

***RESPONSE 12-9***

The Draft EIR evaluates cumulative impacts on pages 11-27 through 11-31. A proposed Rezone and Community Plan Amendment at Arden Hills was identified as a project having the potential to contribute to cumulative impacts, which was considered in the analysis. However, it should be noted that the Arden Hills application has been withdrawn. The County does not currently have any specific information with regard to any plans that San Juan Unified School District has to install lighting, portable or otherwise, at Rio Americano High School. Because no details are available and no application has been submitted, any analysis of cumulative impacts of the proposed Marauder Stadium Lighting that considers the contribution of future lighting at Rio Americano High School would be speculative. Any temporary lighting that may be currently used at Rio Americano High School is considered part of the baseline conditions and would not be part of the cumulative analysis.

**LETTER 13**

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Barbara Dugal (October 17, 2023).

**COMMENT 13-1**

I apologize for all the emails, but trying to get ready for Monday. Has Arden Hills submitted an application to the County? If so, what is the status of the application? My understanding is that members of Arden Hills have been informed that the project is not moving forward. Please advise. Also, since Rio Americano is in the process of obtaining signatures and making plans to apply for lights, please advise why Rio wasn't included in the Cumulative impact Analysis. Per CEQA Guidelines Rio's lights falls within the "reasonably foreseeable probable future projects". Also, if the County has only received five comments to date on the DEIR, there should be an explanation in the staff report explaining that the comment period will continue until Oct 30 and the County will be receiving the bulk on public comments at that time. The wording in the staff report gives the impression that the community is not fully engaged in the process. The public record needs to reflect the entire record, not just Jesuit's position and their desire for the lights.

**RESPONSE 13-1**

See Response 12-9. The County has received 58 comment letters on the Draft EIR as of the close of the comment period.

**LETTER 14**

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Barbara Dugal (October 21, 2023) (1).

**COMMENT 14-1**

The Draft EIR is deficient because it does not comprehensively address how the stadium lights and synthetic field turf are environmentally safe. Any activity with artificial turf is environmentally safe, as described in the article below. The Applicant's desire to play sports at night using the stadium lights to make that possible may cause harm to the students, coaches, parents, guardians, and visitors.

**RESPONSE 14-1**

The synthetic field turf is an existing condition, which the proposed project would not change. The comment does not identify environmental safety issues regarding stadium lighting or artificial turf. The impact analysis in the Draft EIR is focused on changes that are proposed as a part of the project. See Response 14-2.

**COMMENT 14-2**

Gov. Gavin Newsom's recently signed law makes the ban on synthetic turf available to cities and counties to implement. "Synthetic grass usually contains PFAS chemicals. According to the Environmental Protection Agency, PFAS chemicals are a known carcinogen that can interfere with hormones, reproduction, immunity and cause developmental delays in children." The Applicant's draft EIR does not include a review of the Stadium lighting's contribution to extending play activities on the synthetic turf.

**RESPONSE 14-2**

The synthetic field turf is an existing condition, which the proposed project would not change. The proposed stadium lighting would allow games and practices that are already occurring to shift to evening hours. This schedule change would not change overall usage activity on the field. See Chapter 3 of the Draft EIR, "Project Description," which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details.

## **LETTER 15**

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Barbara Dugal (October 21, 2023 (2)).

### **COMMENT 15-1**

The Project Description is the foundation upon which an environmental analysis is constructed. Section 15124 of the CEQA Guidelines defines the types of information that should be included in an EIR project description. The project description should contain enough information so that the impact analysis contains a meaningful assessment of the project’s impacts. This allows the preparer of the document to analyze the impacts of the proposed project and allows the reader to understand the types and intensities of the project’s environmental impacts. Based on my review of the DEIR, the Project Description does not describe the actual project and what is proposed and therefore cannot be relied on.

### **RESPONSE 15-1**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details.

### **COMMENT 15-2**

Page 3-1 of the DEIR, states in part that...”the purpose of the proposed project is to install permanent light fixtures within the Marauder Stadium at Jesuit”. Page 3-7 of the DEIR, further states that ... “ the Project consists of two light poles 100-feet high, two 90-foot light poles. The request (it is unclear if this refers to the Project and/or the application), also includes additional code compliant lighting for the bleachers and pedestrian pathways.” However, Page 5-16 of the DEIR (Aesthetics) discusses the addition of wheelchair-accessible seating in the first row of the existing bleachers, and handrails/guardrails. The Project Description also does not include the removal of the existing four wood poles currently located on the property, but are described in Construction Methods Page 3-13 of the DEIR. A reader would not know about the addition of the accessible seating or the wood poles by reading the Project Description, but only by reading the Aesthetics or Construction Methods sections.

### **RESPONSE 15-2**

Text regarding wheelchair-accessible seating has been added to the Project Description chapter (page 3-10). As Construction Methods is a sub-section of the Project Description chapter, no edits are required with respect to the removal of existing wooden poles.

### **COMMENT 15-3**

The Project Description should include the number of games, scrimmages, practices, band practices, Junior Marauders, etc., so that the appropriate environmental analysis is undertaken. This should include all activities that would or could, in the foreseeable future, utilize the outdoor fields regardless of time of day so that all potential impacts can be fully identified and analyzed. Because of these deficiencies, I am concerned that

there could be other Project components that Jesuit proposes for its Project that are not included in the DEIR. Therefore, the Project Description needs to be written to reflect an accurate description of the Project and what is proposed, along with all uses, which may necessitate further environmental evaluation.

**RESPONSE 15-3**

Plate PD-5 lists the events that would use the proposed stadium lighting and which were considered in the environmental analysis. No other activities are proposed to use the stadium lighting. There are no other changes in activities that would occur under the proposed project. Therefore, no further analysis is required. The project description accurately states the proposed project. Therefore, no changes to the Draft EIR are required.

**COMMENT 15-4**

A clearly written statement of Objectives is intended to help develop a reasonable range of alternatives to evaluate in the DEIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the purpose of the project. Page 3-7- Project Objectives, states that Jesuit has provided a statement of basic project objectives that includes:

- 1) “Hosting evening athletic events on campus and allow for athletic practices and competitions to occur after peak afternoon temperatures ... “,
- 2) Provide sufficient time, particularly for fall and winter sports, to train and compete without missing classroom time .... However, Plate PD-5: Anticipated Event Lighting Schedule, which was provided by Jesuit, shows that the following sports will have games outside of peak afternoon temperatures: football games August - October, with playoff games in November, lacrosse games - March -April and soccer games December - February. There is no mention of hosting evening athletic events during fall and winter months and no documentation regarding the loss of classroom time and its affects on students.
- 3) Jesuit states that another objective is to “increase athletic opportunities for Jesuit students.” What is the intent of this objective? One can only assume that it means increasing the number of sports activities, competitions, and practices and the County should quantify this and analyze it.
- 4) Spread on-campus activities over a broader period to reduce the number of individuals and vehicles concurrently utilizing school facilities. In fact, this will concentrate activities to the lighted sports complex and extend the overall use of the lights and impacts to the surrounding community and will not reduce the number of individuals or vehicles concurrently using Jesuit’s facilities and may increase daily vehicle trips.
- 5) Enhance the overall high school athletic experience for students, parents, alumni, and the Sacramento community. What is the enhancement for the neighborhood



community that surrounds Jesuit? The neighborhood is already impacted by the numerous sporting activities and other non-school events that take place outside of regular school hours and days (Saturdays and Sundays).

- 6) Continue to build upon Jesuit’s reputation for athletic excellence by providing facilities that allow athletes to achieve peak performance. This objective is very subjective, is not quantifiable and should have been dismissed by the County and not included in the DEIR.

**RESPONSE 15-4**

The comment refers to the project objectives, which are listed on page 3-7 of the Draft EIR. One of the purposes of project objectives is to help the lead agency develop a reasonable range of alternatives to evaluate in the EIR. Objectives also aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits [CEQA Guidelines 15124(b)]. Regarding objectives 2) and 3), by providing permanent lighting, students would be able to participate in athletic activities at the stadium after classroom hours during months when natural lighting is reduced. Objective 4) refers to all school facilities, not just the stadium. Vehicle trips associated with the proposed project are evaluated in Chapter 10. Regarding objective 5), the Draft EIR comprehensively evaluates all direct and reasonably foreseeable indirect effects of the proposed project, including those related to the surrounding neighborhood. The Draft EIR is not designed to evaluate the degree of enhancements to the surrounding community or the level of benefit to the surrounding neighborhood, but this comment is reprinted here for consideration by decision makers.

**COMMENT 15-5**

It appears that the Objectives provided by Jesuit and outlined in the DEIR are an attempt to “justify” the project and thus limit thoughtful analysis of the Alternatives (they describe a Project that is looking for an Objective). Jesuit continuously and whenever the opportunity arises, states that the Project will benefit the “community.” However, whenever neighborhood community members ask Jesuit to explain what the benefit is to the neighborhood community, no explanation has been given. It is debatable that Jesuit has met the threshold per Section 15124(b) of the CEQA guidelines and the County should more thoroughly analyze Jesuit’s project objectives to determine if they meet the CEQA criteria. Additionally, the “No Project” alternative, which is dismissed in the DEIR, and the remaining alternatives require further evaluation considering the issues involving the Project Objectives.

**RESPONSE 15-5**

Section 15124(b) of the CEQA Guidelines states that the project objectives should include the underlying purpose of the project and may discuss the project benefits. See Response 15-4. The project objectives do state the underlying purpose and benefits of the project. Regarding project alternatives, the No Project is not “dismissed,” as the comment states, but is evaluated in Chapter 4 in terms of the environmental topics that were analyzed for the proposed project. The comment does not provide specific

reasons why the remaining alternatives require further evaluation considering the issues involving the Project Objectives. No changes to the Draft EIR are required.

**COMMENT 15-6**

As I understand, the intent of the County’s design standards is to preserve or enhance the urban design character of a community. These standards help to define the relationship of buildings and structures to the lot, street, parking, and existing site, and neighborhood context while considering human interaction and use. The County’s design guidelines seek to promote quality designs that **maintain the community character and promote public health, safety, and livability** through the design of the built environment. Pursuant County Code Section 5.2.2.C, which states in part that ... “public buildings .... houses, school and other similar buildings may not be erected to a height not to exceed 75’ ... “. How do two 90’ and two 100’ steel light towers comply with this Code? The County’s DEIR appears to have relied on commercial lot and commercial and institutional (which appears to include schools) project development standards. Not everyone is familiar with the County’s codes, so the County needs to explain in the DEIR why Code Section 5.2.2.C was not relied upon during its review of the application and project.

**RESPONSE 15-6**

The proposed project (if approved) would include issuance of a conditional use permit for the light standards, as explained in Draft EIR Chapter 3, “Project Description” (page 3-7). County Zoning Code Chapter 5, Section 5.2.2.C cited by the commenter pertains to height exceptions for buildings, and therefore does not apply to the proposed project; County Zoning Code Chapter 5, Section 5.2.2.B, which pertains to height exceptions for ancillary structures, is the applicable code section. The Draft EIR evaluates the potential physical impacts of the proposed project (which includes a conditional use permit) on the environment, as contained in Chapters 5 through 11. In particular, the aesthetics impacts that could result from potential conflicts with applicable zoning and other regulations governing scenic quality are evaluated in Draft EIR Chapter 5, “Aesthetics,” in Impact 5-1 (pages 5-16 and 5-17). Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality.

**COMMENT 15-7**

The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. Cumulative Impacts - Page 11-1- Growth Inducing Impacts - as stated in the Objectives section, one of Jesuit’s stated objectives is to “increase athletic” opportunities for students. Has Jesuit provided evidence that students are unable to participate in offered sports activities because of a lack of field availability? If not, then it needs to be provided. Without more discussion or information, one can only conclude that the goal is to increase student enrollment, which would require County authorization.

**RESPONSE 15-7**

It is not clear from the comment how Jesuit High School's objective to increase the athletic opportunities for Jesuit High School students is related to analysis of cumulative impacts of the project. The proposed project does not include any increase in student enrollment. The comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects of the proposed project, but is reprinted here for decision maker consideration.

**COMMENT 15-8**

As the County is aware, in 2005 the Rio Americano High School Boosters (Rio) proposed the construction of permanent lights and other sports field improvements at Rio. A lawsuit was brought by community neighborhood members and in December 29, 2008, the Honorable Lloyd G. Connelly filed a judgement (Case No. 06CS00495) and ordered the San Juan School Board District (District) to refrain from constructing and operating the sports field improvements unless and until the District prepared and certified a project EIR in compliance with CEQA. Ultimately, a EIR was adopted by the District on June 5, 2010. While portions of that proposed project were ultimately approved and installed, the sports field lights were not included because of significant environmental impacts. In the event the Jesuit stadium light project is approved, a precedent would be set and it is anticipated Rio that will be moving forward through the District for its own sports field lights. Therefore, the County should study the potential for all Cumulative Impacts (not just Arden Hills, which was recently sold and that the proposal outlined in the cumulative section of the DEIR is not moving forward). The same regards noise, traffic, etc., impacts. Below is a screenshot from the Rio Boosters announcing that lights are being proposed for Rio. Additionally, on October 19, 2023, Rio's football coach was interviewed on Sacramento's local Fox station discussing lights at Rio.

**RESPONSE 15-8**

See Response 12-9.

**COMMENT 15-9**

Page 11-3- Raptors and Nesting Birds-The DEIR states that it is "unlikely that raptors will nest in mature trees in residential areas". This statement is incorrect and misleading. Even though the neighborhood is located near the American River, it is a fact that hawks, owls, and other raptors and bird species, do nest and forage throughout the neighborhood. In fact, owls' nest in trees that are directly adjacent to the sports complex. You can frequently hear owls calling out to each other at night. This section needs to be reviewed and rewritten.

**RESPONSE 15-9**

The Draft EIR acknowledges that raptors have been colonizing in urban and suburban areas – areas that could potentially include the project site and vicinity (Draft EIR, page 11-3). The commenter quotes a part of a sentence from the Draft EIR. The full sentence is, "While it is unlikely that raptors will nest within mature trees in residential

neighborhoods, especially with better quality habitat located nearby along the American River, their potential for nesting within the project vicinity should still be considered due to the continuous shift in their ranges and as higher quality habitat becomes scarcer” (Draft EIR, page 11-3). As shown, the analysis in the Draft EIR does not rule out the possibility of raptors and birds nesting adjacent to the project site. In addition, the Draft EIR is focused specifically on potential impacts of the proposed project, and thus provides mitigation to reduce the potentially significant impact on nesting birds to a less-than-significant level. While the Draft EIR acknowledges the potential presence of nesting birds including raptors, Mitigation Measure BIO-1 requires nesting surveys prior to demolition and construction so that impacts are avoided at the time that they would have actually occurred. No change to the Draft EIR is necessary.

**COMMENT 15-10**

Jesuit’s Protocol for Night Events: 1) Game Day General - Behavior: It is stated that no tailgating is permitted in parking lots, overflow parking lots or on adjacent public streets, but there was tailgating at the August 25, 2023 football game. 2) Tech, Sound, and Lighting: When and under what authorization(s) was the WIFI installed? 3) Food Service and Vendors: Food trucks were operating at the August 25, 2023 football game. Were all permits and/or licenses obtained in advance to operate the food trucks?

**RESPONSE 15-10**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT 15-11**

Please confirm that Jesuit is fully in compliance with all existing per- conditions, mitigation measures, etc. This is extremely important especially if the County intends to “combine” all of Jesuit’s previous authorizations into the Use Permit Amendment and Design Review that is the subject of this DEIR. An example of Jesuit being out of compliance with the mitigation measures includes leaving the gate on Fair Oaks Boulevard open past 10:00 pm as required and allowing students and their guests to linger in the parking lot and along Fair Oaks Boulevard after attending evening events on the campus and beyond the time allowed.

**RESPONSE 15-11**

See Chapter 3 of the EIR, “Project Description,” which includes details about previous permitting at the Jesuit campus. The project involves a request for a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles. This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT 15-12**

Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into several pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less than-significant impact on the environment, but which together may result in a significant impact.

**RESPONSE 15-12**

The County acknowledges the general comment regarding piecemealing or segmenting under CEQA. See Response 17-2.

**COMMENT 15-13**

In 2013, the County approved a EIR for Jesuit’s Chapel project, which I and other community neighborhood members commented on. In June of 2013, I learned that Jesuit was in the process of designing improvements to the football field and track area with a capacity for 3,000 individuals and possibly lights. I immediately contacted the County to get more information and stated that there was the potential for cumulative impacts and pursuant to CEQA, the chapel and stadium improvements should not have been reviewed separately and that these activities could be considered “piecemealed.” In fact, the County issued a Notice of Exemption (NOE) in 2015 for a grading permit associated with the track and field improvements, (County Control No: PLER 2015-00039 - see page 3-1 of the DEIR for additional details). In 2019, the County issued another NOE to permit the relocation of the scoreboard and sound system. All evidence and information that supports Jesuit’s claims and the statements on Page 3-1 and 3-2 in the DEIR needs to be included in the DEIR. Other temporary use permits associated with temporary lighting for various football games were also granted by the County (see page 3-2 of the DEIR for additional details). It is apparent that the previous exemptions and other actions taken by the County have contributed to the negative environmental impacts to the neighborhood is experiencing, which is why further review of the overall project description, project objectives, and alternatives, etc., is warranted.

**RESPONSE 15-13**

The Draft EIR has been made available for public comment on its adequacy. In addition, the Planning Commission will review the analysis and findings prior to making a decision on the project. See also Response 17-2.

**COMMENT 15-14**

The following needs to be clarified and analyzed in the DEIR: Page 3-9 - states in part... “pre-cast base will be buried approximately 20’ below grade ... “ however Page 11-20 - states in part ... “the holes for the pre-cast bases will be 16’ below grade ... “ How wide will the holes be? What is the estimated cubic yard of material to be excavated? Please what will happen with the excavated soil? I cannot locate this information and it needs to be provided in the DEIR and analyzed. Page 3-16 - states

that...”underground electrical conduit is existing with pull boxes within ten feet of the pole location.” Does underground electrical conduit with pole boxes exist at each proposed hole location? Did the County previously approve the electrical work? These details need to be included in the DEIR and evaluated as needed.

***RESPONSE 15-14***

See Response PM-8-15. The amount of soil that would be excavated for installation of the light poles is estimated to be less than 50 cubic yards, which would be exported off site. Dimensions of the holes are estimated to be 3-4 feet in width. Previous approval of electrical work at the stadium does not affect the environmental analysis of the proposed project. No changes to the Draft EIR are required.

## **LETTER 16**

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Barbara Dugal (October 28, 2023).

### **COMMENT 16-1**

Unfortunately, the DEIR as currently written is extremely deficient in many aspects, and does not accurately detail or describe the Project and what is being analyzed under CEQA. Some of my comments are editorial in nature, but most are substantive.

### **RESPONSE 16-1**

Responses to specific comments on the Draft EIR are provided below and throughout the Final EIR. Where revisions to the Draft EIR were needed, they have been made, and are reflected in the Final EIR. No substantial changes were needed, and no revisions change the conclusions of the Draft EIR.

### **COMMENT 16-2**

1) Page 1-1 Executive Summary: While minor 1st sentence “The subject of this Environmental Impact Report (EIR). The document is a “Draft Environmental Impact Report” (DEIR) and needs to be corrected throughout the document.

### **RESPONSE 16-2**

The comment is noted. As it does not affect the adequacy of the environmental analysis, no change is necessary.

### **COMMENT 16-3**

2) Executive Summary - add the following to the end of the 3rd line down after at Jesuit High School...”and conduct evening athletic practices and competitions.” This accurately describes was the proposed project is and should be included throughout the DEIR.

### **RESPONSE 16-3**

The comment is noted. As it does not affect the adequacy of the environmental analysis, no change is necessary.

### **COMMENT 16-4**

3) Page 1-2-Areas of Controversy-The neighborhood community is not just concerned with the nighttime football games, but all of the other proposed nighttime sports games and practices, etc., as it represents a change in the historic nature and use of the sports fields at Jesuit and needs to be included.

### **RESPONSE 16-4**

The proposed events that would be played under the new lighting are shown in Plate PD-5. Please refer to Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project.

**COMMENT 16-5**

- 4) Page 2-1 Summary - 6th line down, states that the LED lights will be affixed to the top of the poles, elsewhere in the DEIR it states that the LED lights will be spread out, clarify, revise, reanalyze as needed. Last line of Summary, the activities proposed for nighttime need to be included, as well as pole removal, handicapped seating and guardrails (include throughout DEIR), additional analysis should be completed as required.

**RESPONSE 16-5**

Please see Response 15-2. Removal of the existing wooden poles is described in Construction Methods, a sub-section of the Project Description chapter. LED lights would be attached to the tops of four new light standards (poles) as described in Draft EIR Chapter 2, "Introduction," in the first paragraph on page 2-1 as noted by the commenter. The last sentence in that same paragraph on page 2-1 also states, "The proposed project also includes additional code-compliant lighting for the bleachers and pedestrian pathways of the stadium." This lighting would also consist of LED lights. Thus, there is no discrepancy, and no changes to the analysis contained in the Draft EIR are required.

**COMMENT 16-6**

- 5) Page 2-4, Final EIR add the word "to" after the word "prior".

**RESPONSE 16-6**

This edit has been made in the Final EIR.

**COMMENT 16-7**

- 6) Page 3-1 - Project Description - Suggest the following edits to the first sentence as follows: "The proposed project involves the removal of four existing wood poles and the installation, operation and use of permanent field light fixtures, installation of code complaint safety lighting, handicapped seating and guardrails within ..... "All proposed improvements, changes, or additions and proposed uses need to be included. Also, all field activities that are proposed to take place under the lights needs to be provided and detailed, further analysis may be required.

**RESPONSE 16-7**

Page 3-10 of the Draft EIR (Project Description) has been revised to include installation of wheelchair-accessible seating in the first row of the existing bleachers and the proposed handrails/guardrails at the ends of the existing bleacher seating. It should be noted that the project description already discusses removal of existing poles on page 3-9 as follows: "The approved PA system speakers are attached to wooden poles. As part of the proposed project, the poles to which the PA speakers are currently attached would be taken down and replaced by the new lighting system's metal poles." Proposed code-compliant lighting for the bleachers and pedestrian pathways of the stadium is discussed on page 3-7 of the Draft EIR.



**COMMENT 16-8**

- 7) Page 3-1- Background - It is important for the County Planning Commission to understand background details regarding the various improvements that have been authorized by the County and constructed at the project site and the related uses. These details are relevant to the Commission’s consideration of Jesuit’s proposed Planning Amendment. It will provide history and context to the neighborhood’s frustration with Jesuit and the County. I know that there will be many public comments on Jesuit’s proposed project and I do not want this information to be overlooked by the Commissioners, so I will be preparing comments and a summary specifically on the background and it will be sent separately to the County by October 30, 2023.

**RESPONSE 16-8**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT 16-9**

- 8) Page 3-2 Background - “A emergency temporary use permit included the installation of seven (7) 20-foot by 40-foot pole tents.” It appears that several white tents are still on site. Information regarding the status of the seven the temporary tents needs to be provided and included in the final EIR.

**RESPONSE 16-9**

If the comment is referring to tents that were set up in relation to pandemic safety measures, to the project applicant’s knowledge, these tents have been removed.

**COMMENT 16-10**

- 9) Page 3-7 - Project Objectives -What is meant by the statement that the Applicant has provided a “BASIC” project objective? As detailed in the DEIR, a clearly written statement of objects will help the Lead Agency develop a reasonable range of alternatives and will aid the decision makers preparing findings or a statement of overriding considerations, if necessary. As I stated in my prior letters and at the Planning Commission meeting October 24, 2023, it appears that Jesuit’s objectives aim to “justify” the project and thus limit thoughtful analysis of the Alternatives.

**RESPONSE 16-10**

The word “basic” is used due to its use in the CEQA Guidelines. CEQA Guidelines Section 15126.6(a), for example, in a discussion related to the development of alternatives, recommends that an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the **basic** objectives of the project but would avoid or substantially lessen any of the significant effects of the project...” The use of basic in this context makes clear that lead agencies have the discretion to identify more fundamental project objectives and also additional project objectives that address more ancillary elements of the project. Refer

to Chapter 4 of the Draft EIR, which describes in detail how the alternatives were identified and the sections of the Public Resources Code and CEQA Guidelines that were implemented by the County in developing the alternatives. The comment does not identify a project objective that “aims to ‘justify’ the project and thus limit thoughtful analysis of the Alternatives.”

**COMMENT 16-11**

- Suggest replacing host evening events on **campus with Marauder Stadium** since athletic practices and games would be held at the Stadium.

**RESPONSE 16-11**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT 16-12**

- Provide a feasible location .... to increase the athletic opportunities for Jesuit High School students. What are these opportunities, do they represent an increase in the numbers or types of athletic opportunities, or an increase in student enrollment? This needs to be explained and described and may require further analysis particularly in the context of Growth Inducing impacts, i.e., increasing student enrollment.

**RESPONSE 16-12**

The stadium lighting would enable Jesuit High School to shift some athletic activities (e.g., practices) that are currently scheduled in the afternoon to evening hours. Because these activities occur close to the end of classes, student athletes can find it challenging to participate in both. The events that would use the stadium lighting in the evenings on school days (Monday through Friday) are listed in the table in Plate PD-5 in Chapter 3, Project Description. The project does not propose to increase enrollment. Growth-inducing impacts are discussed on page 11-1 of the Draft EIR.

**COMMENT 16-13**

- Has Jesuit provided information to support the Objective **regarding “missing excessive classroom instruction multiple times per month”**? Is there an issue with academic performance, what is the total of missed classes? Requires explanation and details provided. Again, it appears that Jesuit is looking for any objective to support the lights.

**RESPONSE 16-13**

See Response 15-5 regarding the purpose of project objectives. See Response 16-12 regarding the issue the objective of increasing athletic opportunities is intended to solve.

**COMMENT 16-14**

- “Spread on-campus activities (should be stadium only activities) over a broader period of time ..... to reduce the number of individuals and vehicles concurrently utilizing school facilities.” This will lead to the prolonged use of the lights and their impacts on the neighborhood and will increase VTDs (vehicle trips daily), unless students are required to stay on Campus after school.

**RESPONSE 16-14**

The visual impacts of use of the proposed lighting and increased VMT are evaluated in Chapters 5 and 10, respectively.

**COMMENT 16-15**

- “Enhance the overall .... athletic experience for students, parents, alumni and the Sacramento community” .... This is very subjective and cannot be relied upon, quantified, or analyzed under CEQA. Recommend deleting and eliminating further analysis or consideration. What is the benefit to the surrounding neighborhood community?

**RESPONSE 16-15**

See Responses 15-4 and PM-8-15. This comment is unrelated to the adequacy of the Draft EIR for addressing potential environmental effects of the proposed project.

**COMMENT 16-16**

- “Continue to build upon Jesuit’s reputation for athletic excellence ... “ This needs to be removed from the final EIR as it has no relevance in the CEQA analysis or in the decision-making process. It is offensive to expect the surrounding neighborhood community to shoulder the significant environmental impacts that, if the project is approved, will continue to degrade the homeowners use and enjoyment of their homes and surrounding neighborhood.

**RESPONSE 16-16**

The commenter’s opinion regarding this project objective is noted. The Draft EIR comprehensively addresses all direct and reasonably foreseeable indirect effects of the proposed project, including those effects that are related to the surrounding neighborhood.

**COMMENT 16-17**

10) Page 3-7 and Page 3-9- Project Description and **Characteristics -1) Page 3-7**, states, in part, that ... “Jesuit is requesting a Use Permit and Design Review .... “ What action is the County contemplating taking? The DEIR states in part ... “The project request would amend the most current comprehensive entitlement of Jesuit High School’s Use Permit (County Control No. PLMP 2008-00237). Does the County intend to “combine” all of Jesuit’s previous authorizations into a single Use Permit Amendment that is the subject of this DEIR? Please clarify and provide in the EIR. If

that is the County’s intent, then please confirm that Jesuit is fully in compliance with all existing permit conditions, mitigation measures, etc. I am aware of a few examples of Jesuit being out of compliance with the mitigation measures including, but not limited to, leaving the gate on Fair Oaks Boulevard open past 10:00 pm as required and allowing students and their guests to linger in the parking lot and along Fair Oaks Boulevard after attending evening events on the campus and beyond the time allowed. Additionally, see my comments on page 2 of this Comment Letter on the Background (Page 3-1 of the DEIR).

### **RESPONSE 16-17**

The proposed project (if approved) would include a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium. The request also includes additional code-compliant lighting for the bleachers and pedestrian, as explained in Draft EIR Chapter 3, “Project Description” (page 3-7). Please see Chapter 3 of this Draft EIR, “Project Description,” also for the permitting history at the Jesuit campus (Draft EIR, pages 3-1 and 3-2). The Draft EIR evaluates the potential physical impacts of the proposed project (which includes a the proposed use permit amendment) on the environment, as contained in Chapters 5 through 11. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the project, and not an evaluation of past activities or events related to the project site. The impacts of the proposed project are compared with existing, “baseline” conditions, so that the impacts specific to the project can be isolated and reported. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for transparency and decision maker consideration.

### **COMMENT 16-18**

2) Page 3-7 states in part that...“the proposed light poles will have LED lights affixed to the top ...”, however, on page 3-9, it is stated ... “the number of luminaires (lighting fixtures) on each lighting pole would range from 14 to 19, with a total for all four poles of 66. These luminaires would be mounted at varying heights, ranging from 15 to 100 feet above grade.” This needs to be explained, clarified, or corrected, etc., additional analysis may be required. 3) Page 3-9 - states in part ... “As part of the proposed project .... the wood poles to which the PA speakers are currently attached would be taken down .... “ How will the poles be taken down and removed? There is discussion later in the DEIR that a crane would be used, but there are no additional details provided. Will soil excavation be required, if so, what is the estimated quantity of material to be excavated (cubic yards), where and how will the poles be transported and disposed of? All details for the pole’s removal need to be provided and included in the EIR which may require further environmental analysis, etc.

### **RESPONSE 16-18**

As noted by the commenter, DEIR Chapter 3, Project Description, provides a description of the number and types of lighting fixtures that would be installed on each

light standard (pole). It is unclear as to what further “clarification” the commenter believes should be provided. The visual impacts of the new lighting that would be provided at the stadium, as described in the Project Description, are evaluated in DEIR Chapter 5, Aesthetics and in the project’s Lighting Report attached to the DEIR as Appendix B. Regarding excavated soil, less than 50 cubic yards of soil would be excavated, which was accounted for in the analyses throughout the DEIR; please see also Response PM-8-15. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 16-19**

11) **Page 3-9 - Operations Plan -1)** Have all guidelines, plans, protocol, etc., referred to or mentioned in the DEIR, been included in the DEIR? If not, they need to be included. I previously provided comments on Jesuit’s Protocol for Night Events: Game Day General - Behavior: It is stated that no tailgating is permitted in parking lots, overflow parking lots or on adjacent public streets, but there was tailgating at the August 25, 2023 football game. 2) Tech, Sound, and Lighting: When and under what authorization(s) was the WIFI installed? 3) Food Service and Vendors: Food trucks were operating at the August 25, 2023 football game. Were all permits and/or licenses obtained in advance to operate the food trucks? What is the definition of “high profile/high-capacity events? Needs to be included.

**RESPONSE 16-19**

Jesuit’s Protocol for Night Events (Appendix I of the Final EIR) contains information about noticing, communications, management of volunteers, security and law enforcement procedures, signage, prohibited behaviors (e.g., “no tailgating is permitted in parking lots, overflow parking lots or on adjacent public streets”), parking management, and other services prior to, during, and following events. Generally, this information is not relevant to analysis of environmental impacts. However, PA sound levels (under “Tech, Sound, and Lighting” in the protocol document) are addressed by Mitigation Measure NOI-1. No changes to the Draft EIR are required.

**COMMENT 16-20**

12) **Page 3-9 - Proposed Improvements -** See comment number 10 above of this letter. The improvements listed does not include the handicapped seating, guardrails or bleacher safety lighting that is proposed/outlined on page 5-16 -Aesthetics, all proposed improvements, need to be included in the EIR and analyzed.

**RESPONSE 16-20**

See Response 15-2.

**COMMENT 16-21**

13) **Page 3-10-**The third bullet states ... “ Designed to meet.. .. and, as such, will not contribute to glare or skyglow.” However, Page 5-21 concludes that impacts from

skyglow is considered to be to be **significant and unavoidable**. Explain this contradiction.

**RESPONSE 16-21**

As explained in Draft EIR Chapter 5, “Aesthetics” (page 5-21), modeling results (see Draft EIR Appendix B, Lighting Report) demonstrate that the proposed stadium lighting would result in zero light trespass off-site at both public (American River Drive, Tennyson Way, and American River Parkway) and private (neighboring residences) viewpoints. Modeling of the proposed project lighting also demonstrates that glare and skyglow would be reduced to levels that meet International DarkSky Association standards, which are designed to minimize neighborhood lighting nuisances. Therefore, the proposed project would not contribute to glare or skyglow effects. As further stated on Draft EIR page 5-21, “However, it is acknowledged that the ambient nighttime lighting environment at the project site and from off-site public views of the project site would change as a result of the proposed stadium lighting. In order to be conservative, this analysis concludes that the nighttime generation of visually perceptible light source altering existing nighttime views from the proposed stadium lighting would result in a potentially significant impact.” Thus, in order to be conservative, the County has chosen to characterize the change in ambient nighttime lighting as a significant and unavoidable impact under CEQA.

**COMMENT 16-22**

14)Page 3-11- Schedule of Uses - This represents a historic change in use of the Stadium. What is the timing of all PAL programs/activities/practices? What about the Junior Marauder football league? What about the use of diesel -powered lights? Needs to be included and analyzed.

**RESPONSE 16-22**

As noted on page 3-11 of the Draft EIR, the stadium’s track and field is used by the Junior Marauders football league as well as the Parochial Athletic League (PAL) flag football and track programs. As these activities (including Junior Marauder’s use of diesel-powered lighting for games) are existing, they are part of the baseline against which the proposed project is analyzed.

**COMMENT 16-23**

15)Page 3-12 - Plate PD-5 - This does not represent the actual estimated number of practices which is approximately 219 or approximate number of games which is 37. This needs to be analyzed and included in the EIR. If the Junior Marauders will be using the stadium lights, needs to be included and analyzed also. Track and field will “rarely” use the lights, what is the definition of rarely? Needs to be included, and a worse-case scenario analysis should be completed. Has Lacrosse historically been amplified? If not, why now? What about the overlap of practices, how will they be accommodated?

**RESPONSE 16-23**

See Response 16-22.

**COMMENT 16-24**

16) Page 3-13-Attendance-Throughout the DEIR different attendance numbers are used. Review for consistency throughout DEIR. Worst-case scenario needs to be analyzed.

**RESPONSE 16-24**

See Master Response 5: Attendance Estimates

**COMMENT 16-25**

17) Page 3-13- Parking Needs - Maximum capacity needs to be defined. Other fields could be used for parking, what if rain or wet conditions renders this additional parking area unusable? If damage to these fields occurs, how will be repaired? Needs to be included. As Arden Hills Resort recently sold, will the agreement be honored by purchaser? What about conflicts with Rio Americano High School? Were all potential impacts (traffic, noise, etc.) to those residing near and around Rio analyzed? If not, needs to be included.

**RESPONSE 16-25**

The maximum capacity of Marauder Stadium is defined as 3,000 attendees, as stated on page 3-3 of the Draft EIR. See Master Response 5: Attendance Estimates. See Master Response 6: Parking Availability.

In the event wet conditions render the on-site overflow parking unusable, attendees would park at Rio Americano High School, or along the streets in the surrounding neighborhood. It is currently unknown whether parking will be available at Arden Hills. The comment refers to “conflicts with Rio American[o]’s schedule” but does not give any additional detail. See Response 12-9.

**COMMENT 16-26**

18) Page 3-13 and 3-16 - Construction Methods - Complete details need to be provided regarding the pole removal process. Different terms are used to describe the wood poles/PA supports. Needs to be consistent throughout the DEIR. Page 3-16 discusses “underground electrical conduit is existing with pull boxes within 10 feet of the pole location.” Do these improvements exist at the four proposed light pole locations? When was the conduit/pull boxes installed and under what permits from the County? What was the intended use of these improvements? What is the size of conduit, etc.? Needs to be included and analyzed.

**RESPONSE 16-26**

See Response 15-2. There is existing electrical supply on-site near the location where the stadium lights would be installed. The project may require a very small extension to the existing electrical supply. No changes to the Draft EIR are required.

**COMMENT 16-27**

19) Page 3-15 - Plate PD-7 - Why include the 539 spaces when the document states they will not all be used, clarification is warranted.

**RESPONSE 16-27**

Plate PD-7 in the Draft EIR provides a breakdown of all the parking spaces on campus at Jesuit High School. Page 3-13 in the Draft EIR clarifies that 499 of the total 539 spaces on campus would be available for attendees. The remaining 40 spaces are dedicated strictly for staff and maintenance equipment.

**COMMENT 16-28**

20) Page 4-2 - Consideration of Alternatives - Attainment of Project Objectives – See comment #10 of this letter.

**RESPONSE 16-28**

See Response 16-17.

**COMMENT 16-29**

21) Page 4-4 - Alternatives Considered but Dismissed from Further Evaluation - **Alternative Project Location** - As Jesuit is a Sacramento regional school, the student population comes from 90 zip codes, and is diverse geographically. This Alternative requires further evaluation in regards to travel, air pollution and greenhouse gas emissions and not rejected.

**RESPONSE 16-29**

This alternative was dismissed from further evaluation because developing an entirely new site could result in new or more severe significant impacts than have been identified for the proposed project, such as aesthetic, biological, cultural resources, hydrology and water quality, noise, and transportation impacts. The applicant would likely also need to obtain control of a new site that is of sufficient size to accommodate a new stadium. It should be noted that an alternative site may not be feasible, due to the limited availability of properties of sufficient size in the vicinity of Jesuit High School. CEQA does not require analysis of an alternative location to a proposed project when it is not feasible. According to CEQA Guidelines Section 15126.6(f)(1), a lead agency's feasibility analysis for alternatives can include consideration of whether a project applicant can reasonably acquire, control or otherwise have access to an alternative site. In addition, if a new site is not available within a reasonable distance of Jesuit High School and its enrolled population, most of the project objectives would not be attained. For example, it may not meet the objectives of enabling greater participation/attendance



by students and their families due to the significantly greater (6-10 mile) travel distance from Jesuit High School or providing sufficient time, particularly for Fall and Winter sports, to train and compete without requiring student-athletes to miss excessive classroom instruction multiple times per month. As the Draft EIR evaluated a reasonable range of other alternatives, this comment does not identify an inadequacy in the environmental analysis.

**COMMENT 16-30**

22) **Page 4-5 - No Project Alternative** -As significant and unmitigable impacts are identified in the DEIR, temporary lights cannot be used in the future and all references to this needs to be deleted **throughout the document**. The County’s position regarding the use of temporary lights in the future was confirmed by County staff at the October 11, 2023 CPAC public meeting. Additionally, the discussion regarding air quality impacts under the No Project Alternative needs to discuss and analyze the impacts from the use of diesel generator lights that are used by Junior Marauders and possibly others. This Alternative requires further analysis and evaluation and should not be dismissed.

**RESPONSE 16-30**

Significant and unavoidable impact conclusions in the Draft EIR for the proposed project would not be applicable to use of temporary lighting in the future in the event that the proposed project is not approved. The Draft EIR is focused on addressing all direct and reasonably foreseeable indirect effects attributable to the proposed project. In Chapter 4, Alternative of the Draft EIR, air quality is discussed under No Project Alternative. The No Project Alternative would not have evening or nighttime events at the stadium. The No Project Alternative includes the potential use of temporary portable lighting, which may include the use of diesel generators. The analysis focuses primarily on aspects directly associated with the proposed project and temporary portable lighting is not introduced or altered by the proposed project. Therefore, no air quality impacts would occur because no construction would occur. Since there would be no increase in attendance for planned events, there would be no increase in criteria air pollutant emissions during operations. As noted on page 3-11 of the Draft EIR, the stadium’s track and field is used by the Junior Marauders football league as well as the Parochial Athletic League (PAL) flag football and track programs. As these activities (including Junior Marauder’s use of diesel-powered lighting for games) are existing and anticipated to continue, they are part of the existing conditions and reasonably foreseeable future conditions that would exist if the project were not approved. They are therefore covered in the analysis of the No Project Alternative.

**COMMENT 16-31**

23) **Page 4-6 -Alternative 1-Alternate Stadium Locations** - It is stated that this Alternative would meet most of the basis objectives. However, ... “it may not meet the objective of enabling greater participation ... by students, etc...due to the significantly greater travel distance from Jesuit.” As Jesuit is a Sacramento regional school, the student population comes from 90 zip codes, and is diverse

geographically. The impacts identified for Alternative 1, need to be reevaluated and reconsidered.

**RESPONSE 16-31**

The Draft EIR considered the potential environmental impacts of Alternative 1 in Chapter 4 (Alternatives). See Chapter 10, “Transportation” and Appendix E for a comprehensive analysis of transportation-related impacts attributable to the proposed project. Therefore, no further evaluation is required.

**COMMENT 16-32**

24) **Page 4 - 8 -Alternative 2: Shade Structure - States ...** “this alternative would construct a shade structure over the bleachers and field at Marauder Stadium ... and potentially over another field at Jesuit...” What field is this and why is it needed? Additional details and analysis need to be provided, this Alternative requires further consideration. States “could” conflict with applicable zoning ... more analysis required.

**RESPONSE 16-32**

As this is a project alternative, specific engineering details have not been developed to answer the question about the exact location, although it is stated on page 4-8 (Chapter 4, Alternatives, that the structure would be constructed over the bleachers and field at Marauder Stadium. Alternative 2 was developed to address the second project objective: Allow for athletic practices and competition to occur after the peak afternoon hours during times with more favorable weather conditions to protect the health and safety of student-athletes, coaches, and spectators. The shade structure would help make afternoon practices more tolerable for players during the hotter months of early fall and late spring. Regarding the potential to conflict with applicable zoning and regulations, this would relate height and setback requirements. Since Alternative 2 has not been designed, and does not need to be designed to allow for a meaningful alternatives analysis, the County is not certain that the shade structure would comply with all height, setback, and other development standards of the County’s Zoning Ordinance.

**COMMENT 16-33**

25) **Page 4-10 -Table ALT 1-Comparison of Alternatives - Impact AE-1- Project impact level rated as LS,** however this requires further evaluation, as significant and unavoidable impacts may occur due to a lack of analysis of potential impacts to the American River Parkway (Parkway). The analysis included was very limited in scope as users of the Parkway utilize the levees immediately adjacent to the Parkway to recreate. Further analysis of the pedestrian access points at Regency Circle and the Jacob Lane needs to be conducted. **Impact AQ-3 - Project impact levels rated as LS,** however as fueling of vehicles and equipment associated with construction and the potential repair of equipment was not discussed or evaluated in the DEIR, rating of LS is inappropriate without further discussion and analysis.

**RESPONSE 16-33**

The levee height along the Parkway immediately adjacent to the Jacob Lane and Regency Circle Parkway access points referred to by the commenter is only 8 feet above the elevation of the surrounding residences, roadways, and the Jedediah Smith Memorial Trail. The potential visual impacts for recreationists throughout the Parkway are described in Draft EIR Chapter 5, “Aesthetics,” and were found to be less than significant, in part because the intervening residences and tall landscape trees would block all views of the proposed light standards except for the very top of the standards and the luminaires. As described on Draft EIR page 5-17, the poles would be of a small diameter (particularly as viewed from a distance of nearly one-half mile) and the light silver/grey color of the steel poles would tend to blend in with the sky background. As further explained in Draft EIR Impact 5-2 (Draft EIR, pages 5-17 through 5-21), given the distance of nearly one-half mile between the Parkway and the proposed light standards, the fact that modeling results demonstrate there would be zero light trespass off the project site (see Draft EIR Appendix B, Lighting Report), and only the tops of the shielded luminaires would be visible from the Parkway (one-half mile in the distance), and the fact that the American River Parkway is only open from sunrise to sunset, there would be no adverse impacts related to lighting for recreationists in the Parkway. The impacts for recreationists at the Regency Circle Parkway access, approximately 855 feet west of the Jacob Lane Parkway access, would be the same as those already discussed in the Draft EIR for the Jacob Lane access because the Regency Circle access point is the same distance from the project site, is situated at the same elevation, and views are blocked by the same residences and tall landscape trees as the Jacob Lane access discussed above and in the Draft EIR Chapter 5, “Aesthetics.” The EIR is not required to include photographs or descriptions of every conceivable access point or every possible public viewpoint of the project site; rather, as explained on Draft EIR page 5-1, the KOPs in Chapter 5, “Aesthetics” illustrate *representative* viewpoints that are typical of the project area. KOP-5 in Draft EIR Chapter 5, “Aesthetics” illustrates views from the Jedediah Smith Memorial Trail, one of the primary recreational features which the Parkway was intended to preserve. There are no potentially significant, significant, or significant and unavoidable impacts related to aesthetics on Parkway users, nor does the commenter present any factual evidence indicating how or why such impacts would occur. Thus, no further analysis in the Draft EIR related to aesthetics is required.

Construction-related emissions were modeled using CalEEMod (v.2022.1.1.12). CalEEMod is designed to incorporate a wide range of emission sources, including fugitive dust and exhaust emissions from the operation of construction equipment and vehicles. Table AQ-3 of the Draft EIR presents the project-related emissions including fugitive dust from ground disturbing activities and vehicle travel on paved roadways, and exhaust emissions (i.e., emissions resulting from fuel combustion) from the use of off-road equipment and on-road motor vehicles during construction. Construction-related emissions, which may result from equipment operation, on-site transportation, and fuel combustion, are considered in CalEEMod to provide a comprehensive assessment of air pollutant and greenhouse gas (GHG) emissions associated with the proposed project. Project-specific construction parameters were used as inputs in the air quality

analysis. The modeled construction-related emissions were compared with applicable Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds to determine significance. Table AQ-3 in Chapter 6, “Air Quality” of the Draft EIR shows that emissions generated during construction would not exceed the SMAQMD significance thresholds.

Furthermore, construction equipment repair activities are the responsibility of equipment fleet owners and operators and occur irrespective of the proposed project in order to ensure equipment is operating properly and efficiently, which also ensures exhaust emissions from equipment operation are minimized. Equipment repair is not an anticipated activity that would occur at the project site, as such activities occur at dedicated repair facilities. Therefore, the impact of construction equipment repair on air quality is unrelated to the proposed project. No changes to the Draft EIR have been made.

**COMMENT 16-34**

26) **Impact TR-2** - Identifies Alternative 1 as potentially significant and greater than the Project. This determination needs to be reevaluated as Jesuit is a regional school, see comment #22 of this letter.

**RESPONSE 16-34**

Chapter 4 “Alternatives” identifies feasible alternatives to the proposed project. Alternative 1: Alternate Stadium Locations identifies two possible stadiums (with stadium lighting already in place) that could be used for Jesuit High School nighttime sports practices and games. As described in the *VMT Analysis* prepared by Kimley-Horn, the analysis reasonably assumes approximately 10% of students and faculty that would attend evening football games would remain on campus. Alternative 1 would require students and faculty that would otherwise stay on campus to have to drive to an alternate location. This additional VMT generated from Alternative 1 compared to the proposed project would represent a greater impact. While the analysis only considered Friday night football games, the same assumption can be applied to all other nighttime practices and games. Friday night football games would constitute the “worst-case scenario” for transportation impacts, so the discussion of impacts focuses on anticipated transportation impacts related to Friday night football games.

**COMMENT 16-35**

27) **Page 4-14** ‘-- Environmentally Superior Alternative-The No Project Alternative - delete reference to portable lights, since there are two unavoidable and significant environmental impacts, this Alternative requires further evaluation and consideration by decision makers.

**RESPONSE 16-35**

See Response 16-30.

**COMMENT 16-36**

28) **Page 5-1-Aesthetics - Existing Visual Resources - Plate AE-1** shows the location of each of the key viewpoints. Photos and analysis also needs to be conducted from the Regency Circle and Jacob Lane public access points along the levee area which is used heavily by the public to recreate and access the Parkway. The only photos and analysis of the Parkway is identified as Observation Point #5.

**RESPONSE 16-36**

The Jedediah Smith Memorial Trail, which is within the Parkway, was selected as the primary representative KOP within the Parkway (KOP-5) because it is the primary public recreational feature within the Parkway near the project site, and because KOP-5 illustrates the nature of open space views within the Parkway. Views from the Parkway access points mentioned by the commenter would consist solely of houses, which are not representative of the American River Parkway. Furthermore, the American River Parkway is only open from sunrise to sunset. Please see also response to comment 16-33; for the reasons stated therein, no photos or additional analysis related to the Regency Circle or Jacob Lane Parkway access points are required.

**COMMENT 16-37**

29) **Page 5-3 - Existing Visual Character - Project Site -** This section needs to be evaluated and rewritten due to the conflicts which include in part the following; states that a small paved parking lot south of the stadium would serve as temporary construction area. Whereas, it is also stated that the discus/soccer field will be used as a temporary construction area. This conflict needs to be resolved throughout the DEIR. The field is artificial turf not green turf grass, needs to be corrected throughout DEIR. States that the proposed light standards would be installed in existing paved areas ..... this is not described or analyzed anywhere in the DEIR. This needs to be corrected, or included and analyzed. This is why a thorough and complete project description is needed throughout the DEIR and its analysis. Delete the word “pleasing” before visual contrast, extremely subjective. The second paragraph on Page 5-3 states that several tall wood poles west of the track, where exactly are these located and what is their purpose? KOPI and KOP2 (Page 5-4) contain errors. KO PI states that the aerial view shows the green turf field, the field is synthetic, correct. KOP2 describes a paved sidewalk, but it is concrete and purports to show the view of the proposed construction staging area, but the area cannot be seen in the photo. Photos should be taken from within the Campus and from the sidewalk on the south side of American River Drive.

**RESPONSE 16-37**

The fact that the existing stadium infield is composed of artificial turf is not related to the analysis contained in the Draft EIR, nevertheless, the County appreciates the commenter’s correction. The location of the proposed light standards is shown in Draft EIR Chapter 3, “Project Description,” Plate PD-4 Preliminary Site Plan; see also Draft EIR page 5-3 which states, “The four proposed light standards would be installed in existing paved areas immediately adjacent to the adjacent stadium and bleachers: two

on the north side and two on the south side” (emphasis added). Therefore, no further information or clarification is necessary regarding the locations of the light standards. The second paragraph on Draft EIR page 5-3 referred to by the commenter states, “Several tall wood power poles are present on the west side of the track”; no further clarification is required. The stadium infield is green in color, which provides contrast with the red-colored track oval and the white-colored infield markings, as described in the caption underneath KOP-1 referred to by the commenter. This caption is intended to note the color contrasts from a visual perspective, not the fact that the infield is composed of synthetic turf rather than natural turf grass. KOP-2 referred to by the commenter illustrates and describes the existing sidewalk adjacent to and south of the project site; the sidewalk is “paved” as opposed to bare dirt or gravel. Furthermore, these comments are unrelated to the environmental impact analysis. No changes to the Draft EIR have been made.

The commenter is correct that the proposed construction staging area cannot be seen from KOP-2. KOP-2 from American River Drive was included in part to demonstrate that the proposed construction area is not visible from any public viewpoint and thus there would be no construction-related visual impact from use of the area for construction equipment and staging, except for short-term views of the top of a crane that may be used to set the light standards in place. Because the view of the top of the crane would occur over a matter of hours in the course of 2–3 days, and because use of cranes is typical in construction, this short-term temporary view would be less than significant. Therefore, no additional photos are required.

### **COMMENT 16-38**

30) **Page 5-3** - Surrounding Land Uses - states in part ... “the areas surrounding the project site are flat.” This requires correction as some of the homes on Piccadilly Circle are located on hills.

### **RESPONSE 16-38**

Before the housing development on Piccadilly Circle was developed (in the 1960s), the land sloped gently upwards. However, when the residences were constructed, the developer excavated most of the soil along the southeast side of the slope and graded the land flat for construction of the residences and their associated front and back yards. A review of topographic maps of the areas surrounding the project site, as well as a site visit, indicates that the elevation of most of the residences on Piccadilly Circle, including those that back up to the project site, ranges from 50 to 55 feet above mean sea level (amsl) on the east side (closest to the project site) and 51 feet above mean sea level on the west side (furthest from the project site). This constitutes “flat land.” Furthermore, the residences surrounding the project site to the southeast and northeast are also situated on flat land, and the project site itself is comprised of flat land. There are five residences on the northwest side of Piccadilly Circle, which are not adjacent to the project site, that have been built into the toe of a slope. These residences are situated at an elevation of approximately 64 feet amsl. Facilities that are located on the flat plateau above (to the northwest) of the stadium and the residences on Piccadilly Circle consist of additional existing Jesuit High School buildings, parking lots, and

athletic fields. Finally, the project’s Lighting Report prepared by M. Neils Engineering (attached to the Draft EIR as Appendix B) includes a detailed nighttime lighting analysis performed by Musco Lighting that takes into account the exact elevations throughout the project site and the surrounding area, including the residences adjacent to the southwest side of the project site on Picadilly Circle. Therefore, no changes to the Draft EIR are required.

**COMMENT 16-39**

31) **Page 5-5 - Surrounding Land Uses Continued** -Add the competitive swimming facility, concrete seating/viewing area and tennis courts which are also located on the Campus. The document states in part ... “The only public viewpoints of the project site are from motorists traveling on American River Drive .... “ This statement needs to be corrected as American River Drive is used heavily every day and evening of the week by walkers, joggers and cyclists who also can see the project site.

**RESPONSE 16-39**

Jesuit High School is a private school; therefore, it does not provide public views of the project site from within the school campus. The text on Draft EIR page 5-5 has been corrected as follows: “The only public viewpoints of the project site are from ~~motorists traveling on~~ American River Drive between Piccadilly Circle and Jacob Lane (KOP-2), and ~~motorists~~ at the north end of Tennyson Way at American River Drive.”

**COMMENT 16-40**

32) **Page 5-6 - Surrounding Land Uses Continued** - Include the distances of the homes on Piccadilly Circle from the construction staging area and project site. KOP-4 - delete the word “isle”.

**RESPONSE 16-40**

As stated on Draft EIR page 5-5, “Single-family detached residences, zoned Residential 4 (RD-4), are present immediately adjacent to the project site to the west along Piccadilly Circle and to the east along Jacob Lane, and to the south across American River Drive” (emphasis added). The relationship between these residences and the project site is also shown on Draft EIR Plate AE-1, Key Observation Points (page 5-2). No changes to the Draft EIR are required.

The description in the caption underneath KOP-4 referencing a “drive aisle” which provides access to the school campus is appropriate, and therefore has not been deleted.

**COMMENT 16-41**

33) **Page 5-6 and Page 5-7 -American River Parkway-** This discussion also needs to include the Regency Circle pedestrian access area and should be added before the Harrington Way access which is further away. On Page 5-7, suggest deleting the word “distance” and replace with “area” ... As stated in comment number 26 in this

letter, the analysis needs to include areas on the levees at the Regency Circle and Jacob Lane pedestrian access areas. These areas are elevated and are areas that are used frequently by those that reside in the neighborhood and members of the public. This analysis needs to take place throughout the document, including, but not limited to Aesthetics, and Noise, as Jesuit's PA and crowd noise can be heard in these areas and was not analyzed in the DEIR. What is the reference to the SARA Park Area Plan?

**RESPONSE 16-41**

It appears the commenter is actually referring to comment 36 rather than comment 26. Please see responses to comment 16-33 and 16-36. For the reasons stated therein, no additional analysis related to the Regency Circle or Jacob Lane Parkway access points is required. Regarding the commenter's question on the SARA Park Area Plan, this is discussed on Draft EIR page 5-7. The portion of the Parkway that is south of Jesuit High School is within the Save the American River Association (SARA) Park Area Plan, in the Rio Americano Area, within the American River Parkway Plan. See the American River Parkway Plan for more detail:

[https://regionalparks.saccounty.gov/Parks/Documents/Parks/ARPP06-092617\\_sm.pdf](https://regionalparks.saccounty.gov/Parks/Documents/Parks/ARPP06-092617_sm.pdf).

This comment is not related to the adequacy of the Draft EIR for addressing potentially significant impacts of the proposed project.

**COMMENT 16-42**

34) **Page 5-8 - Light and Glare** - states in part ... "Overhead light standards .... are present along American River Drive ... " These standards are spread out on American River Drive and the light emitted is very dim, please correct. Further .... "Nighttime security lighting is also present ... at single-family residences ... " This sentence requires clarification, not all homes have outdoor lighting (as is the case in the vicinity of my home) or it is very limited in nature and is turned off in the early evening hours. Suggest deleting the word "security" lighting.

**RESPONSE 16-42**

The information presented on Draft EIR page 5-8 regarding overhead light standards along American River Drive and nighttime security lighting at residences is correct; therefore, no changes to the Draft EIR are required.

**COMMENT 16-43**

35) **Appendix B - Stadium lighting Report - Page B-3** - What is the definition of "curfew" as it relates to the stadium lighting and its effect on the operation of the lighting? This is also referred to in the DEIR Page 5-8. Page B-6, summary of Musco Calculations - Please provide additional details regarding the calculated horizontal light levels a 3' -0" grade for the surrounding residential area including the residential property lines. On page B-9 Curfew is listed as 10:30, what is the impact/intention of the curfew? Appendix B - No Page Number - View E - The label on the rendering states that the view from school towards stadium, however, it appears to depict the view from American River Drive towards the school, please correct/verify. (J) View,



depicts a view from the American River Parkway, but does not state from where on the Parkway this rendering was made. Needs to be included and approximate the distance. B-22, what does the “triangle” depict? Page B-24 does this depict the spillover? Since most of the reviewers are not lighting experts, more information needs to be provided that explains what the Illumination summaries mean and what are the impacts on the surrounding public streets and homes.

**RESPONSE 16-43**

In the context of the Lighting Report prepared by M. Neils Engineering and attached to the Draft EIR as Appendix B, the use of the word “curfew” represents the time at which the Project Description indicates that the stadium lights are to be turned off, which would typically be 10:00 PM but may extend beyond that time in the occasional instance in which games go into overtime. As it pertains to the Lighting Performance Summary prepared by the International Dark-Sky Association (IDA), the “curfew” utilized for the study was 10:30 PM (the average between 10 PM and 11 PM). Regardless of whether the lights are turned off at 10:00 PM, 10:30 PM or 11:00 PM, there is no change in the quality of the lighting. The relevance of referencing a “curfew” is to denote that there is a designated time after which there would be no light from the stadium. The types of luminaires are described in Draft EIR Chapter 3, “Project Description,” and in the Lighting Report attached to the Draft EIR as Appendix B. The potential impacts of the proposed stadium lighting on the surrounding public streets are evaluated in Draft EIR Chapter 5, “Aesthetics.” Although not required under CEQA, the potential impacts of the proposed stadium lighting on the surrounding private residences are evaluated in Draft EIR Chapter 5, “Aesthetics.” Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, and Master Response 2: Nighttime Light and Glare Impacts.

**COMMENT 16-44**

36) Page 5-9 - Regulatory Setting - “Rivers or segments included with” should be “within”, next paragraph .... as a “Recreation” should be “Recreational”.

**RESPONSE 16-44**

The text on Draft EIR page 5-9 referred to by the commenter is correct. The comment is unrelated to the environmental analysis contained in the Draft EIR. Therefore, no revisions to the Draft EIR are required.

**COMMENT 16-45**

37) Page 5-12 - States ... “The proposed light standards ... would be approximately 0.45 miles north of the SARA Park Area.” Unsure what this means and how it is used in the DEIR, this sentence is confusing the way it is currently written.

**RESPONSE 16-45**

The statement on Draft EIR page 5-12 is that the proposed light standards would be installed approximately 0.45 miles north of the Save the American River Association (SARA) Park Area Plan Area. As explained in the Environmental Setting of Chapter 5,

“Aesthetics,” on Draft EIR page 5-7, the Save the American River Association (SARA) Park Area Plan is a part of the American River Parkway Plan. No changes to the Draft EIR are required.

**COMMENT 16-46**

38) **Page 5-13** - Substantial Adverse Effect on a Scenic Vista - The DEIR fails to demonstrate that the stadium lighting will not have a significant impact on the scenic vista from the Parkway. Additional analysis is required before a determination can be made.

**RESPONSE 16-46**

Draft EIR Chapter 5, “Aesthetics,” provides an analysis of the potential degradation of visual character from the proposed stadium lighting, including the American River Parkway (Impact 5-1, pages 5-15 through 5-17); potential conflicts with regulations governing scenic quality including the American River Parkway Plan (Impact 5-1, pages 5-15 through 5-17); and potential impacts from nighttime glare and skyglow including recreationists in the Parkway after dusk (Impact 5-2, pages 5-17 through 5-21). The analysis contained in Draft EIR Chapter 5, “Aesthetics,” is thorough and complete, and no further analysis is necessary.

**COMMENT 16-47**

39) **Page 5-14** - Methodology-The DEIR states ... “This visual impact analysis is based on field observations conducted by AECOM in May 2023 ... “ The analysis of nighttime lighting impacts (Impact AE-2) relies on the Lighting Report prepared by M. Neils Engineering, Inc. (2023)”. The M. Neils report was prepared in March 2023, and the field observations were conducted in May 2023, please explain the discrepancy in the dates.

**RESPONSE 16-47**

There is no discrepancy in the dates noted by the commenter. The AECOM field observations occurred in May of 2023 and the M. Neils technical lighting report was prepared in March of 2023. The Lighting Report prepared by M. Neils Engineering did not rely on field observations performed by AECOM. M. Neils Engineering performed an independent analysis of potential project lighting based on their professional judgement and expertise, lighting industry standards, reviews by the International Dark Sky Association, and site-specific lighting calculations performed by Musco Lighting (all of which are described in detail in the Lighting Report attached to the DEIR as Appendix B). No change to the Draft EIR is needed.

**COMMENT 16-48**

40) **Page 5-15**- Degradation of Visual Character - States ... “The only public viewpoints in the project vicinity are from motorists traveling on American River Drive ... “ This is not accurate. Walkers, joggers, and cyclists also have a view of the project. This needs to be corrected and further environmental analysis may be required. “Due to the intervening vegetation on the school campus, (see KOPs 2 and 4) views of

construction equipment in the staging area would be **mostly** blocked from motorists traveling on American River Drive.” As mentioned, walkers, joggers, and cyclists would be able to see the equipment. Photos and analysis from the south side of American River Drive needs to be completed and included in the DEIR. Further, the documents states ... “ A crane may be necessary to set the light poles.” This needs to be corrected and analyzed, as elsewhere in the DEIR it is stated that a crane would be used to remove the existing wood poles and set the new concrete bases and set up the light poles. “As shown in KOP-2, views of the lower 20 feet of the proposed light poles would be blocked by the intervening hedges ... “ Analysis needs to be conducted from the south side of American River Drive.

**RESPONSE 16-48**

Please see responses to comments 16-37 and 16-39. The statement that public views of the lower 20 feet of the proposed light poles from American River Drive would be blocked by the intervening hedges is supported by the photos shown in KOP-2; therefore, no changes to the Draft EIR are required. The south side of American River Drive is developed with private residences. While the Draft EIR broadly evaluates visual changes in the vicinity of the project site, as noted on Draft EIR page 5-20, “Under CEQA, an evaluation of a project’s potential visual change as viewed from private property is not required (*Mira Mar Mobile Community v. City of Oceanside*, 119 Cal.App.4th 477 [Cal. Ct. App. 2004]).” Therefore, no further analysis related to the south side of American River Drive is required.

**COMMENT 16-49**

I do not believe that the hedges along American River Drive are 20 feet tall, please verify height. “Views of the proposed light poles ... from the north end of Tennyson Way .... would be mostly blocked by landscape trees ... “ This sentence should be rewritten to state that the light poles and luminaries would be partially blocked by the landscape trees, etc. As previously outlined, additional analysis also needs to occur from the public access points at Regency Circle and Jacob Lane levee areas. Last sentence on Page 5-15, which continues on Page 5-16, states in part ... “

**RESPONSE 16-49**

The information presented in the Draft EIR is accurate; therefore, no changes are required. Regardless of the precise height, the hedge together with the existing medium height and tall height landscape trees between the hedge and the proposed light standards, would still block views of the lower portions of the light standards as stated in the Draft EIR page 5-15 and shown in KOP-2. Nevertheless, the change suggested by the commenter (i.e., “partially blocked” rather than “mostly blocked”) has been made as shown in Final EIR Chapter 5. As stated on Draft EIR page 5-15, “the upper 70–80 feet of the light poles and the luminaires would be visible to motorists looking north from American River Drive.” Furthermore, the commenter does not express disagreement with the impact conclusion presented in Impact 5-1 related to degradation of visual character. Please see also response 16-33.

**COMMENT 16-50**

“The light poles would be visually similar to other existing urban (delete this word) development at the project site.” The poles and luminaries will be much taller than the improvements that exist at the project site or in the surrounding neighborhood. Further, it is stated that ... “The existing PA speakers on the existing power poles are not visible from any public viewpoints and would not be visible when reinstalled ... “ This is incorrect as the existing PA speakers are visible from American River Drive and from the north and south sidewalks on American River Drive. This needs to be corrected and analyzed.

**RESPONSE 16-50**

The text referred to by the commenter on Draft EIR page 5-16 states, “The light poles would be visually similar to other existing urban development at the project site, including the power poles, bleachers, scoreboard, concession building, and various equipment storage buildings. Although the poles would be tall, they would be of a small diameter and of a similar color as the existing on-site development. The light silver/grey color of the steel poles would tend to blend in with the sky background.” This analysis is accurate and therefore no changes to the Draft EIR are required. The text of the first paragraph on DEIR page 5-16 has been revised to state that the existing PA speakers on the existing power poles are “partially” visible from public viewpoints along American River Drive, and would continue to be “partially” visible when they are reinstalled at the same height on the new light poles. The County also notes that even with the PA speakers being intermittently visible from American River Drive in between the landscape trees, given the small size of the speakers and the distance from public viewers, they would appear, visually, as a tiny white square approximately 6 inches in diameter, visible in the middleground surrounded by other school campus development as described above. Finally, the PA speakers are an existing feature at the project site; therefore, replacing the existing speakers with new speakers of a similar size would have no visual impact regardless of the viewer’s location.

**COMMENT 16-51**

Further, the DEIR describes ... “The proposed additions of wheelchair-accessible seating and ... the proposed handrails/guardrails ... in the existing bleacher seating would be composed of the same materials (steel) and would not be visible from any public viewpoint.” No where in the DEIR are these improvements described or include construction or installation methods, etc. **ALL improvements** need to be included and analyzed in the DEIR.

**RESPONSE 16-51**

See Response 15-2.

**COMMENT 16-52**

The distance to the Parkway is stated as 0.05 miles, while elsewhere in the document it is stated as 0.40 miles or less. This requires further clarification and analysis. Because of these issues in the Degradation of Visual Character section,

this entire section of the DEIR needs to be rewritten, which may trigger that the DEIR be recirculated for public review and comment. The DEIR does not provide sufficient information for members of the public to fully understand and consider the issues raised by the proposed project.

**RESPONSE 16-52**

The distance to the Parkway is not stated as 0.05 miles anywhere in the Draft EIR. As stated on Draft EIR page 5-6, “The proposed light standards at the Jesuit High School stadium would be installed approximately 2,014–2,300 feet (0.45 mile) north of the Jacob Lane access to the American River Parkway (Parkway).” No changes to the Draft EIR are required.

**COMMENT 16-53**

41) Page 5-16 - Conflicts with Regulations Governing Scenic Quality - Pursuant to the County’s Design Guidelines, how does this proposed project located on a private high school strengthen the economic vitality of all areas of the County (especially since Jesuit pays no property taxes), advance sustainable development and provide business and user-friendly practices? The Design Guidelines are also intended to improve community planning and design to promote healthy living and balance social, economic, and environmental concerns. The proposed project does not meet the stated Design Guidelines and degrades the overall atmosphere of the neighborhood and prevents homeowners of the full use and enjoyment of their homes and neighborhood. The statement that the proposed project would not conflict with the policies of the American River Parkway Plan is based on errors and omissions and needs to be reanalyzed and as outlined in comment number 40 above. The potential significant impacts need to be reanalyzed and which can require the implementation of Mitigation Measures.

**RESPONSE 16-53**

Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality.

**COMMENT 16-54**

42) Page 5-17- Impact AE-2-The document states in part that ... “the project applicant retained the services of M. Niels Engineering, Inc., in consultation with Musco Lighting (delete the word “leading provider” as it has no relevance in the CEQA analysis or DEIR), to design and engineer Jesuit High School’s stadium lighting system. Since M. Niels Engineering designed, engineered, and provided the review of the lighting system that is included in the DEIR, the County needs to conduct an independent analysis of the proposed lighting system.

**RESPONSE 16-54**

M. Neils Engineering, Inc. has substantial expertise in performing lighting studies for high schools in the Central Valley to assess the impact of proposed football field lighting on the adjacent residential area and to understand issues of light spill and glare. The

firm’s previous experience includes studies for football stadium lighting at Tokay High School in Lodi, CA and Capital Christian School in Sacramento, CA. These studies included development of a point-by-point computer model and photometric report based on Musco Lighting products, an environmental analysis to determine the impact of the proposed lighting on the surrounding residential areas, and proposed measures to reduce impacts. M. Neils Engineering also prepared sports lighting studies for two baseball fields in the City of Vacaville adjacent to residential neighborhoods, and has completed numerous sports lighting design projects within Northern California. The firm has demonstrated experience as a subject matter expert in the lighting field since its inception in 1990, offering support to the development of Title 24 standards and Illuminating Engineering Society recommendations. Furthermore, the County has confirmed data and analysis independently as a part of compiling the Draft EIR.

**COMMENT 16-55**

43)Page 5-19, States that....”Nearly all games would end by 10:00 P.M., but no later than 11:00 P.M. with lighting potentially remaining on for a short period afterwards ... “ However, Appendix B discusses a curfew of 10:30 P.M. this conflict needs to be resolved. If the stadium lights remain on, then they should be dimmed to 50% capacity or less, as the proposed project includes safety lighting. Are there Minor curfew laws that need to be complied with?

**RESPONSE 16-55**

With regards to the “curfew” referenced by the commenter, please see response to comment 16-43. To ensure appropriate safety of persons exiting the stadium after events, the lights cannot be dimmed to 50% capacity or less as suggested by the commenter.

**COMMENT 16-56**

44)Page 6-6 - Sensitive Receptors - include walkers, joggers, and cyclists at the end of the sentence.

**RESPONSE 16-56**

The air quality analysis of sensitive receptors inherently considers the users associated with what are identified as sensitive land uses, including walkers, joggers, and cyclists that may be users of surrounding residential uses. The potential exposure and susceptibility of these users to the effects of project-related emissions are implicitly addressed in the assessment through the broader analysis of sensitive receptor groups. No change to the Draft EIR is required.

**COMMENT 16-57**

45)Page 6-13 - Methodology- Include the analysis of the diesel generators that are used by the Junior Marauders for a minimum of two hours a night, three nights a week. Additionally, parents and others idle their vehicles while waiting to pick up their children, etc., after practice. On Page 6-15, it discusses minimizing vehicle idling.

Therefore, the use of diesel generators and the idling of vehicles while waiting to pick up children needs to be included in the Air Quality analysis.

**RESPONSE 16-57**

See Response 2-1 and Response 16-30. See Response 16-22 regarding use of diesel generators for Junior Marauders activities.

**COMMENT 16-58**

46) Page 6-18 - Operational Emissions -Vehicle trips needs to be further analyzed unless students are required to remain on Campus until their practice or game begins. Additionally, on a Friday night or during other evening games, more individuals will drive straight from work and this represents additional trips that needs to be analyzed.

**RESPONSE 16-58**

Operational emissions associated with operational activities were quantified using CalEEMod. CalEEMod is designed to incorporate a wide range of emissions sources, including those associated with vehicle travel as a result of the proposed project. Operation-related emissions, which may result from vehicle trips, are considered in CalEEMod to comprehensively assess greenhouse gas (GHG) and criteria air pollutant emissions associated with the proposed project. Additionally, the observation regarding increased vehicular activity on Friday nights or during evening game was evaluated in the analysis. The trip generation rate was based on the traffic study prepared for the project (Appendix E of the Draft EIR). According to the traffic study, it is assumed that approximately 10 percent of attendees are already on campus under existing conditions plus the proposed project conditions. Under the proposed project, Fridays maintain a similar pattern with trips for parents and students to school, parents to work, parents back to school, and parents and students returning home. The analysis assumes a conservative stance to ensure a cautious estimation of vehicle miles traveled and associated impacts. Given the comprehensive overview of existing and proposed project vehicle trip patterns in the traffic study, the assessment provides a valid representation of the potential impacts of operational emissions and vehicle trips.

**COMMENT 16-59**

47) Page 6-22 - Recommend deleting the word “quite” before subjective, at the end of the last sentence.

**RESPONSE 16-59**

This comment is not related to the environmental analysis contained in the Draft EIR. No changes to the Draft EIR have been made.

**COMMENT 16-60**

48) Page 7-2- Environmental Setting, suggest replacing global warming with climate change throughout the DEIR.

**RESPONSE 16-60**

This comment is editorial in nature and is not related to the environmental analysis contained in the Draft EIR. No changes to the Draft EIR have been made.

**COMMENT 16-61**

49)Page 7-4 - Regulatory Setting - The sentence states ... “While most do not...”  
What/who does most refer to?

**RESPONSE 16-61**

The Draft EIR is explaining that most federal and state regulations do not apply directly to this project to install lighting, though the regulatory environment overall is informative to the analysis presented in the Draft EIR. This comment is editorial in nature and is not related to the environmental analysis contained in the Draft EIR. No changes to the Draft EIR have been made.

**COMMENT 16-62**

50)Page 7-5 -Assembly Bill 1279 - Clarify last sentence.

**RESPONSE 16-62**

The subject sentence is “[i]t as requires that by 2045 statewide anthropogenic greenhouse gas emissions are reduced to at least 85 percent below the 1990 levels.” This means that Assembly Bill 1279 establishes the policy of the state to reduce human caused greenhouse gas emissions by at least 85 percent compared to the level that existed statewide in 1990 by 2045. This comment is editorial in nature and is not related to the environmental analysis contained in the Draft EIR. No changes to the Draft EIR have been made.

**COMMENT 16-63**

51)Page 7-9 - Impact GHG-1-The second paragraph states in part ... “The intermittent increase in operational vehicle trip would generally be limited to special events.”  
What are “special events” and from where is this statement derived? Clarification needed.

**RESPONSE 16-63**

In the sentence referenced by the commenter, “special events” refers to intermittent operational activities that would occur as a result of the proposed project. As detailed in the discussion on page 7-9 of the Draft EIR referenced by the commenter, the estimated vehicle travel used to inform the emissions estimates in the Greenhouse Gas section of the Draft EIR were conservative and were informed by the traffic study prepared for the project (Appendix E of the Draft EIR).

**COMMENT 16-64**

52)Page 7-10 - Impact GHG 2- When does the County anticipating the finalization of the Draft CAP.



**RESPONSE 16-64**

This is not a comment on the Draft EIR, but the text is provided here for decision maker consideration. For information on Sacramento County’s Climate Action Plan, please visit <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/CAP.aspx>.

**COMMENT 16-65**

53)Page 7-11- Impact GHG 2 - Suggest deleting “local” before school needs as the proposed project only serves Jesuit.

**RESPONSE 16-65**

This comment is editorial in nature and is not related to the environmental analysis contained in the Draft EIR. No changes to the Draft EIR have been made.

**COMMENT 16-66**

54)Page 8-1- Introduction - This section should include the following after stadium lights ... “and an increase in nighttime sports practices and games”, which accurately describes the intended use of the stadium lights. Further, the statement that the County did not receive any responses to the NOP that directly addressed impacts to, appears to be incorrect. In response to the NOP, I did provide a comment regarding land use as follows: This area needs to be reviewed by the County. There is the potential to increase student population growth from Jesuit’s proposed project. Student growth will result in adverse secondary effects beyond what is anticipated by local jurisdictions; therefore, the County needs to address the degree to which student growth will or will not be consistent with applicable land use plans.

**RESPONSE 16-66**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The introduction to the land use chapter is not intended to describe the proposed project itself but to set the stage for the rest of the chapter. Therefore, this change is not required. The project does not propose any change to enrollment – the project is a request for stadium lighting to be added within an existing high school campus stadium. As discussed on page 11-1 of the Draft EIR, there is no growth-inducing component of the proposed project or any physical environmental impact related to consistency with applicable land use plans.

**COMMENT 16-67**

55)Page 8-4 Land Use - Suggest the following edit ... “with single-family homes that make up a suburban neighborhood that was established in the 1960’s.”

**RESPONSE 16-67**

This comment is editorial in nature and is not related to the environmental analysis contained in the Draft EIR. No changes to the Draft EIR have been made.

**COMMENT 16-68**

56) Page 8-7 - Issues not Discussed Further - Add the following to the first sentence, “The project is a request for stadium lighting **and the use of the lights for nighttime athletic games and practices.**” The general purposes of residential land use zone as outlined in the Zoning Code, under Section 2.6.1, state in part that ... “Protect residential areas, as far as possible, against heavy traffic and through traffic.” Further ... “To provide appropriate space .... and similar facilities that serve the needs of nearby residents, to generally perform their own activities more effectively in a residential environment and do not create objectionable influences.” The direct impacts to the existing neighborhood needs to be discussed further as the proposed project does not serve the needs of the neighborhood. The County needs to protect the neighborhood from the increase in noise, traffic, degradation of visual quality, etc.

**RESPONSE 16-68**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the direct impacts of the project, including impacts related to noise (Chapter 9), traffic (Chapter 10), degradation of visual quality (Chapter 5).

**COMMENT 16-69**

57) Page 8-7 - Methodology-What agencies were consulted, please provide, and include in EIR.

**RESPONSE 16-69**

As Sacramento County is the agency that has jurisdiction over land use in the unincorporated areas, it was the primary agency consulted for Chapter 8 (Land Use and Planning). See Chapter 3 of the Draft EIR, “Project Description,” which includes a list of approvals for the proposed project – all approvals by Sacramento County.

**COMMENT 16-70**

58) Page 8-7 - Zoning Code Consistency- Needs to include the increase in evening/nighttime athletic games and practices.

**RESPONSE 16-70**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. There is not a need to repeat details of the project description in Chapter 8 or any of the chapters of the Draft EIR focused on environmental analysis and mitigation.

**COMMENT 16-71**

59) Page 9-18 - Short Term Impacts - Last paragraph, verify the distances stated conflicts with the distances on Page 9-21.

**RESPONSE 16-71**

See Response 16-75.

**COMMENT 16-72**

60)Page 9-19 - Identify where the 70 dBA locations are located.

**RESPONSE 16-72**

As shown in Table 6 in Appendix D of the Draft EIR, existing maximum noise levels of 70 dBA were measured in the vicinity of 844 Piccadilly Circle, 852 Piccadilly Circle, 4748 Marlborough Way, and 1131 Jacob Lane.

**COMMENT 16-73**

61)Page 9-20 - The Junior Marauders also use the PA system on weekends, needs to be included. Recommend conducting additional noise studies as it appears that data was only collected from one football game October 8, 2022.

**RESPONSE 16-73**

Please note that the analysis of the Draft EIR focuses on the potential impacts of the proposed project, i.e., installing stadium lighting and shifting certain events into the evening. The noise data collected are representative of baseline conditions. As stated in other comment responses, the project’s ambient noise study took place 24 hours a day over a 10-day period from September 30th through Monday, October 10, 2022, capturing any activities that took place in the stadium during this period. It did not only capture one football game – junior varsity and varsity football games took place and were recorded on October 1<sup>st</sup> and October 8<sup>th</sup>. For the purpose of the noise analysis, the October 8<sup>th</sup> football game was used as a “worst-case” noise scenario, including the use of the PA system and marching band.

**COMMENT 16-74**

62)Page 9-24 - Mitigation Measure NOI-1- Delete entirely from NOI-1 “To the maximum extent feasible” this statement is open to interpretation. Jesuit should be required to install a state-of-the-art PA system that will limit noise. Need to list the games that Jesuit is allowed to use the PA system, should not be used on the weekends by Junior Marauders or others.

**RESPONSE 16-74**

Please refer to the revised Mitigation Measure NOI-1 in the Final EIR. An updated Mitigation Measure has been provided in the Final EIR in order to reduce the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system. Regarding the schedule, the proposed events that would be played under the new lighting are shown in Plate PD-5.

**COMMENT 16-75**

63) Page 9-25 - Distance of residence on Piccadilly Circle conflicts with Page 9-21, correct.

**RESPONSE 16-75**

The distance between the end of the home bleachers and edge of property for the referenced sensitive receptor is approximately 160 feet. However, this sensitive receptor is approximately 230 feet away from the closest proposed construction, which is a proposed lighting pole, as shown in Plate PD-4 of the Draft EIR. These two different distances are used separately in the discussion of potential long-term ambient noise increases and short-term construction-related vibration, respectively.

**COMMENT 16-76**

64) Page 10-3 - Project study area American River Drive, last sentence needs to be clarified.

**RESPONSE 16-76**

To clarify the information about American River Drive, the text on Draft EIR page 10-3 has been corrected as follows: “There is bicycle access to the school that campus from American River Drive that also facilitates pedestrian access to the school.”

**COMMENT 16-77**

65) Page 10-4 - Parking - States up to 2,500 attendees why wasn't this number used in analysis instead of 1,500? This analysis conflicts with Environmental Setting on Page 10-1 and with TR-1 Page 10-11, resolve throughout document. Local LTA data needs to be used in analysis not data from high school in Carmel. As Arden Hills just sold, will the parking arrangement continue? What about conflicts with Rio Americana's schedule. Needs to be reanalyzed. The term “major event” needs to be defined. All impacts to the surrounding residential areas from parking at Rio Americana needs to be analyzed.

**RESPONSE 16-77**

The numbers 2,500 and 1,500 were both used for the transportation analysis. Page 10-4 of the Draft EIR states that “the estimated size of an existing Jesuit High School home football game can reach up to 2,500 attendees,” under existing conditions. As described in more detail on page 10-1, Saturday afternoon football games typically attract 1,200 attendees, but can reach up to 2,500 during major events such as playoff games. Major events are atypical events that may exceed on-site parking availability, such as playoff games. With implementation of the proposed project, and shifting football games to Friday nights, the attendance is expected to increase to 1,500 for regular season games and up to 3,000 for major events such as playoff games.

Page 10-11 contains a discussion of project induced changes in vehicle trips (i.e. VMT) during regular season games, and page 10-12 contains a discussion of project induced changes to vehicle trips (i.e. VMT) during playoff games. There are no inconsistencies

between the attendance estimates in the environmental setting and impact analysis contained in Chapter 10 “Transportation.” Therefore, no changes to the Draft EIR are required.

Kimley-Horn collected local LTA data for this project, and the findings are summarized in the Local Transportation Analysis memorandum (Draft EIR Appendix F). The discussion of transportation-related impacts contained in Chapter 10 “Transportation” rely heavily on the findings described in this report. The discussion of VMT also uses data collected for the Carmel High School Stadium project to support assumptions made about vehicle occupancy. To support the assumptions and supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project. W-Trans conducted a survey of parking activity related to a nighttime football game at Jesuit High School. The parking surveys were conducted on a non-football Friday in August 2023 and on the evening of a night football game held under portable lighting in September 2023. Based on those surveys, W-Trans estimated that the vehicle occupancy for the nighttime game in September was approximately 3.22 people per vehicle, which is nearly identical to the 3.24 people per vehicle assumed in the Draft EIR. This survey supports the assumptions made in the Draft EIR pertaining to average vehicle occupancy. The Parking Survey Memorandum prepared by W-Trans can be found in Appendix H.

Future parking availability at Arden Hills is unknown. The comment refers to “conflicts with Rio American[o]’s schedule” but does not give any additional detail.

Parking availability is not an impact under CEQA. Parking availability is discussed in the Draft EIR to the extent that it may result in traffic-related hazards. Please refer to Impact TR-3 in Chapter 10 “Transportation.” See Master Response 4: Traffic Hazards, Master Response 5: Attendance Estimates, and Master Response 6: Parking Availability.

**COMMENT 16-78**

66)Page 10-9 - Construction - Crane needs to be included along with concrete trucks, verify that all construction vehicles are included.

**RESPONSE 16-78**

The referenced language under Impact TR-1 is that “[c]onstruction-related vehicle trips would be generated from a variety of sources during construction of the project including, but not limited to, haul trucks, material delivery trucks, and approximately 10 construction workers...[during an] estimated two-week construction period.” In this evaluation of whether the project would conflict with any program, plan, ordinance, or policy related to circulation that would lead to any significant adverse physical environmental impact, it is not necessary to have a full listing of all vehicle types. Since the project construction period would be very limited, and given the scale of the project, the movement of construction equipment and workers would also be very limited, there would be little impact on the capacity on local roadways, and there is no policy conflict that would lead to any adverse physical environmental effect. No change to the Draft EIR is needed.

**COMMENT 16-79**

67) Page 10-10 - Roadway Access - The analysis does not consider when Jesuit hosts non-athletic events on Campus. An example of this is the recent car show which caused congestion and traffic backups. See my previous comments regarding off site parking at Arden Hills and Rio Americano.

**RESPONSE 16-79**

The project proposes to install stadium lights at the Jesuit High School Marauder Stadium for the benefit of student athletics programs. See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the project, and not an evaluation of past activities or events related to the project site. Historically, car shows hosted by Jesuit High School occur during daylight hours and would not utilize the components of the proposed project. With regard to other entities using the field at night or during the day, the project applicant anticipates the use of the proposed lighting for Jesuit athletic activities, including football, soccer, lacrosse, and track and field. The timing of all other school-affiliated sporting activities that do not utilize the stadium for practices or games would remain the same. Please see Plate PD-5 for a detailed anticipated event lighting schedule, which provides a summary of the anticipated uses of the stadium after the lights are installed.

**COMMENT 16-80**

68) Page 10-13 - The document is intended to analyze impacts at the proposed project site, not regionally, and that “it can be presumed” (no assumptions) that the project would have a less than significant impact on transportation. This needs to be further analyzed for potential impacts to the neighborhood.

**RESPONSE 16-80**

See Chapter 10 “Transportation” for a detailed analysis of potential environmental impacts of the proposed project related to transportation. See Master Response 5. Transportation-related impacts analysis and comprehensively reported in the Draft EIR include those related to increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access. The use of public streets, the social inconvenience of traffic congestion, and parking supply and demand are not generally transportation impacts under CEQA. However, the County has also included a *Local Transportation Analysis* conducted by Kimley-Horn for the proposed project as Appendix F to the Draft EIR that evaluates transportation-related conditions more broadly. These transportation-related conditions include existing LOS on roadways and intersections (including American River Drive and Fair Oaks Boulevard), existing bicycle and pedestrian facilities near campus, parking supply and demand, and a general safety analysis focusing on the transportation infrastructure in the immediate vicinity of the project. Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis (Appendix H) for the proposed project which included a survey of parking activity related to a nighttime

football game at Jesuit High School, which identifies the use of American River Drive for parking for this event.

**COMMENT 16-81**

69)Page 10-13 - Operation - Copies the parking agreements between Jesuit and Arden Hills and Rio America need to be provided and made a part of the document.

**RESPONSE 16-81**

The off-site parking Jesuit High School has previously arranged to use for major events is located at the Arden Hills Wellness Resort (on the north side of Fair Oaks) and the Rio Americano High School Parking Lot on American River Drive approximately 0.5 miles southwest of the stadium. The parking agreement that Jesuit High School has made with Arden Hills Wellness Resort and Rio Americano High School in the past provides context for the discussion about parking availability at and near the project site, which is relevant to the discussion of impact TR-3. However, this does not require that a copy of the parking agreement be made part of the Draft EIR. See Master Response 6: Parking Availability.

**COMMENT 16-82**

70)Page 10-14 -A crosswalk does not exist at American River Drive and Jacob Lane, correct.

**RESPONSE 16-82**

The commenter’s agreement with this statement is noted. See Master Response 4: Traffic Hazards.

**COMMENT 16-83**

71)Page 10-15- Construction - “Temporary facilities would be developed” .... what are these, where would they be developed? Needs to be described and analyzed for potential impacts.

**RESPONSE 16-83**

Temporary facilities would include a temporary staging area. Impacts associated with a temporary staging area have been analyzed throughout the Draft EIR, as it was identified as a project component. To clarify which temporary facilities this text is referring to, the text on Draft EIR page 10-15 has been corrected as follows: “Temporary facilities A temporary equipment staging area would be developed.”

**COMMENT 16-84**

72)Page 11-1- Growth Inducing Impacts- One of Jesuit’s stated objectives is to “increase athletic” opportunities for students. Has Jesuit provided evidence that students are unable to participate in offered sports activities because of a lack of field availability? If not, then it needs to be provided. Without more discussion or

information, one can only conclude that the goal is to increase student enrollment, which would require the County’s environmental analysis and authorization.

**RESPONSE 16-84**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the potential physical impacts of the proposed project on the environment, as contained in Chapters 5 through 11. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the project. The project does not propose any change to enrollment.

**COMMENT 16-85**

73)Page 11-3 - Raptors and Nesting Birds - Even though the neighborhood is located near the American River, it is a fact that hawks, owls, other raptors, and bird species, do nest and forage throughout the neighborhood. In fact, owls’ nest in trees that are directly adjacent to the sports complex. You can frequently hear owls calling out to each other at night. This section needs to be reviewed and rewritten.

**RESPONSE 16-85**

See Response 15-9.

**COMMENT 16-86**

74)Page 11-5 - Consider deleting “or construction foreman”, what is the intent/purpose of including the construction foreman?

**RESPONSE 16-86**

Reference to the qualified biologist or construction foreman identifies the people that may be responsible for ceasing construction work if the conditions stipulated in the referenced mitigation measures materialize. No changes to the Draft EIR have been made.

**COMMENT 16-87**

75)Page 11-5 - Lighting Impacts - see my comment on the discrepancies of how the luminaires will be distributed on the light poles. Add “four” after top of four 90 and 100-foot poles. Potential impacts to owls, etc., who forage at night needs to be analyzed.

**RESPONSE 16-87**

Potential nighttime lighting impacts related to animals at the project site are evaluated in Draft EIR Chapter 11 under the heading “Biological Resources,” on page 11-5, and were found to be less than significant. The Draft EIR provides mitigation to reduce the potentially significant impact on nesting birds to a less-than-significant level. Mitigation Measure BIO-1 requires nesting surveys prior to demolition and construction so that



impacts are avoided at the time that they would have actually occurred. No change to the Draft EIR is necessary.

**COMMENT 16-88**

76) Page 11-6- Noise Impacts - Delete “immediate vicinity” and replace with surrounding neighborhood (the PA system can be heard when on the Parkway and throughout the neighborhood). All evening/nighttime games and practices represents a change in the historic nature and use of the stadium and all these activities represent a increase in noise levels throughout the neighborhood.

**RESPONSE 16-88**

Refer to Chapter 9, “Noise,” which comprehensively addresses noise impacts of the proposed project. Please note that the measured noise impacts described in this context are based on the sensitive receptors studied in the Project Environmental Noise Assessment (Appendix D), which are within the vicinity of the JHS stadium. As shown in Table NOI-4, existing ambient noise levels in the vicinity of the project site range from 60 to 75 dBA Lmax with no activity at Jesuit High School and from 60 to 78 dBA Lmax during an evening football game. While the Draft EIR is focused on the noise sensitive receptors that would be most affected by the proposed project, noise associated with the proposed project would be discernable, though at lower levels, at other receptor locations in the vicinity of the project site.

**COMMENT 16-89**

77) Page 11-7 - Cultural Resources -The size of the four holes to be used for the concrete bases needs to be provided throughout the DEIR.

**RESPONSE 16-89**

Based on records search results, there are no archaeological resources identified within the project site, though given the project’s location within approximately ½ mile of the American River, which is historically known to contain archaeological resources, there is a potential for inadvertent discoveries of archaeological resources during construction. The size of the holes for the concrete bases would be 3-4 feet in diameter. Mitigation Measure CR-1 is imposed as a part of the Draft EIR to avoid and minimize any impact to archaeological resources.

**COMMENT 16-90**

78) Page 11-8 - Mitigation Measure CR-1- Delete reference to “unusual amounts” of bone ... and delete reference to “development” activities and replace with construction activities.

**RESPONSE 16-90**

It is not unusual for animal bones to be uncovered during construction and “development” in this case is referring more broadly to demolition, excavation, and construction activities. No change is warranted.

**COMMENT 16-91**

79)Page 11-14 - The area and amount of soil that will be disturbed/removed for installation of the four steel light poles needs to be provided (throughout document). Statement that the area is “very small” needs to be deleted and rewritten which may change the impact determination.

**RESPONSE 16-91**

The amount of soil that would be disturbed for the excavation associated with the bottom of the light standards would be less than 50 cubic yards, which would not change the impact conclusion related to paleontological resources, for the reasons explained in detail on Draft EIR page 11-14. No change to the Draft EIR is required.

**COMMENT 16-92**

80)Page 11-15 - No discussion or analysis in the DEIR regarding refueling of construction equipment or vehicles or equipment maintenance in the event of a breakdown. Needs to be included and analyzed throughout DEIR.

**RESPONSE 16-92**

A discussion and analysis in the Draft EIR regarding small quantities of hazardous materials used in construction equipment, vehicles, and equipment maintenance (such as fuel and oil) is provided on Draft EIR page 11-14: “The construction process at Jesuit High School would involve the use of construction equipment and associated small quantities of fuels and oils, which are hazardous materials.” No change to the Draft EIR is required.

**COMMENT 16-93**

81)Page 11-17 - Construction -Will the turf discuss field be restored/repared after completion of construction? If so, needs to be detailed and included in DEIR. Delete reference to “outdoor baseball fields” as they are not a part of the proposed project.

**RESPONSE 16-93**

The text on Draft EIR page 11-17 refers to the potential need for emergency evacuation during the project’s construction phase (i.e., Hazards and Hazardous Materials Impact 5. “Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan”). This analysis has no relationship to restoration or repair of the turf discuss field referenced by the commenter. No change to the Draft EIR is required.

**COMMENT 16-94**

82)Page 11-18- Document states .... “Traffic conditions are monitored” delete “are” and replace with would be.

**RESPONSE 16-94**

To clarify that traffic conditions would continue to be monitored, the text on Draft EIR page 11-18 has been corrected as follows: “Traffic conditions are **and would continue to be** monitored along evacuation routes, and operational adjustments would be made by County officials as necessary during an evacuation to maximize throughput.”

**COMMENT 16-95**

83) Page 11-20 - Hydrology- Include more details regarding the excavation of the four holes for the new steel poles. The details need to be incorporated throughout the document.

**RESPONSE 16-95**

Draft EIR page 11-20 states, “The project will require the excavation of four (4) 16-foot deep holes for the pre-cast base of the stadium lights...” Therefore, no further details are required. Furthermore, Hydrology and Water Quality Impact 1: “Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality” (Draft EIR pages 11-19 and 11-20) along with Hydrology and Water Quality Impact 2: “Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site” (Draft EIR page 11-20) provide a thorough and complete analysis related to the project’s potential for soil erosion, pollutant transport, and degradation of water quality. The analysis presented in Hydrology and Water Quality Impact 1 and Hydrology and Water Quality Impact 2 is based on the project as proposed. Therefore, no changes to the Draft EIR are required.

**COMMENT 16-96**

84) Page 11-22 - Delete references to “ancestral” channels of the American River throughout document and replace with “historic” channel(s).

**RESPONSE 16-96**

The reference to “ancestral” channels of the American River (Draft EIR page 11-22) is a standard geologic term, which is correct. No changes to the Draft EIR have been made.

**COMMENT 16-79**

85) Page 11-24- Recreation - First full paragraph needs to include all games and practices that are proposed to use the stadium lights. Further, as the document states the proposed installation would not change the capacity of the stadium, then the capacity needs to be set.

**RESPONSE 16-97**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. See Master Response 5: Attendance Estimates. The commenter is correct that the

proposed project does not change the capacity of the stadium. No changes to the Draft EIR are required.

**COMMENT 16-98**

86) Page 11-24 - Tribal Concerns - What does “indicated positive results” mean? “In the case that an object .... is uncovered, construction can halt ... “ Delete the word “can” and replace with “will”. More specifics are required regarding next steps.

**RESPONSE 16-98**

As detailed in Chapter 11 of the Draft EIR, the California Native American Heritage Commission (NAHC) Sacred Lands File (SLF) records search was positive. This means that within the 0.25-mile search radius of the project site, the Native American Heritage Commission has record of a place that is recognized as sacred due to its traditional cultural or religious significance. There are no recorded indigenous-period/ethnographic-period resources within the project site or search radius. Regarding replacing the word “can” with “will” in the last paragraph on page 11-24, this discussion is not a mitigation measure but a general statement about the types of mitigation that is available when specific locations of resources have not been identified. It should be noted that Mitigation Measure TCR-1 includes the more enforceable ‘shall’ and also outlines protocols in the event of an inadvertent discovery. No change to the Draft EIR is necessary.

**COMMENT 16-99**

87) Page 11-27 - Cumulative Impacts - The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. As the County is aware, in 2005 the Rio Americana High School Boosters (Rio) proposed the construction of permanent lights and other sports field improvements at Rio. A lawsuit was brought by community neighborhood members and in December 29, 2008, the Honorable Lloyd G. Connelly filed a judgement (Case No. 06CS00495) and ordered the San Juan School Board District (District) to refrain from constructing and operating the sports field improvements unless and until the District prepared and certified a project EIR in compliance with CEQA. Ultimately, a EIR was adopted by the District on June 5, 2010. While portions of that proposed project were ultimately approved and installed, the sports field lights were not included because of significant environmental impacts. In the event the Jesuit stadium light project is approved, a precedent would be set and it is anticipated Rio that will be moving forward through the District for its own sports field lights. Therefore, the County should study the potential for all Cumulative Impacts (not just Arden Hills, which was recently sold and that the proposal outlined in the cumulative section of the DEIR is not moving forward). The same regards noise, traffic, etc., impacts. Also, the County needs to analyze and consider the impacts that the proposed project will add to

existing noise, traffic, etc., from Rio Americana’s outdoor athletic games and practices (water polo, baseball, etc.).

**RESPONSE 16-99**

See Response 12-9.

**COMMENT 16-100**

General comments:

- 1) Please confirm that Jesuit is fully in compliance with all existing permit conditions, mitigation measures, etc. This is extremely important especially if the County intends to “combine” all of Jesuit’s previous authorizations into the Use Permit Amendment and Design Review that is the subject of this DEIR. An example of Jesuit being out of compliance with the mitigation measures includes leaving the gate on Fair Oaks Boulevard open past 10:00 pm as required and allowing students and their guests to linger in the parking lot and along Fair Oaks Boulevard after attending evening events on the campus and beyond the time allowed.

**RESPONSE 16-100**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the potential physical impacts of the proposed project on the environment, as contained in Chapters 5 through 11. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the project, and not an evaluation of past activities or events related to the project site. The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for transparency and decision maker consideration.

**COMMENT 16-101**

- 2) Approximately 60 years ago, County planners designed roads, land use and restrictions for this Residential 4 (RD-4) Zoning District which prohibited stadium lighting in the community. Since then, the hundreds of individuals who have purchased homes in the neighborhood have relied on these standards. Neighbors protested when Jesuit and then Rio Americana HS (2015-16) petitioned to amend the Land Use permits which prohibit Stadium lights. Approximately 85% of the Jesuit High School campus footprint adjoins residential property. In both cases, the CPAC and Supervisors ruled to maintain the status quo and preserve the original plan, which ensures the beauty of the American River Parkway and our peaceful enjoyment of our homes and streets during the evening.

**RESPONSE 16-101**

See Chapter 8 of the Draft EIR for a discussion of planning and zoning. As addressed in this chapter, private schools are permitted in the RD-4 land use zone, subject to issuance of a conditional use permit. The request is a Use Permit Amendment to allow permanent stadium lighting at Jesuit High School's Marauder Stadium. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for transparency and decision maker consideration.

## **LETTER 17**

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Barbara Dugal (October 30, 2023).

### **COMMENT 17-1**

The CEQA Guidelines define a project under CEQA as “the whole of the action” that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis.

### **RESPONSE 17-1**

See Response 17-2.

### **COMMENT 17-2**

The proposed project site has a history of entitlements associated with the athletic uses at Jesuit High School. In 2015, a Notice of Exemption (NOE) for a grading permit associated with track and field improvements was released (County Control No: PLER2015-00039). The project consisted of upgrading the existing track and field facilities with construction of a 400-meter, 8 lane all-weather running track, a synthetic turf stadium field with permanent field markings for football and soccer, and stadium seating on home and visitor sides. The project was authorized as a Categorical Exemption under CEQA Statue 15301, Class I. The County determined that the project qualified under this exemption class because it consisted of repair and maintenance of existing facilities involving negligible or no expansion of use beyond that existing at the time of determination. This project should not have been exempted as all, or nearly all, existing improvements were removed and new improvements were constructed. It also appears that the seating capacity was increased from what existed wood bleachers. In 2013, the County approved a EIR for Jesuit’s Chapel project, which I and other community neighborhood members commented on. In June of 2013, I learned that Jesuit was in the process of designing improvements to the football field and track area with a capacity for 3,000 individuals and possibly lights. I immediately contacted the County to get more information and stated that there was the potential for cumulative impacts and pursuant to CEQA, the chapel and stadium improvements should not have been reviewed separately and that these activities could be considered “piecemealed.” I was not informed about the County’s proposed exemption of the construction project.

Did the “catwalk” from the upper parking area to the football stadium exist previously or the concession stand? I am requesting a complete copy of the County’s files, records, etc., as it relates to No: PLER2015-00039.

**RESPONSE 17-2**

The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium. This stadium lighting would be used to allow night games and practices at the stadium. This is the whole of the action. The previous Jesuit projects cited by the commenter, approved pursuant to CEQA exemptions, are already completed and are part of the baseline conditions. No change to the Draft EIR is necessary.

**COMMENT 17-3**

Sometime after 2015, exact timeframe is unclear, the neighborhood began experiencing excessive noise coming from Jesuit’s PA system and community members began registering complaints with County staff. During this time, Jesuit also relocated the existing scoreboard to its current location without prior authorization from the County. Despite the complaints, in 2019, the County issued another NOE for a Use Permit Amendment to PLNP2008-00237 for the “after the fact” relocation of the scoreboard and sound system on the Jesuit’s athletic field. This action was as a Categorical Exemption under CEQA Guidelines Section 15323, Class 23. Class 23 consists of the normal operations of existing facilities for public gatherings for which the facilities were designed, where there is a past history of the facility being used for the same or similar kind of purpose. For the purposes of this section, “past history” shall mean that the same or similar kind of activity has been occurring for at least three years and that there is a reasonable expectation that the future occurrence of the activity would not represent a change in the operation of the facility. It was determined that this Categorical Exemption applied to the previous project because Jesuit High School had been operating at the location since 1963, and the subject parcel had been developed with sports fields during that time. Please provide a complete copy of the County’s files, records, etc., as it relates to PLNP2008-00237.

**RESPONSE 17-3**

Background on the project site, including prior permitting associated with Jesuit High School athletic uses, is located on pages 3-1 and 3-2 of the Draft EIR. Please see Response 17-2. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for transparency and decision maker consideration.

**COMMENT 17-4**

All evidence and information that supports the statements on Page 3-1 and 3-2 in the DEIR needs to be included in the DEIR. Other temporary use permits associated with temporary lighting for various football games were also granted by the County (see page 3-2 of the DEIR for additional details). It is apparent that the previous exemptions



and other actions taken by the County have contributed to the negative environmental impacts the neighborhood currently experiences.

**RESPONSE 17-4**

Please see Response 17-2. The intent of Chapter 3, Project Description, is to provide context and detail the objectives and features of the proposed project. Copies of environmental documentation for past actions, such as PLNP2008-00237, can be made available upon request to the County of Sacramento, Department of Community Development Planning and Environmental Review.

**LETTER 18**

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Molly Dugdale (October 23, 2023).

**COMMENT 18-1**

We have lived in Piccadilly street wimbledon court area for 53 years. Jesuit started in 63 and adds each year. When construction of parking lot and chapel began 2014? They opened the alleyway for temporary parking and entrance. Somehow that became during COVID a Jesuit expansion We cannot get in or out of our street at certain times of day and need to close access there in alleyway

**RESPONSE 18-1**

Past actions and permitting at the stadium are documented in the Background section of Chapter 3, Project Description, within the Draft EIR. Please refer to Pages 3-1 and 3-2, which discuss past actions. Please refer to Chapter 10 for a discussion of transportation-related impacts of the proposed project.

**COMMENT 18-2**

They need to stop evening games as parking on American River not monitored. People leave car doors open and walk across street as they please. At dusk is dangerous and not designed for the traffic. No night games. Rio does not have that issue as is designed for local use. Not regional. No evening games

**RESPONSE 18-2**

A discussion of pedestrian safety infrastructure is provided on Pages 10-13 through 10-15 of the Draft EIR. As discussed therein, pedestrian safety improvements to site plans have been proposed for the project. See Master Response 4: Traffic Hazards.

**COMMENT 18-3**

Who secretly allowed this construction on the lower field

**RESPONSE 18-3**

Context regarding past actions and permitting at the stadium is provided in the Background section of Chapter 3, Project Description, within the Draft EIR. Please refer to Pages 3-1 and 3-2, which discuss past actions.

**COMMENT 18-4**

There is no traffic monitoring and noise control. I feel for those who live along fence line. They have stuck score boards in their back yards. Plus the noise

**RESPONSE 18-4**

As part of the project's transportation assessment, a Local Transportation Analysis was conducted, which is included in the Draft EIR as Appendix F. Additionally, a Vehicle

Miles Traveled analysis was conducted, and is included in the Draft EIR as Appendix E. The results of these studies are discussed in Chapter 10 of the Draft EIR.

Regarding noise, an Environmental Noise Study was prepared for the project, and is included in the Draft EIR as Appendix D. As part of this assessment, an ambient noise study was conducted to establish a baseline for existing noise conditions, and quantify potential project impacts. Mitigation Measure NOI-1 has been proposed to implement noise control measures for the project, which includes concluding games by 10 PM, and reducing PA system output and usage.

**COMMENT 18-5**

We never received notices about what Jesuit intends to do and does not resemble the end result. Nor seen plans of end result. They used COVID to hide the construction Molly in Wimbledon court

**RESPONSE 18-5**

As part of the planning process, the County provided written notice to all property owners and renters within a 1,500-foot radius of the subject parcel. Additionally, a sign posting was placed on the subject parcel at the inception of the application process to notify members of the public that the property was the subject of a development proposal. Beginning on Page 3-7, the Project Description details the proposed changes that the Project would implement. Please see Plate PD-4, Preliminary Site Plan, which depicts how the stadium would change under the Build Alternative.

## **LETTER 19**

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Larry Galizio & Janice O'Malley Galizio (September 16, 2023).

### **COMMENT 19-1**

After reading the Environmental Impact Report, and experiencing the issues of concern in this report and beyond, we write in opposition to the proposed Jesuit High School Stadium Lighting Proposal.

### **RESPONSE 19-1**

The County acknowledges the commenter's opposition to the proposed project. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project. Comments for or against approval of the proposed project will be considered by the Planning Commission when the hearing is conducted early in 2024.

### **COMMENT 19-2**

As noted in 3-1, "The Jesuit High School campus is surrounded entirely by single-family residences with the exception of the County Oaks Pet Hospital." With two high schools located on the same street, residents already contend with considerable traffic, hazardous driving, noise, parking problems, and litter. The project would substantially increase all of the aforementioned problems, and the primary beneficiaries of the proposal would be an exclusive, single-sex, sectarian institution that is exempt from the considerable property taxes paid by the area's residents.

### **RESPONSE 19-2**

Transportation-related impacts have been evaluated in Chapter 10 "Transportation" of the Draft EIR and include increased vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access. Although parking availability is not an impact under CEQA, a survey of parking activity was conducted by W-Trans and an analysis of parking availability's impact on traffic was included (see Appendix H). In Impact TR-3, the Draft EIR evaluates how overflow parking from shifting games to evening hours would exacerbate existing safety hazards to pedestrians and bicyclists who cross American River Drive to attend games. Mitigation Measure TR-2 (Pedestrian Safety Improvements to Site Plans) would reduce this impact to a less-than-significant level by requiring a marked and lighted pedestrian crossing at the intersection of Tennyson Way and American River Drive across from Jesuit High School's southern parking lot as well as striping of crosswalks at the stop-control intersection of Jacob Lane at American River Drive. Additionally, Mitigation Measure TR-2 has been amended to require the installation of basic yellow crosswalks at all legs of the intersection of Jacob Lane and American River Drive. As noted in the W-Trans survey of parking activity, American River Drive was the only public street that appeared to have experienced an increase in parking due to the night football game on September 1, 2023.

**COMMENT 19-3**

Tellingly, four of the six “basic project objectives” are specific to athletics or the institution’s reputation for athletics. While athletics can supplement a high school education, the educational value is hardly mentioned in the project. And conspicuously absent from the discussion is the institution’s plan to increase its revenue streams while the daughters of taxpaying families in the area are prohibited from reaping its benefits.

**RESPONSE 19-3**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 19-4**

The proposal is replete with purposefully ambiguous language such as “...capacity crowds are anticipated to be held between 7 and 10 times per year.” And that use by football, soccer, lacrosse, and track & field teams would occur during “select evenings”. And once the massive stadium lights were built, if there were to be 15-20 events with capacity crowds, and far more nights with “light” use of the stadium lights with crowds, exactly what recourse would residents affected by the project have? What if athletic events end at 10:15 or 10:30 p.m.? Or when the crush of traffic means that area residents are awakened by cars, people yelling, dogs barking at 11 p.m. when people are walking to their cars after a game? The answer is simple: we will have no recourse whatsoever.

**RESPONSE 19-4**

The EIR analysis is based on the proposed events and timing listed in Plate PD-5. See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the potential physical impacts of the proposed project on the environment, as contained in Chapters 5 through 11. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the proposed project. Mitigation Measure NOI-1 requires that evening events be scheduled to conclude by 10 pm to the maximum extent feasible, recognizing that events such as football games may occasionally go into overtime.

**COMMENT 19-5**

Parking and hazardous driving are an issue in the status quo. One merely needs to review any of the reports by the Sheriff Patrols in the Wilhaggin Del Dayo Neighborhood Association concerning the number of stop signs that are ignored and citations and warnings given to drivers in the area to recognize that substantially increasing the number of night time events would constitute a significant danger to pedestrians and anyone in the area. The number of illegal U-turns on American River Drive is already a hazard - the proposed project would amplify this considerably.

**RESPONSE 19-5**

Pedestrian safety related to crossing of American River Drive is evaluated in Chapter 10 “Transportation” of the Draft EIR. Please see Master Response 4: Traffic Hazards.

**COMMENT 19-6**

The proposal identifies 539 parking spots at Jesuit H.S., and posits 300 + 100 potential spaces on fields on campus. Apart from being woefully inadequate for the anticipated number of event attendees, it’s difficult to believe that the athletic director and campus maintenance – or parents paying \$16,435 in tuition - are going to permit and tolerate 300 SUV’s and Ford-F150 trucks on their soccer and athletic fields.

**RESPONSE 19-6**

Please see Master Response 6: Parking Availability. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 19-7**

The tax-paying residents of this primarily R-4 residential area are being asked to support a project that will forever negatively affect the quality of life in the neighborhood in myriad significant ways so that a private, tax-exempt, exclusively male institution can enhance its reputation for athletics.

**RESPONSE 19-7**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project. See Response 1-1.

## **LETTER 20**

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Thayer Goodenow (October 30, 2023).

### ***COMMENT 20-1***

While I fully support the existence of the schools in our neighborhood, that support is due to the academics provided by those schools and efforts of the schools to positively contribute to the neighborhood. Jesuit’s lighting proposal and their plan for evening sports events is contrary to the character of this neighborhood, and the county should reject the lighting proposal.

### ***RESPONSE 20-1***

Comments for or against approval of the proposed project will be considered by the Planning Commission when the hearing is conducted early in 2024.

### ***COMMENT 20-2***

Jesuit’s lighting proposal raises significant concerns for the surrounding neighborhood, and the submissions demonstrate that they do not feel the need to attempt to reasonably mitigate the impacts in the area. Jesuit is a private commuter school and as such, already significantly impacts the RD-4 suburban neighborhood that surrounds it. Although Jesuit indicates its intent to limit evening events to certain days and parking to certain areas, it is clear from public comment that Jesuit’s current efforts to mitigate its impact of its daytime sports events have been ineffective.

### ***RESPONSE 20-2***

The comment refers to Jesuit High School’s current daytime sports events, which are not part of the proposed project. The Draft EIR evaluates the proposed installation of permanent stadium lighting to allow the events listed in Plate PD-5 to occur during evening hours. The Draft EIR proposes a number of mitigation measures to address project impacts. These mitigation measures are listed in Table ES-1.

### ***COMMENT 20-3***

Based on lack of notice, both Jesuit and the county appear to consider Kingsford Dr. as outside of the area that would be influenced by this proposal, however, that is anything but true. Already when Jesuit lets out, we see a significant increase in traffic on Kingsford Dr. This after-school traffic moves far in excess of posted limits, despite existing speed calming efforts. Like American River Dr., Kingsford Dr. is popular with significant amounts of pedestrians and bicyclists, both day and evening. As it is, traffic enforcement is inadequate to address the issue. We expect to see an unreasonable increase in the number of speeding drivers on Kingsford in the evenings if Jesuit’s permit is granted with associated risks to evening foot traffic. The county’s reliance on the already overstretched CHP for traffic enforcement, all but ensures that little will be done, especially since Jesuit has taken a somewhat myopic view of the area of impact of potential evening events.

**RESPONSE 20-3**

The intersection of Kingsford Drive and American River Drive is approximately .4 miles from Marauder Stadium at Jesuit High School. The Draft EIR (see Impact TR-3) focused the analysis of pedestrian and bicyclist safety in the section of American River Drive between Jacob Lane and Rio Americano High School because this is the area where off-site parking for stadium events tends to occur, with attendees typically crossing American River Drive in the vicinity of the stadium, from Tennyson Way to Jacob Lane.

**COMMENT 20-4**

Parking on American River and in the surrounding areas is already impacted during weekend events at Jesuit. This results in erratic driving as individuals hunt for spaces or their turns, making illegal U-turns, with pedestrians illegally crossing without warning. Transferring this type of behavior to the evening hours, on a poorly lit streets is sure to increase the number of accidents, especially pedestrian accidents. Jesuit's plans do not adequately contemplate the need for mitigation in the surrounding areas, merely at American River and Tennyson Way.

**RESPONSE 20-4**

See Response 20-3. Mitigation Measure TR-3 requires installation of a striped, high visibility (Caltrans "ladder") crosswalk with flashing beacons at Tennyson Way and American River Drive. Mitigation Measure TR-3 has also been revised to require the installation of basic yellow crosswalk striping on all legs of the stop-controlled intersection at Jacob Lane and American River Drive. See Master Response 4: Traffic Hazards.

**COMMENT 20-5**

The DEIR minimizes the above, as well as the overwhelming number of concerns about this project raised by neighbors and documented in the PowerPoint submitted by Ms. Hughes on 12/6/22. No permits for lighting (and thus evening events) should be granted unless and until these concerns are adequately addressed.

**RESPONSE 20-5**

The comment does not identify any inadequacy in the analysis of the Draft EIR.



## **LETTER 21**

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Thomas Guilderson (October 30, 2023).

### **COMMENT 21-1**

Attached please find a pdf file with comments on the DEIR for the Jesuit High School lighting proposal. As noted during the public comments at last week’s board meeting, there is a requirement under CEQA for mitigation of environmental impacts, including cumulative vehicle miles. The JHS proposal will add vehicle miles at a rate that is not appropriately captured in the report. There is no statement in the report regarding JHS’ proposed mitigation of the encumbered vehicle miles and emissions. I am unfamiliar with the full process, and assume that this will be part of the final report. I did not include this in the attached document, because as part of the commission’s board meeting last week, you are already aware of this issue.

### **RESPONSE 21-1**

The EIR analyzes VMT impacts in Chapter 10 “Transportation” of the Draft EIR. The analysis in the EIR is supported by the Kimley Horn VMT analysis and the technical memorandum authored by Kimley Horn is included as Appendix E to the Draft EIR. Mitigation is required for any impact that may be potentially significant. As discussed in the analysis of Impact TR-2 on page 10-11, the proposed project would have a less than significant impact on VMT, and thus, mitigation for this impact is neither required nor proposed.

### **COMMENT 21-2**

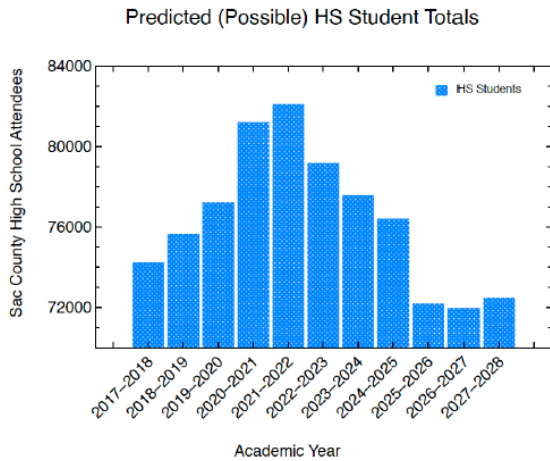
This letter is regarding the DEIR for the Jesuit High School (JHS) lighting facility proposal. With regards to a specific outcome of the DEIR of putatively unavoidable impacts of aesthetics and sound (noise level), at least the sound level could be addressed and remediated. JHS currently uses an open speaker based public address (PA) system which, if the statements by the neighbors are correct, was previously approved by the county under what might be considered “odd” circumstances. In discussions with JHS during their “good neighbor” meetings, it seems that JHS keeps their PA system at the highest level allowed without considering the ability to turn it down to a lower level and still maintain play by play analysis for the spectators. A more technological approach would be for the county to require JHS to replace their extant PA system with dedicated speakers in the bleachers and a Bluetooth/wireless option.

### **RESPONSE 21-2**

Regarding PA system levels associated with the proposed project, please see Response 12-4. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 21-3**

Whether a flaw or by design of the request, it was surprising to not see an assessment of the cumulative impacts of the stadium lighting proposal. If JHS is successful in obtaining their lighting system, the county should anticipate activities at the sports fields well beyond JHS’ stated handful of football games and practices: with larger potential attendees/vehicles and the antecedent impacts (parking, safety, etc.) beyond the streets directly fronting JHS. This is simply because of the business and income requirements that JHS, as a private school requires. An unspoken goal of the JHS lighting project is for JHS to maintain recruitment and income levels in the face of an upcoming substantial drop in HS aged kids in Sacramento County. Demographic shifts such as these can have an outsized impact on private relative to public schools. A sports field complex complete with lighting that could operate to 10 or 11pm could be an attractive add-on for JHS’ marketing and sales staff whether for prospect sports-minded parents or for nonprofits which could rent the fields.



*Demographics of high-school aged children in Sacramento County. Assumes 100% matriculation from preceding grades (age-cohorts). Data from CA Department of Education.*

**RESPONSE 21-3**

Cumulative impacts were analyzed in the Draft EIR in Chapter 11 “Other CEQA Considerations.” Additionally, Chapter 3 “Project Description” details anticipated event lighting schedule and attendance of the stadium after the lights are installed.

**COMMENT 21-4**

Although this is not a ‘merits’ of the project review, it is “interesting” that one of the initial reasons for the lighting project stated by JHS to the community neighbors was the ‘safety’ of the students playing football. The rationale being that with climate change, days and nights will become hotter and practice/playing time will be restricted. The most recent Intergovernmental Panel Climate Change (IPCC) report implies that under the current rate of fossil fuel emissions, the RCP8.5 scenario, by mid-century Sacramento, including Carmichael, is predicted to experience more than 124 >90°F days. Nighttime temperatures are unlikely to cool fast enough during the end of summer and early fall for football players to practice outdoors at ‘reasonable’ evening hours. Early morning,

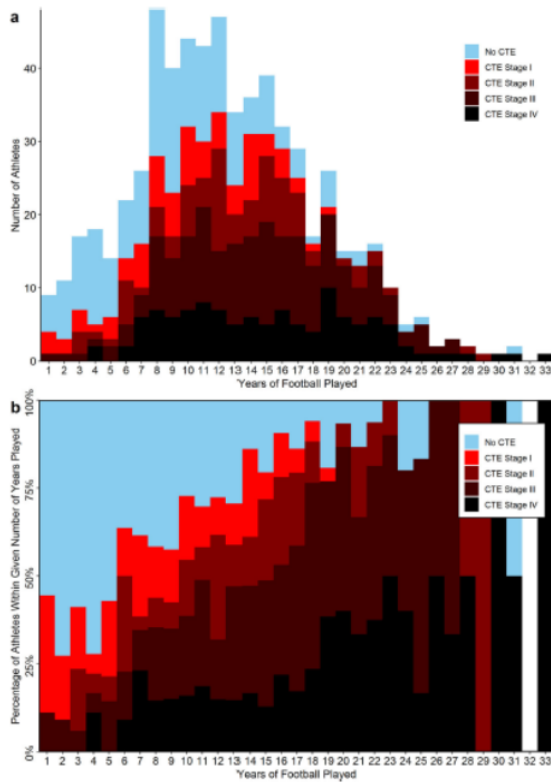
near dawn, will still be the coolest time of the day, but it is difficult to convince parents and participants of the need for 5:30am practices.

**RESPONSE 21-4**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 21-5**

Moreover, if JHS were facilitating the long-term health and safety of their students they might not support football at all because of the well documented relationship between football and chronic traumatic encephalopathy (CTE). Individuals with CTE have higher occurrences of dementia, Alzheimer’s, as well as general cognitive, behavioral, and motor issues as adults. CTE individuals have a shorter life span than non CTE individuals. The rate of CTE in football players far exceeds that in the general population. Within the last decade, CTE and traumatic brain injuries (TBI) have been well studied. All of the peer reviewed studies indicate that CTE in football players occurs regardless of concussion events or TBIs, simply playing the sport leads to CTE. Daneshvar et al., (Nature Communications, 2023) studied 631 former football players, school level all the way through professional, and the results reinforce the potential damage even a few years of contact sports can have. Of the candidates studied, nearly three out of four (72%) had CTE. Of the 95 individuals who played only through high school, more than 50% had CTE.



A) Histogram of number of individuals studied (all football players) who were diagnosed with CTE, and stage, as a function of years of football played. B) The same data transformed into percentage of players in a given year of football cohort with CTE (Figure 1 from Daneshvar et al., Nature Communications, 2023). An inference from these data is that even a few years playing football leads to a significant CTE rate. The rate of CTE in the general population is ~1%.

**RESPONSE 21-5**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 21-6**

The results of Daneshvar are similar to a more age-restricted CTE study of 152 young athletes who played contact sports, all under the age of 30 at the time of death (McKee et al., JAMA Neurology, 2023). In this study, more than 40% of the athletes had full-blown CTE and nearly all had mild CTE (stages I and II). Simply, and regardless of waivers and indemnity clauses, JHS is making a conscious choice to put their students at risk of CTE.

**RESPONSE 21-6**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

## **LETTER 22**

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Dave Higgins, Jr. (October 30, 2023).

### **COMMENT 22-1**

I'm writing in support of the draft EIR and the project. There are a couple of key issues related to this project 1. Lighting - The project is using the best available technology to reduce glare, so this issue appears to have been fully addressed. 2. Traffic - The Kimley Horn study notes that the school already has football games and other sporting events, the only change is the time of use - shift from Saturday afternoons to Friday evenings. This isn't a significant change in the use of the facility. 3. Sound - The Bollard Noise Assessment notes that the P/A system should be re-evaluated to minimize the spillover of noise into the surrounding residential areas. This should be followed up on and further work should be required with additional modeling of the existing P/A system to reduce the impact to the neighbors.

Overall it appears to be complete and in compliance with CEQA.

### **RESPONSE 22-1**

Regarding noise generated by the stadium PA system, please see Response 12-4.

## LETTER 23

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Elizabeth Hughes (October 08, 2023).

### **COMMENT 23-1**

**What is a “project” under CEQA?** Project: activity undertaken by a public agency or a private activity that may cause a change in the environment and must receive **discretionary approval** from a government agency. This means the Applicant is not guaranteed to obtain approvals for their proposed project, and the County officials have discretion and a requirement to consider all cumulative impacts beyond the stated physical installation of 100’ stadium lighting poles.

### **RESPONSE 23-1**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

### **COMMENT 23-2**

**Will the project have a significant impact on the environment?** The following is a list of expected reports for the project per the Draft EIR released on September 15, 2023.

When reports were not provided, the expected report was cited as “no report provided,” which is a deficiency in the project.

When a report or set of reports was provided for a category, a specific section in this document cites deficiencies found.

### **Deficiencies**

This section cites the specific deficiencies per the reports.

### **Project deficiencies due to lack of report**

The following expected reports have not been made available or were not done.

1. Aesthetics – no report provided
2. Agriculture – no report provided
3. Biology – no report provided
4. Cultural – no report provided
5. Geology – no report provided
6. Hazards – no report provided
7. Hydrology – no report provided
8. Land Use – no report provided
9. Minerals – no report provided
10. Population/Housing – no report provided
11. Public Services/Utilities – no report provided
12. Recreation – no report provided

13. Urban decay – no report provided

**RESPONSE 23-2**

CEQA requires that conclusions be supported by substantial evidence, which includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (CEQA Guidelines 15384[b]). All impact conclusions in the Draft EIR are supported by substantial evidence regardless of whether or not a separate report was prepared for a particular environmental topic. Regarding the location of the environmental analysis for the topics cited in the comment, Aesthetics is covered in Chapter 5; Land Use is addressed in Chapter 8; and Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services and Utilities, and Recreation are located in Chapter 11. It should be noted that not all topics warrant technical studies. However, studies were prepared for three topics determined to require additional technical information to support the environmental analysis—Aesthetics (Chapter 5), Noise and Vibration (Chapter 9), and Transportation (Chapter 10). Technical reports for these topics are located in the appendices of the Draft EIR. For these reasons, the comment has not identified a deficiency in the environmental analysis.

**COMMENT 23-3**

**What is a “significant impact on the environment?”**

A significant impact on the environment includes substantial, or potentially substantial, adverse change(s) in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. A social or economic change by itself shall not be considered a significant effect on the environment (CCR §15382).

**RESPONSE 23-3**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-4**

The results from the Applicant’s proposed lighting project will decrease safety, increase neighborhood disruptions, affect the character of the surrounding community, create significant noise, traffic, and pedestrian impacts, and affect the surrounding wildlife environment. Schools are conditionally permitted to use in areas designated as Single-Family Residential. The Applicant’s proposed stadium lighting project is a land-use change that reflects a sporting complex. This change in land use is inconsistent with RD-R residential neighborhoods.

The following sections reflect deficiencies of the technical studies used in the Applicant’s Draft EIR.

**RESPONSE 23-4**

The Draft EIR evaluates noise, traffic and pedestrian impacts, and wildlife in Chapters 9, 10, and 11 (Effects Found to be Less Than Significant – Biological Resources), respectively. The comment is not specific about what constitutes neighborhood disruptions. The proposed project is installation of stadium lighting at an existing stadium, requiring a Use Permit Amendment and Design Review. This is not a land use change and therefore does not create an inconsistency with residential neighborhood zoning. Responses to specific comments regarding the commenter’s perception of deficiencies in the technical studies are provided below.

**COMMENT 23-5**

The Noise Assessment is insufficient and does not meet expectations of a Noise Impact Analysis – Environment Impact Reviews should include a Noise Impact Analysis. The included Bollard Acoustical Noise Assessment, dated March 6, 2023, is an “assessment” and does not meet the expectations of an EIR, which should include a **Noise Impact Analysis**. An Environmental Noise Assessment is a comprehensive study to evaluate existing or potential noise sources in an area. It aims to assess the environment’s current or projected noise levels and analyze their potential impacts on human health, well-being, and the surrounding community. On the other hand, Noise Impact Analysis focuses on evaluating and assessing the potential noise impacts of a specific development project. It is often conducted as part of an Environmental Impact Report or as a requirement for obtaining permits or approvals for a construction project. *An Environmental Noise Assessment assesses an area’s existing or potential noise sources and their environmental and community impacts. A Noise Impact Analysis, on the other hand, examines explicitly the potential noise impacts of a development project and aims to propose mitigation measures to manage those impacts.*

**RESPONSE 23-5**

Chapter 9 of the Draft EIR provides an analysis of the proposed project’s potential noise-related impacts, which leverages data from the Environmental Noise Assessment (Appendix D). As stated therein, the proposed project would have a significant and unavoidable impact related to noise.

**COMMENT 23-6**

- The Bollard Acoustical Noise Assessment did not conduct a normal daytime high school activity baseline.

The Bollard Acoustical Noise Assessment’s specific purposes were to quantify pre-project (baseline) ambient noise conditions in the residential areas surrounding the JHS stadium, to evaluate the impacts of noise generated during evening hours at the stadium within those residential areas, and to evaluate measures to reduce the noise generation of those activities where appropriate and feasible. The Bollard Acoustical Noise Assessment did not conduct a normal daytime high school activity baseline. The baseline study inappropriately defined a “baseline” during high-level noise activities



rather than non-activities. A baseline should study normal noises and then compare this to high-level noises.

**RESPONSE 23-6**

As stated in the Environmental Noise Assessment (Appendix D), long-term ambient noise studies were conducted at six sensitive receptor locations from approximately noon on Friday, September 30 through noon on Monday, October 10th, 2022, a period of approximately 240 consecutive hours at each location. The period of 5 pm to 10 pm is used as the environmental baseline for noise as these are considered to be the primary hours during which ambient conditions would experience the greatest potential for change as a result of the proposed project. Additionally, the noise assessment used home football games as a “worst case” noise generating scenario for its quantitative analysis of evening stadium events, as these events have the highest potential to generate noise.

In summary, the recorded noise levels from the October 8 football game were compared to the 10-day average ambient noise levels from the ambient noise study. From this, it was determined that the proposed project would result in a significant and unavoidable impact related to noise.

**COMMENT 23-7**

- The Bollard Assessment did not study actual high-level football game night activities and noise.

Bollard’s earlier Study dated January 14, 2016, Attachment C-1, states high school P/A sound level at maximum volume was 75-83 dBA in Piccadilly residential area, exceeding desired levels. Only after a manual downward adjustment by school representatives did the noise levels drop to 70 dBA at exterior locations of Piccadilly residents. The Bollard Assessment assumes “the [Jesuit] P/A system sound levels can be maintained at 70 dB Lmax or less within the nearest exterior residential back yard, the predicted sound level of 40 dB Lmax (for interior homes) would be within compliance.”

**RESPONSE 23-7**

Please see Comment Response 12-4 regarding noise-related mitigation and the stadium PA system. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 23-8**

- The Bollard early “assumptions” do not provide appropriate data for a noise compliance assessment as no description supports the assumption. Any assumptions made are arguably due to the last measured data provided. In addition, there is a lack of data on PA system volumes, usage, and noise. The

2016 Bollard assumptions are inappropriate for use in the 2023 Noise Assessment.

The Bollard Assessment states existing P/A speakers, attached 35-45 feet above ground, will be re-attached to the proposed 90-foot-high light towers, and no change of sound levels would result. Only one football event was relied upon for sound measurement:” sound levels at Site 2, Piccadilly Circle “was exceeded at this location during 3 of the hours monitored,” and “maximum sound levels measured at Site 2 exceeded the County’s 70 dBA Lmax daytime noise standards by an average of 4 dBA during the October 8 football game.”

**RESPONSE 23-8**

As stated on Page D-14 of the Environmental Noise Assessment (Appendix D), the existing poles would be replaced with taller lighting poles but the PA speakers would be reinstalled at their current height and angle of projection. Please see Response 12-4 regarding noise-related mitigation and the stadium PA system. This description is also provided in Chapter 3 (Project Description) of the Draft EIR. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 23-9**

- The noise study is deficient because it omitted noise levels generated by food truck vendors, crowds (bullhorns, cowbells, airhorns, cheering, etc.), the band, and music during breaks and cheerleading activities.

On October 22, 2022, at a recent meeting between the school representatives and neighbors, attended by Supervisor Desmond, a neighbor asked if the school monitors or tests their compliance with mandated dBA noise levels, and the school representative answered, “No.” The Applicant does not monitor its noise impacts.

Adjacent neighbors have tracked and recorded DBA levels during the last five years, indicating the school exceeded county guidelines. Attached is a copy of this neighborhood record of excess dBA emanating from Jesuit’s fields.

**RESPONSE 23-9**

Please see Comment Response 23-6 regarding the ambient noise study and results. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 23-10**

- The Bollard Noise Assessment is inadequate because it did not study the Applicant’s actual performance and ability to monitor or maintain noise levels within County code compliance levels. The Bollard recommendations do not

include any feature to hold the Applicant or the County to monitoring or testing (or penalties) to maintain noise compliance.

Page 3. of the Bollard Noise Assessment indicates, “DNL represents a 24-hour average.” An average data set **disguises** short-term variations in the noise environment, such as those generated during activities within the JHS stadium.” Using a smoothed 24-hour “average” data set is inappropriate to represent specific noise-intensive activities the Applicant generates.

**RESPONSE 23-10**

As stated in other responses, it was determined in Chapter 9 of the Draft EIR that the proposed project would result in a significant and unavoidable impact related to noise. Please see Comment Response 12-4 regarding noise-related mitigation.

The Environmental Noise Assessment considers both median (L50) and maximum (Lmax) noise levels in determining whether the project’s noise impacts are significant. DNL was not used to assess noise impacts of the project. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 23-11**

- The Bollard Noise assessment incorrectly uses average data to smooth environmental sound variations. The Assessment should reflect actual noise and sound variations created by the Applicant.

Page 15. of the Bollard Noise Assessment’s anticipated use chart is incorrect; the intended use far exceeds those noted.

**RESPONSE 23-11**

Please see Comment Response 23-10.

**COMMENT 23-12**

- The sample set used by The Bollard Noise Assessment is too small.

Page 16. of the Bollard Noise Assessment indicates the October 1 and October 16 test games were smaller and likely quieter than league and playoff events. The Noise Assessment should reflect high-attendance and high-activity games and events.

**RESPONSE 23-12**

The October 1 and 8, 2022 games were typical daytime league games. The recorded games reportedly had attendance that was average for a regular season game and, as such, are reflective of the typical noise associated with football games, the loudest events that occur withing the stadium. The analysis of noise impacts related to the JHS

stadium lights project utilizes home football games as the worst-case noise source, as they have the highest potential to generate noise.

Further, the Environmental Noise Assessment addresses the fact that the recorded events were not play-off games at or near capacity by making assumptions of increased dB associated with the increased attendance. Specifically, Page 27 of the noise assessment (Appendix D of the Draft EIR) notes that, “As indicated above, approximately 1,500 persons attended each of the two regular-season football games held on October 1st and 8th, 2022. According to Table 7, crowd sizes during playoff football games are expected to range from 1,500 to 3,000 persons. As a result, the noise measurement results represent the largest crowd sizes typically present during regular season football games and the lower end of expected crowd sizes during playoff games.”

Finally, readings were taken during the two special night games hosted on August 25 and September 1, 2023 with reported attendance at approximately 2,500. The data collected at those two high-capacity events confirmed the conclusions of the noise assessment (Appendix J).

### **COMMENT 23-13**

- The Bollard Noise Assessment did not measure a sufficient variety of events and data points to assess the impact adequately.

The events and attendance can vary due to multiple reasons. To have a better understanding of noise and the type of attendance it represents, the following measures and scales should be considered with the noise-based measurements:

1. Number of Attendees – Measured the number of people at the event’s start.
2. Number of vehicles – Measured the number of cars in JHS parking lot(s).
3. Number of vehicles – Measured the number of cars parked on relevant street parking.
4. Length of game – measured in minutes
5. Start time of game – recorded in date and time PDT
6. Temperature at start of game – measured in degrees Fahrenheit
7. Event – Measured by the sporting event taking place.
8. Division – measured by varsity, Junior varsity, or otherwise.

### **RESPONSE 23-13**

Please see Comment Response 23-12.

### **COMMENT 23-14**

Page 27. “If noise generated by evening football games held at the JHS stadium **were not exempt** from the local Sacramento County Code noise standards, noise generated by certain events and activities held at the stadium (primarily football games) would exceed those standards at some residential areas surrounding the stadium.”

**RESPONSE 23-14**

As stated on Page 9-17 of the Draft EIR, “for the purpose of this CEQA analysis, exemptions to the County noise standard are not considered to reduce the significance of potential impacts. Additionally, those exemptions have no bearing on the 3 dBA significance threshold for increases in ambient noise levels. Therefore, potential exemptions to the County noise standard are not considered in the following impact statements.”

**COMMENT 23-15**

Knowing lights and speakers were not part of the initial approval for the stadium made it easy to make many improvements. The speakers (and lights), however, were not part of what has been accepted by neighbors and why a “new” or “exception to existing facility” should not be granted. Based on the many years the facility has existed, JHS should not be exempt from county noise standards. The noise study does not explore the no-build option and using existing facilities with lights.

**RESPONSE 23-15**

See Comment Response 23-14.

**COMMENT 23-16**

Bollard’s Assessment claims the county noise ordinances do not “technically” apply to the high school (letter to Mr. Dave Higgins Jr. January 14, 2016, pg. 5.) and are exempt from county noise ordinances. This would seem logical if the legal parcels of the school athletic fields were zoned identically to the school buildings. But the athletic fields are a legally separate parcel zoned by the County as R-4, not zoned for secondary school buildings. This statement that R-4 zoned school property is exempt from noise ordinances must be litigated. **Logic:** If the school needs the County to exempt them from lights, the same argument applies to noise ordinances involving R-4 zoning.

**RESPONSE 23-16**

See Comment Response 23-14.

**COMMENT 23-17**

The night activities push the sound above the 55 dBA levels, which has a significant impact. That being the case, mitigation must bring that down to a less-than-significant impact.

**RESPONSE 23-17**

As stated in Chapter 9 of the Draft EIR, it was determined that the proposed project would result in a significant and unavoidable impact related to noise. Please also see revised Mitigation Measure NOI-1.

**COMMENT 23-18**

The noise impact of the PA system is a pain point for residents. Opinions have been shared that it can be too loud, and usage later in the evening is uncomfortable. There is no record of an active partnership with JHS (the Applicant) and the community on the level of the PA system.

The alarming noise assessment data states, “[evening events] could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods.” The concern is that the noise is going to get worse. As cited in the Assessment, “people react to nighttime noise exposures as though they were twice as loud as daytime exposures.” (Page 3)

**RESPONSE 23-18**

Please see Comment Response 12-4 regarding noise-related mitigation and the stadium PA system. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 23-19**

Another pain point for residents is frustration on what to do when JSH events are too loud. Residents are unclear of (1) what oversight is done to ensure JSH events meet existing permits and expectations and (2) what action they can take to be heard and find a compromise to continue a healthy co-existence between the residents and JHS. As shown in the report, the noise of the PA is at 70 dbs.

**RESPONSE 23-19**

Please see Comment Response 12-4 regarding noise-related mitigation and the stadium PA system. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 23-20**

Technically, R-4 zoning excludes buildings and outside structures greater than 25 feet in height, and while 150 households that surround the football and baseball field must comply with height and noise levels, shouldn't ALL R-4 zoned property owners comply? **Why does JHS have a professional-sized bating cage that exceeds 25 feet in height with LED lights on R-4 zoned property?**

**RESPONSE 23-20**

This is not a comment on the environmental analysis in the Draft EIR, but it is included here for decisionmaker consideration.

**COMMENT 23-21**

- The Noise Assessment does not consider how speakers affect neighbors and the neighborhood. Numbers and collected data are only a part of the whole picture. The Assessment Study does not represent the cumulative impacts and neighborhood effects, including football games and nearby Rio Americano High School activities.

**RESPONSE 23-21**

Please see Comment Response 12-4 regarding noise-related mitigation and the stadium PA system. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system. Regarding potential cumulative impacts, please refer to the cumulative impact analysis in Chapter 11, “Other CEQA Considerations,” of the Draft EIR. In this cumulative analysis, it was determined that the project’s contribution to a significant noise-related cumulative impact would be cumulatively considerable, and this impact would be significant and unavoidable.

**COMMENT 23-22**

- The Noise Assessment did not consider the sound decibels of the crowds, airhorns, cowbells, or honking horns as spectators leave at 11:00 at night when some of us go to bed at 9 p.m. and our children at 8 p.m.

**RESPONSE 23-22**

As stated in Appendix D, Environmental Noise Assessment, long-term ambient noise studies were conducted at six sensitive receptor locations from approximately noon on Friday, September 30 through noon on Monday, October 10th, 2022, a period of approximately 240 consecutive hours at each location. The period of 5 pm to 10 pm is used as the environmental baseline for noise, because these are considered to be the primary hours during which ambient conditions would experience the greatest potential for change as a result of the proposed project. Please note that, as stated in Chapter 9 of the Draft EIR, it has been determined that the project would have a potentially significant impact related to noise based on the results of this study and the projected increases in ambient noise with the Project.

**COMMENT 23-23**

The Noise Assessment indicates that noise generated by the project is expected to exceed county standards for RD-4 zoned properties. However, the proposed project is exempt from these standards as it is related to school sports, entertainment, etc. Such an exemption seriously impedes the process considering noise impacts on the surrounding neighborhood.

- **Does the Project’s EIR look beyond this county exemption in assessing the proposed project’s overall and cumulative environmental impacts?**

**RESPONSE 23-23**

As stated under the Noise Significance Criteria in Chapter 9, “for the purpose of this CEQA analysis, exemptions to the County noise standard are not considered to reduce the significance of potential impacts.” For the purpose of the CEQA analysis, the exemption described in this comment does not apply. Impact ratings for noise were determined based on the relevant significance criteria, and it was determined that the project would have a potentially significant impact related to noise, as shifting games to the evening would result in perceptible increases in ambient noise levels at five of six studied sensitive receptors.

**COMMENT 23-24**

- The Assessment does not include mitigation measures, monitoring, or reporting to ensure less than significant noise-related impacts generated by evening and nighttime games and events. Program monitoring and enforcement requirements should address PA issues, crowd noise, and band and cheer noise, which greatly concern neighbors near Jesuit High School.

**RESPONSE 23-24**

Please see the response provided to Comment 12-4 regarding noise mitigation measures. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 23-25**

The Noise Assessment did not conduct a comprehensive scope. Baseline noise studies need to be undertaken along the American River Parkway as the noise from activities taking place at Jesuit can be heard on the American River Parkway.

The existing baseline study does not appear to consider the portable diesel lights used for the Junior Marauders and weeknight practices and must be included in the analysis.

**RESPONSE 23-25**

Please refer to Plate NOI-2, Ambient Noise Study Locations, within Chapter 9 of the EIR. As shown in this plate, receptor locations 3 and 5 which were studied for the Environmental Noise Assessment are located along American River Drive. The proposed project does not involve the use of portable diesel lights, as it would install permanent lighting in the stadium. A temporary Use Permit, Control No. PLNP2023-00190, was granted on August 18, 2023 for temporary lighting for two events scheduled for August 25, 2023 and September 1, 2023 between the hours of 4:00 PM to 10:30 PM. This lighting was only permitted for two games and has since been removed from the stadium. The Draft EIR acknowledges on page 3-11 the stadium’s track and field use by the Junior Marauders football league as well as the Parochial Athletic League (PAL) flag football and track programs. As these activities are existing, they are part of the baseline noise environment against which the project’s noise impacts were



analyzed. The ambient noise study conducted by Bollard Acoustical Consultants included 10 days of 24-hour monitoring from Friday, September 30th through Monday, October 10, 2022. If Junior Marauders were using the facilities during the 10 days of noise monitoring, including use of diesel-powered lighting during any evening hours, such noise would have been captured in the baseline. As discussed previously, the EIR addressed the worst-case scenario of a Friday night football game with operation of the PA system and the school band performing. There is no “cumulative” noise impact that has not already been addressed in the EIR, because the Junior Marauders would not be operating at the same time as a Friday night football game.

**COMMENT 23-26**

Page 14 of the Bollard Assessment conflicts with the number of games provided by Jesuit.

- The Assessment also does not analyze evening and nighttime team practices, which must be included.

**RESPONSE 23-26**

Regarding the schedule, Plate PD-5 (Anticipated Event Lighting Schedule) on page 3-12 of the Draft EIR shows the games and practices that would occur in the evening with the proposed installation of the permanent stadium lights. This is consistent with the Noise Assessment used to support the Draft EIR analysis (see Table 7 in Appendix D). Any other tentative schedules that may have circulated prior to the release of the Draft EIR are considered outdated.

Regarding practices, as stated in Chapter 9 of the Draft EIR, the Project Environmental Noise Assessment used home football games as a “worst case” noise generating scenario for its quantitative analysis of evening stadium events, as these events have the highest potential to generate noise.

**COMMENT 23-27**

The Noise Assessment justification states that the project will not alter/or affect the PA system. However, the 2023 Bollard Assessment states that ...” because this analysis concludes that evening activities and sporting events held under the lights at Jesuit could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods, consideration of noise mitigation for the project is warranted.”

Therefore, the conclusion that the lights will not increase any impacts associated with the school’s prior use authorizations, such as the PA system or authorized capacity, is irrelevant since the 2023 Bollard Assessment concludes that substantial increases in ambient noise will occur. Further additional noise will be created by amplifying games that are not currently amplified.

**RESPONSE 23-27**

Please see the response provided to Comment 12-4 regarding the stadium PA system and noise mitigation. An updated Mitigation Measure has been provided in the Final EIR

with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 23-28**

Tyler Mickelson, EIT, et al., report dated March 10, 2023, poorly depicts what happens on the streets of Carmichael, Football, Soccer, Water Polo, and “Jr. Marauder’s” Football events conducted at JHS. The authors relied upon an old, stale report completed in 2015 and “assumed” this represented current conditions eight years later.

**RESPONSE 23-28**

See Response 23-29.

**COMMENT 23-29**

- The Traffic study is deficient because it used dated assumptions to calculate its findings.

Since 2015, both Rio and Jesuit HS have increased enrollment; single student driver/car have increased for both schools; complaints against students parking on residential street has mushroomed (Ref. R Desmond meeting with Rio and Wilhaggin-Del Dayo Association); incidence of juvenile reckless driving have increased; Jesuit HS moved drop-off and pick up site from Jacob Lane to American River Drive at Tennyson Way intersection; Jesuit JR. Marauders (10-14 year olds) increased their enrollment and now include cheerleaders who claim Jesuit’s Tennyson/American River Drive parking lot as their home turf.

**RESPONSE 23-29**

The studies supporting the analysis on the Draft EIR were prepared in 2023 and the transportation analysis is presented in Chapter 10 of the EIR, “Transportation.” The *Vehicle Miles Traveled (VMT) Analysis* and *Local Transportation Analysis* conducted by Kimley-Horn for the proposed project were completed on March 10, 2023 and can be found in Appendix E and Appendix F of the Draft EIR. The purpose of the VMT Analysis was to determine the increase in vehicular travel demand, measured in VMT, attributable to the proposed project. The focus of the analysis was to determine the impact of shifting the times associated with football games under existing conditions (on a Saturday during daylight hours) to conditions proposed under project, which would typically be a Friday evening with stadium lights. The Local Transportation Analysis examines vehicular level of service, queueing at intersections near the project site, impacts to bicycle and pedestrian facilities and circulation, parking supply and demand, and transportation safety in the vicinity of the project site. Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix H). The technical reports that were referenced to support the analysis in Chapter 10 “Transportation” of the Draft EIR reflect current conditions. No change to the Draft EIR is necessary.

**COMMENT 23-30**

The March 10, 2023, report states, “As this analysis was completed after football season had ended, the number of attendees at football games was not counted, “and “this analysis used attendance numbers provided by Jesuit High School” and “to be conservative... we assumed an increase from 1,200 attendees for Saturday games to 1,500 for Friday night games.” (Page 2/8) Since when do public decision-makers rely upon the Applicant’s data without validating the information’s accuracy? News flash! Attendance at the Friday, August 25, 2023, game was 2,000 plus... and the out-of-town visitor’s team only purchased 200 tickets. When local schools pack up their cars and buses for a cross-town rivalry night game at JHS, it will be standing room only. All studies presented to the Sac County Planning Board should be based on maximum occupancy, 3,500 in attendance.

**RESPONSE 23-30**

Please see Master Response 5: Attendance Estimates.

**COMMENT 23-31**

- The Traffic study did not include a spectrum of scenarios to estimate the impacts of possible events.

**RESPONSE 23-31**

As discussed in the *VMT Analysis* prepared by Kimley-Horn, football games produce the largest number of trips to and from the school for stadium events. Additionally, the proposed project would change both the day and times at which football games are played – shifting from Saturday mid-day to Friday evenings – whereas the project would cause such minimal shifts in the times of soccer and lacrosse games that it can reasonably be assumed not to alter any traffic patterns associated with those sports. Therefore, the focus of the analysis was to determine the impact of shifting the times associated with football games under existing conditions (on a Saturday during daylight hours) to under existing plus proposed project conditions (on a Friday evening with stadium lights).

**COMMENT 23-32**

- The stadium occupancy is 3,500, yet no analysis was provided with attendance of this size.

**RESPONSE 23-32**

As described in Chapter 3 “Project Description”, the total maximum capacity for Marauder Stadium is approximately 3,000 persons, which is the projected maximum number of attendees for playoff games used within the Draft EIR analyses and supporting technical studies. Therefore, the transportation analysis did assess impacts associated with the stadium being at capacity.

**COMMENT 23-33**

- The Traffic Study did not cover the impact of all stadium events.

**RESPONSE 23-33**

Please see Responses 23-29 and 23-31.

**COMMENT 23-34**

The Traffic study used data collected for a high school stadium lighting project in Carmel, CA. The Carmel High School data indicated an average occupancy of 3.24 persons per vehicle. The data For Carmel High School vehicle occupancy was real-time, observed data.

- The Traffic Study for the Applicant’s project is deficient and incorrectly uses assumptions for a High School in Carmel, California, and did not collect real-time, observed data at Jesuit High School during a football game. Therefore, a 3.24 vehicle occupancy can not be attributed to the Applicant’s projects based on an assumption.

**RESPONSE 23-34**

To supplement the analysis contained in the Draft EIR, W-Trans prepared an additional traffic analysis for the proposed project. W-Trans conducted a survey of parking activity related to a nighttime football game at Jesuit High School. The parking surveys were conducted on a non-football Friday in August 2023 and on the evening of a night football game held under portable lighting in September 2023. Based on those surveys, W-Trans estimated that the vehicle occupancy for the nighttime game in September was approximately 3.22 people per vehicle, which is nearly identical to the 3.24 people per vehicle assumed in the Draft EIR. This survey supports the assumptions made in the Draft EIR pertaining to average vehicle occupancy. The Parking Survey Memorandum prepared by W-Trans can be found in Appendix H of the EIR.

**COMMENT 23-35**

The traffic analysis report and event lighting schedule provided by JHS inaccurately omitted all Jr Marauder football and cheer squad weekly, night practice, and weekend game activity conducted at the stadium. IF Jesuit moves their games to Friday, the Jr. Marauders football and cheer club will use the field and P/A speakers from 9 a.m. until 6 p.m. on Saturday and/or Sunday without JHS supervision.

**RESPONSE 23-35**

Please see response to Comment 23-31. See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the potential physical impacts of the proposed project on the environment, as contained in Chapters 5 through 11. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with changes proposed by the project.

**COMMENT 23-36**

- The Traffic Study was deficient as the data is potentially inaccurate due to being from 2015.

The data sets are from 2015, roughly eight years old, and potentially not representative of JHS usage.

**RESPONSE 23-36**

The studies supporting the analysis on the Draft EIR were prepared in 2023. The *Vehicle Miles Traveled (VMT) Analysis* and *Local Transportation Analysis* conducted by Kimley-Horn for the proposed project were completed on March 10, 2023 and can be found in Appendix E and Appendix F of the Draft EIR. Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School in 2023 (see Appendix H). The technical reports that were referenced to support the analysis in Chapter 10 “Transportation” of the Draft EIR reflect current conditions.

**COMMENT 23-37**

If attendance numbers of more recent events are not known, then a focus should be made on obtaining those numbers so a more accurate impact assessment can be published.

- The Traffic Study is deficient because it doesn’t include any cumulative traffic impact discussion when Rio Americano High School has an event or activities on the same day as Jesuit’s practices or games.

**RESPONSE 23-37**

For more information surrounding attendance estimates used in the analysis of this Draft EIR, please see Master Response 5: Attendance Estimates. Cumulative impacts related to transportation are discussed in Chapter 11 “Other CEQA Considerations” in the Draft EIR.

The traffic studies, including the *Local Transportation Analysis* and the *Vehicle Miles Traveled Analysis*, support the discussion of transportation impacts found within Chapter 10 “Transportation.”

Though not required by CEQA, Kimley-Horn prepared a *Local Transportation Analysis* that evaluates transportation-related conditions more broadly. These transportation-related conditions include existing LOS on roadways and intersections (including American River Drive and Fair Oaks Boulevard), existing bicycle and pedestrian facilities near campus, parking supply and demand, and a general safety analysis focusing on the transportation infrastructure in the immediate vicinity of the project. This analysis is included as Appendix F to the Draft EIR. Additionally, W-Trans prepared a supplemental traffic analysis which included a survey of parking activity related to a nighttime football game at Jesuit High School, including on American River Drive. The

current traffic conditions surrounding the project site constitutes the existing conditions, and in this case, the environmental baseline. Existing conditions in the broader vicinity of the project site includes Rio Americano High School’s events and activities. The existing conditions and environmental baseline relating to transportation are discussed in Chapter 10 “Transportation.”

Pursuant to SB 743, automobile delay, as described solely by level of service or other measures of vehicular capacity or traffic congestion, is not considered a significant impact on the environment under CEQA. The Draft EIR appropriately analyzed potential increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access.

**COMMENT 23-38**

- The number of passengers per car (AVO) calculations are off if you consider the capacity attendance of these games.

**RESPONSE 23-38**

Please see Response 23-34.

**COMMENT 23-39**

The traffic report gives an overview of the traffic/use of roads on Fair Oaks Blvd., the cross street at the Chapel and Arden Hills; and a brief mention of Jacob and American River Drive on the residential streets that surround Jesuit High School.

- However, the report does not indicate that any of the residents were interviewed by the engineers who wrote these reports to determine if the residents had any concerns about the increase in street usage, i.e., overflow parking during evening games, the impact of before and after games with increased attendees, and no mention of adding crosswalks and increased street lightening if this project is approved.

**RESPONSE 23-39**

Detailed transportation analysis conducted to support the Draft EIR relies on measurements, data collection, modeling, and other objective methods, and as the commenter has noted, the analysis is not generally reliant on interviews with residents. As noted elsewhere, to further supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix H). As noted in the W-Trans survey of parking activity, the only public street which appeared to have experienced an increase in parking due to the night football game on September 1, 2023 was American River Drive.

**COMMENT 23-40**

- The Traffic Study does not consider that the roads surrounding Jesuit are degrading County roads.

The more roadway used from Jesuit traffic, the faster they will continue to degrade. We are dismayed that the County does not seem to have regard for our neighborhood .... Yet look at the property taxes that the County receives from Del Dayo, Wilhaggin, and Sierra Oaks.... homes sold today are roughly a million dollars....that is about \$10K in property taxes a year per sale. Our roads are horrible in our area, with potholes, poor quality repairs, and only 1/2 of a street was repaved when remedial works were done this past Spring.

**RESPONSE 23-40**

The *VMT Analysis* or *Local Transportation Analysis* reports are used to support the analysis within the Draft EIR, which is guided by the CEQA Guidelines Appendix G checklist questions. Road degradation is not considered a transportation impact under CEQA, and thus, is not addressed in these studies.

**COMMENT 23-41**

Additionally, the conclusion states that the project will reduce traffic, circulation, and parking issues for the surrounding community. This conclusion is incorrect also. During warm days, practices will begin later in the evening, yet school gets out at 3:00 (more or less) unless students are required to stay on campus; traffic and daily trips will increase when students leave the campus only to return later in the evening for practice.

- The Traffic Study does not accurately reflect student trips between school, after school, and to games as additional trips generated by nighttime games. Also, shifting daytime trips to peak hours impacts commuters in the neighborhood.

**RESPONSE 23-41**

Transportation-related impacts are comprehensively reported in Chapter 10 of the Draft EIR and include those related to increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access. The Draft EIR does not state that the proposed project would reduce existing traffic, circulation, or parking issues for the surrounding community. In analyzing increase in VMT resulting from the proposed project, a 10-percent “Stay After School Reduction” was applied to the daily trip totals to account for the Friday night game attendees that would contribute to the proposed project’s increase in attendance, but would not contribute to any sort of increase in VMT. These attendees may include Freshman or Junior Varsity football players or staff that would stay on campus in between school ending and the football game starting. While this 10-percent reduction is applied to the proposed project conditions and is not applicable to the existing conditions (Saturday afternoon football games), the total VMT generated for the proposed project would still be greater than the VMT generated under existing conditions. While the proposed project would contribute to an increase in VMT, as discussed in Impact TR-2, this impact would be less than significant.. The conservative assumptions used in the analysis ensures a cautious estimation of vehicle miles traveled and associated impacts that may overestimate actual impacts. Given the comprehensive overview of existing and proposed project vehicle trip patterns in the traffic study, the assessment provides a valid representation of the potential impacts of

operational emissions and vehicle trips. Pursuant to SB 743, automobile delay, as described solely by level of service or other measures of vehicular capacity or traffic congestion, is not considered a significant impact on the environment under CEQA. The Draft EIR appropriately analyzed potential increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access.

Though not required by CEQA, Kimley-Horn prepared a *Local Transportation Analysis* that evaluates transportation-related conditions more broadly. These transportation-related conditions include existing LOS on roadways and intersections (including American River Drive and Fair Oaks Boulevard), existing bicycle and pedestrian facilities near campus, parking supply and demand, and a general safety analysis focusing on the transportation infrastructure in the immediate vicinity of the project. This analysis is included as Appendix F to the Draft EIR.

**COMMENT 23-42**

In the traffic studies, “peak hours” are mentioned.

- The traffic report does not consider the evening commuter traffic that would coincide with the Friday evening games.

**RESPONSE 23-42**

See Master Response 4: Traffic Hazards. See Response 23-41. Pursuant to SB 743, automobile delay, as described solely by level of service or other measures of vehicular capacity or traffic congestion, is not considered a significant impact on the environment under CEQA. The Draft EIR appropriately analyzed potential increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access.

Though not required by CEQA, Kimley-Horn prepared a *Local Transportation Analysis* that evaluates transportation-related conditions more broadly. These transportation-related conditions include existing LOS on roadways and intersections (including American River Drive and Fair Oaks Boulevard), existing bicycle and pedestrian facilities near campus, parking supply and demand, and a general safety analysis focusing on the transportation infrastructure in the immediate vicinity of the project. This analysis is included as Appendix F to the Draft EIR.

**COMMENT 23-43**

- 1) There is no mention of the time of day of impacted traffic. It’s hard to fathom not considering this. Saturday afternoon, we can and have dealt with it for years, but Friday and many other nights = bad!

**RESPONSE 23-43**

As discussed throughout the Draft EIR, under the proposed project, football games would occur on Friday evenings. As discussed more specifically in Chapter 10 “Transportation”, the focus of the transportation analysis is on the Friday evening



football games due to the relatively higher attendance of football games. Minor increases in traffic may also occur when the stadium is being used for non-football game events. See Response 23-42 regarding automobile delay. Because Friday night football games would constitute the “worst-case scenario” for transportation impacts, the discussion of impacts focuses on Friday nights. Please see page 3-11 of Chapter 3 “Project Description” for information on the Marauder Stadium’s anticipated schedule of uses under the proposed project.

**COMMENT 23-44**

2) No Traffic and Engineering study

**RESPONSE 23-44**

It is not clear from the comment what traffic and engineering studies are not included. Multiple technical studies were conducted to support the analysis contained in the Draft EIR. These studies include a *Lighting Report*, an *Air Quality and GHG Emissions Analysis*, an *Environmental Noise Assessment*, and a *Vehicle Miles Traveled (VMT) Analysis Memo*, a *Local Transportation Analysis (LTA) Memo*. Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix H).

The engineering details, including the design and construction methods, of the proposed project can be found in Chapter 3 “Project Description.”

**COMMENT 23-45**

3) Page 2. Attendance based on current Saturday day games is unrealistic – “number of attendees was assumed to increase from an average of 1,200 attendees for Saturday games to 1,500 attendees for Friday night games.”

**RESPONSE 23-45**

See Master Response 5: Attendance Estimates.

**COMMENT 23-46**

4) Page 3. Valley High, St. Vincent, and Carmel are not in residential neighborhoods and are not known as “football schools.” – look at Google Earth to compare; using these two schools without stating the obvious is insulting. Carmel HS Pic: <https://3.files.edl.io/c8e7/21/01/15/202418-efad18ec-ba8d-45ca-afe3-7ad96597996d.jpg> Note surrounding property, not encroaching on private residence.

**RESPONSE 23-46**

It is not clear from the comment what the specific concern is regarding the adequacy of the Draft EIR. The specific details of the proposed project and the project site context are the focus of analysis throughout the Draft EIR, including the transportation analysis.

**COMMENT 23-47**

- 5) Page 3. The Traffic Study did not count student athlete vehicles that will drive home and back in for practices and games.

**RESPONSE 23-47**

Please see Response 23-41.

**COMMENT 23-48**

- 6) Page 8. “An average event vehicle occupancy of 3.0 or higher is needed not to exceed the parking supply on campus assuming 1,500 attendees. While the County has been provided feedback from the public that vehicles park offsite during football games, this is likely due to inefficiencies in managing the parking on-site rather than a deficient number of parking stalls.” So, if riders per car (an estimate only) are off by .24, there is not enough parking? Also, inefficiencies in managing parking on-site have nothing to do with cars parked on surface streets; it is the proximity to the field that encourages visitors to park on nearby streets.

**RESPONSE 23-48**

See Master Response 6: Parking Availability. As stated on page 10-4 of the Draft EIR, there are 499 permanent parking stalls available to event attendees. If parking demand exceeds available parking during special events, off-site parking lots including the parking lot at the Rio American High School and the Arden Hills Wellness Resort may be made available for event parking. Additionally, limited parking would be available on public streets. There is also the ability to park an additional 400 vehicles on the fields adjacent to the football stadium.

For a thorough reasoning behind the use of the average vehicle occupancy value (3.24) used for the analysis, please see page 10-4 of Chapter 10 “Transportation” in the Draft EIR. To supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project. W-Trans conducted a survey of parking activity related to a nighttime football game at Jesuit High School. The parking surveys were conducted on a non-football Friday in August 2023 and on the evening of a night football game held under portable lighting in September 2023. Based on those surveys, W-Trans estimated that the vehicle occupancy for the nighttime game in September was approximately 3.22 people per vehicle, which is nearly identical to the 3.24 people per vehicle assumed in the Draft EIR. This survey supports the assumptions made in the Draft EIR pertaining to average vehicle occupancy. The Parking Survey Memorandum prepared by W-Trans can be found in Appendix H of the EIR.

**COMMENT 23-49**

- 7) Page 19. The Planned Event Lighting Calendar used is not even close to the planned use of lights-this wreaks of bait and switch; JHS has updated this numerous times. Why hasn't K. Horn been informed??

**RESPONSE 23-49**

The “Anticipated Event Lighting Schedule” shown on Plate PD-5 of the Draft EIR on page 3-12 is the same schedule displayed in the *Local Transportation Analysis* and *Vehicle Miles Traveled Analysis* prepared by Kimley-Horn in March 2023.

**COMMENT 23-50**

- The Traffic Study did not use the same figures provided to the public in the Applicant’s proposal.

Jesuit’s claim that no more than 1,500 attendees would attend a night game seems disingenuous. They built the stadium for 3,000 attendees; why would they build it for double the maximum? The traffic study seems to take Jesuit’s word for the number of attendees without any question or data to support it. Did they ask Jesuit for the information Jesuit accumulated in deciding to build a 3000-seat stadium? What about the information provided to the donors who paid for the new stadium? It seems those materials would have made representations concerning why the Applicant needed such a large stadium; I doubt it says only 1,500 people will attend otherwise. How would they have justified building such a large stadium or getting people to pay for it?

**RESPONSE 23-50**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The *Local Transportation Analysis* and the *Vehicle Miles Traveled (VMT) Analysis* were prepared by Kimley-Horn to support the analysis contained within the Draft EIR. The figures found within Chapter 10 “Transportation” come from the traffic studies prepared by Kimley-Horn. Further, Plate PD-5 “Anticipated Event Lighting Schedule” found on page 3-12 of the Draft EIR can be found in Attachment A of the *VMT Analysis* and Appendix C of the *Local Transportation Analysis*. The traffic studies do use the same figures provided to the public in the Draft EIR.

**COMMENT 23-51**

- Therefore, more Study needs to be done to determine a true basis for the number of attendees. The two games being used to “test” a night game are also unrealistic vis-a-vis the numbers since they are against out-of-town and out-of-state teams.

**RESPONSE 23-51**

Please see Master Response 5: Attendance Estimates.

**COMMENT 23-52**

The comments in the traffic study that Jesuit has enough parking but doesn’t manage it correctly were very concerning. It seems to dismiss notions that the Applicant must have more parking before it can have night games without a real analysis. It ignores that people are still parking in the neighborhood and does not propose how we can be assured that Jesuit will appropriately manage its parking and its patrons will park on

campus. At night event this evening (September 1), Jesuit has many cars parking on the grass. Is Jesuit willing to allow parking on its grass areas for night games, particularly during a rainy season? This is highly doubtful, but Jesuit will argue it kept cars off the street, at least for the “test” game evenings.

**RESPONSE 23-52**

As noted on page 3-13 and 10-4 of the Draft EIR, Jesuit High School would provide additional parking on the soccer/rugby fields and on the field south of the visitor’s bleachers, when needed. The Local Transportation Analysis examines vehicular level of service, queueing at intersections near the project site, impacts to bicycle and pedestrian facilities and circulation, parking supply and demand, and transportation safety in the vicinity of the project site. Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix H). As noted in the W-Trans survey of parking activity, the only public street which appeared to have experienced an increase in parking due to the night football game on September 1, 2023 was American River Drive.

**COMMENT 23-53**

The Kimley Horn analyses were based on attendance estimates (1,200 persons) provided by JHS. I feel these studies should have relied upon actual attendance figures verified by an independent third party.

**RESPONSE 23-53**

Please see Master Response 5: Attendance Estimates.

**COMMENT 23-54**

The Kimley Horn studies use 1,500 persons to measure the expected traffic and parking impacts of “the project.” However, a mere 10% increase (to 1,650) would overwhelm the 36 surplus parking spots projected in the JHS parking lot and further exacerbate the expected “storage” shortage indicated in the queuing analysis.

**RESPONSE 23-54**

As discussed in Chapter 10 “Transportation” pages 10-4 and 10-5, as is under existing conditions, attendees are expected to respond to on-site parking shortages by parking off-site. Additionally, there is ability to park approximately 300 vehicles on the soccer/rugby fields and an additional 100 vehicles on the field south of the visitor’s bleachers. See also Master Response 6: Parking Availability.

**COMMENT 23-55**

The local transportation analysis calls out JHS as inefficient in its on-campus parking management, impacting surrounding residential streets.

- The analysis, however, is lacking in suggesting possible remedies for such inefficiencies.

**RESPONSE 23-55**

The *Local Transportation Analysis* assesses existing conditions and anticipated conditions after implementation of the proposed project as they relate to transportation. This analysis assesses level of service (LOS) at the study intersections and roadways segments, bicycle facilities, pedestrian circulation, parking supply and demand, and provides general safety analysis focusing on the transportation infrastructure in the immediate vicinity of the proposed project. See also Master Response 6: Parking Availability.

**COMMENT 23-56**

The map provided in the Jesuit proposal shows traffic and parking problems.

- However, the proposal does not give realistic solutions or adequately address the lack of on-site parking or how to control future high traffic volume.

**RESPONSE 23-56**

Please see Chapter 3 “Project Description” page 3-13 and Chapter 10 “Transportation” pages 10-4 and 10-5 regarding available on- and off-site parking during football games held at Marauder Stadium under existing conditions and proposed project conditions. See also Master Response 6: Parking Availability.

**COMMENT 23-57**

Marauder Stadium seats 3,000, 2,000 home seats plus 1,000 guest seats for those attending the “regular/plus low to high profile/high-intensity events.” The Jesuit proposals have various parking availability numbers from 450-550 listed as Jesuit variable parking slots available, some only with payment, and states additional parking will be available blocks away in the Rio Americano High School’s parking lot.

- 1) Will Jesuit provide security for the parking lot at Rio Americano High School?
- 2) Will Jesuit provide a shuttle for the long walk, or will attendees need to walk, even late at night, between Jesuit High School and Rio Americano High School?
- 3) Will traffic jams likely occur at entry points along American River Drive or Fair Oaks Blvd. and become a new, common occurrence for neighborhood residents on event days and nights?

**RESPONSE 23-57**

Jesuit High School does not propose to provide security for the parking lot at Rio Americano High School, nor does it propose to provide a shuttle between Jesuit High School and Rio Americano High School.

Pursuant to SB 743, automobile delay, as described solely by level of service or other measures of vehicular capacity or traffic congestion, is not considered a significant impact on the environment under CEQA. The Draft EIR appropriately analyzed potential increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access.

**COMMENT 23-58**

- NO EMERGENCY EVACUATION plans are stated in any Jesuit proposal for 500, 1500, or the ‘sold out’ possible 3000 people attempting to suddenly pour out to American River Drive or Fair Oaks Boulevard.

**RESPONSE 23-58**

Please see pages 11-17 and 11-18 of the Draft EIR for a discussion of emergency evacuation plans related to the proposed project. As discussed, any emergency evacuation during a Friday night football game would be coordinated by the Sacramento County Sheriff’s Department. Traffic from any necessary evacuation would be dispersed throughout this grid network as shown in the *Sacramento County Evacuation Plan*. Furthermore, Jesuit High School has an existing Emergency and Crisis Operations Manual that contains procedures addressing how an evacuation of the campus, including the stadium, would occur should that situation ever be warranted.

**COMMENT 23-59**

- There is no mention of the Applicant preparing a Special Events Transportation Systems Management Plan. Enforcement of the TSM program and events will be assured, including coordination of the school to troubleshoot issues and handle complaints promptly.

**RESPONSE 23-59**

See Response 23-58.

**COMMENT 23-60**

- 1) The analysis does not explore the likelihood that more people per vehicle will likely have a Saturday afternoon game rather than a Friday night. Family members would ride together, whereas single families would be more likely to take separate vehicles on a Friday night (parents coming from work, etc.)

**RESPONSE 23-60**

To supplement the analysis contained in the Draft EIR, W-Trans prepared an additional traffic analysis for the proposed project (see Appendix H). W-Trans conducted a survey of parking activity related to a nighttime football game at Jesuit High School. The parking surveys were conducted on a non-football Friday in August 2023 and on the evening of a night football game held under portable lighting in September 2023. Based on those surveys, W-Trans estimated that the vehicle occupancy for the nighttime game in September was approximately 3.22 people per vehicle, which is nearly identical to the

3.24 people per vehicle assumed in the Draft EIR. This survey supports the assumptions made in the Draft EIR pertaining to average vehicle occupancy.

According to the traffic studies prepared by Kimley-Horn, it is assumed that approximately 10 percent of attendees are already on campus under existing conditions plus the proposed project conditions. The analysis assumes a conservative stance to ensure a cautious estimation of vehicle miles traveled and associated impacts. Given the comprehensive overview of existing and proposed project vehicle trip patterns in the traffic study, the assessment provides a valid representation of the potential impacts of vehicle trips.

**COMMENT 23-61**

- 2) Page 4. “Alternative use of the stadium on Saturdays would likely not occur.” There is no way to know this, nor any way JHS can commit to not using the facility on Saturdays and Sundays. There exists a significant chance of increased vehicle trips to JHS on Saturdays that does not exist now.

**RESPONSE 23-61**

Kimley-Horn developed the Vehicle Miles Travelled Analysis with the assistance of the Applicant (Jesuit High School) who provided guidance on the uses of Marauder Stadium if the project is approved. As described in the report, to the extent that other sporting events may replace the football games at Marauder Stadium on Saturday afternoons, it would be replaced by school sporting events that are already occurring at Jesuit on a different field, or are occurring on an off-campus field. In other words, Jesuit High School currently has several other Saturday events occurring on other campus fields. If Saturday football games move to Friday nights, Marauder Stadium may be used by another sports team on Saturday afternoons that would have been otherwise utilizing another field on campus or off campus. Thus, this would not result in any net increase in VMT, since the sporting events would occur regardless.

**COMMENT 23-62**

- 3) Page 4 of the Kimley Horn report states, “They would rent out the football field on Saturdays with the absence of the 4-6 home games that occur today.”

**Does that mean renting out the football field to other football teams in the Sacramento area to play on Saturdays?**

**Would this mean even more football games played during the day on Saturdays OR also more football games played on Saturday evenings?**

**Would renting out the football field on Saturdays involve renting to another type of sport being played? Or, renting out the football field for practice time for other sports?**

If other sports or teams play on the football field during the day on Saturdays, what happened to the concern for players, staff, and attendees being exposed to the hot

outdoor temperatures of climate change? Is this concern only for Jesuit teams, Jesuit staff, and Jesuit attendees? **This contradicts Jesuit's need to change to Friday night football games.**

- Attachment A is entirely inadequate and falsely represents the intended, planned, and anticipated use of the stadium during evenings with lights on.

**RESPONSE 23-62**

As discussed in the Vehicle Miles Traveled Analysis (Appendix E of the Draft EIR), if Marauder Stadium is used on Saturdays, it would likely be used by a Jesuit sport's team that is already playing on the Jesuit High School campus on a different field. Thus, the sport's team would remain on campus, but would be using Marauder Stadium instead of using any of the other Jesuit High School fields. This would not represent any change to VMT generation, because either way, athletes and spectators would have to travel to Jesuit High School.

Please refer to the project objectives found on page 3-7 of the Draft EIR that outlines the objectives that the proposed project would accomplish. Having other sports teams play on Saturday afternoons would not contradict the objectives set forth in the Draft EIR.

Attachment A of the Vehicle Miles Traveled Analysis (Appendix E of the Draft EIR) is a table that displays the general lighting schedule for different events if the proposed project is approved. This table was provided by Jesuit High School in October 2022 and serves as the anticipated lighting schedule, based on the information that is currently available. This table is the Applicant's good-faith effort at full disclosure.

**COMMENT 23-63**

1) Page 3. The words curfew and curfews appear, but nothing tells us what they are.

**RESPONSE 23-63**

Please see Response 16-43.

**COMMENT 23-64**

- The lighting study does not include evidence that they considered using other stadiums with existing lights.

**RESPONSE 23-64**

The purpose of the lighting study (attached as Appendix B to the EIR) was to evaluate the proposed lighting at the project site. Alternatives to the proposed project, such as other stadiums with existing lights as suggested by the commenter, were evaluated in the EIR as required by CEQA. Draft EIR Chapter 4, "Alternatives," included an alternative (Alternative 1) that would arrange for the use of another facility (Hughes Stadium or Hornet Stadium) for practices and games. Alternative 1 is described on Draft EIR page 4-6 and the potentially significant environmental impacts associated with



implementing Alternative 1 are evaluated on Draft EIR page 4-7. A comparison of the potentially significant environmental impacts of Alternative 1 as compared to the proposed project are presented in Draft EIR Table Alt-1 (Draft EIR pages 4-10 through 4-14).

**COMMENT 23-65**

- The lighting study does not identify recommended curfew criteria.

**RESPONSE 23-65**

Implementation of Draft EIR Mitigation Measure NOI-1: Ambient Noise Reduction Strategies (Draft EIR page 9-24) requires nighttime stadium events to be scheduled to conclude by 10 pm, with the understanding that events occasionally require overtime. This represents a 1-hour reduction of the time period during which nighttime stadium lighting is allowed. Although this mitigation measure would not reduce the amount of light emitted, it would reduce the time period during which nearby public and private viewers would experience the proposed visual change. Please see also Master Response 2: Nighttime Light and Glare Impacts and Response 16-43.

**COMMENT 23-66**

- The Lighting study is deficient because the Applicant provided the report, and the County did not have a neutral, third-party consultant expert complete the work.

**RESPONSE 23-66**

Please see Response 16-54. The County has confirmed data and analysis independently as a part of compiling the Draft EIR.

**COMMENT 23-67**

The Light study does not consider how nighttime lights affect neighbors and the neighborhood. Numbers and collected data are only a part of the whole picture.

- 1) **Page 2** states in part...” the stadium lights will be utilized on select evenings to accommodate athletic practices and competitions, primarily during the winter when the sun sets early or during home football games. “Yet on page 4, it states in part that...” the lights will serve to better protect the health and safety of student-athletes...” during Sacramento’s hottest months, June through September. There will be noise from coaches yelling, whistles, and staff during practices. Changing practice times will generate noise outside of current general school hours. The Applicant’s initial and ongoing communications with the neighborhood and residents stated the purpose of the permanent lighting request was to save the children from playing during very hot days. Now, the DEIR states the purpose is so the Applicant can play games and conduct practices during the winter when it’s dark, further expanding activities, noise, and traffic impacts.

**RESPONSE 23-67**

Please refer to the schedule of planned events in Plate PD-5.

**COMMENT 23-68**

- 2) Page 3, all stadium lights will cease approximately one hour after the end of the competition to allow safe egress. Why is this needed since Jesuit has applied for path lights for safety purposes? Once a competition has ended, the stadium lights should be immediately dimmed and/or turned off completely within 15 minutes or sooner.

**RESPONSE 23-68**

To ensure appropriate safety of persons exiting the stadium after events, participant movements, and maintenance, the lights will remain lit after evening events for some period of time – estimated to be approximately one hour for the purposes of the Draft EIR.

**COMMENT 23-69**

- 3) Page 3 how was “near capacity” crowds determined?

**RESPONSE 23-69**

As described in Chapter 3 “Project Description”, the total maximum capacity for Marauder Stadium is approximately 3,000 persons, which is the projected maximum number of attendees for playoff games used within the Draft EIR analyses and supporting technical studies. Therefore, the transportation analysis did assess impacts associated with the stadium being at capacity.

**COMMENT 23-70**

- 4) How will operating lights 120 + nights/year affect all the migratory birds and waterfowl that call this area their home? Geese regularly used to rest on the Jesuit baseball fields, but in 2022, I noticed them fleeing their normal patch of grass on the lower fields. So far this year, the geese have not been observed. Were electronic or sonic devices installed to harass or harm the waterfowl? Who chased these beautiful birds away?

Light pollution, climate change, pesticide use, and habitat loss are driving the decline of some 40 percent of insect species, with the global population of insects shrinking by an estimated 2 percent per year in what some call an “insect apocalypse.” That threatens the pollination of crops and plants and, ultimately, the entire food web. Light pollution is also contributing to the decline in bird population. The number of birds in the United States has dropped by 29 percent since 1970, which means nearly 3 billion fewer birds in our skies, according to a comprehensive study by the Cornell Lab of Ornithology and others.

Artificial light has altered migration, mating, foraging, pollination, and predation rhythms that developed over eons. Light pollution isn’t as severe an ecological threat as climate change or habitat loss, but it’s accelerating the decline of many animal populations.

Insects, drawn to light, are fried or become easy targets for predators. Bright lights lure nocturnally migrating birds and sea birds into the danger of urban areas, and millions of birds die in collisions with floodlit buildings and communications towers. Sea turtle hatchlings are likewise drawn to artificial lights – and into the jaws of predators.

Lights at night also act as barriers to nocturnal animals, ranging from bats to mountain lions, fragmenting their habitats and marooning them on ecological islands. Predatory creatures – certain snakes, salamanders, small mammals, insects – that rely on the darkness of a new moon to find food no longer have that protection.

“The dark places are a refuge,” says Travis Longcore, a professor at UCLA’s Institute of the Environment and Sustainability. But now, “you have light pollution and skyglow that is as bright as the full moon,” and that means certain animals “don’t come out to forage when they should because it’s a danger signal if it’s too bright.”

Animals find their circadian and seasonal rhythms disrupted by artificial light. Urban birds call earlier in the morning, altering the mating process. Plants produce flowers and fruit at the wrong times. And humans lose sleep because of artificial light (whether from streetlights or our digital devices), potentially contributing to increased obesity and cancer.

“There’s days of research that one could go through on how physiology is affected,” Longcore says, “but it all makes sense when you think that this planet has had day/night and lunar cycles for the whole period of the evolution of life.” Until now.

The biggest share of light pollution comes from commercial sources – gas stations, strip malls and the like – followed by outdoor sports facilities. After that comes residential lights, streetlights, and industrial lights. Municipalities can regulate much of that light pollution, and some already do dimming streetlights during certain hours, requiring dark-sky-friendly exterior lights in new construction and renovations, and simply turning off lights that serve no public safety purpose.

**Source:** Will somebody please turn down the lights? Dana Milbank, The Washington Post, May 5, 2023

[https://eedition.sacbee.com/popovers/dynamic\\_article\\_popover.aspx?artguid=b3b0fa0a-05aa-46bf-85f5-d3594b5f8f18&appcode=SACBEE&eguid=a1374dfa-81b4-47b2-b080-9tiabe5711c5&pnum=73](https://eedition.sacbee.com/popovers/dynamic_article_popover.aspx?artguid=b3b0fa0a-05aa-46bf-85f5-d3594b5f8f18&appcode=SACBEE&eguid=a1374dfa-81b4-47b2-b080-9tiabe5711c5&pnum=73)

### **RESPONSE 23-70**

Potential nighttime lighting impacts related to wildlife at the project site are evaluated in Draft EIR Chapter 11 under the heading “Biological Resources,” on page 11-5, and

were found to be less than significant with implementation of mitigation. The Draft EIR is focused specifically on potential impacts of the proposed project, and thus provides mitigation to reduce the potentially significant impact on nesting birds to a less-than-significant level. While the Draft EIR acknowledges the potential presence of nesting birds including raptors, Mitigation Measure BIO-1 requires nesting surveys prior to demolition and construction so that impacts are avoided at the time that they would have actually occurred. No change to the Draft EIR is necessary.

There are a number of bat species that have varying probabilities of roosting or foraging in the project area, including western red bat (*Lasiurus blossevillii*), hoary bat (*Lasiurus cinereus*), silver-haired bat (*Lasionycteris noctivagans*), canyon bat (*Parastrellus hesperus*), Townsend’s big-eared bat (*Corynorhinus townsendii*), western mastiff bat (*Eumops perotis*), pallid bat (*Antrozous pallidus*), big brown bat (*Eptesicus fuscus*), California myotis (*Myotis californicus*), western small-footed myotis (*Myotis ciliolabrum*), long-eared myotis (*Myotis evotis*), little brown bat (*Myotis lucifugus*), fringed myotis (*Myotis thysanodes*), long-legged myotis (*Myotis Volans*), Yuma myotis (*Myotis yumanensis*), and Mexican free-tailed bat (*Tadarida brasiliensis*). These bat species live with varying degrees of population risk, as summarized by the Western Bat Working Group Species Matrix, but none are state- or federally-listed as threatened or endangered (Western Bat Working Group 2024). Four species are considered Special Status Species by the California Department of Fish and Wildlife: western red bat, pallid bat, Townsend’s big-eared bat, and western mastiff bat. The latter two species are unlikely to be found in the project area. All of these species may roost and forage in a variety of habitats, including semi-urban environments similar to that found in the vicinity of the project site. Many of these species roost in large colonies (e.g., Mexican free-tailed bat) in structures or trees, and several roost individually or in small numbers (e.g., Western red bat). In northern California, bats form maternity colonies in the summer, some hibernate in the winter, and some move between habitats in the spring and fall.

There are no reports indicating evidence of bats roosting at or in the immediate vicinity of the school (Sands 2024). During a habitat assessment conducted on February 10, 2024, one large oak tree was observed within the disturbance area near the northern bleachers that has a potential to provide important roosting habitat for colonial bats.

With development projects generally, colonial species could be at risk of significant impacts if construction were to cause the removal or abandonment of an important roost, especially a maternity roost. If an occupied roost were to be removed or a roost was abandoned with pups in residence, substantial direct mortality could occur. However, for the proposed project, construction would not require removal of any potential roosting habitat. In addition, because construction activities for the proposed project would be quick – occurring over the course of two weeks – and would have little impact on surrounding environments, construction activities would not be expected to cause abandonment of any important bat roosts in the vicinity. Therefore, potential construction related impacts on roosting bats would be less than significant.

The effects of nighttime lighting vary by bat species. While some bats avoid brightly lit areas that may make them more vulnerable to predation (e.g., little brown bat), others

may prefer well-lit areas that lure in moths and other insects to eat (e.g., western red bat) (Bat Conservation International 2024). Avoidance of lighted areas can result in a loss of foraging habitat for some species (Global Ecology and Conservation 2023). In addition, substantial novel noise and human disturbance such as that caused by moving games from the afternoon to the evening could discourage some bats during these times from visiting the project area and result in a loss of foraging habitat. However, the field is constructed with artificial turf rather than grass and provides little value as foraging habitat. In addition, because the Lighting Report (M. Neils Engineering, Inc. 2023) indicates that light trespass would be minimal outside of the project footprint (0.049 to 0.1 footcandles in areas directly adjacent to the stadium), and because the project area is small, the potential loss of foraging habitat associated with operations would be less than significant.

Substantial novel disturbance from increased lighting, noise, and human activity near an occupied roost could also cause roost abandonment. If an occupied maternity roost was abandoned with pups in residence, significant direct mortality could occur. The permanent abandonment of an important migratory or winter roost could cause a significant loss of habitat. However, in the case of the proposed project, disturbance associated with stadium lighting and games is not anticipated during the sensitive summer maternity season when pups are nonvolant (cannot fly). Regular evening practices would cause less disturbance than games (Draft EIR, page 3-12, Plate PD-5) during the less sensitive fall, winter, and spring seasons and would not be expected to cause abandonment of an important roost. Because disturbance from games would be temporary and periodic, games would not be expected to cause permanent roost abandonment and loss of important roost habitat. Therefore, potential operational impacts associated with roost abandonment would be less than significant.

### **COMMENT 23-71**

The JHS stadium light request is a “want,” not a necessity. JHS has an illustrious list of alum scholars and athletes who competed for over 50 years and succeeded without stadium lights. Contrary to the school’s case for lights, most athletes excel academically during the sports season because their schedules require them to remain focused and avoid distractions.

Jesuit Administrators, not global warming, created the “hot” and “unsafe” playing fields in 2015 when they switched from a cool, natural grass field to a plastic/artificial field with a Big Marauder logo at midfield. When that surface became dangerous to play on in 2022, they installed another plastic grass surface that retains heat instead of returning to natural grass and a cooler playing surface. They argue that the surface is “too hot,” so we want lights to play in the cooler evenings.

### **RESPONSE 23-71**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-72**

- Is Jesuit currently in compliance with all mitigation/permit measures and/or requirements?

**RESPONSE 23-72**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-73**

- Why does Jesuit High School need permanent stadium lighting now when they haven't needed it for the past 60 years?

**RESPONSE 23-73**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration. See Chapter 3 of the Draft EIR, "Project Description," which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details, in addition to the Project Objectives.

**COMMENT 23-74**

The original county planners got it right, and they excluded tall structures and lights on the athletic field parcel so there would be open air, space, and views of nature to act as a buffer between the high school activities and every day and evening activities of the 400 families trying to raise children at a place, they call home. Stadium lights aglow for five nights/week, and all the noise nuisances will destroy the quiet and safe sanctuary families need to relax, restore, and rest for the next days' work.

**RESPONSE 23-74**

The Draft EIR evaluates lighting impacts in Chapter 5 (Aesthetics) and noise impacts in Chapter 9.

**COMMENT 23-75**

The Applicant purchased the property with the zoning restrictions and must honor their decision. For 60 years, families purchased homes knowing these zoning limits. A change in zoning limits by the County would be a tax on every homeowner in the neighborhood. While JHS does not rent the use of their athletic venues, they have a long history of donating the facilities. Private girls' high schools, public high schools, parochial schools, colleges, and professional teams in need of a practice site for field sports, including baseball, will ask for a donation. High schools needing a playoff sight will petition the County for a temporary use permit to use Jesuit Stadium. Then, the noise and interior residential parking problems follow because JHS does not supervise non-JHS or low attendance events in their game day protocol. Allowing this Jesuit requested variance will not "Implement the objectives and policies of the county plan to"

“Enhance, protect and maintain the value of a property,” “Enhance, maintain, and preserve community quality of life,” or “Promote compatibility between new and existing development.”

**RESPONSE 23-75**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration. See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details.

**COMMENT 23-76**

**What are the feasible alternatives? Why are the current alternatives not feasible to continue? Where is the Initial Study?** What potential impacts were identified in the Initial Study? Initial Study is not required if it is known an EIR will be prepared.

**RESPONSE 23-76**

Alternatives to the proposed project, including their ability to attain the project objectives, are presented in Chapter 4. The feasibility of project alternatives is ultimately determined by County decision-makers as part of making project findings.

**COMMENT 23-77**

**Where is the arborist report?**

**RESPONSE 23-77**

As discussed in Chapter 11 “Other CEQA Considerations” (Draft EIR, page 11-7), no trees are proposed for removal. Additionally, the construction of the proposed stadium lights would not encroach into the root zone of any trees. Therefore, an arborist survey is not necessary to assess impacts.

**COMMENT 23-78**

**Where is the Safety Report?** They haven’t considered the neighborhood’s safety, which changes when games are at night vs. during the day!

**RESPONSE 23-78**

Pedestrian safety in terms of traffic hazards is discussed in Impact TR-3 (Chapter 10). See also Master Response 4: Traffic Hazards.

**COMMENT 23-79**

**Where is the wildlife report?** From a biological standpoint, have there been any studies on the effect of night lighting on nocturnal wildlife, such as bats? With additional traffic on FO Blvd and AR Drive, I would suspect more wildlife will be mowed down by vehicles.

**RESPONSE 23-79**

Please see Chapter 11 “Other CEQA Sections” for a discussion of impacts to biological resources, including wildlife. Page 11-5 discusses the impacts of nighttime lighting on wildlife. A biological resources report was not prepared for this project.

**COMMENT 23-80**

**Where is the Parking Study?**

**RESPONSE 23-80**

Parking availability is discussed in Chapter 3 “Project Description” (Draft EIR pages 3-13 and 3-15) and Chapter 10 “Transportation” (Draft EIR, pages 10-4 and 10-5). Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School. See also Master Response 6: Parking Availability. The W-Trans memorandum can be found in Appendix H.

**COMMENT 23-81**

**What other Jesuit use permits will be consolidated into the proposed stadium lighting use permit?** The Applicant’s lighting proposal expands its ability to conduct evening and nighttime activities in addition to daytime and afternoon activities. The Applicant’s proposal does not benefit the surrounding tax-paying residents and does not benefit the neighborhood. The neighborhood should not be responsible for subsidizing or accommodating the Applicant’s expansion plan or opportunities for families and students from outside the community. The granting of the application is inconsistent with the County’s Comprehensive Plan and the purposes of the Zoning Ordinance.

**RESPONSE 23-81**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the potential physical impacts of the proposed project on the environment, as contained in Chapters 5 through 11. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the project. The applicant is not requesting a change to the R-4 zoning designation. The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality.

**COMMENT 23-82**

The proposed project (used as a sports stadium) allows for over-height limit structures. Neighborhood changes include degrading the site’s visual character and are incompatible with the surrounding residential neighborhood. The project has an incoherent design that:



- a. Creates a sense of disorder and undesirable environment for occupants, visitors, and the general community,
- b. does not preserve, respect, and integrate existing natural features that contribute positively to the site and the neighborhood character, including historic resources of the area when relevant,
- c. is inconsistent with the context-based design criteria of the applicable RD-4 zone district,
- d. creates disharmonious transitions in scale, mass, and character to adjacent land uses and land use designations,
- e. degrades, negatively impacts, and encroaches and infringes on living conditions in adjacent residential areas.

**RESPONSE 23-82**

The project's effect on visual character is analyzed in Impact AE-1 in Chapter 5 (Aesthetics). The ultimate determination of consistency with relevant design guidelines will be made by County decision-makers as part of project findings. Regarding item b, the proposed project does not affect any sensitive biological or known sensitive cultural or historic resources, as detailed in Chapter 11 of the Draft EIR. The applicant is not requesting a change to the R-4 zoning designation. The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium.

**COMMENT 23-83**

Air Quality impacts essentially have been moved from Saturday afternoon to Friday night. That is a baseline, but doesn't Jesuit plan on hosting tournaments and renting out their facilities at other times? If so, the EIR must address the additional impact of extra traffic and the pollution created.

**RESPONSE 23-83**

See Response 23-62. Transportation-related effects are comprehensively addressed in Chapter 10. Air pollutant emission impacts of the proposed project are comprehensively addressed in Chapter 6 of the Draft EIR. As noted, the proposed project's operations would include an intermittent increase in vehicle trips to the stadium during events. To calculate the increase in operational mobile-source emissions that would result from increased attendance at evening and nighttime events, an estimated trip rate for one day per week (Saturday) was used to estimate air pollutant emissions based on the vehicle miles traveled analysis prepared for the Draft EIR the more heavily attended playoff events and not typical games. As shown in Table AQ-4, the intermittent increase in emissions related to project operations would not approach or exceed any Sacramento Metropolitan Air Quality Management District significance threshold for criteria air pollutant emissions.

**COMMENT 23-84**

- The Air Quality report did not address vehicle idling during practices when parents or caregivers wait for students. The idling of vehicles and visiting school buses needs to be addressed. It is inappropriate for family members and school buses to idle their vehicles for long periods, polluting the area and impacting nearby residents.

**RESPONSE 23-84**

See Response 2-1.

**COMMENT 23-85****Insufficient Jesuit Protocol for Night Event**

This section cites items deemed insufficient in the Jesuit’s Protocol for Night Events (<https://acrobat.adobe.com/id/urn:aaid:sc:US:476221e2-286b-4607-87fb-23027d7d5d14>). In some cases, the inadequate aspects are the rationale for the proposed conditions of approval.

**RESPONSE 23-85**

This is a comment on Jesuit High School’s Event Management Protocols. This is not a comment on the Draft EIR, but it is included here for decision maker consideration. See Response 16-19.

**COMMENT 23-86**

- 1) Page 3: The location of the crossing guard at American River Drive is unclear and insufficient.
  - “Serve as a crossing guard at American River Drive from the south side of the street to campus.” More context and details need to be provided.

**RESPONSE 23-86**

This is a comment on Jesuit High School’s Event Management Protocols. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 23-87**

- 2) Monitoring trash is not sufficient. Monitoring for ‘loitering’ is not sufficient.
  - “Monitor the perimeter for loitering and trash.”

**RESPONSE 23-87**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-88**

- 3) The “Visiting School Information Sheet” cited on page 1 should be included to know what is and is not communicated and how the visiting team’s school will communicate to their students and parents.

**RESPONSE 23-88**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-89**

- 4) The scope of the protocol is not clear, and the application of the protocol is not consistent with other events. The original intention of the lights was for Jesuit High School events only. The Jesuit High School Stadium Lighting DEIR (Jesuit High School Stadium Lighting DEIR, 2023) discusses use is not specific to Jesuit High School. If there is to be a protocol for night events, it seems reasonable to have a protocol for all events or specific conditions when the protocol is to be applied.

**RESPONSE 23-89**

The schedule of evening events that is evaluated in this Draft EIR are presented in Plate PD-5.

**COMMENT 23-90**

Is The Event Management Protocol a living document? Will neighbors have an influence on changes/improvements?

**RESPONSE 23-90**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-91**

- 1) Page 4. “Sound limits will be set per county guidelines.” – What are the guidelines??

**RESPONSE 23-91**

This comment regards the Event Management Protocol rather than the Draft EIR. Regarding sound limits, see Response 12-4. An updated Mitigation Measure has been provided as a part of the Final EIR with the goal of reducing the noise associated with the use of the PA system under the proposed project. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system. The performance standard guidance in the revised Mitigation Measure NOI-1 for the use of the PA system is consistent with the Sacramento County General Plan Noise Element for non-transportation sources of noise at night.

**COMMENT 23-92**

- 2) Page 6. What is the good neighbor’s phone line number? Will it be available for all events?? What is the alternative phone number to call if there is no response from a Jesuit representative?

**RESPONSE 23-92**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-93**

- 3) Page 7. Games going beyond 10 p.m. PA will be turned down – but are not defined to what level.

**RESPONSE 23-93**

Please see Response 12-4 and Response 23-91.

**COMMENT 23-94**

- 4) Page 8. Who specifically replies to “neighbors or community concerns”?

**RESPONSE 23-94**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-95**

“Jesuit’s protocol for night events” seems to cover the parking and security issues, although I don’t know how they can legally keep people from parking on public streets.

**RESPONSE 23-95**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-96**

**Game Day General:** states that the CCT will be on-site 90 minutes before an event and remain 90 minutes after or until the venue is clear. What is considered the “venue”? It needs to ensure that the streets are cleared. Under “Identify and report vehicles parking in an illegal or unsafe location, who will this information be reported to?”

**RESPONSE 23-96**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-79**

**Behavior:** It is stated that no tailgating is permitted in parking lots, overflow parking lots, or on adjacent public streets, but there was tailgating at the August 25, 2023, football game.

**RESPONSE 23-97**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-98**

**Tech, Sound, and Lighting:** When and under what authorization(s) was the WIFI installed?

**RESPONSE 23-98**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-99**

**Parking:** States in part that to incentivize carpooling, a designated ride-share area will be established at the front of the Chapel. This designated ride-share area should be closer to the venue to encourage ridesharing. No purchasing of parking spaces should be allowed. Jesuit will implement a shared parking agreement with Rio Americano High School during maximum capacity events.

- However, that would impact other parts of the neighborhood and must be analyzed in the EIR.

**RESPONSE 23-99**

Potential traffic hazards to pedestrians that may park off-site has been evaluated under Impact TR-3 on pages 10-13 and 10-14 of the Draft EIR. Mitigation Measure TR-2 Pedestrian Safety Improvements to Site Plans is proposed to reduce these hazards to a less than significant level. See also Master Response 6: Parking Availability.

**COMMENT 23-100**

**Food Service and Vendors:** Food trucks were operating on the August 25, 2023, football game.

- What permits and/or licenses were obtained in advance to operate the food trucks?

**RESPONSE 23-100**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-101**

**Question:** If it is too hot to practice sports outside in the afternoon, will they suspend all sports practice, excluding swimming? Or will some sports decide 90 degrees is not too hot and others delay until evening? I am concerned that practice may continue for afternoons and evenings on the same day.

**RESPONSE 23-101**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details, including changes in the timing of events attributable to the proposed project.

**COMMENT 23-102**

**Question:** The data shows 41 events with over 500 in attendance. With only five home games in football, which sports account for the other 35 events?

**RESPONSE 23-102**

The scope of evening events that are evaluated in this Draft EIR are presented in Plate PD-5 on page 3-12 of the Draft EIR.

**COMMENT 23-103**

**Question:** I thought lacrosse was a “club sport,” not a varsity sport throughout Sacramento.

**RESPONSE 23-103**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-104**

**Question:** Soccer season is November- February. Same with Track and lacrosse. Heat is not an issue. Why does Jesuit need lights on until 9 p.m.? Remember, the new headmaster cited “heat” in his TV interview for days with late practices.

**RESPONSE 23-104**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details,

including the Project Objectives. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-105**

**Comment:** The online notice is only for high (1,500+) events. Very few events draw 1,500 at Jesuit. But crowds of 800 spectators can quickly impact the neighborhood. So why limit the online notice to only a handful of annual events? The notice is based upon anticipated attendance- not enough notice to “good neighbors.” Especially since these concern lights and nighttime events. Notice that it is not as necessary for daytime events on the weekends.

**RESPONSE 23-105**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-106**

**Comment:** Signage must be at American River Drive and Tennyson because of the Jesuit parking lot on Tennyson.

**RESPONSE 23-106**

Master Response 4: Traffic Hazards. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-107**

**Comment:** Volunteer crossing guards for events of 1,500+?! They should be off-duty police, at the least, not parent volunteers steering traffic.

**RESPONSE 23-107**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-108**

**Comment:** Who do we report “tailgating” to in real time? And if we can hear the loudspeakers clearly from 500 yards away, is that too loud?

**RESPONSE 23-108**

Noise impacts of the proposed project are comprehensively evaluated in Chapter 9 of the Draft EIR. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated

Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 23-109**

**Comment:** Tennyson should be closed on Football home games to avoid overflow south into Del Dayo Estates. Posting “no parking” is too often ignored.

**RESPONSE 23-109**

The studies supporting the analysis on the Draft EIR were prepared in 2023 and the transportation analysis is presented in Chapter 10 of the EIR, “Transportation.” The Vehicle Miles Traveled (VMT) Analysis and Local Transportation Analysis conducted by Kimley-Horn for the proposed project were completed on March 10, 2023 and can be found in Appendix E and Appendix F of the Draft EIR. The Local Transportation Analysis examines vehicular level of service, queueing at intersections near the project site, impacts to bicycle and pedestrian facilities and circulation, parking supply and demand, and transportation safety in the vicinity of the project site. To supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix H). As noted in the W-Trans survey of parking activity, the only public street which appeared to have experienced an increase in parking due to the night football game on September 1, 2023 was American River Drive. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-110**

**Comment:** Using Rio’s parking lot for big events (Football playoff games) is a great idea.

**RESPONSE 23-110**

The commenter’s support for using Rio Americano High School’s parking lot for large events is noted.

**COMMENT 23-111**

**Comment:** Post the “good neighbor” phone number. We all need to have it.

**RESPONSE 23-111**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-112**

**Comment:** No vendor trucks, please, unless they are inside the Jesuit fences. Creates crowds and waste if they are parked on American River Drive.



**RESPONSE 23-112**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-113**

**Comment:** Lights can remain on for over an hour after the event because they have a permit—no use of the speakers to request attendees to exit and turn the lights off ASAP.

**RESPONSE 23-113**

Visual impacts, including impacts related to the use of stadium lights are comprehensively addressed in Chapter 5 of the Draft EIR. As noted, lighting potentially will remain on for a short time afterward the end of an event to facilitate safe crowd exiting and for clean-up and other similar activities after game completion. A revised Mitigation Measure NOI-1 clarifies that events shall be scheduled to end by or before 10pm, with the recognition that games may occasionally require overtime play, and overtime play may require that a game extend beyond 10pm.

**COMMENT 23-114**

**Comment:** We need a STOP SIGN on American River Drive and Tennyson. Rio has one. Jesuit has a light on Fair Oaks and a stop sign on Jacob. A driver was ticketed on American River Drive going over 60 mph a few weeks ago. We don't even have speed bumps to slow traffic in front of the Jesuit lot on Tennyson. Jesuit should advocate for either speed bumps before and after Tennyson or a STOP SIGN. It will create a safer environment for all in a lasting, meaningful way.

**RESPONSE 23-114**

Regarding the safety of pedestrians crossing American River Drive and Tennyson Way, please see Response 42-7.

**COMMENT 23-115**

The “Visiting School Information Sheet” cited on page 1 does not identify what is and is not communicated.

**RESPONSE 23-115**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-116**

Jesuit should pay for the off-duty sheriff patrol that that we home owners pay for through the Del Dayo Association for all events and practice to patrol the outside areas of the

neighborhood (river access roads, side streets within 1/4 mile of the school, Del Dayo elementary school, Ashton Park)

**RESPONSE 23-116**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-117**

Jesuit needs to have a person assigned at each stop sign 90 minutes before and after each game (Jacob and Oak Vista, Jacob Lane, and American River Drive).

**RESPONSE 23-117**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-118**

Jesuit needs to sign a legal document that the protocol will continue if Jesuit has a campus in the neighborhood.

**RESPONSE 23-118**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. In addition, the proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium, and the Use Permit, if issued, will have enforceable permit conditions. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 23-119**

Jesuit needs to sign a legal document that if any incident take place (car crash, hit and run, pedestrian hit by automobile, violence caused by guns or knives, drunk drivers or high on drugs). Jesuit cannot redeem themselves from any law suit.

- Jesuit High School shall publish the “Visiting School Information Sheet” online.
- The “Visiting School Information Sheet” shall cite crosswalk locations.
- The “Visiting School Information Sheet” shall cite that parking is primarily in Lot A
- The “Visiting School Information Sheet” shall cite that parking is discouraged on American River Drive.

- The “Visiting School Information Sheet” shall cite “South Entrance” (S) on page 10 has no pedestrian access and is for vehicles only.
- The “Visiting School Information Sheet” shall use an alternate icon for “South Entrance”(S) on page 10 as this is NOT the primary or recommended access for vehicles or pedestrians.

***RESPONSE 23-119***

See Response 23-118. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

## **LETTER 24**

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Elizabeth Hughes (October 15, 2023 (1)).

### **COMMENT 24-1**

Imagine a project submitted to the County that encompasses the creation of a cutting-edge sports track and field, a grandiose scoreboard, stadium-style bleachers, a state-of-the-art press box, a booming PA system, permanent lighting, and extended operating hours from 7:00 a.m. to 10:00 p.m. A project with the described components would be a “sports complex” land use, not a “school” land use.

### **RESPONSE 24-1**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the potential physical impacts of the proposed project on the environment, as contained in Chapters 5 through 11. The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

### **COMMENT 24-2**

Jesuit has approached this vision gradually, seeking separate approvals for each aspect of their plan over several years. Their aim, however, is clear: to build a comprehensive sports complex that defies the conventional zoning norms of an RD or a typical school use within an RD zone. Their expansion into the realm of athletics has far surpassed the boundaries of traditional “school use.”

### **RESPONSE 24-2**

See Response 17-2.

### **COMMENT 24-3**

In Sacramento County, a sporting complex typically resides in an M-1 zone, and the kind that Jesuit aspires to create doesn’t belong in an RD-4 residential neighborhood and exceeds the needs of a school. If the County were to endorse such a land use change in this strategic, multi-year manner, it could become the crux of our appeal and legal challenge when the Planning Commission gives the green light to the project.

### **RESPONSE 24-3**

See Chapter 8 of the Draft EIR for a discussion of planning and zoning. As addressed in this chapter, private schools are permitted in the RD-4 land use zone, subject to issuance of a conditional use permit. It should be noted that the applicant is not requesting a change to the R-4 zoning designation. The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium.

**COMMENT 24-4**

This project's only beneficiary is Jesuit High School (a private business) and its ambitious expansion plans, with little thought given to the neighborhood. The cumulative effects of this venture stand to benefit Jesuit by boosting their sports program and student enrollment, all at the expense of the hardworking, tax-paying residents and their families. When asked "what does Jesuit believe its project does to benefit the community," they responded that by allowing the school to play Friday night games, they would not play on Saturdays, which is the benefit they are offering to the residents. I surveyed 200 residents to ask if they preferred Jesuit to play games on Friday nights or during the day on Saturdays. Ninety-eight percent of respondents chose games to play on Saturday rather than intrude on our Friday nights. The Jesuit-defined "benefit" offered to the community is not a "benefit" desired by the residents. Remember that Jesuit allows many other non-profit organizations to use their fields on Saturdays and Sundays, so having Jesuit not playing games on Saturdays does not mean we will have one single day of quiet in the neighborhood.

**RESPONSE 24-4**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 24-5**

There has never been one public community meeting to involve the residents in this planning process. Supervisor Desmond offered to hold a meeting but now says it won't occur until after the EIR is approved.

**RESPONSE 24-5**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 24-6**

The big question remains: What tangible benefits does Jesuit's development proposal offer to offset the significant impact it will have on our community? Regrettably, there seems to be no silver lining for the neighborhood—only challenges to confront.

**RESPONSE 24-6**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

## **LETTER 25**

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Elizabeth Hughes (October 15, 2023 (2)).

### **COMMENT 25-1**

Imagine a project submitted to the County that encompasses the creation of a cutting-edge sports track and field, a grandiose scoreboard, stadium-style bleachers, a state-of-the-art press box, a booming PA system, permanent lighting, and extended operating hours from 7:00 a.m. to 10:00 p.m. A project with the described components would be a “sports complex” land use, not a “school” land use.

### **RESPONSE 25-1**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the potential physical impacts of the proposed project on the environment, as contained in Chapters 5 through 11. The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

### **COMMENT 25-2**

Jesuit has approached this vision gradually, seeking separate approvals for each aspect of their plan over several years. Their aim, however, is clear: to build a comprehensive sports complex that defies the conventional zoning norms of an RD or a typical school use within an RD zone. Their expansion into the realm of athletics has far surpassed the boundaries of traditional “school use.”

### **RESPONSE 25-2**

See Response 17-2.

### **COMMENT 25-3**

In Sacramento County, a sporting complex typically resides in an M-1 zone, and the kind that Jesuit aspires to create doesn’t belong in an RD-4 residential neighborhood and exceeds the needs of a school. If the County were to endorse such a land use change in this strategic, multi-year manner, it could become the crux of our appeal and legal challenge when the Planning Commission gives the green light to the project.

### **RESPONSE 25-3**

See Response 24-3.

### **COMMENT 25-4**

This project’s only beneficiary is Jesuit High School (a private business) and its ambitious expansion plans, with little thought given to the neighborhood. The cumulative effects of this venture stand to benefit Jesuit by boosting their sports program and

student enrollment, all at the expense of the hardworking, tax-paying residents and their families. When asked “what does Jesuit believe its project does to benefit the community,” they responded that by allowing the school to play Friday night games, they would not play on Saturdays, which is the benefit they are offering to the residents. I surveyed 200 residents to ask if they preferred Jesuit to play games on Friday nights or during the day on Saturdays. Ninety-eight percent of respondents chose games to play on Saturday rather than intrude on our Friday nights. The Jesuit-defined “benefit” offered to the community is not a “benefit” desired by the residents. Remember that Jesuit allows many other non-profit organizations to use their fields on Saturdays and Sundays, so having Jesuit not playing games on Saturdays does not mean we will have one single day of quiet in the neighborhood.

***RESPONSE 25-4***

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The project does not propose any increase in enrollment.

***COMMENT 25-5***

There has never been one public community meeting to involve the residents in this planning process. Supervisor Desmond offered to hold a meeting but now says it won’t occur until after the EIR is approved.

***RESPONSE 25-5***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

***COMMENT 25-6***

The big question remains: What tangible benefits does Jesuit’s development proposal offer to offset the significant impact it will have on our community? Regrettably, there seems to be no silver lining for the neighborhood—only challenges to confront.

***RESPONSE 25-6***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

## LETTER 26

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Elizabeth Hughes (October 18, 2023 (1)).

### **COMMENT 26-1**

**What is a “project” under CEQA? Project:** activity undertaken by a public agency or a private activity that may cause a change in the environment and must receive **discretionary approval** from a government agency. This means the Applicant is not guaranteed to obtain approvals for their proposed project, and the County officials have discretion and a requirement to consider all cumulative impacts beyond the stated physical installation of 100’ stadium lighting poles.

### **RESPONSE 26-1**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

### **COMMENT 26-2**

**Will the project have a significant impact on the environment?** The following is a list of expected reports for the project per the Draft EIR released on September 15, 2023.

When reports were not provided, the expected report was cited as “no report provided,” which is a deficiency in the project.

When a report or set of reports was provided for a category, a specific section in this document cites deficiencies found.

### **Deficiencies**

This section cites the specific deficiencies per the reports.

### **Project deficiencies due to lack of report**

The following expected reports have not been made available or were not done.

1. Aesthetics – no report provided
2. Agriculture – no report provided
3. Biology – no report provided
4. Cultural – no report provided
5. Geology – no report provided
6. Hazards – no report provided
7. Hydrology – no report provided
8. Land Use – no report provided
9. Minerals – no report provided
10. Population/Housing – no report provided
11. Public Services/Utilities – no report provided



12. Recreation – no report provided
13. Urban decay – no report provided

**RESPONSE 26-2**

Please see Response 23-2.

**COMMENT 26-3**

**What is a “significant impact on the environment?”**

A significant impact on the environment includes substantial, or potentially substantial, adverse change(s) in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. A social or economic change by itself shall not be considered a significant effect on the environment (CCR §15382).

The results from the Applicant’s proposed lighting project will decrease safety, increase neighborhood disruptions, affect the character of the surrounding community, create significant noise, traffic, and pedestrian impacts, and affect the surrounding wildlife environment.

Schools are conditionally permitted to use in areas designated as Single-Family Residential. The Applicant’s proposed stadium lighting project is a land-use change that reflects a sporting complex. This change in land use is inconsistent with RD-R residential neighborhoods.

The following sections reflect deficiencies of the technical studies used in the County’s Draft EIR for the Applicant’s proposed project.

**RESPONSE 26-3**

The Draft EIR ensures a comprehensive assessment of the environmental effects, providing a reliable basis for evaluating and addressing the proposed project’s impact on the physical surroundings and includes mitigation measures that are summarized in Chapter 1, “Executive Summary.” With regard to land use, please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality. It should be noted that the applicant is not requesting a change to the R-4 zoning designation. The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium.

**COMMENT 26-4**

The Noise Assessment is insufficient and does not meet expectations of a Noise Impact Analysis – Environment Impact Reviews should include a Noise Impact Analysis. The Bollard Acoustical Noise Assessment, dated March 6, 2023, is an “assessment” and does not meet the expectations of an EIR, which should include a **Noise Impact Analysis**. An Environmental Noise Assessment is a comprehensive study to evaluate existing or potential noise sources in an area. It aims to assess the environment’s current or projected noise levels and analyze their potential impacts on human health,

well-being, and the surrounding community. On the other hand, Noise Impact Analysis focuses on evaluating and assessing the potential noise impacts of a specific development project. It is often conducted as part of an Environmental Impact Report or as a requirement for obtaining permits or approvals for a construction project. *An Environmental Noise Assessment assesses an area’s existing or potential noise sources and their environmental and community impacts. A Noise Impact Analysis, on the other hand, examines explicitly the potential noise impacts of a development project and aims to propose mitigation measures to manage those impacts.*

**RESPONSE 26-4**

Please see Response 23-5.

**COMMENT 26-5**

- The Bollard Acoustical Noise Assessment did not conduct a normal daytime high school activity baseline.

The Bollard Acoustical Noise Assessment’s specific purposes were to quantify pre-project (baseline) ambient noise conditions in the residential areas surrounding the JHS stadium, to evaluate the impacts of noise generated during evening hours at the stadium within those residential areas, and to evaluate measures to reduce the noise generation of those activities where appropriate and feasible. The Bollard Acoustical Noise Assessment did not conduct a normal daytime high school activity baseline. The baseline study inappropriately defined a “baseline” during high-level noise activities rather than non-activities. A baseline study should be required to analyze normal noises and then compare this to high-level noises.

- The Bollard Assessment did not study actual high-level football game night activities and noise.

**RESPONSE 26-5**

Please see Responses 23-6 and 23-12.

**COMMENT 26-6**

Bollard’s earlier Study dated January 14, 2016, Attachment C-1, states high school P/A sound level at maximum volume was 75-83 dBA in Piccadilly residential area, exceeding desired levels. Only after a manual downward adjustment by school representatives did the noise levels drop to 70 dBA at exterior locations of Piccadilly residents. The Bollard Assessment assumes “the [Jesuit] P/A system sound levels can be maintained at 70 dB Lmax or less within the nearest exterior residential back yard, the predicted sound level of 40 dB Lmax (for interior homes) would be within compliance.”

- The Bollard early “assumptions” do not provide appropriate data for a noise compliance assessment as no description supports the assumption. Any assumptions made are arguably due to the last measured data provided. In addition, there is a lack of data on PA system volumes, usage, and noise. The

2016 Bollard assumptions are inappropriate for use in the 2023 Noise Assessment.

**RESPONSE 26-6**

Please see Response 23-7. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 26-7**

The Bollard Assessment states existing P/A speakers, attached 35-45 feet above ground, will be re-attached to the proposed 90-foot-high light towers, and no change of sound levels would result. Only one football event was relied upon for sound measurement:” sound levels at Site 2, Piccadilly Circle “was exceeded at this location during 3 of the hours monitored,” and “maximum sound levels measured at Site 2 exceeded the County’s 70 dBA Lmax daytime noise standards by an average of 4 dBA during the October 8 football game.”

- The noise assessment is deficient because it omitted noise levels generated by food truck vendors, crowds (bullhorns, cowbells, airhorns, cheering, etc.), the band, and music during breaks and cheerleading activities.

**RESPONSE 26-7**

Please see Response 23-8.

**COMMENT 26-8**

On October 22, 2022, at a recent meeting between the school representatives and neighbors, attended by Supervisor Desmond, a neighbor asked if the school monitors or tests their compliance with mandated dBA noise levels, and the school representative answered, “No.” The Applicant does not monitor its noise impacts.

**RESPONSE 26-8**

Please see Comment Response 23-6 regarding the ambient noise study and results.

**COMMENT 26-9**

Adjacent neighbors have tracked and recorded DBA levels during the last five years, indicating the school exceeded county guidelines. Attached is a copy of this neighborhood record of excess dBA emanating from Jesuit’s fields.

- The Bollard Noise Assessment is inadequate because it did not study the Applicant’s actual performance and ability to monitor or maintain noise levels within County code compliance levels. The Bollard recommendations do not include any feature to hold the Applicant or the County to monitoring or testing (or penalties) to maintain noise compliance.

**RESPONSE 26-9**

Please see Response 23-6 regarding the ambient noise study and results. Regarding County guidelines, an updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 26-10**

Page 3. of the Bollard Noise Assessment indicates, “DNL represents a 24-hour average.” An average data set disguises short-term variations in the noise environment, such as those generated during activities within the JHS stadium.” Using a smoothed 24-hour “average” data set is inappropriate to represent specific noise-intense activities the Applicant generates.

- The Bollard Noise assessment incorrectly uses average data to smooth environmental sound variations. The Assessment should reflect actual clim sound variations created by the Applicant.

**RESPONSE 26-10**

Please see Response 23-10.

**COMMENT 26-11**

Page 4. of the Bollard Assessment failed to reveal that the sample set is smaller than first reported because the high school chose to silence the PA system for the entire mid-morning JV game versus Clayton Valley HS, conducted between 10 am - 1:30 pm so that students taking the SAT test would not be disturbed.

**RESPONSE 26-11**

Please see Comment Response 23-6 regarding the ambient noise study. Please note that the period of the project noise study included data from two separate varsity football games on October 1 and October 8 of 2022.

**COMMENT 26-12**

Page 15. of the Bollard Noise Assessment’s anticipated use chart is incorrect; the intended use far exceeds those noted.

- The sample set used by The Bollard Noise Assessment is too small.

**RESPONSE 26-12**

The proposed events that would be played under the new lighting are shown in Plate PD-5. The Draft EIR evaluated this schedule and not previous iterations that may have been communicated to the public.

**COMMENT 26-13**

Page 16. of the Bollard Noise Assessment indicates the October 1 and October 16 test games were smaller and likely quieter than league and playoff events. The Noise Assessment should reflect high-attendance and high-activity games and events, worse case scenarios.

- The Bollard Noise Assessment did not measure a sufficient variety of events and data points to assess the impact adequately.

**RESPONSE 26-13**

Please see Response 23-12, which discusses the attendance numbers of the October 1 and 8, 2022 games, as well as two additional football games with higher attendance that were later studied. As stated therein, two additional football games on August 25 and September 1, 2023 were studied with reported attendance at approximately 2,500. The results of that additional study reinforced the conclusions of the noise assessment (Appendix J).

**COMMENT 26-14**

The events and attendance can vary due to multiple reasons. To have a better understanding of noise and the type of attendance it represents, the following measures and scales should be considered with the noise-based measurements:

1. Number of Attendees – Measured the number of people at the event’s start.
2. Number of vehicles – Measured the number of cars in JHS parking lot(s).
3. Number of vehicles – Measured the number of cars parked on relevant street parking.
4. Length of game – measured in minutes
5. Start time of game – recorded in date and time PDT
6. Temperature at start of game – measured in degrees Fahrenheit
7. Event – Measured by the sporting event taking place.
8. Division – measured by varsity, Junior varsity, or otherwise.

**RESPONSE 26-14**

Please see Response 23-12.

**COMMENT 26-15**

Page 27. “If noise generated by evening football games held at the JHS stadium **were not exempt** from the local Sacramento County Code noise standards, noise generated by certain events and activities held at the stadium (primarily football games) would exceed those standards at some residential areas surrounding the stadium.”

**RESPONSE 26-15**

Please see Response 23-14.

**COMMENT 26-16**

Knowing lights and speakers were not part of the initial approval for the stadium made it easy to make many improvements. The speakers (and lights), however, were not part of what has been accepted by neighbors and why a “new” or “exception to existing facility” should not be granted. Based on the many years the facility has existed, JHS should not be exempt from county noise standards. The noise study does not explore the no-build option and using existing facilities with lights.

**RESPONSE 26-16**

See Response 23-14. See Chapter 4 of the Draft EIR, which evaluates alternatives to the proposed project, including the no project alternative.

**COMMENT 26-17**

Bollard’s Assessment claims the county noise ordinances do not “technically” apply to the high school (letter to Mr. Dave Higgins Jr. January 14, 2016, pg. 5.) and are exempt from county noise ordinances. This would seem logical if the legal parcels of the school athletic fields were zoned identically to the school buildings. But the athletic fields are a legally separate parcel zoned by the County as R-4, not zoned for secondary school buildings. This statement that R-4 zoned school property is exempt from noise ordinances must be litigated. If the Applicant needs the County to review and approve the lights, the same applies to noise ordinances involving R-4 zoning.

**RESPONSE 26-17**

See Response 23-14.

**COMMENT 26-18**

The proposed night activities push the sound above the 55 dBA levels, which creates a significant environmental impact. That being the case, mitigation must bring that down to a less-than- significant impact, which, as outlined in the DEIR, cannot be mitigated to a level of insignificance.

**RESPONSE 26-18**

Please see Response 23-17. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 26-19**

The noise impact of the PA system is a pain point for residents. Opinions have been shared that it can be too loud, and usage later in the evening is uncomfortable. There is no record of an active partnership with JHS (the Applicant) and the community on the level of the PA system. The noise assessment data states, “[evening events] could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods.” If approved, the noise levels will increase. As cited in the Assessment,

“people react to nighttime noise exposures as though they were twice as loud as daytime exposures.” (Page 3)

**RESPONSE 26-19**

Please see Response 23-18.

**COMMENT 26-20**

Another pain point for residents is frustration on what to do when JSH events are too loud. Residents are unclear of (1) what oversight is done to ensure JSH events meet existing permits and expectations and (2) what action they can take to be heard and find a compromise to continue a healthy co-existence between the residents and JHS. As shown in the report, the noise of the PA is at 70 dbs.

**RESPONSE 26-20**

Please see Response 12-4 regarding noise-related mitigation and the stadium PA system. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system.

**COMMENT 26-21**

Technically, R-4 zoning excludes buildings and outside structures greater than 25 feet in height, and while 150 households that surround the football and baseball field must comply with height and noise levels, shouldn't ALL R-4 zoned property owners comply? **Why does JHS have a professional-sized bating cage that exceeds 25 feet in height with LED lights on R-4 zoned property?**

**RESPONSE 26-21**

Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality. This comment is not related to the adequacy of the Draft EIR for addressing potentially significant environmental effects of the proposed project.

**COMMENT 26-22**

- The Noise Assessment does not consider how speakers affect neighbors and the neighborhood. Numbers and collected data are only a part of the whole picture. The Assessment Study does not represent the cumulative impacts and neighborhood effects, including football games and nearby Rio Americano High School activities.

**RESPONSE 26-22**

Please see Response 12-4 regarding noise-related mitigation and the stadium PA system.

**COMMENT 26-23**

- The Noise Assessment did not consider the sound decibels of the crowds, airhorns, cowbells, or honking horns as spectators leave at 11:00 at night when some of us go to bed at 9 p.m. and our children at 8 p.m.

**RESPONSE 26-23**

Please see Response 23-22. Evening football games were considered to be the events with the highest potential to generate noise as a result of the project. To quantify the potential long-term impacts of the project, noise levels were recorded for home football games played at the JHS stadium and compared to County standards, as discussed below. All sources of noise were included in these measurements, which were in turn used to inform the noise impact analysis detailed in Chapter 9 of the Draft EIR.

**COMMENT 26-24**

The Noise Assessment indicates that noise generated by the project is expected to exceed county standards for RD-4 zoned properties. However, the proposed project is exempt from these standards as it is related to school sports, entertainment, etc. Such an exemption seriously impedes the process considering noise impacts on the surrounding neighborhood.

- Does the Project's EIR look beyond this county exemption in assessing the proposed project's overall and cumulative environmental impacts?

**RESPONSE 26-24**

Please see Response 23-23. As detailed in Chapter 9 of the Draft EIR, the noise-related impacts of the proposed project are considered significant and unavoidable. Please review Chapter 9 of the Draft EIR.

**COMMENT 26-25**

- The Assessment does not include mitigation measures, monitoring, or reporting to ensure less than significant noise-related impacts generated by evening and nighttime games and events. Program monitoring and enforcement requirements should address PA issues, crowd noise, and band and cheer noise, which greatly concern neighbors near Jesuit High School.

**RESPONSE 26-25**

Please see Response 12-4 regarding noise mitigation. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system. However, it is not feasible to reduce overall noise associated with evening events to a less-than-significant level, as PA system noise is only one factor of overall noise associated with evening stadium usage. Other factors include crowd noise and the use of the marching band, which cannot be effectively mitigated.



**COMMENT 26-26**

The Noise Assessment did not conduct a comprehensive scope. Baseline noise studies need to be undertaken along the American River Parkway as the noise from activities taking place at Jesuit can be heard on the American River Parkway.

The existing baseline study does not appear to consider the portable diesel lights used for the Junior Marauders and weeknight practices and must be included in the analysis.

**RESPONSE 26-26**

Please see Response 23-25.

**COMMENT 26-27**

Page 14 of the Bollard Assessment conflicts with the number of games provided by Jesuit.

- The Assessment also does not analyze evening and nighttime team practices, which must be included.

The Noise Assessment justification states that the project will not alter/or affect the PA system. However, the 2023 Bollard Assessment states that ...” **because this analysis concludes that** evening activities and sporting events held under the lights at Jesuit could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods, consideration of **noise mitigation for the project is warranted.**”

Therefore, the conclusion that the lights will not increase any impacts associated with the school’s prior use authorizations, such as the PA system or authorized capacity, is irrelevant since the 2023 Bollard Assessment concludes that substantial increases in ambient noise will occur. Further additional noise will be created by amplifying games that are not currently amplified.

**RESPONSE 26-27**

Please see Response 23-26.

**COMMENT 26-28**

Tyler Mickelson, EIT, et al., report dated March 10, 2023, poorly depicts what happens on the streets of Carmichael, Football, Soccer, Water Polo, and “Jr. Marauder’s” Football events conducted at JHS. The authors relied upon an old, stale report completed in 2015 and “assumed” this represented current conditions eight years later.

- The Traffic study is deficient because it used dated assumptions to calculate its findings.

**RESPONSE 26-28**

The studies supporting the analysis on the Draft EIR were prepared in 2023. The Vehicle Miles Travelled (VMT) Analysis and Local Transportation Analysis conducted by Kimley-Horn for the proposed project were completed on March 10, 2023 and can be

found in Appendix E and Appendix F of the Draft EIR. Additionally, to supplement the analysis in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix H). The technical reports that were referenced to support the analysis in Chapter 10 “Transportation” of the Draft EIR reflect current conditions. The data from 2015 was assumed to be representative of current conditions based on the Sacramento County Traffic Count program, which indicates that volumes along Fair Oaks Boulevard are currently equal to or less than those experienced in 2015. The use of the 2015 data is sufficient within the context of the Sacramento County Traffic Count program, which supports the assumption that conditions have not significantly changed since then.

**COMMENT 26-29**

Since 2015, both Rio and Jesuit HS have increased enrollment; single student driver/car have increased for both schools; complaints against students parking on residential street has mushroomed (Ref. R Desmond meeting with Rio and Wilhaggin-Del Dayo Association); incidence of juvenile reckless driving have increased; Jesuit HS moved drop-off and pick up site from Jacob Lane to American River Drive at Tennyson Way intersection; Jesuit JR. Marauders (10-14 year olds) increased their enrollment and now include cheerleaders who claim Jesuit’s Tennyson/American River Drive parking lot as their home turf.

**RESPONSE 26-29**

This is not a comment on the Draft EIR but is included here for transparency and decision maker consideration.

**COMMENT 26-30**

The March 10, 2023, report states, “As this analysis was completed after football season had ended, the number of attendees at football games was not counted,” and “this analysis used attendance numbers provided by Jesuit High School” and “to be conservative... we assumed an increase from 1,200 attendees for Saturday games to 1,500 for Friday night games.” (Page 2/8) Since when do public decision-makers rely upon the Applicant’s data without validating the information’s accuracy? News flash! Attendance at the Friday, August 25, 2023, game was 2,000 plus... and the out-of-town visitor’s team only purchased 200 tickets. When local schools pack up their cars and buses for a cross-town rivalry night game at JHS, it will be standing room only. All studies presented to the Sac County Planning Board should be based on maximum occupancy (or the worst-case scenario), 3,500 in attendance.

- The Traffic study did not include a spectrum of scenarios to estimate the impacts of possible events.
- The stadium occupancy is 3,500, yet no analysis was provided with attendance of this size.
- The Traffic Study did not cover the impact of all stadium events.

**RESPONSE 26-30**

The *VMT Analysis* and *Local Transportation Analysis* prepared by Kimley Horn assessed transportation impacts for regular season games and playoff games. These studies focus on transportation impacts of football games because football games produce the largest number of trips to and from the school for stadium events. Additionally, the project would change both the day and times at which football games are played—shifting from Saturday midday to Friday evenings—whereas the project would cause such minimal shifts in the times of soccer and lacrosse that it can be reasonable assumed not to alter any traffic patterns associated with those sports. Thus, the analysis in these technical reports and Chapter 10 “Transportation” of the Draft EIR accounts for the “worst case” scenario in terms of transportation impacts.

As noted on page 3-4 of the Draft EIR, the total capacity of Marauder Stadium is approximately 3,000 persons. The project does not propose to change the capacity of the stadium. See Master Response 5: Attendance Estimates.

**COMMENT 26-31**

The Traffic study used data collected for a high school stadium lighting project in Carmel, CA. The Carmel High School data indicated an average occupancy of 3.24 people per vehicle. The data For Carmel High School vehicle occupancy was real-time, observed data.

- The Traffic Study for the Applicant’s project is deficient and incorrectly uses assumptions for a High School in Carmel, California, and did not collect real-time, observed data at Jesuit High School during a football game. Therefore, a 3.24 vehicle

**RESPONSE 26-31**

To supplement the analysis contained in the Draft EIR, W-Trans prepared an additional traffic analysis for the proposed project. W-Trans conducted a survey of parking activity related to a nighttime football game at Jesuit High School. The parking surveys were conducted on a non-football Friday in August 2023 and on the evening of a night football game held under portable lighting in September 2023. Based on those surveys, W-Trans estimated that the vehicle occupancy for the nighttime game in September was approximately 3.22 people per vehicle, which is nearly identical to the 3.24 people per vehicle assumed in the Draft EIR. This survey supports the assumptions made in the Draft EIR pertaining to average vehicle occupancy. The Parking Survey Memorandum prepared by W-Trans can be found in Appendix H of the EIR.

**COMMENT 26-32**

The traffic analysis report and event lighting schedule provided by JHS inaccurately omitted all Jr Marauder football and cheer squad weekly, night practice, and weekend game activity conducted at the stadium. IF Jesuit moves their games to Friday, the Jr. Marauders football and cheer club could use the field and P/A speakers from 9 a.m.

until 6 p.m. on Saturday and/or Sunday without JHS supervision and without an analysis of the potential environmental impacts as required by CEQA.

**RESPONSE 26-32**

Please see Plate PD-5 for the event lighting schedule provided by the applicant, Jesuit High School. This is the schedule of events that would use the proposed stadium lighting.

As described in the *Vehicle Miles Travelled Analysis*, to the extent that other sporting events may replace the football games at Marauder Stadium on Saturday afternoons, it would be replaced by school sporting events that are already occurring at Jesuit on a different field, or are occurring on an off-campus field. In other words, Jesuit High School currently has several other Saturday events occurring on other campus fields. If Saturday football games move to Friday nights, Marauder Stadium may be used by another sports team on Saturday afternoons that would have been otherwise utilizing another field on campus or off campus. Thus, this would not result in any net increase in VMT, since the sporting events would occur regardless.

**COMMENT 26-33**

- The Traffic Study was deficient as the data is potentially inaccurate due to being from 2015.

The data sets are from 2015, roughly eight years old, and potentially not representative of JHS usage.

**RESPONSE 26-33**

Please see Response 26-28.

**COMMENT 26-34**

If attendance numbers of more recent events are not known, then a focus should be made on obtaining those numbers so a more accurate impact assessment can be conducted and published.

**RESPONSE 26-34**

Please see Master Response 5: Attendance Estimates.

**COMMENT 26-35**

- The Traffic Study is deficient because it doesn't include any cumulative traffic impact discussion when Rio Americano High School has an event or activities on the same day as Jesuit's practices or games.

**RESPONSE 26-35**

Please see Response 23-37.

**COMMENT 26-36**

- The number of passengers per car (AVO) calculations are off if you consider the capacity attendance of these games.

**RESPONSE 26-36**

Please see Response 23-34.

**COMMENT 26-37**

The traffic report gives an overview of the traffic/use of roads on Fair Oaks Blvd., the cross street at the Chapel and Arden Hills; and a brief mention of Jacob and American River Drive on the residential streets that surround Jesuit High School.

- However, the report does not indicate that any of the residents were interviewed by the engineers who wrote these reports to determine if the residents had any concerns about the increase in street usage, i.e., overflow parking during evening games, the impact of before and after games with increased attendees, and no mention of adding crosswalks and increased street lightening if this project is approved.

**RESPONSE 26-37**

Detailed transportation analysis conducted to support the Draft EIR relies on measurements, data collection, modeling, and other objective methods, and as the commenter has noted, the analysis is not generally reliant on interviews with residents. To further supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School. As noted in the W-Trans survey of parking activity, the only public street which appeared to have experienced an increase in parking due to the night football game on September 1, 2023 was American River Drive. The Parking Survey Memorandum prepared by W-Trans can be found in Appendix H of the EIR. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-38**

- The Traffic Study does not consider that the roads surrounding Jesuit are degrading County roads.

The more roadway used from Jesuit traffic, the faster they will continue to degrade. We are dismayed that the County does not seem to have regard for our neighborhood .... Yet look at the property taxes that the County receives from Del Dayo, Wilhaggin, and Sierra Oaks.... homes sold today are roughly a million dollars....that is about \$10K in property taxes a year per sale. Our roads are horrible in our area, with potholes, poor quality repairs, and only 1/2 of a street was repaved when remedial works were done this past Spring.

**RESPONSE 26-38**

See Response 23-40.

**COMMENT 26-39**

Additionally, the conclusion states that the project will reduce traffic, circulation, and parking issues for the surrounding community. This conclusion is incorrect also. If lights are installed, practices will begin later in the afternoon/evening, yet school gets out at 3:00 (more or less) unless students are required to stay on campus; traffic and daily trips will increase when students leave the campus only to return later in the evening for practice.

- The Traffic Study does not accurately reflect student trips between school, after school, and to games as additional trips generated by nighttime games. Also, shifting daytime trips to peak hours impacts commuters in the neighborhood.

**RESPONSE 26-39**

Pursuant to SB 743, automobile delay, as described solely by level of service or other measures of vehicular capacity or traffic congestion, is not considered a significant impact on the environment under CEQA. The Draft EIR appropriately analyzed potential increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access.

Though not required by CEQA, Kimley-Horn prepared a *Local Transportation Analysis* that evaluates transportation-related conditions more broadly. These transportation-related conditions include existing LOS on roadways and intersections (including American River Drive and Fair Oaks Boulevard), existing bicycle and pedestrian facilities near campus, parking supply and demand, and a general safety analysis focusing on the transportation infrastructure in the immediate vicinity of the project. This analysis is included as Appendix F to the Draft EIR. Additionally, W-Trans prepared a supplemental traffic analysis which included a survey of parking activity related to a nighttime football game at Jesuit High School, including on American River Drive.

**COMMENT 26-40**

In the traffic studies, “peak hours” are mentioned.

- The traffic report does not consider the evening commuter traffic that would coincide with the Friday evening games. An example of impact include the recent October 2023 car show held at Jesuit.

**RESPONSE 26-40**

Please see Response 23-41.

**COMMENT 26-41**

- 1) There is no mention of the time of day of impacted traffic. It's hard to fathom not considering this. Saturday afternoon, we can and have dealt with it for years, but Friday and many other nights = bad!

**RESPONSE 26-41**

See Response 23-43.

**COMMENT 26-42**

- 2) No Traffic and Engineering study

**RESPONSE 26-42**

See Response 23-44.

**COMMENT 26-43**

- 3) Page 2. Attendance based on current Saturday day games is unrealistic – “number of attendees was assumed to increase from an average of 1,200 attendees for Saturday games to 1,500 attendees for Friday night games.”

**RESPONSE 26-43**

See Master Response 5: Attendance Estimates.

**COMMENT 26-44**

- 4) Page 3. Valley High, St. Vincent, and Carmel are not in residential neighborhoods and are not known as “football schools.” – look at Google Earth to compare; using these two schools without stating the obvious is insulting. Carmel HS Pic: <https://3.files.edl.io/c8e7/21/01/15/202418-efad18ec-ba8d-45ca-afe3-7ad96597996d.jpg> Note surrounding property, not encroaching on private residence.

**RESPONSE 26-44**

It is not clear from the comment what the specific concern is regarding the adequacy of the Draft EIR. The specific details of the proposed project and the project site context are the focus of analysis throughout the Draft EIR, including the transportation analysis.

**COMMENT 26-45**

- 5) Page 3. The Traffic Study did not count student athlete vehicles that will drive home and back in for practices and games.

**RESPONSE 26-45**

The analysis assumes that 10 percent of attendees (including students and staff) would remain on campus between school ending and the football games beginning, the remaining 90 percent of attendees would come to campus later in the day. These attendees that would not stay on campus represent students, families, and other visitors

that are travelling to the project site from off-site. The conservative assumptions used in the transportation analysis may result in an overestimate of impacts related to an increase VMT attributable to the proposed project. Given the comprehensive overview of existing and proposed project vehicle trip patterns in the traffic study, the assessment provides a valid representation of the potential impacts of operational emissions and vehicle trips.

**COMMENT 26-46**

- 6) Page 8. “An average event vehicle occupancy of 3.0 or higher is needed not to exceed the parking supply on campus assuming 1,500 attendees. While the County has been provided feedback from the public that vehicles park offsite during football games, this is likely due to inefficiencies in managing the parking on-site rather than a deficient number of parking stalls.” So, if riders per car (an estimate only) are off by .24, there is not enough parking? Also, inefficiencies in managing parking on-site have nothing to do with cars parked on surface streets; it is the proximity to the field that encourages visitors to park on nearby streets.

**RESPONSE 26-46**

Please see Response 26-50. See also Master Response 5: Parking Availability.

**COMMENT 26-47**

- 7) Page 19. The Planned Event Lighting Calendar prepared by the Applicant and used by K. Horn does not reflect the proposed use of lights; JHS has updated this Calendar numerous times, and the County should reanalyze this. Who independently analyzed the data provided by the Applicant?

**RESPONSE 26-47**

The lighting schedule shown on page F19 is the same as the schedule of events shown on Plate PD-5 in the on page 3-12 in Chapter 3 (Project Description) in the Draft EIR.

**COMMENT 26-48**

- The Traffic Study did not use the same figures provided to the public in the Applicant’s proposal.

**RESPONSE 26-48**

Please see Response 23-50.

**COMMENT 26-49**

Jesuit’s claim that no more than 1,500 attendees would attend a night game seems disingenuous. They built the stadium for 3,000 attendees; why would they build it for double the maximum? The traffic study seems to take Jesuit’s word for the number of attendees without any question or data to support it. Did they ask Jesuit for the information Jesuit accumulated in deciding to build a 3000-seat stadium? What about the information provided to the donors who paid for the new stadium? It seems those



materials would have made representations concerning why the Applicant needed such a large stadium; I doubt it says only 1,500 people will attend otherwise. How would they have justified building such a large stadium or getting people to pay for it?

- Therefore, more Study needs to be done to determine a true basis for the number of attendees. The two games being used to “test” a night game is also unrealistic vis-a-vis the numbers since they are against out-of-town and out-of-state teams.

**RESPONSE 26-49**

Please see Master Response 5: Attendance Estimates.

**COMMENT 26-50**

The comments in the traffic study that Jesuit has enough parking but doesn’t manage it correctly were very concerning. It seems to dismiss notions that the Applicant must have more parking before it can have night games without a real analysis. It ignores that people are still parking in the neighborhood and does not propose how we can be assured that Jesuit will appropriately manage its parking and its patrons will park on campus. At a night event on September 1, Jesuit had many cars parking on the grass. Is Jesuit willing to allow parking on its grass areas for night games/events, etc., particularly during a rainy season? This is highly doubtful, but Jesuit will argue it kept cars off the street, at least for the “test” game evenings.

**RESPONSE 26-50**

Please see Chapter 3 “Project Description” page 3-13 and Chapter 10 “Transportation” pages 10-4 and 10-5 regarding available on- and off-site parking during football games held at Marauder Stadium. See Master Response 6: Parking Availability.

**COMMENT 26-51**

The Kimley Horn analyses were based on attendance estimates (1,200 persons) provided by JHS. These studies should have relied upon actual attendance figures verified by an independent third party.

**RESPONSE 26-51**

Please see Response 5: Attendance Estimates.

**COMMENT 26-52**

The Kimley Horn studies use 1,500 persons to measure the expected traffic and parking impacts of “the project.” However, a mere 10% increase (to 1,650) would overwhelm the 36 surplus parking spots projected in the JHS parking lot and further exacerbate the expected “storage” shortage indicated in the queuing analysis.

**RESPONSE 26-52**

Please see Response 23-54.

**COMMENT 26-53**

The local transportation analysis calls out JHS as inefficient in its on-campus parking management, impacting surrounding residential streets.

- The analysis, however, is lacking in suggesting possible remedies for such inefficiencies.

**RESPONSE 26-53**

Please see Response 23-55.

**COMMENT 26-54**

The map provided in the Jesuit proposal shows traffic and parking problems.

- However, the proposal does not give realistic solutions or adequately address the lack of on-site parking or how to control future high traffic volume.

**RESPONSE 26-54**

Please see Response 23-56.

**COMMENT 26-55**

Marauder Stadium seats 3,000, 2,000 home seats plus 1,000 guest seats for those attending the “regular/plus low to high profile/high-intensity events.” The Jesuit proposals have various parking availability numbers from 450-550 listed as Jesuit variable parking slots available, some only with payment, and states additional parking will be available blocks away in the Rio Americano High School’s parking lot.

**RESPONSE 26-55**

See Response 23-57 and Master Response 5: Attendance Estimates.

**COMMENT 26-56**

- 1) Will Jesuit provide security for the parking lot at Rio Americano High School?
- 2) Will Jesuit provide a shuttle for the long walk, or will attendees need to walk, even late at night, between Jesuit High School and Rio Americano High School?
- 3) Will traffic jams likely occur at entry points along American River Drive or Fair Oaks Blvd. and become a new, common occurrence for neighborhood residents on event days and nights?

**RESPONSE 26-56**

Regarding traffic congestion, please see Master Response 4: Traffic Hazards. See Response 23-57.

**COMMENT 26-57**

The Traffic Report (page 8) does not include health and safety studies, specifically the ability of Sacramento County Fire and Rescue and Emergency response services to navigate and pass through neighborhood street intersections and interior streets, to respond to residents when Extra Duty SUV vehicles are parked at the corner intersections and/or on opposite sides of the streets, which are only 26 feet wide.

**RESPONSE 26-57**

The Local Transportation Analysis prepared by Kimley-Horn provides information on traffic-related hazards to pedestrians. Please see pages 11-17 and 11-18 of the Draft EIR for a discussion of emergency evacuation plans related to the proposed project. As discussed, any emergency evacuation during a Friday night football game would be coordinated by the Sacramento County Sheriff's Department. Traffic from any necessary evacuation would be dispersed throughout the transportation network as shown in the *Sacramento County Evacuation Plan*. Furthermore, Jesuit High School has an existing Emergency and Crisis Operations Manual that contains procedures addressing how an evacuation of the campus, including the stadium, would occur should that situation ever be warranted.

**COMMENT 26-58**

**Traffic, Parking** - Jesuit HS stated to CPAC members that it has parking agreements with Arden Hills CC and Rio Americano HS to handle overflow parking. The applicant should be required to produce written copies of these agreements for legal review and durability. Arden Hills has a new owner, so any previous "parking agreement" is null and void. Regardless, Sacramento County planners know Jesuit HS alone, no one else, must supply on-campus parking for all guests and the public, based on peak attendance, for all types and sizes of vehicles so that it does not endanger the safety of next-door neighbors.

**RESPONSE 26-58**

As discussed in Chapter 10 "Transportation", if parking demand exceeds available parking during special events, off-site parking lots including the parking lot at the Rio American High School and the Arden Hills Wellness Resort may be made available for event parking. While no formal agreement is in place, this arrangement has been made in the past, and is reasonable to assume that this arrangement would be made in the future. However, the Draft EIR also identifies other potential solutions to parking demand during high attendance events, including parking on public streets, and parking an additional 400 vehicles on the fields adjacent to the football stadium.

**COMMENT 26-59**

**Traffic, Parking, and adherence to county parking code** - Night Games conducted on August 25, 2023 (vs. Bishop Manogue of Reno) and September 1, 2023 (vs. St Ignatius of San Francisco) are not a proxy for future events, not even close. The August 25th game only attracted 200 visitors from Reno, and the St Ignatius contest on September 1, Labor Day weekend, only attracted 100 visitors. The game did go into

overtime. The only traffic, parking, and crowd behavior problems were that of the home team. What happens when the powerhouse top-ranked teams and 1,000 fans from Folsom, Del Oro, and Rocklin invade the neighborhood with KCRA cameras rolling? Contrary to the Staff report, these two isolated, under-attended games do not represent the realities and chaos of attempting to squeeze a night event sports complex into a residential neighborhood. Combine any future large-scale game with a Friday Night game at Rio Americano High School, and the neighborhood will have gridlock.

**RESPONSE 26-59**

Please see Master Response 5: Attendance Estimates. Comment 26-60

- NO EMERGENCY EVACUATION plans are stated in any Jesuit proposal for 500, 1500, or the ‘sold out’ possible 3000 people attempting to suddenly pour out to American River Drive or Fair Oaks Boulevard.

**RESPONSE 26-60**

Please see response to Comment 23-57. Impact TR-4 in the Draft EIR addresses emergency access.

**COMMENT 26-61**

- There is no mention of the Applicant preparing a Special Events Transportation Systems Management Plan. Enforcement of the TSM program and events will be assured, including coordination of the school to troubleshoot issues and handle complaints promptly.

**RESPONSE 26-61**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT 26-62**

- 1) The analysis does not explore the likelihood that more people per vehicle will likely attend a Saturday afternoon game rather than a Friday night. On a Saturday event, one could assume that most family members would ride together, whereas for a Friday event, families would be more likely to take separate vehicles as parents may be coming from work, etc.

**RESPONSE 26-62**

Please see Response 28-7 regarding estimates of persons per vehicle related to game attendance. See also Response 23-60.

**COMMENT 26-63**

- 2) Page 4. “Alternative use of the stadium on Saturdays would likely not occur.” There is no way to know this, nor any way JHS can commit to not using the facility on

Saturdays and Sundays. There exists a significant chance of increased vehicle trips to JHS on Saturdays that does not exist now.

**RESPONSE 26-63**

See Response 23-61.

**COMMENT 26-64**

3) Page 4 of the Kimley Horn report states, “They would rent out the football field on Saturdays with the absence of the 4-6 home games that occur today.”

**RESPONSE 26-64**

See Response 23-61.

**COMMENT 26-65**

4) Page 11 refers to “rent out the football field on Saturday...”. Jesuit will restate that “renting” is a misrepresentation, and they rephrased this to “donating” the field to other “non-profits.” No matter what they call it, the Deficiencies are still valid. Still, I think it best to avoid a rebuttal and dismissal of the deficiencies by amending this and other sections (page 15, page 11) to read “donating the field use” to “non-profits.” Then ask, if they “donate” the field to a “non-profit,” and that same non-profit makes a dollar donation back to Jesuit, it’s reported as revenue on their non-profit IRS tax return?

**RESPONSE 26-65**

See Responses 23-61 and 23-62.

**COMMENT 26-66**

What does this mean as the Applicant has stated publicly that they are a non-profit and cannot rent out the fields, etc. The information that K. Horn relied on came directly from the Applicant. Does it mean renting out the field for football or other sporting activities/events in the Sacramento area to play or practice on Saturdays?

Would this mean even more football games played during the day on Saturdays OR also more football games played on Saturday evenings?

Would renting out the football field on Saturdays involve renting out another type of sport being played? Or, renting out the football field for practice time for other sports?

If other sports or teams play on the football field during the day on Saturdays, what happened to the concern for players, staff, and attendees being exposed to the hot outdoor temperatures of climate change? Is this concern only for Jesuit teams, Jesuit staff, and Jesuit attendees? This contradicts Jesuit’s need to change to Friday night football games.

- Attachment A is entirely inadequate and falsely represents the intended, planned, and anticipated use of the stadium during evenings with lights on.

**RESPONSE 26-66**

Please see Response 23-62.

**COMMENT 26-67**

1) **Page 3.** The words curfew and curfews appear, but nothing tells us what they are.

**RESPONSE 26-67**

Please see Response 16-43.

**COMMENT 26-68**

- The lighting study does not include evidence that they considered using other stadiums with existing lights.

**RESPONSE 26-68**

The purpose of the lighting study (attached as Appendix B to the EIR) was to evaluate the proposed lighting at the project site. Alternatives to the proposed project, such as other stadiums with existing lights as suggested by the commenter, were evaluated in the EIR as required by CEQA. Draft EIR Chapter 4, “Alternatives,” included an alternative (Alternative 1) that would arrange for the use of another facility (Hughes Stadium or Hornet Stadium) for practices and games. Alternative 1 is described on Draft EIR page 4-6 and the potentially significant environmental impacts associated with implementing Alternative 1 are evaluated on Draft EIR page 4-7. A comparison of the potentially significant environmental impacts of Alternative 1 as compared to the proposed project are presented in Draft EIR Table Alt-1 (Draft EIR pages 4-10 through 4-14).

**COMMENT 26-69**

- The lighting study does not identify or recommend curfew criteria.

**RESPONSE 26-69**

Implementation of Revised Draft EIR Mitigation Measure NOI-1: Ambient Noise Reduction Strategies (Final EIR Chapter 9) requires nighttime stadium events be scheduled to conclude by 10 pm, recognizing that football games may occasionally go into overtime. For most sporting events at the stadium, this would represent a 1-hour reduction of the time period during which nighttime stadium lighting would occur. Although this mitigation measure would not reduce the amount of light emitted, it would reduce the time period during which nearby public and private viewers would experience the proposed visual change during most sporting events. Please see also Master Response 2: Nighttime Light and Glare Impacts.

**COMMENT 26-70**

- The Lighting study is deficient because the Applicant provided the report, and the County did not have a neutral, third-party consultant expert complete the work.

**RESPONSE 26-70**

The County has confirmed data and analysis independently as a part of compiling the Draft EIR. Please see response to comment 16-54.

**COMMENT 26-71**

The Light study does not consider how nighttime lights affect neighbors and the neighborhood. Numbers and collected data are only a part of the whole picture.

**RESPONSE 26-71**

See Response 26-22. The potential environmental impacts of implementing the proposed nighttime lighting are evaluated in Draft EIR Chapter 5, “Aesthetics.” Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, and Master Response 2: Nighttime Light and Glare Impacts.

**COMMENT 26-72**

- 1) **Page 2** states in part...” the stadium lights will be utilized on select evenings to accommodate athletic practices and competitions, primarily during the winter when the sun sets early or during home football games. “Yet on page 4, it states in part that...” the lights will serve to better protect the health and safety of student-athletes...” during Sacramento’s hottest months, June through September. There will be noise from coaches yelling, whistles, and staff during practices. Changing practice times will generate noise outside of current general school hours. The Applicant’s initial and ongoing communications with the neighborhood and residents stated the purpose of the permanent lighting request was to save the children from playing during very hot days. Now, the DEIR states the purpose is so the Applicant can play games and conduct practices during the winter when it’s dark, further expanding activities, noise, and traffic impacts.

**RESPONSE 26-72**

Please refer to the schedule of planned events in Plate PD-5. See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details.

**COMMENT 26-73**

- 2) **Page 3**, all stadium lights will cease approximately one hour after the end of the competition to allow safe egress. Why is this needed since Jesuit has applied for path lights for safety purposes? Once a competition has ended, the stadium lights should be immediately dimmed and/or turned off completely within 15 minutes or sooner.

**RESPONSE 26-73**

It is not clear what document the comment is referring to regarding cessation of stadium lighting on page 3. The action suggested by the commenter is infeasible because the low-voltage pathway lights that would be added to the bleachers would not provide enough illumination for people to safely exit the bleachers. Both the new overhead lights and the new bleacher lights are necessary for spectator safety.

**COMMENT 26-74**

3) Page 3 how was “near capacity” crowds determined?

**RESPONSE 26-74**

It is not clear what document the comment is referring to regarding “near capacity” crowds on page 3. See Master Response 5: Attendance Estimates. As described in Chapter 3 “Project Description”, the total maximum capacity for Marauder Stadium is approximately 3,000 persons, which is the projected maximum number of attendees for playoff games used within the Draft EIR analyses and supporting technical studies. Therefore, the transportation analysis did assess impacts associated with the stadium being at capacity.

**COMMENT 26-75**

4) How will operating lights 120 + nights/year affect all the migratory birds and waterfowl that call this area their home? Canada geese regularly used to rest on the Jesuit baseball fields, but in 2022, neighbors noticed them fleeing their normal patch of grass on the lower fields. So far this year, the geese have not been observed. Were electronic or sonic devices installed to harass or harm the waterfowl? Who/what chased these beautiful birds away? This same activity was observed at Rio Americano when they began using portable diesel lights last year.

Light pollution, climate change, pesticide use, and habitat loss are driving the decline of some 40 percent of insect species, with the global population of insects shrinking by an estimated 2 percent per year in what some call an “insect apocalypse.” That threatens the pollination of crops and plants and, ultimately, the entire food web. Light pollution is also contributing to the decline in bird population. The number of birds in the United States has dropped by 29 percent since 1970, which means nearly 3 billion fewer birds in our skies, according to a comprehensive study by the Cornell Lab of Ornithology and others.

Artificial light has altered migration, mating, foraging, pollination, and predation rhythms that developed over eons. Light pollution isn’t as severe an ecological threat as climate change or habitat loss, but it’s accelerating the decline of many animal populations.

Insects, drawn to light, are fried, or become easy targets for predators. Bright lights lure nocturnally migrating birds and sea birds into the danger of urban areas, and millions of birds die in collisions with floodlit buildings and communications towers.



Sea turtle hatchlings are likewise drawn to artificial lights – and into the jaws of predators.

Lights at night also act as barriers to nocturnal animals, ranging from bats to mountain lions, fragmenting their habitats and marooning them on ecological islands. Predatory creatures – certain snakes, salamanders, small mammals, insects – that rely on the darkness of a new moon to find food no longer have that protection.

“The dark places are a refuge,” says Travis Longcore, a professor at UCLA’s Institute of the Environment and Sustainability. But now, “you have light pollution and skyglow that is as bright as the full moon,” and that means certain animals “don’t come out to forage when they should because it’s a danger signal if it’s too bright.”

Animals find their circadian and seasonal rhythms disrupted by artificial light. Urban birds call earlier in the morning, altering the mating process. Plants produce flowers and fruit at the wrong times. And humans lose sleep because of artificial light (whether from streetlights or our digital devices), potentially contributing to increased obesity and cancer.

“There’s days of research that one could go through on how physiology is affected,” Longcore says, “but it all makes sense when you think that this planet has had day/night and lunar cycles for the whole period of the evolution of life.” Until now.

The biggest share of light pollution comes from commercial sources – gas stations, strip malls and the like – followed by outdoor sports facilities. After that comes residential lights, streetlights, and industrial lights. Municipalities can regulate much of that light pollution, and some already do dimming streetlights during certain hours, requiring dark-sky-friendly exterior lights in new construction and renovations, and simply turning off lights that serve no public safety purpose.

**Source:** Will somebody please turn down the lights? Dana Milbank, The Washington Post, May 5, 2023

[https://eedition.sacbee.com/popovers/dynamic\\_article\\_popover.aspx?artguid=b3b0fa0a-05aa-46bf-85f5-d3594b5f8f18&appcode=SACBEE&eguid=a1374dfa-81b4-47b2-b080-9tiabe5711c5&pnum=73](https://eedition.sacbee.com/popovers/dynamic_article_popover.aspx?artguid=b3b0fa0a-05aa-46bf-85f5-d3594b5f8f18&appcode=SACBEE&eguid=a1374dfa-81b4-47b2-b080-9tiabe5711c5&pnum=73)

### **RESPONSE 26-75**

Please see Response 23-70.

### **COMMENT 26-76**

The JHS stadium light request is a “want,” not a necessity. JHS has an illustrious list of alum scholars and athletes who competed for over 50 years and succeeded without stadium lights. Contrary to the school’s case for lights, most athletes excel academically during the sports season because their schedules require them to remain focused and avoid distractions.

Jesuit Administrators, not global warming, created the ‘hot’ and “unsafe” playing fields in 2015 when they switched from a cool, natural grass field to a plastic/artificial field with a Big Marauder logo at midfield and removed the wood bleachers which were replaced with metal bleachers. When that surface became dangerous to play on in 2022, they installed another plastic grass surface that retains heat instead of returning to natural grass and a cooler playing surface. They argue that the surface is “too hot,” so we want lights to play in the cooler evenings

**RESPONSE 26-76**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-77**

- Is Jesuit currently in compliance with all mitigation/permit measures and/or requirements?

**RESPONSE 26-77**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-78**

- Why does Jesuit High School need permanent stadium lighting now when they haven’t needed it for the past 60 years?

**RESPONSE 26-78**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details, including the Project Objectives. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-79**

The original county planners got it right, and they excluded tall structures and lights on the athletic field parcel so there would be open air, space, and views of nature to act as a buffer between the high school activities and every day and evening activities of the 400 families trying to raise children at a place, they call home. Stadium lights aglow for five nights/week, and all the noise nuisances will destroy the quiet and safe sanctuary families need to relax, restore, and rest for the next days’ work.

**RESPONSE 26-79**

The potential environmental impacts associated with aesthetics from installation of the light standards and operation of nighttime lighting are comprehensively evaluated in

Draft EIR Chapter 5, “Aesthetics.” Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, and Master Response 2: Nighttime Light and Glare Impacts.

**COMMENT 26-80**

The Applicant purchased the property with the zoning restrictions and must honor their decision. For 60 years, families purchased homes knowing these zoning limits. A change in zoning limits by the County would be a tax on every homeowner in the neighborhood.

**RESPONSE 26-80**

Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality.

**COMMENT 26-81**

While JHS does not rent the use of their athletic venues, they have a long history of donating the facilities. Private girls’ high schools, public high schools, parochial schools, colleges, and professional teams in need of a practice site for field sports, including baseball, will ask for a donation. High schools needing a playoff sight will petition the County for a temporary use permit to use Jesuit Stadium. Then, the noise and interior residential parking problems follow because JHS does not supervise non-JHS or low attendance events in their game day protocol.

**RESPONSE 26-81**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-82**

Approving the requested Permit amendment to the Applicant will not “Implement the objectives and policies of the county plan to” “Enhance, protect, and maintain the value of a property,” “Enhance, maintain, and preserve community quality of life,” or “Promote compatibility between new and existing development.”

**RESPONSE 26-82**

Comments for or against the proposed project will be considered by the Planning Commission when the hearing is conducted in early 2024. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project. See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details, including the Project Objectives.

**COMMENT 26-83**

Why are the current alternatives not feasible to continue to be used by the Applicant?

**RESPONSE 26-83**

See Chapter 4 of the Draft EIR, “Alternatives,” which evaluates alternatives to the proposed project in detail, including the No Project Alternative. The Planning Commission will consider the feasibility of the alternatives when it considers the EIR and the project.

**COMMENT 26-84**

**Where is the Initial Study?** What potential impacts were identified in the Initial Study? Initial Study is not required if it is known an EIR will be prepared.

**RESPONSE 26-84**

As the comment notes, it was determined that preparation of an EIR was warranted; therefore, an Initial Study was not prepared.

**COMMENT 26-85**

**Where is the arborist report?**

**RESPONSE 26-85**

Please see Response 23-71.

**COMMENT 26-86**

**Where is the Safety Report?** They haven’t considered the neighborhood’s safety, which changes when games are at night vs. during the day!

**RESPONSE 26-86**

Safety is addressed in various parts of the Draft EIR, including Hazards and Hazardous Materials (Chapter 11) and Transportation (Chapter 10). Please see also Master Response 4: Traffic Hazards.

**COMMENT 26-87**

**Where is the wildlife report?** From a biological standpoint, have there been any studies on the effect of night lighting on nocturnal wildlife, such as bats? With additional traffic on FO Blvd and AR Drive, I would suspect more wildlife will be mowed down by vehicles.

**RESPONSE 26-87**

Please see Response 23-79.

**COMMENT 26-88**

**Where is the Parking Study?**

**RESPONSE 26-88**

Please see Response 23-80.

**COMMENT 26-89**

**What other Jesuit use permits will be consolidated into the proposed stadium lighting use permit?** The Applicant's lighting proposal expands its ability to conduct evening and nighttime activities in addition to daytime and afternoon activities. The Applicant's proposal does not benefit the surrounding tax-paying residents and does not benefit the neighborhood. The neighborhood should not be responsible for subsidizing or accommodating the Applicant's expansion plan or opportunities for families and students from outside the community. The granting of the application is inconsistent with the County's Comprehensive Plan and the purposes of the Zoning Ordinance.

**RESPONSE 26-89**

Please see Response 23-81.

**COMMENT 26-90**

The proposed project (used as a sports stadium) allows for over-height limit structures. Neighborhood changes include degrading the site's visual character and are incompatible with the surrounding residential neighborhood. The project has an incoherent design that:

- a. Creates a sense of disorder and undesirable environment for occupants, visitors, and the general community,
- b. does not preserve, respect, and integrate existing natural features that contribute positively to the site and the neighborhood character, including historic resources of the area when relevant,
- c. is inconsistent with the context-based design criteria of the applicable RD-4 zone district,
- d. creates disharmonious transitions in scale, mass, and character to adjacent land uses and land use designations,
- e. degrades, negatively impacts, and encroaches and infringes on living conditions in adjacent residential areas.

**RESPONSE 26-90**

See Response 23-82. The potential environmental impacts associated with aesthetics from installation of the light standards and operation of nighttime lighting are evaluated in Draft EIR Chapter 5, "Aesthetics." Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, and Master Response 2: Nighttime Light and Glare Impacts.

**COMMENT 26-91**

Air Quality impacts essentially have been moved from Saturday afternoon to Friday night. That is a baseline, but doesn't the Applicant plan on hosting tournaments and renting out their facilities at other times? If so, the EIR must address the additional impact of extra traffic and the pollution created.

- The Air Quality report did not address vehicle idling during practices or during games when parents or caregivers wait for students/athletes, etc. The idling of vehicles and visiting school buses needs to be analyzed to assess potential significant environmental impacts.

**RESPONSE 26-91**

See Responses 2-1, 23-83, and 23-62.

**COMMENT 26-92**Jesuit High School's Event Management Protocols

- 1) Page 3: The location of the crossing guard at American River Drive is unclear and insufficient.
  - "Serve as a crossing guard at American River Drive from the south side of the street to campus." More context and details need to be provided.

**RESPONSE 26-92**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration. Mitigation Measure TR-2 states that a pedestrian crossing would be installed at the intersection of Tennyson Way and American River Drive across from Jesuit High School's southern parking lot. Mitigation Measure TR-2 has been modified to include additional details on safety features and the installation of crosswalk markings on all legs of the intersection of Jacob Lane and American River Drive. These intersections would therefore be the likely locations to be staffed by crossing guards.

**COMMENT 26-93**

- 2) Monitoring trash is not sufficient. Monitoring for 'loitering' is not sufficient.
  - "Monitor the perimeter for loitering and trash."

**RESPONSE 26-93**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-94**

- 3) The “Visiting School Information Sheet” cited on page 1 should be included to know what is and is not communicated and how the visiting team’s school will communicate to their students and parents.

**RESPONSE 26-94**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-95**

- 4) The scope of the protocol is not clear, and the application of the protocol is not consistent with other events. The original intention of the lights was for Jesuit High School events only. The Jesuit High School Stadium Lighting DEIR (Jesuit High School Stadium Lighting DEIR, 2023) discusses activities not specific to Jesuit High School. If there is to be a protocol for night events, it seems reasonable to have a protocol for all events or specific conditions when the protocol is to be applied.

**RESPONSE 26-95**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. In addition, the proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium, and the Use Permit, if issued, will have enforceable permit conditions. Jesuit implements its “Protocol for Night Events” (Appendix I), which addresses traffic, safety, security, law enforcement, sound, lighting, signage, prohibited materials and behavior, parking, access, communications, and other relevant topics. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-96**

Is The Event Management Protocol a living document? Will neighbors have an influence on changes/improvements?

**RESPONSE 26-96**

The Jesuit Protocol for Night Events (Appendix I) is being included as a condition of approval and is applicable to all nighttime events utilizing stadium lights

**COMMENT 26-79**

- 1) Page 4. “Sound limits will be set per county guidelines.” – What are the guidelines??

**RESPONSE 26-97**

See Response 23-91. See Response 12-4 regarding the evaluation and mitigation of noise related to the proposed project.

**COMMENT 26-98**

- 2) Page 6. What is the Applicant’s Good Neighbor’s phone line number? Will it be available for all events?? What is the alternative phone number to call if there is no response from a Jesuit representative?

**RESPONSE 26-98**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-99**

- 3) Page 7. Games going beyond 10 p.m. PA will be turned down – but are not defined to what level.

**RESPONSE 26-99**

See Responses 12-4, 23-91, and 26-97.

**COMMENT 26-100**

- 4) Page 8. Who will specifically reply to “neighbors or community concerns”?

**RESPONSE 26-100**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-101**

- 5) Pages 16-17. A resident monitored the entrance to Tennyson Way residential street on August 25, 2023. There was no sign or CCT or otherwise, directing cars away from Tennyson and into the school visitors’ parking lot. Tennyson Way is directly across from the stadium’s one and only pedestrian entrance. Visitors and home team fans use this gate to avoid the inadequate parking spaces on campus. Over 25 cars, two parked illegally in front of fire hydrants, were reported to sheriff deputies and should be disclosed in the school’s incident report. Ask to view the incident report for both nighttime games. If the high school couldn’t follow its protocols with 100 visiting fans, what happens when 1,000 fill the visitor’s bleachers?

**RESPONSE 26-101**

See Master Response 4: Traffic Hazards. The studies supporting the analysis on the Draft EIR were prepared in 2023 and the transportation analysis is presented in Chapter 10 of the EIR, “Transportation.” The Vehicle Miles Traveled (VMT) Analysis and Local Transportation Analysis conducted by Kimley-Horn for the proposed project were completed on March 10, 2023 and can be found in Appendix E and Appendix F of the Draft EIR. The Local Transportation Analysis examines vehicular level of service, queueing at intersections near the project site, impacts to bicycle and pedestrian



facilities and circulation, parking supply and demand, and transportation safety in the vicinity of the project site. Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (see Appendix H). The technical reports that were referenced to support the analysis in Chapter 10 “Transportation” of the Draft EIR reflect current conditions. As noted in the W-Trans survey of parking activity, the only public street which appeared to have experienced an increase in parking due to the night football game on September 1, 2023 was American River Drive. No change to the Draft EIR is necessary.

**COMMENT 26-102**

“Jesuit’s protocol for night events” seems to cover the parking and security issues, although I don’t know how they can legally keep people from parking on public streets.

**RESPONSE 26-102**

As discussed in the Parking Survey Memorandum prepared by W-Trans (see Appendix H), during the football game on September 1, 2023, Jesuit High School staff encouraged visitors to use the parking areas provided on campus, and attendees complied. The commenter is correct that there is no way to restrict drivers from using public streets for travel or parking. However, this comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-103**

**Game Day General:** states that the CCT will be on-site 90 minutes before an event and remain 90 minutes after or until the venue is clear. **What is considered the “venue”?** It needs to ensure that the streets are cleared. Under “Identify and report vehicles parking in an illegal or unsafe location, who will this information be reported to?”

**RESPONSE 26-103**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-104**

**Behavior:** It is stated that no tailgating is permitted in parking lots, overflow parking lots, or on adjacent public streets, but there was tailgating at the August 25, 2023, football game.

**RESPONSE 26-104**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-105**

**Tech, Sound, and Lighting:** When and under what authorization(s) was the WIFI installed?

**RESPONSE 26-105**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-106**

**Parking:** States in part that to incentivize carpooling, a designated ride-share area will be established at the front of the Chapel. This designated ride-share area should be closer to the venue to encourage ride sharing. No purchasing of parking spaces should be allowed. Jesuit will implement a shared parking agreement with Rio Americano High School during maximum capacity events.

- However, that would impact other parts of the neighborhood and must be analyzed in the EIR.

**RESPONSE 26-106**

Please see Responses 23-99 and 5-3.

**COMMENT 26-107**

**Food Service and Vendors:** Food trucks were operating on the August 25, 2023, football game.

- What permits and/or licenses were obtained in advance to operate the food trucks?

**RESPONSE 26-107**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-108**

**Question:** If it is too hot to practice sports outside in the afternoon, will they suspend all sports practice, excluding swimming? Or will some sports decide 90 degrees is not too hot and others delay until evening? There are concerns that practice may continue from the afternoon and into the evening on the same day.

**RESPONSE 26-108**

See Response 23-101. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-109**

**Question:** The data shows 41 events with over 500 in attendance. With only five home games in football, which sports account for the other 35 events?

**RESPONSE 26-109**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details.

**COMMENT 26-110**

**Question:** I thought lacrosse was a “club sport,” not a varsity sport throughout Sacramento.

**RESPONSE 26-110**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-111**

**Question:** Soccer season is November- February. Same with Track and lacrosse. Heat is not an issue. Why does Jesuit need lights on until 9 p.m.? The new headmaster cited “heat” in his TV interview for days with late practices.

**RESPONSE 26-111**

See Response 23-104. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-112**

**Comment:** The online notice is only for high (1,500+) events. Very few events draw 1,500 at Jesuit. But crowds of 800 spectators can quickly impact the neighborhood. So why limit the online notice to only a handful of annual events? The notice is based upon anticipated attendance- not enough notice to “Good Neighbors.” Especially since these concern lights and nighttime events. Notice that it is not as necessary for daytime events on the weekends.

**RESPONSE 26-112**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the potential physical impacts of the proposed project on the environment, as contained in Chapters 5 through 11. This is a comment on Jesuit High School’s Event Management Protocols. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 26-113**

**Comment:** Signage must be at American River Drive and Tennyson because of the Jesuit parking lot on Tennyson.

**RESPONSE 26-113**

See Master Response 4: Traffic Hazards. This is a comment on Jesuit High School's Event Management Protocols. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 26-114**

**Comment:** Volunteer crossing guards for events of 1,500+. They should be off-duty police, at the least, not parent volunteers steering traffic.

**RESPONSE 26-114**

This is a comment on Jesuit High School's Event Management Protocols. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 26-115**

**Comment:** Who do we report "tailgating" to in real time? And if we can hear the loudspeakers clearly from 500 yards away, is that too loud?

**RESPONSE 26-115**

See Response 23-108.

**COMMENT 26-116**

**Comment:** Tennyson should be closed on Football home games to avoid overflow south into Del Dayo Estates. Posting "no parking" is too often ignored.

**RESPONSE 26-116**

See Response 23-109. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 26-117**

**Comment:** Using Rio's parking lot for big events (Football playoff games) is a great idea.

**RESPONSE 26-117**

The commenter's support for using Rio Americano High School's parking lot for large events is noted.

**COMMENT 26-118**

**Comment:** Post the "Good Neighbor" phone number. We all need to have it.

**RESPONSE 26-118**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-119**

**Comment:** No vendor trucks, please, unless they are inside the Jesuit fences. Creates crowds and waste if they are parked on American River Drive.

Response 26-119

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-120**

**Comment:** Lights can remain on for over an hour after the event because they have a permit— no use of the speakers to request attendees to exit and turn the lights off ASAP.

**RESPONSE 26-120**

Please see Responses 23-113 and 12-4.

**COMMENT 26-121**

**Comment:** We need a STOP SIGN on American River Drive and Tennyson. Rio has one. Jesuit has a light on Fair Oaks and a stop sign on Jacob. A driver was ticketed on American River Drive going over 60 mph a few weeks ago. We don't even have speed bumps to slow traffic in front of the Jesuit lot on Tennyson. Jesuit should advocate for either speed bumps before and after Tennyson or a STOP SIGN. It will create a safer environment for all in a lasting, meaningful way.

**RESPONSE 26-121**

Regarding the safety of pedestrians crossing American River Drive and Tennyson Way, please see Response 42-7.

**COMMENT 26-122**

The “Visiting School Information Sheet” cited on page 1 does not identify what is and is not communicated.

**RESPONSE 26-122**

This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project.

**COMMENT 26-123**

Jesuit should pay for the off-duty sheriff patrol that the home owners pay for through the Wilhaggin/Del Dayo Association for all events and practice to patrol the outside areas of the neighborhood (river access roads, side streets with in 1/4 mile of the school, Del Dayo elementary school, Ashton Park)

**RESPONSE 26-123**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-124**

Jesuit needs to have a person assigned at each stop sign 90 minutes before and after each game (Jacob and Oak Vista, Jacob Lane, and American River Drive).

**RESPONSE 26-124**

The commenter's support for using Rio Americano High School's parking lot for large events is noted.

**COMMENT 26-125**

Jesuit needs to sign a legal document that the protocol will continue if Jesuit has a campus in the neighborhood.

**RESPONSE 26-125**

See Chapter 3 of the Draft EIR, "Project Description," which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. In addition, the proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium, and the Use Permit, if issued, will have enforceable permit conditions. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 26-126**

Jesuit needs to sign a legal document that if any incident takes place (car crash, hit and run, pedestrian hit by automobile, violence caused by guns or knives, drunk drivers or high on drugs). Jesuit cannot redeem themselves from any law suit.

- Jesuit High School shall publish the "Visiting School Information Sheet" online.
- The "Visiting School Information Sheet" shall cite crosswalk locations.
- The "Visiting School Information Sheet" shall cite that parking is primarily in Lot A
- The "Visiting School Information Sheet" shall cite that parking is discouraged on American River Drive.

- The “Visiting School Information Sheet” shall cite “South Entrance” (S) on page 10 has no pedestrian access and is for vehicles only.
- The “Visiting School Information Sheet” shall use an alternate icon for “South Entrance” (S) on page 10 as this is NOT the primary or recommended access for vehicles or pedestrians.

**RESPONSE 26-126**

See Response 26-125. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decision maker consideration.

**LETTER 27**

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Elizabeth Hughes (October 18, 2023 (2)).

**COMMENT 27-1**

The Draft EIR is deficient because it does not comprehensively address how the stadium lights and synthetic field turf are environmentally safe. Any activity with artificial turf is environmentally safe, as described in the article below. The Applicant's desire to play sports at night using the stadium lights to make that possible may cause harm to the students, coaches, parents, guardians, and visitors.

**RESPONSE 27-1**

The synthetic field turf is an existing condition, which the proposed project would not change. The proposed stadium lighting would allow games and practices that are already occurring to shift to evening hours.

**COMMENT 27-2**

Gov. Gavin Newsom's recently signed law makes the ban on synthetic turf available to cities and counties to implement. "Synthetic grass usually contains PFAS chemicals. According to the Environmental Protection Agency, PFAS chemicals are a known carcinogen that can interfere with hormones, reproduction, immunity and cause developmental delays in children."

The Applicant's draft EIR does not include a review of the Stadium lighting's contribution to extending play activities on the synthetic turf.

**RESPONSE 27-2**

See Response 27-1. The project would not extend field play but rather shift the timing of some activities to evening hours.



## **LETTER 28**

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Elizabeth Hughes (October 23, 2023).

### ***COMMENT 28-1***

Thank you for allowing me extended time to provide critical feedback on the Draft Environmental Impact Report (DEIR) for Jesuit High School's Stadium Lighting Proposal.

I aim to highlight some key concerns and omissions that require immediate attention for a more thorough and accurate assessment of the project's environmental impact.

We find ourselves in a situation where the draft Environmental Impact Report (DEIR) concerning the Jesuit High School Stadium Lighting Proposal falls short of comprehensively addressing the critical issue of cumulative impacts. There are key aspects that require our collection attention and immediate action.

### ***RESPONSE 28-1***

Specific comments related to the issues raised in Comment 28-1 are addressed in the following responses.

### ***COMMENT 28-2***

#### **Cumulative Noise**

The applicant did not provide the number of activities and user events at their facility. The applicant provided only a list of practices, games, and graduation events in its proposal from its own activities. In the technical reports, the number of activities studied was less than the applicant's original number. The change in the number of activities to be less than proposed is doubtful, and the change in the number was not explained in the study. The number of activities, events, and use of the applicant's fields does not include a comprehensive accounting of all the other non-profit and non-applicant organizations. This failure to list all other occasions and activities in which the applicant's fields are used creates a deceptive picture of how frequently the fields are used for non-applicant and non-school activities and the ability of these non-applicant organizations to use the fields later in the evenings and nights. A correct and cumulative study of all noise created and generated by the applicant and its affiliated organization was not studied.

### ***RESPONSE 28-2***

The proposed events that would be played under the new lighting are shown in Plate PD-5. The Draft EIR evaluated this schedule and not previous iterations that may have been communicated to the public.

**COMMENT 28-3**

The draft EIR states that noise impacts are significant and unavoidable. I disagree that significant noise levels are unavoidable. However, we firmly believe that significant noise levels can be mitigated. A simple solution, which the applicant could implement today, includes downsizing the PA system, lowering the volume, and restricting its use. Surprisingly, the DEIR remains silent on this matter. The draft EIR does not clarify the type of speakers the applicant used when the noise measurements were taken or whether the speaker (PA) system used by the applicant will be the same after buildout. Please clarify the type of speaker/PA system used by the applicant.

**RESPONSE 28-3**

Please see Response 12-4 regarding noise-related mitigation and the stadium PA system. While mitigation has been proposed to reduce the output of the PA system, PA system noise is just one factor of the overall noise associated with evening stadium usage. Other factors include crowd noise and the use of the marching band. Therefore, PA system noise mitigation will be employed, but is not anticipated to reduce the noise-related impact to less-than-significant.

**COMMENT 28-4**

The initial communication from the applicant to the community was incomplete and, in some cases, misleading. In 2021, it was suggested that only 6-8 Jesuit games would be played under the new lighting, leading residents to believe that the lights would be used sparingly. However, this could not be further from the truth, with over 250 practices and non-applicant activities occurring yearly. The DEIR, while attempting to assess noise impacts, falls short of addressing the cumulative noise generated seven days a week. This comprehensive evaluation is imperative, considering the constant noise disturbance in our community. The draft EIR attempted to study the potential noise impacts of the project, but it doesn't comprehensively address cumulative noise that occurs seven days per week. While the non-applicant weekend and afternoon activities do not seem to exceed noise thresholds except when they use the applicant's PA system, it should be noted that noise generation seven days per week, during the day, afternoons, and evenings, and proposed nighttime until 11 p.m., and weekends and summers (training clinics, sports camps, etc.) has a cumulative impact that no resident can escape.

**RESPONSE 28-4**

Please see Responses 28-2 and 12-4. Additionally, as part of the environmental noise assessment, an ambient noise study was conducted, which included 10 days of 24-hour monitoring from Friday, September 30th through Monday, October 10, 2022, capturing any activities that took place in the stadium during this period. As discussed previously, the EIR addressed the worst-case scenario of a Friday night football game with operation of the PA system and the school band performing. Regarding schedule of uses, please refer to the Schedule of Uses on page 3-11 of the Draft EIR, which details what activities the proposed lighting would be used for.

Cumulative impacts are addressed in Chapter 11, “Other CEQA Considerations,” of the Draft EIR. In this cumulative analysis, it was determined that the project’s contribution to a significant noise-related cumulative impact would be cumulatively considerable, and this impact would be significant and unavoidable.

**COMMENT 28-5**

The applicant needs to provide a complete list and schedule of practices, band use, Delta League use, Junior Marauders use, games use, track meets, St. Francis cheer practices, parochial league games, and all the other non-applicant organizations that use the fields. The applicant, a non-profit organization, operates as a thriving business, allowing non-school activities to occur in its fields. The EIR consultant should consider the cumulative impacts and duration of the ongoing noises, applicant and non-applicant uses, seven days per week and 12 months per year, and how those impacts and impacts exacerbate our opposition to allow extend noise activities until 11:00 p.m. Our neighborhood already accommodates school-related activities on weekdays, but the continuous presence of non-school-related noises from the applicant’s private fields on weekends and afternoons is unreasonable.

The Planning Commission should know that the applicant currently uses temporary lights to practice on its fields until 8 p.m. They can do this because the temporary lights are not too large to require a permit. Neighborhood residents accommodate weekday school noises from 7:00 p.m. until 3:00 p.m. and then again from sports and practices from 3:00 p.m. until 8:00 p.m. (five days per week). The neighborhood residents should not have to accommodate non-school-related noises from the applicant’s private fields daily on weekends and afternoons.

**RESPONSE 28-5**

Please see Responses 28-2 and 28-4. Please note that this EIR analyzes the potential impacts of the proposed project, which is to install stadium lighting. A cumulative impact analysis is included in Chapter 11 of the draft EIR, in which an additional cumulative project was considered. In this cumulative analysis, it was determined that the project’s contribution to a significant noise-related cumulative impact would be cumulatively considerable, and this impact would be significant and unavoidable.

**COMMENT 28-6**

**Aesthetics**

The aesthetics study, which is one paragraph in the draft EIR, is deficient as it doesn’t address how a 100-foot lighting pole, the equivalent of a 10-story house, is aesthetically acceptable in a residential neighborhood built with primary single-story homes.

**RESPONSE 28-6**

The potential environmental impacts associated with aesthetics from installation of the light standards and operation of nighttime lighting are evaluated in Draft EIR Chapter 5, “Aesthetics.” A complete copy of the aesthetics study is attached to the Draft EIR as

Appendix B. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality.

**COMMENT 28-7**

**Cumulative Traffic**

The draft EIR’s traffic study is deficient because it does not cumulatively address the circulation impacts of traffic in the surrounding neighborhood. The traffic study provided information about what could happen with traffic, not what does happen with traffic. No observations were made to study vehicle trips in the neighborhood on non-game nights or game nights. No observations were made to study parking counts or average vehicle occupancy. The traffic analysis relied on a study of Carmel High School, which is 200 miles away, to assume the average vehicle occupancy is insufficient for the applicant’s project. The study is irrelevant to our situation. We must insist on a more comprehensive and locally relevant study. An EIR must address the secondary effects of scarce parking, such as traffic and air quality, which indirectly impact the physical environment.

**RESPONSE 28-7**

Cumulative impacts related to transportation are discussed in Chapter 11 “Other CEQA Considerations” in the Draft EIR.

The analysis in the Draft EIR does not include a discussion of traffic patterns on non-game nights because those traffic patterns would not be affected by the proposed project. The Draft EIR sets out to assess impacts that the proposed project would directly or indirectly have on the surrounding environment.

To supplement the analysis contained in the Draft EIR, W-Trans prepared an additional traffic analysis for the proposed project. W-Trans conducted a survey of parking activity related to a nighttime football game at Jesuit High School. The parking surveys were conducted on a non-football Friday in August 2023 and on the evening of a night football game held under portable lighting in September 2023. Based on those surveys, W-Trans estimated that the vehicle occupancy for the nighttime game in September was approximately 3.22 people per vehicle, which is nearly identical to the 3.24 people per vehicle assumed in the Draft EIR. This survey supports the assumptions made in the Draft EIR pertaining to average vehicle occupancy. The Parking Survey Memorandum prepared by W-Trans can be found in Appendix H of this document.

**COMMENT 28-8**

The draft EIR traffic analysis assumed high-attendance games rather than the impacts of all field uses seven days per week. A cumulative traffic analysis of all field use and activities during the week and weekends would detect additional trips resulting in an unacceptable level of services (LOS) in the community. Why was the analysis of American River Drive during weekday a.m. and p.m. peak hours excluded from the existing conditions, which are already at a deficient LOS? If there is no justification for

this omission, please revise the traffic analysis to analyze and disclose the potential impacts on American River Drive during the weekday a.m. and p.m. peak hours.

**RESPONSE 28-8**

Pursuant to SB 743, automobile delay, as described solely by level of service or other measures of vehicular capacity or traffic congestion, is not considered a significant impact on the environment under CEQA. The Draft EIR appropriately analyzed potential increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access.

Though not required by CEQA, Kimley-Horn prepared a *Local Transportation Analysis* to the Draft EIR that evaluates transportation-related conditions more broadly. These transportation-related conditions include existing LOS at adjacent roadways at intersections (including American River Drive and Fair Oaks Boulevard), existing bicycle and pedestrian facilities near campus, parking supply and demand, and a general safety analysis focusing on the transportation infrastructure in the immediate vicinity of the project. This analysis is included as Appendix F to the Draft EIR. Additionally, W-Trans prepared a supplemental traffic analysis that included a survey of parking activity related to a nighttime football game at Jesuit High School, including on American River Drive. The W-Trans memorandum can be found in Appendix H of the EIR.

**COMMENT 28-9**

In conclusion, the DEIR requires substantial revision to address critical noise, traffic, and aesthetics concerns. As neighborhood residents, except for the few Jesuit families and out-of-town supporters, we oppose the applicant's project. We are striving to protect what is left of our neighborhood's tranquility and wellbeing.

**RESPONSE 28-9**

Please see Responses 28-1 through 28-8; for the reasons stated therein, substantial revisions to the Draft EIR are not required. Please see also Master Response 3: Project Approval Where There are Significant and Unavoidable Impacts.

**LETTER 29**

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Elizabeth Hughes (November 6, 2023).

**COMMENT 29-1**

Please correct the record regarding your response to Commissioner Mariana about community notifications for Jesuit’s illegal scoreboard installation and public address system installations (see below). The western community of Jesuit’s field, the closest location to the PA sound system and the MOST affected, was not notified about the Carmichael CPAC meeting 2019. We subsequently did receive a county notification for a planning commission hearing. Still, we missed the opportunity to learn about the project or engage with CPAC in opposition to the project. The County Planning Department established a process for Jesuits to seek approval for their new scoreboard and PA speaker placement without discussing the alternative that the scoreboard and PA speaker placement should not have been built in the first place. The only option provided to the Planning Commission was approving an existing installation as a formality without discussing the project’s alternative of not being built or made in its current location.

**RESPONSE 29-1**

This is not a comment on the adequacy of the Draft EIR for addressing potentially significant impacts of the proposed project.

**LETTER 30**

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Elizabeth Hughes (November 7, 2023).

**COMMENT 30-1**


Please include the attached pedestrian safety issue in the Jesuit project record. This vehicle habitually parks in front of and blocks the location to cross American River Dr. at Tennyson Way. I will also submit this to the sheriff's office. The County should know that Jesuit-generated vehicle activity along American River Dr. frequently includes this type of unsafe parking, illegal U-turns, and speeding.

**RESPONSE 30-1**

This is not a comment on the Draft EIR, but has been reprinted here for decision maker consideration.

**COMMENT 30-2**

Below is another example of how Jesuit make it hard for the residents to attend a Good Neighbor meeting by changing the time they host the meeting to 8:30 a.m. when residents are at work. Several years ago, the community complained to Jesuit that their 4:00 p.m. Good Neighbor meetings did not allow residents to attend because they were still at work. Jesuit accommodated this issue by changing the meeting times to 6:00 p.m. Jesuit has changed its weekday meeting time to 8:30 a.m., which doesn't work for most residents. This time change makes it harder for residents to attend Good Neighbor meetings.



**Join Us**  
**IN THE JESUIT LIBRARY**


Chris Alling, President of Jesuit High School, and Michael Wood '99, Principal, invite you and all neighbors to the **2023-2024 Good Neighbor meetings** in the school library.

- August 23 at 6:00 p.m. (past)
- **November 1 at 8:30 a.m.**
- **March 6 at 6:00 p.m.**
- **June 5 at 8:30 a.m.**

*For closest access & parking use Jacob Lane entrance.*

Now in their fifth year, these meetings are an opportunity to come together for hospitality and conversation. Agendas will be posted to the Good Neighbor web page in advance and include topics to help our community learn more about Jesuit's mission, be informed on school happenings, and hear updates on campus projects.

**SUBMIT A QUESTION. GET MORE INFO.**  
[jesuithighschool.org/good-neighbor](https://jesuithighschool.org/good-neighbor)



**RESPONSE 30-2**

This is not a comment on the adequacy of the Draft EIR for addressing potentially significant impacts of the proposed project.



## **LETTER 31**

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Kelly Hughes (October 19, 2023).

### **COMMENT 31-1**

Regarding PLNP2021-00262, I respectfully comment that the Draft EIR is incomplete and inadequate.

### **RESPONSE 31-1**

Responses to specific comments regarding the commenter’s opinions on the completeness and adequacy of the Draft EIR are provided below. Where revisions to the Draft EIR were needed, they have been made, and are reflected in the Final EIR. No substantial changes were needed, and no revisions change the conclusions of the Draft EIR.

### **COMMENT 31-2**

--The EIR should include a full biological assessment of the Project’s impact on the nearby American River Parkway, its habitat, and protected wildlife, birds, reptiles, amphibians, insects, and fish.

### **RESPONSE 31-2**

Impacts to biological resources are discussed in Chapter 11 “Other CEQA Considerations.” An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision which intelligently takes account of environmental consequences (Public Resources Code Section 15151). Because the proposed project has a small disturbance footprint, is located within an already developed schoolyard subject to high levels of disturbance, and is surrounded on all sides by developed property, a separate technical study of biological resources impacts is not necessary to support the conclusions made in this Draft EIR. The research, analysis, and reporting required to address the potential biological resource-related impacts of the proposed project is provided in the text of the Draft EIR. Additionally, the biological resources impact analysis in Chapter 11 “Other CEQA considerations” discusses the potential impacts to avian species that may be nesting adjacent to the project site and provides Mitigation Measure BIO-1, which reduces impacts to nesting birds to a less-than-significant level.

### **COMMENT 31-3**

Additionally, a full assessment should be done on species potentially impacted by the Project that live in the immediate area of Jesuit’s football field sports complex. These would include avian species such as the nocturnal owls that live in the tall trees on Piccadilly Circle next to the campus and football field, the hawks that live in those trees that prey on the local doves and other small birds that frequent Piccadilly Circle’s trees, and the migratory geese that occasionally use the football field as nighttime rest areas.

**RESPONSE 31-3**

See Response 31-2. The Draft EIR acknowledges that raptors have been colonizing in urban and suburban areas – areas that could potentially include the project site and vicinity (Draft EIR, page 11-3). The analysis in the Draft EIR does not rule out the possibility of raptors and other birds nesting adjacent to the project site. In addition, the Draft EIR is focused specifically on potential impacts of the proposed project, and thus provides mitigation to reduce the potentially significant impact on nesting birds to a less-than-significant level. While the Draft EIR acknowledges the potential presence of nesting birds including raptors, Mitigation Measure BIO-1 requires nesting surveys prior to demolition and construction so that impacts are avoided at the time that they would have actually occurred. No change to the Draft EIR is necessary.

**COMMENT 31-4**

--The EIR should include a full assessment of the air pollution burden from Jesuit High School's ongoing activities and the additional air pollution that this Project would bring.

**RESPONSE 31-4**

The Draft EIR includes a comprehensive assessment of the air pollutants that would occur as a result of the project. Please see the full assessment of air quality and greenhouse gas in Chapter 6, "Air Quality" and Chapter 7, "Greenhouse Gas" of the Draft EIR. See Chapter 3 of the Draft EIR, "Project Description," which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the project, and not an evaluation of past activities or events related to the project site.

**COMMENT 31-5**

Our traffic count shows over 200 vehicle trips per school day occur down the alleyway between Piccadilly Circle and the football field. Students and/or parents use the alleyway to circumvent waiting at the Fair Oaks Boulevard and O'Donnell Drive stoplight. This stoplight intersection is provided by the County as the intended ingress/egress route to the school for drop-off of students and access to the school parking lot. The alleyway is intended for emergency egress use and maintenance traffic only. The school allows regular use of the alleyway so students and/or parents don't have to wait in a queue at the stoplight.

**RESPONSE 31-5**

See Chapter 3 of the Draft EIR, "Project Description," which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The Draft EIR evaluates the potential physical impacts of the proposed project on the environment, as contained in Chapters 5 through 11. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the project, and not an evaluation of past activities or events related to the project site. Transportation impacts of the proposed project are comprehensively addressed in Chapter 10 of the Draft EIR, "Transportation."

**COMMENT 31-6**

The air pollution impacts of this 5-days-a-week traffic flow within feet of the houses on Piccadilly Circle must be evaluated and modeled, and a full health risk assessment should be included in the EIR so that Jesuit’s continuing violation of this existing requirement be understood within the context of this Project and its added air pollution component to our neighborhoods.

**RESPONSE 31-6**

Chapter 6, “Air Quality,” of the Draft EIR includes the Sacramento Metropolitan Air Quality Management District (SMAQMD) health effects screening tool to estimate the potential health risks arising from operational criteria air pollutant emissions, specifically for Reactive Organic Gases (ROG), Nitrogen Oxides (NO<sub>x</sub>), and Particulate Matter (PM<sub>2.5</sub>), per SMAQMD’s *Instructions for Sac Metro Air District Minor Project and Strategic Area Project Health Effects Screening Tools*. The highest allowable emission rate for ROG, NO<sub>x</sub> and PM<sub>2.5</sub> pollutants is 82 pounds per day. In the case of the proposed project, the operational emissions of the project would be less than 1 pound per day of each respective criteria air pollutant (ROG, NO<sub>x</sub> and PM<sub>2.5</sub>) modeled by the SMAQMD’s health screening tool, which is less than 1 percent of the mass emissions. Moreover, as detailed in Impact AQ-3 of the Draft EIR (pages 6-19 through 6-22), the proposed project’s operations are not anticipated to result in a substantial net increase in Toxic Air Contaminants (TACs). See also Response 2-1 pertaining to mobile source emissions.

**LETTER 32**


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Jill (October 20, 2023).

**COMMENT 32-1**

I live within 1500 feet of Jesuit’ High School as well as its stadium. Jesuit has 1000 students. I had a student who attended Jesuit. I oppose the application for stadium lights.

**RESPONSE 32-1**

The commenter’s opposition to the proposed project is acknowledged. Comments for or against the proposed project will be considered by the Planning Commission when a hearing is conducted in early 2024. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project.

**COMMENT 32-2**

I also live within 1500 feet of Rio Americano High School. Rio has over 1900 students.

Jesuit and Rio Americano are across the street from each other. That means we have 3000 high school students attending school in our neighborhood. These two campuses generate a huge amount of traffic (and inexperienced drivers) before and after school, as well as a great amount of noise coming from PA systems and athletic events.

Beyond normal school and athletic activities, we have kids doing wheelies in the parking lot at Rio Americano, for example, and other issues that result from the fact that high schools can be an attractive nuisance for teens. Yes, we knew we had two high schools by us when we moved in and we had three children who attended both Rio and Jesuit. BUT we were never told we would be moving next door to a regional sports complex that would operate well into the night. That is something Jesuit is asking for and it will change the very nature of our neighborhood. This change will impact our families and the enjoyment of our homes in a way that cannot be addressed unless the project is denied. Our ability to sit on our patios, walk in our neighborhoods, and even enjoy quiet inside our homes will be significantly impacted no matter what kind of mitigation Jesuit proposes.

**RESPONSE 32-2**

Noise and traffic are evaluated in chapters 9 and 10 of the Draft EIR, respectively. See Responses 32-7 and 12-9.

**COMMENT 32-3**

As far as the Draft EIR, I join in the comments presented in the Technical Report Findings that include the deficiencies in the Draft EIR. In addition, I would emphasize how many of the assumptions in the studies in the Draft EIR are basically statements made by Jesuit with no back up evidence to establish the information provided. For example, their claim that there won't be more than 1500 in attendance defies logic .... Why would they have built a stadium for 3000 if they only intended to use it for 1500? Has anyone asked Jesuit staff for the studies they used to determine how many seats to have? What information or promises were provided to their donors to convince them to pay for a 3000-person stadium. No doubt they never told their donors there would only be 1500 attendees, otherwise they would not have been able to raise the money to put in the 3000 seats. Also, the two "sample" games to test out their protocols, and analyze traffic, etc. are based on a fallacy. These were games with out-of-town teams and not the league in which they play. Clearly this caused a false set of information as they were not realistic about the number of participants.

**RESPONSE 32-3**

Please see Master Response 5: Attendance Estimates.

**COMMENT 32-4**

Also, there are so many weaknesses in the protocols Jesuit touts. Jesuit reserves so much discretion as to when they will open up parking on their school grounds, when they will seek off site parking at another location, when and how many volunteers they will have, when and how many off-duty sheriffs will be hired --- ALL OF THIS IS WITHIN JESUIT'S DISCRETION UNDER ITS PROTOCOLS, ONLY IF JESUIT "THINKS" IT IS NEEDED BASED ON THE NUBMER OF ATTENDEES JESUIT "THINKS" WILL BE COMING. These protocols should not be at the whim of Jesuit. There should be absolute minimum numbers of volunteers and off duty sheriffs at all games, and additional onsite parking at Jesuit (e.g., Jesuit can't say no parking on its fields when it

is raining). More tests need to be done that include games with local teams, and significant conditions must be placed on any approval.

**RESPONSE 32-4**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 32-5**

The other issue is that Rio Americano High School is also considering making a similar application. This must be factored into any decision. The application cannot be approved indefinitely. If the application is to be approved, it must come up for renewal and re-evaluation periodically so we aren't stuck without any redress when things do not go as Jesuit says they will.

**RESPONSE 32-5**

See Response 12-9.

**COMMENT 32-6**

There is discussion that our neighborhood will have to switch over to having parking permits on our vehicles to park here so that people at games will not be able to park in our neighborhood. How is that fair to us? What if I want to have an event at my house? Now my friends can't park in the neighborhood to come see me because Jesuit has insisted on having night games?

**RESPONSE 32-6**

Parking supply and demand are discussed in the Local Transportation Analysis Memorandum (March 10, 2023) that was prepared by Kimley-Horn and is contained in Appendix F of the Draft EIR. Parking is also discussed on pages 10-4 and 10-5 of the Draft EIR. It should be noted that the lack of parking is not, in and of itself, an environmental impact under CEQA. See Master Response 6: Parking Availability. No change to the Draft EIR is necessary.

**COMMENT 32-7**

Jesuit is a private school, so unlike its counter part Rio, our neighborhood is not allowed to use its fields, tracks, or other athletic amenities. Moreover, unlike Rio, the majority of the students do not live in the neighborhood. This is a key factor. These families will not bear the brunt of the changes as they live elsewhere. How is that fair? They wouldn't want a stadium in their neighborhood going well into the night in addition to all of the daytime activities. The fact that hundreds of families in our neighborhood will be negatively impacted so that the solely male students who attend Jesuit can have night games makes no sense.

**RESPONSE 32-7**

CEQA requires an analysis of physical impacts to the environment; it does not require analysis of social and economic impacts. Under CEQA, “an economic or social change by itself shall not be considered a significant effect on the environment.” (14 CCR §§ 15131 & 15382). Effects analyzed under CEQA must be related to a physical change. (14 CCR § 15358(b)). Social and economic impacts alone do not constitute a significant effect on the environment (14 CCR §§ 15064(e), 15131 & 15382). No change to the Draft EIR is necessary.

**COMMENT 32-8**

Jesuit has no problem in adding another 200 plus events a year at night with no respect on the impact it will have on our quality of life and neighborhood. Jesuit announces at every meeting with anyone that it “is a good neighbor.” Since when does someone self-identify as a good neighbor, shouldn’t Jesuit’s neighbors be a judge of whether they are acting as a good neighbor? Simply calling yourself a good neighbor and hosting a few meetings a year (although many are cancelled by Jesuit) does not mean you are a good neighbor.

**RESPONSE 32-8**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The proposed project will not add 200 events. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 32-9**

These impacts will come in noise (not only the crowds cheering, but traffic, as well as a PA system that can be heard from miles away well into the night). Moreover, the noise that comes from crowds leaving events at 10-11 at night in our neighborhoods will also result in vandalism and other activities in our neighborhood that are less likely to occur during the day.

**RESPONSE 32-9**

Noise and traffic are evaluated in Chapters 9 and 10 of the Draft EIR, respectively. Under CEQA, “an economic or social change by itself shall not be considered a significant effect on the environment” (14 CCR §§ 15131 & 15382). Effects analyzed under CEQA must be related to a physical change. (14 CCR § 15358[b]). Social and economic impacts alone do not constitute a significant effect on the environment (14 CCR §§ 15064[e], 15131 & 15382). No change to the Draft EIR is necessary.

**COMMENT 32-10**

There is no benefit to our neighborhood, only negative impacts. The only benefit that Jesuit says we will have is not to have Saturday day games. We are fine with Saturday day games, we prefer them! And when Jesuit moves its games to evenings, they will

most likely allow other non-profits to fill the Saturday slots, so that benefit also goes out the door!

**RESPONSE 32-10**

The commenter’s preference for Saturday games is noted. Comments for or against the project will be considered by the Planning Commission when it makes a decision regarding the project.

**COMMENT 32-11**

While we now deal with noise 12 hours a day, we will no longer be able to have evenings free of noise and events late into the night. How is this fair and how can this make sense when Jesuit and Rio have done fine for 60 years without these night games. The reason they have not had them before is because this is a residential neighborhood that already deals with a great deal of traffic and noise during the day and common decency would lead anyone reasonable to conclude that adding another 4 or more hours a day to the noise and commotion is no only not being a good neighbor, but sacrificing the quality of life for our neighborhood simply so the Jesuit boosters can be satisfied and Jesuit can grow as a business. Its own Rev. McGarey has stated that if Jesuit can’t grow, it cannot survive and stay in business. Jesuit is a BUSINESS—that is not what we understood the high schools to be.

**RESPONSE 32-11**

Noise and traffic are evaluated in Chapters 9 and 10 of the Draft EIR, respectively.

**COMMENT 32-12**

The challenges claimed by Jesuit such as student schedules and heat can be addressed through other means rather than night games. While Jesuit claims it must do this because of the heat, it also admits the hottest time of the year is June through September. But Jesuit is not limiting night events to those four months but wants them all year long. So, this is simply a convenient reason for the application, but not based in actual need. If heat is really the cause, then night games should only be played during those four months of the year. My son played soccer at Jesuit and there was no issue about needing a venue for practice or games at night. Just wasn’t an issue.

**RESPONSE 32-12**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project, but it is included here for decisionmaker consideration.

**COMMENT 32-13**

In addition, we are fortunate to live near the American River Parkway, however, the access point at Jacob and other locations near Jesuit also bring more traffic to our area in addition to the two high schools. Making Jesuit an event venue for sporting events well into the evenings for so many evenings of the year and weekends will exacerbate this traffic, and negatively affect our air quality while increasing GHG emissions. This

does not even address the impact of lighting on the environment. These emissions and the air quality impacts not only the people who live here, but the wildlife on the parkway.

***RESPONSE 32-13***

Traffic is evaluated in chapter 10 of the Draft EIR. The potential environmental impacts of operating the proposed nighttime lighting, including potential impacts on the American River Parkway, are evaluated in Draft EIR Chapter 5, “Aesthetics.” Please see also Master Response 2: Nighttime Light and Glare Impacts. Chapter 6, “Air Quality” and Chapter 7, “Greenhouse Gas” of the Draft EIR provide a comprehensive assessment that addresses concerns related to air quality impacts and greenhouse gas (GHG) emissions. Please also see Response 2-1. See Response 31-2 regarding effects on wildlife.

***COMMENT 32-14***

We were never told we would be moving next door to a regional sports complex. That is something now being changed and will impact our families and the enjoyment of our homes in a way that cannot be addressed, unless the project is denied. Our ability to sit on our patios, walk in our neighborhoods, and even enjoy quiet inside our homes will be significantly impacted no matter what kind of mitigation Jesuit proposes.

***RESPONSE 32-14***

The project does not propose a regional sports complex. Please see Chapter 3 of the Draft EIR, “Project Description,” for a comprehensive characterization of the proposed project. Please see also Master Response 3: Project Approval Where There are Significant and Unavoidable Impacts.



## **LETTER 33**

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Leibovitz Family (October 29, 2023).

### **COMMENT 33-1**

We have lived near Jesuit High School for over 30 years and have enjoyed the quiet and safety of our neighborhood. We opposed the installation of lights when it was announced that Rio Americano High School was considering adding field lights. Why should Jesuit be treated any differently? Thousands of high school sports occur all over the country in locations much hotter and more humid than Sacramento without adding 100 foot light poles resulting in increased light annoyance and also increased night traffic and noise.

### **RESPONSE 33-1**

Noise and traffic are evaluated in Chapters 9 and 10 of the Draft EIR, respectively. The Draft EIR is specifically focused on addressing all direct and reasonably foreseeable indirect effects associated with the proposed changes to the campus – namely, the proposed permanent stadium lighting. Please see Chapter 3 “Project Description” of the Draft EIR for a comprehensive description of the proposed changes that are the subject of analysis in the Draft EIR.

### **COMMENT 33-2**

I have been an electrical contractor for more than 35 years and reviewed the lighting documents. When a light fixture is 100 feet in the air there is no way to avoid the brightness or glare as the light beam shines out causing annoyance for the neighbors much like you would see in the surrounding area of an airport.

### **RESPONSE 33-2**

The potential environmental impacts associated with aesthetics from installation of the light standards and operation of nighttime lighting are evaluated in Draft EIR Chapter 5, “Aesthetics.” Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B, “Lighting Report.”

### **COMMENT 33-3**

Over the years we’ve been fine with hearing the PA system during Saturday games but hearing the PA system on Friday nights is taking it to a whole different level and honestly is inconsiderate to our neighborhood.

### **RESPONSE 33-3**

Noise impacts are comprehensively addressed in Chapter 9 of the Draft EIR, including impacts associated with shifting events. See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium

PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 33-4**

I am concerned about the increased evening traffic and that young drivers will be driving throughout our neighborhood when pedestrians are out walking. Just last week my car was almost side swiped by a reckless driver trying to turn into the school entrance off of Fair Oaks Blvd. This occurred last Friday evening right as the football game was starting.

**RESPONSE 33-4**

Please see Response 5-3.

**COMMENT 33-5**

We are also concerned that Jesuit will continue to expand the availability of the field for Jesuit as well as other sporting events taking place in the evenings. It seems to us that Jesuit has not been completely transparent throughout this process.

**RESPONSE 33-5**

Please see Master Response 5: Attendance Estimates. See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details.

**COMMENT 33-6**

We would hope that Jesuit would take into consideration the negative effects of this proposal and be a good neighbor by not going through with this project.

**RESPONSE 33-6**

Please see Master Response 3: Project Approval Where There are Significant and Unavoidable Impacts.

**LETTER 34**

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Craig Milligan (October 30, 2023).

**COMMENT 34-1**

I am writing to provide concern and opposition to approval and note approximately 200 home owners in surrounding neighborhoods that oppose approval. Neighbors of Jesuit moved to the area knowing there were no night games and based on location, in a residential neighborhood there would be none going forward.

**RESPONSE 34-1**

The commenter's opposition to the proposed project is acknowledged. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project. Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024.

**COMMENT 34-2**

While there are numerous, seemingly small issues with data collected and it's use that has seriously squeed results in favor of applicant, the aggregate is alarming and need be noted.

**RESPONSE 34-2**

The CEQA analysis presented in the Draft EIR considers all direct and reasonably foreseeable indirect physical impacts associated with the proposed project.

**COMMENT 34-3**

Applicants basic project objectives are not consistent with provided Calendar, page 35 applicant claims use will be for practice and competition, but does not note the number of practices, which is significant, and why it is not noted!

Through out the EIR the proposed Anticipated Event Calendar is used (see page 40 of PLNP2021-00262), and it is entirely inaccurate! CPAC members questioned JHS at the last meeting on October 11, 2023 and they lied about the number of planned events. Their own Calendar shows 228 events (to include practices) and the Calendar provided to all study agencies in preparation of the EIR claims only 29-36! This is far to large a discrepancy and clearly impacts a proper assessment. Opportunity to correct the Calendar was given and JHS stood by their submitted Calendar. As such, it would be fair and appropriate to limit light usage if approved to the the number of nights submitted numerous times and used in the following assessments: noise, traffic, lighting. Leaving it as such does not limit use of lights!

Furthermore, the calendar only examines JHS team use of the complex and makes no mention of potential use by Parochial Athletic League, Junior Marauders and or any other league (soccer, lacrosse, etc.) seeking night use of a complex. Not limiting nights

allowed would leave open the chance for complex use 365 nights a year as the field has synthetic turf and track that could hold up to such use.

**RESPONSE 34-3**

Plate PD-5 (Anticipated Event Lighting Schedule) provides days of the week and time periods during which practices would occur. The comment is correct that the EIR analysis is based on the proposed events and timing listed in Plate PD-5. No other events are proposed to use the stadium lighting. Therefore, no change to the Draft EIR is necessary.

**COMMENT 34-4**

Concession/Mitigation:

There are none! While several have been suggested, JHS has offered none! CPAC members made it clear they needed to offer something, and to date none have been offered. Here are some that make good sense whether or not approval is granted, as these conditions are currently issues, albeit at different times of the day.

1. Street parking: make it illegal, applicant claims to have adequate parking, but need to insure its use. This would enhance safety and lower environmental effects on neighbors.
2. Noise barriers to lessen encroachment to RD4 neighbors.
3. Limit number of nights lights can be used, to include games and practices. Currently, there is a huge discrepancy and this would hold applicant accountable to a known Calendar restricting the number of nights lights can be used, the concern here is that approval could be granted based on far fewer events than those applicant is actually planning to use stadium lights.
4. Complete all “suggested” items in traffic study, also be aware the study claims a crosswalk exists at American River and Jacob which is not true, none exists. Good neighbors should willingly offer to enhance the safety of students, guests and neighbors.
5. Join and help pay for neighborhood patrol. Hosting meeting’s is a start, but not good enough.

**RESPONSE 34-4**

Regarding making street parking illegal, public parking is allowed on most streets in the vicinity of Jesuit High School is allowed by County ordinance. Noise barriers to reduce noise emissions at neighboring properties were considered. However, it would not be feasible in this circumstance because noise generated by the elevated noise sources (i.e., speakers and upper bleachers) would be largely unaffected by ground-level barriers. The nights the proposed stadium lighting would be used are listed in the table in Plate PD-5. The Draft EIR evaluated this schedule in terms of environmental impacts.

The proposed schedule would be enforced by the County through the Use Permit Amendment to ensure that the stadium lighting is not used for events not listed. Regarding the misidentification of a crosswalk at American River and Jacob Lane, please see Response PM-14-1. Mitigation Measure TR-2: Pedestrian Safety Improvements to Site Plans has been revised to include a requirement to improve the pedestrian crossing at the intersection at Jacob Lane and American Drive. Mitigation Measure TR-2 has been amended as shown in Final EIR Chapter 10, “Transportation.” The comment regarding neighborhood patrol is not a comment on the environmental analysis in the Draft EIR.

**LETTER 35**

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Wendy Milligan (October 30, 2023).

**COMMENT 35-1**

I am writing in an effort to point out significant issues with data being used for the Jesuit High School stadium lighting proposal and oppose approval.

>>>> 1. Bollard Noise Assessment:

**RESPONSE 35-1**

Responses to specific comments related analysis in the Draft EIR are provided below.

**COMMENT 35-2**

>> A. Numerous noises not assessed, most notably: ref whistles, air horns, bull horns, car horns and cheer leading

**RESPONSE 35-2**

As part of the Environmental Noise Assessment (Appendix D), long-term ambient noise studies were conducted at six sensitive receptor locations from approximately noon on Friday, September 30 through noon on Monday, October 10th, 2022, a period of approximately 240 consecutive hours at each location. During this period, noise generated by two football games was recorded, and the results of the October 8 football game were used to quantify potential impacts related to noise associated with the project. All noise sources were captured by these noise measurements. Based on this analysis, it was determined that the project would have a potentially significant impact related to noise.

**COMMENT 35-3**

>> B. Sample set for assessment was too small and done at games that were not well attended yielding inaccurate data/results

**RESPONSE 35-3**

Please see the Response 35-2 regarding the project noise study and impact determination related to noise. The project's ambient noise study included two football games on October 1 and October 8, 2022, which had approximately 1,500 attendees, which is typical for a regular season game. Two additional football games on August 25 and September 1, 2023 were studied with reported attendance at approximately 2,500, which is a typical crowd size for a playoff game (Appendix J). The results of that additional study reinforced the conclusions of the project's noise assessment, in that the project would result in a significant and unavoidable impact related to noise.

**COMMENT 35-4**

>> C. Anticipated use “Table 7” is entirely incorrect and significant! The chart shows 37 events, yet the number of events provided by Jesuit is clearly written as 258 nights!

**RESPONSE 35-4**

The proposed events that would be played under the new lighting are shown in Plate PD-5. The Draft EIR evaluated this schedule and not previous iterations that may have been communicated to the public.

**COMMENT 35-5**

>> D. Table 3 - Acoustic Analysis. None done! No prescribed mitigation measures!

\*Wire Fraud is Real\*. Before wiring any money, call the intended recipient at a number you know is valid to confirm the instructions. Additionally, please note that the sender does not have authority to bind a party to a real estate contract via written or verbal communication.

**RESPONSE 35-5**

As stated above, ambient noise studies were conducted as part of the Environmental Noise Assessment. Based on the results of these studies, it was determined that the project would have a potentially significant impact related to noise. Regarding noise-related mitigation, please see the Response 12-4. The commenter is incorrect to suggest that an acoustical analysis was not done and the commenter is also incorrect that there are no prescribed mitigation measures. Mitigation measures are summarized in Table ES 1.

## **LETTER 36**

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Patrick Moore (October 2, 2023).

### ***COMMENT 36-1***

It may not be in the purview of the Council to address the Draft EIR, but the only new information to comment on is in reference to this report. As a longtime resident on Tennyson Way, I remain deeply opposed to the project. Noise and Transportation, my worries, are both covered in the DEIR. Noise will have a big impact on neighbors. Not surprisingly, the closer you live to the stadium the worse it will be. The report lists several ways to mitigate the effects. I hope that the school will be required to implement all of them.

### ***RESPONSE 36-1***

The commenter's opposition to the project is recognized. Noise impacts of the proposed project are comprehensively addressed in Chapter 9 of the Draft EIR, and transportation related impacts of the proposed project are comprehensively addressed in Chapter 10 of the Draft EIR. The Planning Commission will consider the information in the EIR in making decisions regarding the proposed project. If the project is approved, Jesuit High School would be required to implement the mitigation measures as a condition of that approval.

### ***COMMENT 36-2***

For us, the worry is increased traffic and cars clogging our streets on game nights. Here, I don't believe the DEIR gives enough weight to the impacts of many more cars, many more pedestrians, and all occurring at night. The congestion will be greatest at the end of the game with noise, litter, pollution, much worse than occurs now. The only mitigation offered is a designated crosswalk where currently there is none. The school must be required to provide alternatives to overflow parking covering our streets at nighttime. Personnel from Traffic control must be present to direct cars and pedestrians during the critical times before and after the biggest events.

### ***RESPONSE 36-2***

Please see Response 5-3 and Master Response 4: Traffic Hazards.

### ***COMMENT 36-3***

Lastly, I believe if approved, the addition of stadium lighting will prove to be a big success, if success is measured by more events, larger crowds, more parking congestion, and more noise. Soccer, lacrosse, flag football, rugby, and track and field will all benefit in the same way as football. Increased ticket sales will mean more revenue and gradually many more events will be added to the schedule. Our peaceful neighborhood will be negatively impacted unnecessarily.



**RESPONSE 36-3**

Please see Response 5-3, Master Response 4: Traffic Hazards, and Master Response 5: Attendance Estimates.

**COMMENT 36-4**

It is for all of the above reasons we oppose the project.

**RESPONSE 36-4**

The commenter's opposition to the project is recognized. Please see Master Response 3: Project Approval Where There are Significant and Unavoidable Impacts.

## **LETTER 37**

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Gaylord Moulds (October 8, 2023).

### ***COMMENT 37-1***

I believe that the two most important Items in the EIR which have the most impact on the neighborhood and which I feel were not adequately covered in the EIR were solutions to the noise, especially the volume of the public address system, and parking alternatives, so people are discouraged from parking down side streets.

### ***RESPONSE 37-1***

Project impacts related to noise are evaluated in Chapter 9 “Noise and Vibrations,” including proposed mitigation measures. Traffic-related impacts are analyzed in Chapter 10 “Transportation,” Master Response 4: Traffic Hazards, and Master Response 5: Parking Availability.

**LETTER 38**

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Gaylord Moulds (October 30, 2023).

**COMMENT 38-1**

Jesuit continues to pursue building a major sports complex in the Wilhaggin/Del Dayo community, a lovely, quiet neighborhood of single family homes. Homeowners pay a premium price for their homes and high property taxes for the privilege of living here. Yet, Jesuit continues to get approval to expand their presence in the neighborhood even if it's at the expense of its neighbors.

**RESPONSE 38-1**

Please see Response 8-1.

**COMMENT 38-2**

Jesuit's request to now install stadium lights in order to play Friday night football games as well as other sporting events will further disrupt the lives of neighbors living in close proximity. Friday night football games that last at least until 10:00 pm concern us as follows:

**RESPONSE 38-2**

Responses to specific comments related analysis in the Draft EIR are provided below.

**COMMENT 38-3**

NOISE:

Excessive noise from the public address system (P.A.), the band and a crowded stadium are more than enough to send neighboring homeowners and potential guests indoors, unable to enjoy an evening outdoors in their backyard. The Environmental Impact Report (EIR) said it best by describing the noise level in our area as a "significant and unavoidable impact regardless of mitigation". Otherwise, it's saying significant noise is something we'll have endure for the duration of a three hour game lasting until 10:00pm. Further, excessive noise will continue between 10:00 pm and at least 11:00 pm as potentially 1500 to 2000 or more exuberant fans exit the stadium after a game. This noise will be even more severe if people attending the game are allowed to park down side streets. This, of course, at a time when many homeowners have retired for the night and are trying to sleep.

**RESPONSE 38-3**

The Final EIR includes updated Mitigation Measure NOI-1, which will reduce the noise output of the stadium PA system through performance standards, and will therefore reduce the significant and unavoidable noise impact to the extent feasible.

**COMMENT 38-4****PARKING/SECURITY**

Jesuit has identified a number of parking locations including overflow lots at Arden Hills and Rio Americano High School for games with between 2000 and 3000 people attending. Jesuit also proposes to have signs and/or monitors to keep people from parking down side streets. While this is an excellent idea, I'm not sure they can legally do that. And if not, people will most often choose parking that is most convenient which more than likely will be down side streets. If that occurs, residents will be confronted with additional chaos after the game including parking issues, noise, and potentially security issues late into the night.

**RESPONSE 38-4**

Transportation-related impacts are analyzed in Chapter 10 "Transportation," Master Response 4: Traffic Hazards, and Master Response 5: Parking Availability. Please also see Response 23-57. Project impacts related to noise are analyzed in Chapter 9 "Noise and Vibrations," including proposed mitigation measures. Security issues is not considered an impact under CEQA, and thus, is not addressed in the Draft EIR. Events will be implemented according to Jesuit's Protocol for Nighttime Events, which addresses security. See Response 16-19.

**COMMENT 38-5****CONCLUSION**

Neither the EIR or "JESUIT'S PROTOCOL FOR NIGHT EVENTS" were fully able to provide adequate solutions to the noise or parking concerns brought about by the installation of stadium lights and that are of considerable concern to the neighbors who live on streets surrounding Jesuit's stadium complex. A major sports complex with stadium lights and games lasting until 10:00 pm should not be allowed in the middle of a quiet residential neighborhood. And the P.A. system as it exists, is far too loud and invasive. For these reasons, I would definitely disapprove of Jesuit's stadium lighting project.

**RESPONSE 38-5**

Please see Response 38-4. See Master Response 6: Parking Availability. Regarding the stadium PA system, please see the revised Mitigation Measure NOI-1, which has been updated to require lowering PA system output.

**LETTER 39**

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Susan Myers (October 5, 2023).

**COMMENT 39-1**

1. I currently live about 1/4 mile from Jesuit. Every time there are announcements made to the student body and faculty, my husband and I, sitting in our backyard, can clearly hear their words. The study of noise levels in the neighborhood are sorely lacking in the report. There is enough new technology available, there is no reason these messages could not be sent by txt or email to reduce this noise pollution. If there were then to be added night games with the use of speakers, the report again is deficient in correctly measuring the change in noise levels. Averaging noise level measurements will incorrectly state the impact on the neighborhood and give a false assessment of what we have to endure.

**RESPONSE 39-1**

Please note that this EIR assesses the potential impacts of the proposed project, which is to add lighting to Jesuit High School stadium. The noise impact assessment in Chapter 9 of the Draft EIR is focused on potential impacts that would occur with the project, such as shifting stadium events into the evening. Regarding the stadium's PA system, please see Response 12-4.

**COMMENT 39-2**

2. Parking along American River Drive should be limited to the sidewalk adjacent to the Jesuit High School property line. This is a requirement the city imposed on Sacramento Country Day School. Jesuit's situation is no different and should be applied to them as well. And there should not be any parking allowed in any of the neighborhood streets surrounding Jesuit High School. If there is not enough parking on site at Jesuit High School, there should not be activities scheduled.

**RESPONSE 39-2**

Transportation-related impacts are analyzed in Chapter 10 "Transportation," Master Response 4: Traffic Hazards, and Master Response 5: Parking Availability. The project will be implemented consistent with Jesuit's Protocol For Night Events, which addresses noticing, safety, access, parking, sound, lighting, and signage. See Response 16-19.

**COMMENT 39-3**

3. Many of us moved to this neighborhood to be able to enjoy the American River Parkway. To install lighting that could endanger the species of animals that live in and around the Parkway is a travesty. The EIR does not adequately assess the damage that could be done to the wildlife living in the Parkway. A study should be done to fully define any damage to their living environment and put a halt to the temporary lighting currently used by Jesuit until this assessment has been completed.

**RESPONSE 39-3**

The potential environmental impacts associated with aesthetics from installation of the light standards and operation of nighttime lighting, including the impacts to the American River Parkway, are evaluated in Draft EIR Chapter 5, “Aesthetics.” Because the project’s nighttime lighting would not adversely affect the American River Parkway as discussed in Draft EIR Chapter 5, there is no need for additional biological studies related to nighttime lighting within the Parkway. Please see also Master Response 2: Nighttime Light and Glare Impacts.

**COMMENT 39-4**

4. Lastly, It is only a minority of the student body that represents families in this community around Jesuit High School. As a community member, it makes no sense that people from other areas of the Sacramento region are trying to define what our neighborhood should put up with in terms of noise, traffic, outdoor lighting and impact on the wildlife. Our representatives in our government should be responsible for ensuring these studies and documents of what will actually occur from this lighting project be accurate and comprehensive in order for both Jesuit and the neighborhood to reach a successful conclusion as to whether this project should proceed.

**RESPONSE 39-4**

Noise, transportation, and biological resources effects of the proposed project are fully addressed in Chapters 9, 10, and 11 of the Draft EIR, respectively. This is not a comment on the Draft EIR, but it is included here for decision maker consideration. Comments for or against approval of the proposed project will be considered by the Planning Commission when the hearing is conducted early in 2024.

## **LETTER 40**

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Susan Myers (October 22, 2023).

### **COMMENT 40-1**

An environmental study of wildlife impacts is essential before the Jesuit expansion project sign-off. We currently see owls in our backyard and geese on Jesuit's lawn. I'd hate to think those lights would create dangerous conditions for them when there wasn't any danger before.

### **RESPONSE 40-1**

Please see Response 31-2.

### **COMMENT 40-2**

The Draft EIR is not complete and does not include wildlife impacts.

### **RESPONSE 40-2**

Impacts to biological resources, including wildlife, are comprehensively evaluated in Chapter 11 "Other CEQA Considerations." No change to the Draft EIR is needed.

**LETTER 41**

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Susan Myers (October 25, 2023).

**COMMENT 41-1**

We oppose the Use Permit Amendment to PLNP2018-00190 to allow stadium lighting at Jesuit High School athletic field.

**RESPONSE 41-1**

The commenter’s opposition to the proposed project is acknowledged. Comments for or against approval of the proposed project will be considered by the Planning Commission when the hearing is conducted early in 2024.

**COMMENT 41-2**

The negative impact on traffic, noise, air, and light during night time hours is a paramount concern.

**RESPONSE 41-2**

Traffic-related impacts are analyzed in Chapter 10 “Transportation,” and Master Response 4: Traffic Hazards. Noise impacts are evaluated in Chapter 9. The Draft EIR evaluated air quality and greenhouse gas impacts, including emissions sources associated with any potential evening and nighttime events, in Chapter 6, “Air Quality” and Chapter 7, “Greenhouse Gas.” The potential environmental impacts associated with aesthetics from operation of nighttime lighting are evaluated in Draft EIR Chapter 5, “Aesthetics.” Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B, “Lighting Report.”

**COMMENT 41-3**

Many cars on American River Dr., Jacob Lane, and especially Fair Oaks Blvd. exceed the speed limit. Accessing Fair Oaks Blvd. from Day and Del Dayo Drives is a challenge and often dangerous. Added heavy night traffic from Jesuit and other school activities will greatly exacerbate this problem.

**RESPONSE 41-3**

Traffic-related impacts are analyzed in Chapter 10 “Transportation.” See also Master Response 4: Traffic Hazards.

**COMMENT 41-4**

Listening to announcements, games, bells during the day is welcome, but on a nightly basis would not be. How often and for how long the field will be used and lit is not clear.



**RESPONSE 41-4**

See Chapter 3 of the Draft EIR, “Project Description,” which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. Evening events are required to be scheduled to end by or before 10pm by Mitigation Measure NOI-1, though it is understood that occasionally overtime play may require an event to extend beyond 10pm.

**COMMENT 41-5**

The light from two 100 foot and two 90 foot poles, sidewalks, other pathways, and multiple vehicles will extend well into neighbor residential areas. The lit night sky may negatively affect both humans and animals.

**RESPONSE 41-5**

The potential environmental impacts associated with aesthetics from installation of the light standards and operation of nighttime lighting are evaluated in Draft EIR Chapter 5, “Aesthetics.” Potential nighttime lighting impacts related to animals at the project site are evaluated in Draft EIR Chapter 11 under the heading “Biological Resources,” on page 11-5. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B, “Lighting Report.”

**COMMENT 41-6**

Is Jesuit renting, or contracting out field use for financial gain or subsidy?

**RESPONSE 41-6**

Please refer to the schedule of planned events in Plate PD-5 in Chapter 3 of the Draft EIR, “Project Description.” This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 41-7**

Jesuit High School is a renowned institution and has/does contribute positively to the lives of many. This permit amendment, however, does not positively affect the residential community surrounding its campus.

**RESPONSE 41-7**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

## **LETTER 42**

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Joy Hiroko Nishida (October 22, 2023).

### **COMMENT 42-1**

This is a comment letter on the Draft Environmental Impact Report (DEIR) regarding the Jesuit High School Stadium Lighting Project (Project), Control Number PLNP2021-00262, State Clearinghouse Number 2022100645.

### **RESPONSE 42-1**

Responses to specific topics raised in this comment letter are provided below.

### **COMMENT 42-2**

#### Air Quality

How will air quality be impacted above the baseline vehicle emissions by allowing post-season games, which were held at Hughes Stadium, and the rental of the facilities at Jesuit High School? Though postseason games are very few, how many activities will be held at Jesuit High School for those who rent their facilities? This needs to be assessed.

### **RESPONSE 42-2**

The operational air quality and greenhouse gas (GHG) analysis presented in Chapter 6, “Air Quality,” and Chapter 7, “Greenhouse Gas,” of the Draft EIR is based on the events shown in Plate PD-5. No other events are proposed to use the stadium lighting. Therefore, no additional assessment is required.

### **COMMENT 42-3**

#### Biological Resources

Impact BIO-1: Swainson’s Hawk (SWHA), which is a California listed threatened species, has been known to nest along the American River Parkway, which is in close proximity to the Project area. A common mitigation measure for nesting SWHA is to establish a 0.25-mile radius buffer. A nest survey must encompass a 0.25-mile radius from the Project site to ensure that SWHA is not present.

### **RESPONSE 42-3**

Mitigation Measure BIO-1 requires preconstruction surveys be conducted for raptors adjacent to the project site. If found, Mitigation Measure BIO-1 requires the establishment of no-disturbance buffers. Please see Chapter 11 “Other CEQA Considerations” pages 11-4 and 11-5. While there may be suitable nesting habitat for Swainson’s hawk along the American River Parkway, this riparian area is approximately 0.4 miles from the project site. There is no suitable nesting habitat within 0.25 miles of the project site. For these reasons, the proposed project would not have any impacts to nesting Swainson’s hawks or their habitat.

**COMMENT 42-4**

Brazilian Free-Tailed Bats and Hoary Bats, the latter which is on California Department of Fish and Wildlife’s Special Animals List, occur in the area. Though Hoary Bats have the ranking of S4-Apparently Secure, which translates to a fairly low risk of extirpation in the state due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors. How are these bats affected by the night lighting and noise? Have the nearby trees been surveyed for bat occupation?

**RESPONSE 42-4**

See Response 23-70.

**COMMENT 42-5**Cultural and Tribal Resources

As a mitigation measure, due to the proximity to the American River Parkway, a high probability of subsurface resources may occur. A cultural resources monitor should be onsite during any ground disturbance activity should a cultural resource be discovered.

**RESPONSE 42-5**

Mitigation Measures CR-1 and TCR-1 require construction work to be suspended in the event of discovery of subsurface cultural resources to allow for review by a qualified professional archaeologist. If it is determined due to the types of deposits discovered that a Native American monitor is required, the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission would be followed.

**COMMENT 42-6**Noise

The proposed night games at Jesuit High School would result in a significant and unavoidable impact, regardless of mitigation if using the current PA system. Other measures not discussed are researching and using a better sound system, limiting the number of night events, and not allowing the rental of the facilities during the night, just to mention a few.

**RESPONSE 42-6**

See Comment Response 12-4 regarding the stadium PA system and noise-related mitigation. Please note that the impact determination related to noise is not solely based on the usage of the PA system. The PA system would contribute to increases above ambient noise levels, but is just one part of an equation which also includes crowd noise, cheering, music, etc. Please also note that an updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

**COMMENT 42-7**Transportation

Increased traffic along two-way roads such as American River Drive and Jacob Lane will increase during night games. As a resident near American River Drive (ARD), lighting is dim at the intersections. Pedestrian crossings at ARD become dangerous when vehicles are leaving a nighttime event. Having improvements at Tennyson Way and ARD is a start. More safety features as stated in Mitigation Measure TR-2 for more intersections along ARD should be considered.

**RESPONSE 42-7**

Mitigation Measure TR-2: Pedestrian Safety Improvements to Site Plans has been revised to include a requirement to improve the pedestrian crossing at the intersection at Jacob Lane and American Drive, in addition to the already required improvements at the intersection at Tennyson Way and American River Drive. Mitigation Measure TR-2 has been amended as shown in Final EIR Chapter 10, “Transportation.”

## **LETTER 43**

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Richard Paleski (October 8, 2023).

### **COMMENT 43-1**

Currently our neighborhood is subject to two distinct and separate traffic cycles when Jesuit High School and Rio Americano schools are in session. We are subject daily to a huge surge in vehicles driven by enrolled students and other vehicles transporting student/students to be dropped off at these two schools. The first influx of vehicles, totaling many hundreds of them, occurs mostly every weekday between approximately 7:30 and 8:45 AM. This massive influx of cars and trucks creates a large increase in street traffic, noise, and pedestrian activity. The streets surrounding these schools are all impacted by this activity every weekday.

### **RESPONSE 43-1**

This is a comment on existing traffic conditions in the neighborhoods surrounding Jesuit High School. A response regarding the environmental analysis of the proposed stadium lighting in the Draft EIR is provided below. Two technical studies related to transportation are summarized in Chapter 10 of the EIR, “Transportation.” The Vehicle Miles Traveled (VMT) Analysis and Local Transportation Analysis conducted by Kimley-Horn for the proposed project were completed on March 10, 2023 and can be found in Appendix E and Appendix F of the Draft EIR. The purpose of the VMT Analysis was to determine the increase in vehicular travel demand, measured in VMT, attributable to the proposed project. The focus of the analysis was to determine the impact of shifting the times associated with football games under existing conditions (on a Saturday during daylight hours) to conditions proposed under the project, which would typically be a Friday evening with stadium lights. The Local Transportation Analysis examines vehicular level of service, queueing at intersections near the project site, impacts to bicycle and pedestrian facilities and circulation, parking supply and demand, and transportation safety in the vicinity of the project site. Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School. The W-Trans memorandum can be found in Appendix H of the Final EIR.

### **COMMENT 43-2**

Later in the day-again every weekday-from around 3:00 PM until 4:00 PM the same surge of traffic will occur when these schools are in session.

Allowing the installation of Stadium Lighting and the nighttime scheduling of more than two hundred plus sporting events throughout the year at the Jesuit High School will set up a second set of two more traffic cycles in our neighborhoods at times of the day that currently do not see vehicular and pedestrian traffic beyond that of local residents transiting to and from their homes on a normal weekday evening. Prior to each evening event each of these visiting vehicles will enter the local streets and search for parking, discharge passengers, and create noise as they leave and head to the stadium. At the

finish of these events—at a time when many people, infants, young and old are in their homes—many already sleeping—the quiet of their neighborhood (and their daily rest) will be disturbed by the return of the crowds of event goers who will now again start their vehicles, slamming doors, trunks and playing music while talking outside of homes, idling their vehicles in traffic while waiting to enter the flow of traffic all leaving at the same time.

**RESPONSE 43-2**

See Response 43-1. Noise and traffic are evaluated in Chapters 9 and 10 of the Draft EIR, respectively. With regard to past increases in activity at the Jesuit High School campus, the Draft EIR is specifically focused on addressing all direct and reasonably foreseeable indirect effects associated with the proposed changes to the campus – namely, the proposed permanent stadium lighting. Please see Chapter 3 “Project Description,” of the Draft EIR for a comprehensive description of the proposed changes that are the subject of analysis in the Draft EIR.

**COMMENT 43-3**

- The installation of stadium lighting at Jesuit High School, the creation of their commercial Sports Complex, the timing of their proposed annual schedule of evening events are all components of a program that has no place in our residential neighborhood and will result in the complete negative transformation of the tranquil and peaceful **environment** we currently reside in. In short the stadium lighting and all proposed changes and additions should not be allowed to be built in any form.

**RESPONSE 43-3**

The commenter’s opposition to the proposed project is acknowledged. This is not a comment on the Draft EIR, but it is included here for decision maker consideration. Comments for or against approval of the proposed project will be considered by the Planning Commission when the hearing is conducted early in 2024.

## **LETTER 44**

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Lisa Phenix (October 18, 2023).

### **COMMENT 44-1**

As to PLNP2021-00262, I respectfully comment that the Draft EIR is incomplete and inadequate. I respectfully request that a full biological assessment be done regarding the impacts of the proposal on the very nearby American River Parkway, its habitat, and protected wildlife, birds, reptiles, amphibians, insects and fish. I request that this assessment include but not be limited to the impacts on habitat and wildlife from the fact that many mammals, birds, insects, amphibians access, traverse and forage our neighborhood and Jesuit property to and from the parkway. It is well documented that light, sound, vibration, and increased human activity detracts many protected species, plants, and degrades their habitat.

As the proposal will result in more traffic which will increase air pollution in my neighborhood, I respectfully request an in depth assessment of air pollution and its impact in our neighborhood be included.

### **RESPONSE 44-1**

The potential environmental impacts associated with aesthetics from operation of the proposed nighttime lighting are evaluated in Draft EIR Chapter 5, “Aesthetics.” Because the project’s nighttime lighting would not adversely affect the American River Parkway as discussed in Draft EIR Chapter 5, there is no need for additional biological studies related to nighttime lighting within the Parkway. Potential nighttime lighting impacts related to animals at the project site are evaluated in Draft EIR Chapter 11 under the heading “Biological Resources,” on page 11-5. Please see also response to comment 31-2 regarding the need for a biological resources assessment, Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B, “Lighting Report.”

The potential environmental impacts associated with air pollution and greenhouse gas are evaluated in Draft EIR Chapter 6, “Air Quality” and Chapter 7, “Greenhouse Gas.”

### **COMMENT 44-2**

As this proposal will result in and is connected with construction, existing landscape disruption, and artificial turf, I request study of the impact of any and all chemicals that will likely be used, off gassed, etc., in relation to this project. Also please study and review the impact of increased human waste, trash, and construction disruption to the area’s soil as Jesuit and all of our neighborhood drainage drains directly into the American River.

In 2015, Jesuit was digging and invasive Japanese beetles were found. Jesuit allowed California Department of Food and Agriculture (CDFA) to aggressively spray the athletic fields every 2 weeks all summer and continued to run summer school and have summer

sports camps on these sprayed athletic fields, despite requests from parents to delay student exposure. The pesticides are proven to cause cancer and affect adolescent brain development. Due to Jesuit's size, pesticide lingered in the air, and drifted. Our entire neighborhood was doused with toxic pesticides including Neonicotinoids (highly toxic to pollinators and aquatic invertebrates), and cancer causing Carbaryl. All amphibians in the area where died, Children and grandparents got sick, cancer survivors were impacted, wildlife, bees, birds etc. were harmed and died. Although Jesuit was advised of the toxicity of the pesticides sprayed and neighbors asked that Jesuit actively monitor CDFA, to spray in the least invasive manner, Jesuit failed to make any accommodation. Our teen boys played on Jesuit fields exposed to many toxins unnecessarily. CDFA was found to be in violation of state law.

<https://www.ewg.org/news-insights/news-release/2022/05/court-rejects-californias-blanketapproval-pesticide-spraying>.

**RESPONSE 44-2**

No increase in the use of pesticides would result from implementation of the proposed project, which is installation and operation of stadium lighting. The use and disposal of hazardous materials during construction is evaluated on pages 11-14 and 11-15 of the Draft EIR. The potential for construction-related degradation of water quality is evaluated in Draft EIR Chapter 11 under the heading "Geology, Soils, and Paleontological Resources" (Impact 2, pages 11-10 and 11-11), and under the heading "Hydrology and Water Quality" (Impacts 1 and 2, pages 11-19 and 11-20).

**COMMENT 44-3**

Our neighborhood is slowly recovering. Jesuit keeps expanding to the detriment of its neighbors. Please respect that this is a family area near the American River Parkway with health conscious people and protected wildlife, nesting birds, and protected plants that will be exposed to much greater air, water, light, sound, and vibration pollution. Thank you in advance for your careful consideration of my comments.

**RESPONSE 44-3**

Please see Response 44-1.



## **LETTER 45**

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Marybeth Primeau (October 26, 2023).

### **COMMENT 45-1**

It has come to my attention that you are looking for flaws or deficiencies in the draft EIR. As a resident of the neighborhood surrounding Jesuit, I find a few things that need to be considered before a decision is made.

### **RESPONSE 45-1**

Responses to specific comments regarding the commenter’s perspective on potential deficiencies in the Draft EIR are provided below.

### **COMMENT 45-2**

1. The traffic assessment in the draft assumes 1,500 attendees for football games. That appears to be too low of an estimate. The stadium capacity is 3,000 and a recent exhibition night game on 8/25/23 had 2,000 attendees. The draft EIR plate PD-5 estimates crowds up to 3,000 people for the playoffs. Such crowds should also be expected for games with rival teams. The traffic assessment needs to be revised, assessing for 3,000 attendees.

### **RESPONSE 45-2**

As detailed in Chapter 9 “Noise”, attendance estimates used for this analysis comes from data collected on October 1, 2022 and October 8, 2022. To support the analysis of the noise assessment, attendance of both games was tracked. For more information on attendance estimates, please see Master Response 5: Please see Master Response 5: Attendance Estimates.

### **COMMENT 45-3**

2. The traffic assessment in the EIR draft assumed 3.2 passengers per vehicle, based on a high school in Carmel, CA. No basis for this assumption is provided. There is no reason to believe this is a valid assumption. Driving patterns will be different in the Sacramento area. Jesuit HS has students from a very wide geographic area. On a Friday evening, it is likely that parents, families and friends will be traveling from different workplaces to the stadium, often traveling alone in each car. The number of passengers per vehicle needs to be directly determined for Jesuit HS events.

### **RESPONSE 45-3**

Please see Response 16-77.

### **COMMENT 45-4**

3. The EIR draft says “Attendees also park on nearby residential streets where it is allowed” But the draft does not address the impact of this parking. Environmental impacts such as littering, loitering, vandalism, noise and safety need to be assessed.

**RESPONSE 45-4**

Project impacts related to noise are thoroughly assessed in Chapter 9 “Noise and Vibrations.” Traffic related hazards are analyzed in Chapter 10 “Transportation”. Other safety concerns related to geology and soils, hazards and hazardous materials, public services, and wildfire are discussed in Chapter 11 “Other CEQA Considerations.” Littering, loitering, and vandalism are not considered impacts under CEQA and are therefore not discussed in this document.

**COMMENT 45-5**

4. The EIR draft also states that Jesuit will “install pedestrian crossings with enhanced safety features...” but it does not offer any specific locations or details. The specific location and details of this proposed safety upgrade need to be included.

**RESPONSE 45-5**

Pedestrian crossings with enhanced safety features would be placed at the intersection of Tennyson Way and American River Drive across from Jesuit High School’s southern parking lot (page 3-18 of the Draft EIR) as well as at Jacob Lane and American River Drive. See Response 42-7.

**LETTER 46**

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Kanwal Randhawa (November 5, 2023).

**COMMENT 46-1**

I have a property on 1099 Stewart Road, Sacramento CA 95864. I am opposed to the Stadium lighting as I believe it would adversely affect the night time ambients in that neighborhood. I'm hoping this project will not be approved. I would appreciate being apprised of what is happening with this project.

**RESPONSE 46-1**

The potential environmental impacts associated with aesthetics from operation of the proposed nighttime lighting are evaluated in Draft EIR Chapter 5, "Aesthetics." Please see also Master Response 2: Nighttime Light and Glare Impacts, Master Response 3: Project Approval Where There are Significant and Unavoidable Impacts, and Draft EIR Appendix B, "Lighting Report." The commenter has been added to the project's mailing list associated with the CEQA process.

## **LETTER 47**

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Sacramento County Parks (October 27, 2023).

### **COMMENT 47-1**

Thank you for providing Sacramento County Department of Regional Parks the opportunity to provide comments on the Draft EIR for Jesuit High School Stadium Lighting/Sound. Our comments pertain to the visual impacts of the lights to the American River Parkway.

### **RESPONSE 47-1**

Please see Responses 47-2 through 47-4.

### **COMMENT 47-2**

Artificial lighting is a concern as it can impact public night sky aesthetics and diminish habitat function by acting as an environmental stressor. Effects could include loss and/or redistribution of nesting and shelter locations, decreased foraging and predation success, a shift in migration patterns, disrupt ion of terrestrial and aquatic wildlife’s circadian rhythms and behavior, and adverse impact to wildlife survival. Glare from lighting sources outside of the Parkway can also affect the visibility for Parkway cyclists after dusk.

### **RESPONSE 47-2**

The potential environmental impacts associated with aesthetics from operation of the proposed nighttime lighting are evaluated in Draft EIR Chapter 5, “Aesthetics.” Because the project’s nighttime lighting would not adversely affect the American River Parkway as discussed in Draft EIR Chapter 5 (Impacts 5-1 and 5-2), there would be no adverse impacts on visibility for Parkway cyclists after dusk, and there is no need for additional biological studies related to nighttime lighting within the Parkway. Potential nighttime lighting impacts related to animals at the project site are evaluated in Draft EIR Chapter 11 under the heading “Biological Resources,” on page 11-5, and were found to be less than significant. Please see also Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B, “Lighting Report.”

### **COMMENT 47-3**

The project, as described in the Draft EIR and appendixes, is visible to the American River Parkway, and appears to be in compliance with Sacramento County American River Parkway Plan (ARP Plan). The ARP Plan includes recommendations for minimizing visual impacts upon the Parkway from uses and facilities adjacent to the Parkway. These recommendations include setbacks or buffers, screening, using colors and materials of non-reflective surfaces using colors that blend with the colors of the surrounding vegetation. The ARP Plan also recommends using techniques to discourage intrusive lighting, such as optimizing foot candle ratios, shielding, re-aiming, non-glare lighting, full cut off optics (FCOs), short heights, timers, motion sensors, and adjacent native tree and shrubbery plantings.

**RESPONSE 47-3**

The County appreciates the concerns raised by the commenter. The new lights at the stadium would be light-emitting diode (LED), and are described in detail in Draft EIR Table PD-1 (page 3-10). The new lighting system would be dark-sky certified. The visual impacts of the light standards from the American River Parkway are evaluated in Draft EIR Chapter 5, “Aesthetics.” The suggestions provided by the commenter, which are part of the American River Parkway Plan Policy 7.24, are listed in Draft EIR Chapter 5 on page 5-12. As discussed in Draft EIR Impact 5-1 on pages 5-16 and 5-17, the American River Parkway is approximately 2,014–2,300 feet (nearly one-half mile) from the proposed light poles at the Jesuit High School stadium. The project site is not visible from the Parkway due to the intervening distance, single-family detached residences, and tall landscape trees. The Parkway corridor decreases in elevation to the south towards the American River. The project site is situated at an elevation of approximately 54 feet above mean sea level (amsl). The top of the levee along the American River, which borders the Parkway on the north side, is approximately 61 feet amsl. The Jedediah Smith Memorial Trail within the Parkway (which is approximately 2,258–2,400 feet south of the proposed light standards) is situated at elevations ranging from 52–53 feet amsl. The land within the Parkway continues to slope down to the southeast to the American River, which is situated at an elevation of approximately 27 feet. However, due to the intervening distance and tall trees, only the tops of the light poles and the luminaires would be visible from the Parkway. The poles would be of a small diameter (particularly as viewed from a distance of nearly one-half mile) and the light silver/grey color of the steel poles would tend to blend in with the sky background. Therefore, the proposed light poles would not substantially degrade the existing visual character or quality of public views of the viewshed from the American River Parkway, and therefore the Draft EIR found that this impact would be less than significant. Thus, no mitigation measures are required. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B, “Lighting Report.”

**COMMENT 47-4**

While artificial lighting that is visible to the American River Parkway is not ideal, our staff appreciates that the Jesuit High School Stadium Lighting project has been designed to minimize intrusive lighting and visual impacts upon the Parkway. We appreciate the opportunity to comment and look forward to a visually unobtrusive lighting project.

**RESPONSE 47-4**

The County thanks Sacramento Regional Parks Department for its review and comments on the proposed project, and agrees that the Jesuit High School Stadium Lighting project has been designed to minimize intrusive lighting and visual impacts on the Parkway as explained in responses 47-2 and 47-3.

## **LETTER 48**

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Save the American River Association (October 16, 2023).

### **COMMENT 48-1**

It has come to the attention of Save the American River Association (SARA) that Jesuit High School proposes to add stadium lighting and sound to its athletic fields located at American River Drive and Jacob Lane. (<https://planning.saccounty.gov/Pages/Jesuit-High-School-Stadium-Lighting.aspx>). Although the DEIR notes the proximity to the American River Parkway, SARA and other entities that developed the American River Parkway Plan were not contacted, notified, or consulted by Sacramento County. (see page 65 of DEIR)

Since SARA has just recently been advised of this proposal by a nearby neighbor, it appears that the County’s public outreach has not been effective.

### **RESPONSE 48-1**

Please refer to Chapter 2 “Introduction” of the Draft EIR for the details of the public notification and review process. Consistent with Public Resources Code Section 21092, prior to the preparation of the Draft EIR the County distributed a Notice of Preparation (NOP), held an agency scoping meeting, held a public scoping meeting, and provided the public a period to submit scoping comments. County Regional Parks was notified of the proposed project during the NOP scoping process; no concerns associated with the proposed project were noted by County Regional Parks that would have required any further outreach to other affiliated Parkway organizations. Once the Draft EIR was completed, the County filed a Notice of Completion (NOC) with the State Office of Planning and Research along with a Notice of Availability to begin the public review period (PRC Section 21161). The Draft EIR was distributed to responsible and trustee agencies, as well as other affected agencies, surrounding cities, and interested parties. Finally, the Draft EIR was made available online at the Sacramento County website, as well as in person at the Sacramento County Community Development Department office, whose address is provided on page 2-3 of the Draft EIR. The County followed all requirements for public notification.

### **COMMENT 48-2**

This athletic field is approximately .3 miles from the American River Parkway. Parkway access is right at the end of Jacob Lane.

### **RESPONSE 48-2**

The County recognizes that access to the Parkway is available from the south end of Jacob Lane. As discussed in Draft EIR Chapter 5, “Aesthetics” (page 5-6), the proposed light standards at the Jesuit High School stadium would be installed approximately 2,014–2,300 feet (0.45 mile) north of the Jacob Lane access to the Parkway. The proposed construction staging area (i.e., the discus/soccer field south of the stadium) is approximately 1,851 feet (0.35 mile) north of the Jacob Lane access to the Parkway.

From the Harrington Way Parkway access (east of the Jacob Lane access), the proposed light standards would range from 0.45 to 0.54 mile to the northwest (Draft EIR pages 5-6 and 5-7). The Jedediah Smith Memorial Trail is approximately 2,258–2,400 feet south of the proposed light standards (Draft EIR page 5-7). As discussed in Draft EIR Impact 5-1 on pages 5-16 and 5-17, the project site is not visible from the Parkway due to the intervening distance, single-family detached residences, and tall landscape trees; at most, only the tops of the light poles and the luminaires would be visible from the Parkway, the poles would be of a small diameter (particularly as viewed from a distance of nearly one-half mile), and the light silver/grey color of the steel poles would tend to blend in with the sky background. Furthermore, as discussed in the project's Lighting Report (attached to the Draft EIR as Appendix B), modeling results indicate that due to the intervening distance, topography, tall trees, and residences, the proposed nighttime lighting at the Jesuit High School stadium would not be visible from the Parkway. Furthermore, the Parkway is only open from sunrise to sunset; thus, recreationists are not allowed within the Parkway during nighttime hours and therefore nighttime impacts to recreationists within the Parkway would not occur. Please see also Master Response 2: Nighttime Light and Glare Impacts.

**COMMENT 48-3**

A review of Sacramento County's DEIR as to Jesuit's proposal reveals that it fails to consider the impact of the proposal on the Parkway's habitat, protected wildlife, plants, and wild and scenic river.

**RESPONSE 48-3**

The potential environmental impacts associated with aesthetics from operation of the proposed nighttime lighting are evaluated in Draft EIR Chapter 5, "Aesthetics." Because the project's nighttime lighting would not adversely affect the American River Parkway as discussed in Draft EIR Chapter 5 (Impacts 5-1 and 5-2), there would be no adverse impacts on visibility for Parkway or Lower American River users after dusk, and there is no need for additional biological studies related to nighttime lighting within the Parkway. Please see also response to comment 47-3, Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B, "Lighting Report."

Potential impacts to biological resources within and adjacent to the project site are addressed in Chapter 11 "Other CEQA Considerations."

**COMMENT 48-4**

Recent studies document serious impacts of light, sound, traffic, vibration, pollutants and more caused by proposals such as Jesuit's on the wildlife, plants and habitat of the Parkway. Moreover, the DEIR acknowledges negative health impact to persons using the Parkway for its intended recreational purposes.

**RESPONSE 48-4**

The commenter's concern related to the impacts of light, sound, traffic, vibration, and pollutants related to wildlife and plants is noted. The potential environmental impacts of

the proposed project related to these topics are evaluated in Draft EIR Chapters 5, 6, 9, and 10. Please see also Response 48-3.

The Draft EIR does not “acknowledge” or state in any way that the proposed project would have negative health impacts to persons using the Parkway.

**COMMENT 48-5**

SARA respectfully requests that a full Biological Assessment be required as part of the EIR for this proposal.

**RESPONSE 48-5**

Please see Response 48-3.

**COMMENT 48-6**

SARA also requests that Sacramento County consult directly the following local area organizations regarding this proposal for feedback: County Regional Parks, California Native Plant Society, Water Forum, Lower American River Conservancy and Environmental Council of Sacramento.

Extensive restoration is occurring at or near this point of the Parkway. Such restoration could be impacted.

**RESPONSE 48-6**

As stated in Response 48-1, opportunities for public and agency comment on the potential environmental impacts that could occur from implementing the proposed project were provided during the NOP comment period and the Draft EIR comment period, as well as County public scoping meetings during these time periods. County Regional Parks provided a public comment on the Draft EIR, and those comments and responses are included as part of this Final EIR (see comments and responses 47-1 through 47-4).

The Draft EIR considered potential impacts from the proposed project on the Parkway, and concluded based on substantial evidence that there will be no impacts. Please see also Response 48-2 related to aesthetics, and Draft EIR Chapter 11, “Biological Resources.”

**COMMENT 48-7**

SARA respectfully requests that Sacramento County pull existing approved and withhold approval of any further proposed temporary use permits pending biological assessment above requested to maximize Parkway protection as required by county and state laws.

**RESPONSE 48-7**

Please see response 48-3.



**COMMENT 48-8**

The DEIR documents that this proposal will increase pollution which will harm students on site, nearby residents, and recreational users of the parkway. As presented, SARA respectfully objects to the proposal and requests that it be declined.

**RESPONSE 48-8**

See Response 2-1. The commenter's opposition to the proposed project is acknowledged. Comments for or against approval of the proposed project will be considered by the decision making body when the hearing is conducted early in 2024.

## **LETTER 49**

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Mary Ann Shepperd (September 1, 2023).

### **COMMENT 49-1**

I strongly oppose Stadium Lighting at Jesuit High School.

### **RESPONSE 49-1**

The commenter's opposition to the proposed project is acknowledged. Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024.

### **COMMENT 49-2**

I have lived on Keane Drive since 1972. I have seen the stop sign at Jacob and Fair Oaks changed to a stop light which was a great safety measure. I have seen the enrollment of students increase from 100 to 1000.

### **RESPONSE 49-2**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

### **COMMENT 49-3**

Schools should be in neighborhoods, however they **should enhance the neighborhood**, not deter from it. Parking in front of residential homes, cars running stop signs, speeding is becoming a real danger in this neighborhood. I feel that the stadium lights will increase these dangers exponentially!

### **RESPONSE 49-3**

Please see Maser Response 4: Traffic Hazards.

### **COMMENT 49-4**

I hear the noise from baseball and football games and band practice inside my home. I don't mind it because it is during the day or early evening. I actually enjoy hearing the baseball and football scores on the PA. It is "tolerable" now. **I WILL NOT** enjoy listening to the noise until 10pm followed by yelling and many cars zooming through the neighborhood for **ANOTHER HOUR OR SO (11PM)**.

### **RESPONSE 49-4**

Noise impacts are evaluated in Chapter 9. Mitigation Measure NOI-1 requires that evening events be scheduled to conclude no later than 10 pm, recognizing that events such as football games may occasionally go into overtime.

**COMMENT 49-5**

*The studies that have been done are meaningless to a point. Jesuit IS in a neighborhood and I would hope that Jesuit would continue the good relationship with the neighbors surrounding the school and take into consideration of how this would impact the neighborhood.*

**RESPONSE 49-5**

The Draft EIR evaluates the potential adverse physical environmental impacts of the proposed project on the environment, as contained in Chapters 5 through 11. The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the project. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

## LETTER 50

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Mary Ann Shepperd (October 22, 2023).

### **COMMENT 50-1**

I am opposed to the Jesuit “Lighting” Project for the reasons below.

I appreciate your time to read my concerns.

### **RESPONSE 50-1**

The commenter’s opposition to the proposed project is acknowledged. Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024.

### **COMMENT 50-2**

- All of the noise reduction improvements will help very **minimally**. **Noise is noise is noise!** There will still be the “roar” of the crowd and PA. These improvements will **also** not help with people walking and talking loudly to their cars, car doors slamming, motors starting, horns honking, etc. from 8-9pm and 10-11pm. (after the games end)

### **RESPONSE 50-2**

Project impacts related to noise are analyzed in Chapter 9 “Noise and Vibrations.” An updated Mitigation Measure has been provided in the Final EIR to reduce noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

### **COMMENT 50-3**

**The bottom line is how does this benefit the neighborhood and it’s residences?**

Jesuit will benefit by getting revenue from “leasing” out their “sports complex”.

### **RESPONSE 50-3**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

### **COMMENT 50-4**

The neighborhood will **suffer**. We get NOISE 261 days each year, 300 to 600 + or - cars and shuttles and buses and 1000 or 2000 people on the neighborhood streets that are not “made” for that kind of traffic. All of this traffic will overwhelm our peaceful **established** neighborhood.

**RESPONSE 50-4**

The Draft EIR is focused on a detailed evaluation of all direct and reasonably foreseeable indirect effects associated with the project, and not an evaluation of past activities or events related to the project site. Chapter 9 of the Draft EIR comprehensively addresses noise impacts attributable to the proposed project. Transportation-related impacts are comprehensively addressed in Chapter 10 of the Draft EIR.

**COMMENT 50-5**

- This is a NEIGHBORHOOD and can't nor should we have to accommodate the immense extra traffic these constant games will cause. Even with all of their "plans" for safety there is still a very real danger to ALL pedestrians, neighbors included.

**RESPONSE 50-5**

See Chapter 3 of the Draft EIR, "Project Description," which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. Transportation-related impacts are comprehensively addressed in Chapter 10 of the Draft EIR. See Master Response 4: Traffic Hazards. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 50-6**

- I find it inconceivable that Jesuit finds it is **reasonable** for our neighborhood "to have one weekday afternoon and evening free" and Saturdays from noise.

This would be "**your worst nightmare neighbor**"!! Is constant noise for 261 days a year reasonable?

Would you want that in a neighbor?

I enjoy my backyard and my windows open for fresh air but not if I have to listen to constant noise 261 days a year which will be unfair to me and many other neighbors.

**RESPONSE 50-6**

See Chapter 3 of the Draft EIR, "Project Description," which comprehensively details the proposed project, including changes to lighting, the schedule of uses, and other details. The proposed stadium lighting would allow games and practices that are already occurring to shift to evening hours. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 50-7**

Schools should be in neighborhoods but as anyone who lives in a neighborhood it comes with a responsibility of being a "good neighbor". I find this total disruption 261 days a year is definitely NOT neighborly.

I think it a huge imposition for our community as the residences WILL suffer.

**RESPONSE 50-7**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 50-8**

- I have a great concern of the **increase in crime in the neighborhood**...a very real threat.

**RESPONSE 50-8**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 50-9**

- I am also greatly concerned for our house values...though not measurable at this time. Personally, I would not move to a neighborhood with constant noise the majority of the whole year.

**RESPONSE 50-9**

See Response 1-1.

**COMMENT 50-10**

- I support Jesuit and it's sports program BUT not other schools or clubs to use their facilities...**which affects my enjoyment of living in this neighborhood**. Other venues are more suited to a "sports complex".

**RESPONSE 50-10**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 50-11**

- This draft mentioned "Sports Complex". Shouldn't that be in a different location that is zoned for that...on public or commercial land, not near residences across the street and in Jesuits "back yard". This is a fully established neighborhood and has been for years. I understand Jesuit wants to enhance their sports program but NOT to the detriment of this neighborhood.

**RESPONSE 50-11**

As described in Chapter 3 (Project Description), the proposed project is installation of stadium lighting to allow athletic activities (see Plate PD-5) in the evening hours. "Sports Complex" is not a term used in the Draft EIR.

**COMMENT 50-12**

I think the best solution, which was mentioned in this draft, is for Jesuit and maybe other high schools “explore the possibility of holding events at other schools or locations” that is more suited to the extra traffic and the safety of the attendees, not in the middle of a long established neighborhood.

**RESPONSE 50-12**

Draft EIR Chapter 4, “Alternatives,” included an alternative (Alternative 1) that would arrange for the use of another facility (Hughes Stadium or Hornet Stadium) for practices and games. Alternative 1 is described on Draft EIR page 4-6 and the potentially significant environmental impacts associated with implementing Alternative 1 are evaluated on Draft EIR page 4-7. A comparison of the potentially significant environmental impacts of Alternative 1 as compared to the proposed project are presented in Draft EIR Table Alt-1 (Draft EIR pages 4-10 through 4-14). The commenter’s preference for Alternative 1 is noted.

**COMMENT 50-13**

- Unfortunately I know very little about zoning laws but I believe there is a reason for them...to avoid this sort of thing happening where it “shouldn’t be allowed.

**RESPONSE 50-13**

See Chapter 8 of the Draft EIR for a discussion of planning and zoning. As addressed in this chapter, private schools are permitted in the RD-4 land use zone, subject to issuance of a conditional use permit. The request is a Use Permit Amendment to allow permanent stadium lighting at Jesuit High School’s Marauder Stadium. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 50-14**

- Jesuit has been a “good neighbor” for years. I’m greatly saddened that Jesuit wants to do this to our neighborhood.

**RESPONSE 50-14**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

## **LETTER 51**

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Maryam Mehrkhasht Smitheman (October 27, 2023). (1)

### ***COMMENT 51-1***

This afternoon along with so many we have encountered here on Piccadilly Cir. is Jesuit fans filling up our street & having difficulty even just turning into Piccadilly due to spectators walking to their cars, running across American River Drive & the amount of traffic going down American River drive!

Today I noticed many single driver cars, some with more but it's not the norm for there to be multiple people in the car as the draft EIR states.

Signs were up yet people completely disregarded them!

### ***RESPONSE 51-1***

The project will be implemented consistent with Jesuit's Protocol For Night Events, which addresses noticing, safety, access, parking, sound, lighting, and signage. See Response 16-19. See Master Response 4: Traffic Hazards. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.



**LETTER 52**

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Maryam Mehrkhas Smitheman (October 27, 2023). (2)

**COMMENT 52-1**

Your draft EIR has not taken into account the accurate number of participants & cars to these Jesuit events!

**RESPONSE 52-1**

Please see Response 16-80 pertaining to vehicles and Master Response 5: Attendance Estimates for number of participants during events.

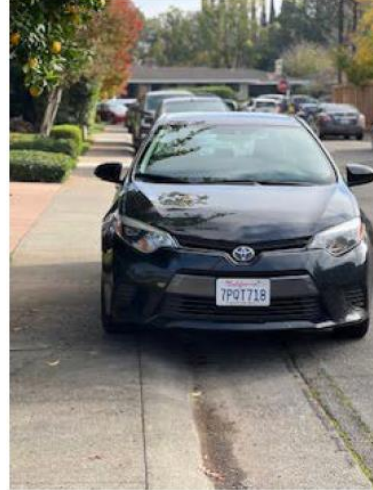
**COMMENT 52-1**

I have also not seen any consideration to the community’s disruption in getting access to their homes, emergency services or policing of these events!

With this proposal we will no longer be living next to a high school, instead we’ll be living next to a full fledged sports complex with all of the pitfalls & dangers of one!

Please consider all of these things when reviewing this project!





**RESPONSE 52-2**

The Draft EIR concluded on page 11-23 that the project would result in less than significant impacts associated with public utilities and public services. The installation of permanent light fixtures does not entail significant alterations to existing infrastructure or substantial impacts on public services such as police services. For emergency and pedestrian access, please see Response 16-80. See Master Response 4: Traffic Hazards.

## **LETTER 53**

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Todd Sperber (September 26, 2023).

### ***COMMENT 53-1***

I am writing because I received a letter, “Notice of Availability”, from the County of Sacramento in reference to the lighting of the stadium.

I am a neighbor that lives right next to the school. My three oldest kids are all in college now, one went to Rio Americano, one to Jesuit, and one to El Camino. I am 100% in favor of lighting the stadium. Our schools are what make our community great and the more we can do to support them and the kids the better. The noise is not a bother, but rather a blessing. It’s wonderful to hear kids participating in whatever even is going on in the community. I can also hear the morning announcements at Del Dayo elementary, every morning, and it’s great. It makes me feel part of the community where I live. I wish Rio was applying for lights as well because they too should have them at their stadium.

Please approve this project.

### ***RESPONSE 53-1***

The commenter’s support for the proposed project is acknowledged. Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024.

## **LETTER 54**

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Steve (October 28, 2023).

### ***COMMENT 54-1***

I am sad and disappointed with the decision that the 5 board members have made. We have lived in the neighborhood for over 30 years and have enjoyed the quietness and small amount of traffic in the area.

I would bet that all 5 board members would not like to have a sports complex in there backyard.

I can assume that all 5 board members have a friend or family member who has attended Jesuit High School and that is why you made this decision.

I would ask that as you are reviewing the request of the neighbors you take it seriously the request that we are asking for and limit the damage that you have already bestowed upon the neighborhood.

Please be mind full of the decisions that you make because they do have consequences.

### ***RESPONSE 54-1***

The commenter's opposition to the proposed project is acknowledged. Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024.

## **LETTER 55**

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David Tait (October 30, 2023).

### **COMMENT 55-1**

My name is David Tait and I am **supportive** of the stadium lights.

Born and raised in Carmichael, Jesuit alumni, parent of two graduates and one current student. Resident of Wilhaggen on nearby Ashton drive.

### **A little History on Jesuit High School:**

Founded in 1963.....school and the fields built, as I understand, before the levees and before the neighborhood developed along American River Drive. In fact, nearby Rio HS was built only a few years after Jesuit. Since the 1960's, area home buyers have always been well aware of two nearby high schools and all that entails, including the potential for future stadium lights.

### **RESPONSE 55-1**

The commenter's support for the proposed project is acknowledged. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

### **COMMENT 55-2**

#### **Are lights at Jesuit unique in the Sacramento region?**

I would estimate that most high schools in region have stadium lights. I would estimate that most of those HS are surrounded by neighborhoods. These stadiums for youth sports provide a gathering place for their communities. With lights at Jesuit, the communities of Del Dayo, Wilhaggen, Sierra Oaks, Arden park, Carmichael, where many Jesuit students and alumni reside, will have a gathering place to encourage and enjoy youth sports. Events are open to all neighbors.

In years past, when Jesuit rented lights for the Rio/Jesuit American River drive rivalry game.....tickets sold out within hours. It was a memorable community event. It felt like we lived in a small town with "Friday night lights".

### **RESPONSE 55-2**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

### **COMMENT 55-3**

#### **Concerns about traffic and parking**

HS sporting events generate traffic whether during the day or evening. Daytime events have occurred since the 1960's. At recent Friday night light events, I think Jesuit did a

good job encouraging and managing traffic off Fair Oaks Blvd., had parking on the upper athletic field, and had signs discouraging parking into the streets off American River Drive. I am confident future traffic and parking plans will greatly reduce the impacts to the nearby neighborhood.

**RESPONSE 55-3**

The project will be implemented consistent with Jesuit's Protocol For Night Events, which addresses noticing, safety, access, parking, sound, lighting, and signage. See Response 16-19. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 55-4**

**Concerns about house value reduction**

Because Jesuit and Rio HS are located in the neighborhood, this is a sought after area to live. There will always be plenty of buyers willing to pay a premium. That's why I moved here!!!

I am confident that Jesuit will take all reasonable measures to limit impacts to the neighborhood. As an active parent, alumni and neighbor I am interested to see that happen.

On behalf of myself and many alumni and parents, we are supportive and excited for the project.

**RESPONSE 55-4**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**LETTER 56**

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Dale and Darlene Vaira (October 18, 2023).

**COMMENT 56-1**

We live at 719 Whitehall Way, Sacramento CA, off American River Drive. We are two blocks from Rio Americano High School and two blocks away from Jesuit High School. Our children went to both Rio and Jesuit.

We oppose Jesuit's Lighting Project.

**RESPONSE 56-1**

The commenter's opposition to the proposed project is acknowledged. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 56-2**

In reference to the "Proposed Conditions of Approval". It is a vague document and does not provide specifics for the neighbors to consider.

**RESPONSE 56-2**

The proposed project is a Use Permit Amendment and Design Review to install four (4) permanent stadium light poles at the Marauder Stadium, and the Use Permit, if issued, will have enforceable permit conditions. This comment is not related to the adequacy of the Draft EIR for addressing potential effects associated with the proposed project, but it is included here for decision maker consideration.

**COMMENT 56-3**

1. Who will monitor PA System? Will it be done for every event?

**RESPONSE 56-3**

Please see the revised Mitigation Measure NOI-1 in the Final EIR, which details how the PA system will have an electronic limiter installed to reduce its output.

**COMMENT 56-4**

2. Who will monitor the traffic control, issue tickets? What about crossing guards? This should be done by off duty sheriff's and not Jesuit volunteers. Who will pay for the Sheriffs?

**RESPONSE 56-4**

The project will be implemented consistent with Jesuit's Protocol For Night Events, which addresses noticing, safety, access, parking, sound, lighting, and signage. See Response 16-19. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 56-5**

3. Food Vendors on our streets are totally inappropriate. It should be on Jesuit property and with the appropriate permits.

**RESPONSE 56-5**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 56-6**

4. Where/when has Jesuit/County explored alternative event locations? Should a neighborhood representative be with them when they do this?

**RESPONSE 56-6**

See Response 11-1.

**COMMENT 56-7**

5. Should the Jesuit community outreach/ liaison program have several people on call to take complaints and report inappropriate behavior and traffic violations during every event?

**RESPONSE 56-7**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 56-8**

6. What are the fines/penalties to Jesuit for non compliance of sound violations? Other violations?

**RESPONSE 56-8**

An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system. This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 56-9**

7. The County has a lot to monitor that goes with Sound Compliance : Complaint Logs, On Site Inspections, Collection of Documentation and Evidence Collection, Issue Warnings, Issue Formal Notices of Violation, Community Engagement, Compliance Checks. Also, the Country has to monitor the traffic and parking and issue fines. This looks like a full time job for a County Employee just monitoring Jesuit Events plus being at these events.



**RESPONSE 56-9**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 56-10**

8. Traffic and Parking. Where are the designated drop off locations? How many Jesuit volunteers would be directing traffic to parking lots? Use of public transportation and shuttles, that's a lot of buses in the neighborhood to accommodate 2000-3000 fans. What about the noise and pollution from the buses?

**RESPONSE 56-10**

See Master Response 5: Parking Availability. Project impacts related to noise are evaluated in Chapter 9 "Noise and Vibrations." Please see Response 2-1 related to air pollution. The project will be implemented consistent with Jesuit's Protocol For Night Events, which addresses noticing, safety, access, parking, sound, lighting, and signage. See Response 16-19.

**COMMENT 56-11**

9. Where are the nearby parking lots? Is that Rio Americano High School, Del Dayo Elementary School, or William B Pond Park?

**RESPONSE 56-11**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 56-12**

10. Whitehall Way on the south side of American River Drive and the west side of Piccadilly Circle has not been addressed. These streets will be parked solidly with cars as the proposal only addresses Jacob Lane, Piccadilly Circle East, Tennyson, and American River Drive. There is no crosswalk here.

**RESPONSE 56-12**

Please see Master Response 4: Traffic Hazards and Master Response 5: Parking Availability.

**COMMENT 56-13**

11. Jesuit implementing traffic control measures, road closures, detours or one way traffic flow during events. This is absolutely a huge inconvenience to the neighbors if we can't leave or return from our homes without taking a detour.

**RESPONSE 56-13**

Please see Master Response 4: Traffic Hazards. The project does not propose road closures, detours required by road closures, or changing the direction of travel on any

public roads. Mitigation Measure TR-2 states that a pedestrian crossing would be installed at the intersection of Tennyson Way and American River Drive across from Jesuit High School’s southern parking lot. Mitigation Measure TR-2 has been modified to include additional details on safety features and the installation of crosswalk markings on all legs of the intersection of Jacob Lane and American River Drive. See Chapter 10 of the EIR for more detail.

**COMMENT 56-14**

12. As for Jesuit offering the neighbors ONE WEEKEND and ONE WEEK DAY free of events I find this absolutely ridiculous and saying it is “reasonable “ is just insulting. Jesuit High School should not be able to dictate to us when we can enjoy our homes and backyards. We should be able to enjoy the peace and quiet when we come home from work every night like most neighbors and neighborhoods.

**RESPONSE 56-14**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 56-15**

13. As for Jesuit building a parking structure off Fair Oaks Boulevard... Perhaps they should build it first before asking to approve lighting.

**RESPONSE 56-15**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 56-16**

14. The height of the lights and glow emitted from the lights at Jesuit for hours will ruin the look and serenity of our neighborhood. And will disturb any neighbors facing the Jesuit field.

**RESPONSE 56-16**

The potential environmental impacts associated with aesthetics from installation of the light standards and operation of nighttime lighting are evaluated in Draft EIR Chapter 5, “Aesthetics.” Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B, “Lighting Report.”

**COMMENT 56-17**

15. Jesuit recommends people ride bikes to the stadium. That doesn’t make sense for bikes to be leaving the stadium at night.

**RESPONSE 56-17**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 56-18**

In conclusion our neighborhood will be inundated with Increased traffic in the evenings and weekends. People do not obey traffic rules. Besides Speeding down American River Drive and not stopping at stop signs, people make U-turns, park in front of fire hydrants, park on the corners and in turn lanes. This makes it very difficult for residents to see oncoming traffic coming in and out of the side streets to turn onto American River Drive. Everyday on Whitehall Way we have to pull our cars out almost into the traffic lane to see if it is clear to turn left or right onto American River Drive. I'm sure it is the same on Tennyson as we do not have 4 way stops.

**RESPONSE 56-18**

See Master Response 4: Traffic Hazards. Two technical studies related to transportation area summarized in Chapter 10 of the EIR, "Transportation." The Vehicle Miles Traveled (VMT) Analysis and Local Transportation Analysis conducted by Kimley-Horn for the proposed project were completed on March 10, 2023 and can be found in Appendix E and Appendix F of the Draft EIR. The purpose of the VMT Analysis was to determine the increase in vehicular travel demand, measured in VMT, attributable to the proposed project. The focus of the analysis was to determine the impact of shifting the times associated with football games under existing conditions (on a Saturday during daylight hours) to conditions proposed under project, which would typically be a Friday evening with stadium lights. The Local Transportation Analysis examines vehicular level of service, queueing at intersections near the project site, impacts to bicycle and pedestrian facilities and circulation, parking supply and demand, and transportation safety in the vicinity of the project site. Additionally, to supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project which included a survey of parking activity related to a nighttime football game at Jesuit High School (Appendix H). The technical reports that were referenced to support the analysis in Chapter 10 "Transportation" of the Draft EIR reflect current conditions. As noted in the W-Trans survey of parking activity, the only public street which appeared to have experienced an increase in parking due to the night football game on September 1, 2023 was American River Drive.

**COMMENT 56-19**

We recommend several traffic studies be done at different times of the day. Under the cover of darkness it becomes extremely dangerous for Adult Residents/Children walking or riding bikes in the neighborhood and crossing the streets

**RESPONSE 56-19**

Please see Response 56-18 and Master Response 4: Traffic Hazards.

**COMMENT 56-20**

Jesuit is also a commuter school. People will be coming into our neighborhood from all different areas of Sacramento, Woodland, Roseville, Rocklin, Auburn etc. who do not necessarily share our values and the respect and pride we have for our neighborhood. The possibility of drugs/alcohol, crime, property damage and garbage coming into our neighborhood is a big reality. Who will pay for extra security in our neighborhood for damages done to our property and cars? Jesuit provides security that is for their property only.

**RESPONSE 56-20**

Please see Responses 56-18 and 1-1.

**COMMENT 56-21**

In March of 2023 we had a guest who was, spending the night and parked her car in front of our house. In the morning she found it covered in syrup and flour. It cost \$200.00 to have it detailed as. We reported it to the Wilhaggin Neighborhood Association. Rio had a dance that Friday night....Coincidence?

**RESPONSE 56-21**

This comment is not related to the adequacy of the Draft EIR for addressing potential environmental effects associated with the proposed project.

**COMMENT 56-22**

Parking in front of our own homes for our own families and guests will become impossible. Also our property values will go down as a result of the lights and evening events from Jesuit High School.

**RESPONSE 56-22**

See Response 1-1.

**COMMENT 56-23**

The noise level will carry at night. We live two blocks away from Jesuit but hear their loudspeakers, cheering, cowbells, the drum line and horns honking from Jesuit in our backyard during the day. The noise will be carried louder and farther at night time.

**RESPONSE 56-23**

As stated in Chapter 9 of the Draft EIR, potential noise impacts stemming from the proposed project were evaluated, and it was determined that the project would result in a significant and unavoidable impact related to increases in ambient noise levels in the vicinity of the project.

**COMMENT 56-24**

On Saturday, October 7, 2023, Jesuit had an alumni party outside with a live band. I am assuming this was in their Quad. There was no audio control of the speakers that the band was using. It was extremely loud in our backyard which would be approximately 5 blocks away from their Quad. We were trying to enjoy a glass of wine with friends in our backyard, as it was a lovely fall evening. We had to go inside because the music was so loud. The music started at 6pm and ended at 9pm. There went our enjoyable evening.

We are becoming prisoners in our homes and are losing our rights to the quiet enjoyment of our homes and backyards in the evenings and weekends. We all put up with traffic and noise from both schools 7 days a week. Please don't ask more from us.

**RESPONSE 56-24**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 56-25**

We are all law abiding citizens and pay very high taxes in our neighborhood. Jesuit High School pays none. The responsibility of our County Supervisors is to protect the neighbors and neighborhood to make it a better and safer place to live. Allowing Jesuit High School to have lights and night games does not do that. Our elected officials need to step up and work for the people who voted and elected them.

**RESPONSE 56-25**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT 56-26**

Times have changed and Jesuit has outgrown the neighborhood. Perhaps they should look at purchasing a piece of property elsewhere for their stadium and or their school.

**RESPONSE 56-26**

Alternatives to the proposed project are evaluated in Chapter 4 of the Draft EIR, including alternative locations.

**LETTER 57**

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Carole & Philip Vercruyssen (October 30, 2023).

**COMMENT 57-1**

There is no mention of the maximum number of night events that may be held at J-Hi.  
That makes the Draft EIR deficient.

**RESPONSE 57-1**

See Response 6-3 and Master Response 5: Attendance Estimates. No change to the Draft EIR is needed.

**COMMENT 57-2**

No lights or PA system at J Hi is my proposal as a neighbor.

TOO LIGHT.

TOO LOUD

TOO MUCH TRAFFIC.

NO LIGHTS AT JESUIT HIGH SCHOOL IS MY PROPOSAL.

**RESPONSE 57-2**

The commenter's position with respect to the proposed project is acknowledged. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

## **LETTER 58**

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Nick Vinciguerra & Brian O’Neill (October 29, 2023).

### **COMMENT 58-1**

This letter is to voice our family’s opposition to the proposed stadium lighting at Jesuit High School.

### **RESPONSE 58-1**

The commenter’s opposition to the proposed project is acknowledged. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

### **COMMENT 58-2**

In 2021, we purchased a Del Dayo Estates home knowing that there is a high school nearby with parameters for field and sports activities already established. Thus far, most of Jesuit outdoor activities produce acceptable levels of light (from current, permanent lighting) and noise (from sports participants, attendees, and band).

### **RESPONSE 58-2**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

### **COMMENT 58-3**

Jesuit’s plan to turn its sports fields into an ever expanding sports complex with taller, brighter lighting (and hours expanding later into the evening) will negatively impact our neighborhood in the following ways:

### **RESPONSE 58-3**

Responses to specific comments regarding the adequacy of the Draft EIR are provided below.

### **COMMENT 58-4**

1. Stadium lighting will increase (both the reach and intensity of) the light pollution we already experience in our homes and yards.

### **RESPONSE 58-4**

The potential environmental impacts associated with aesthetics from installation of the light standards and operation of nighttime lighting are evaluated in Draft EIR Chapter 5, “Aesthetics.” Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B, “Lighting Report.”

**COMMENT 58-5**

2. Jesuit already employs a booming broadcast system, and extra lighting with extending evening/night activities will continue to deteriorate the quality of life for neighbors, who should not be subjected to broadcasting voices and booming music any later than the current schedule.

**RESPONSE 58-5**

Lighting related impacts are comprehensively addressed in Chapter 5 of the EIR, and noise impacts are comprehensively addressed in Chapter 9 of the Draft EIR.

**COMMENT 58-6**

3. We already deal with inconsiderate driving (including speed and traffic violators), parking issues, and discarded litter from sports attendees at Jesuit. Shifting sports activities to later times (aided by new lighting) increases the traffic issues that will happen during periods when homeowners are home trying to enjoy our homes and private yards.

**RESPONSE 58-6**

Transportation related impacts of the proposed project are comprehensively addressed in Chapter 10 of the Draft EIR. See also Master Response 4: Traffic Hazards.

**COMMENT 58-7**

Our home not only faces West, beelined towards the proposed project, but it also sits directly on the busiest thoroughfare in the neighborhood - Jacob Lane. Hence, we shudder at the thought of how our quality of life will be affected by the project.

Additionally, the findings in the EIR only solidifies our absolute opposition of the stadium lighting proposed by Jesuit High School.

**RESPONSE 58-7**

The commenter's opposition to the proposed project is acknowledged. This is not a comment on the Draft EIR, but it is included here for decision maker consideration.



**PUBLIC MEETING COMMENTS**

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Jesuit High School Lights Planning Commission Meeting–Public Testimony, October 23, 2023

## **PUBLIC MEETING COMMENT 1**

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William Pevack

### ***COMMENT PM-1-1***

I'd like to thank the commissioners for obtaining a comprehensive environmental impact report and sharing it with the public for review. However, there are four areas that I have some concerns about:

### ***RESPONSE PM-1-1***

Responses to specific comments on the EIR are provided below.

### ***COMMENT PM-1-2***

1 The first is the traffic assessment assumed 1,500 attendees in a stadium with the capacity of 3,000 and even the game that was on August 25th this year had 2,000 attendees and plate five in the report actually list crowds up to 3,000 for football playoffs so that traffic assessment really should be redone to assess these greater crowd sizes.

### ***RESPONSE PM-1-2***

See Response 16-77.

### ***COMMENT PM-1-3***

2 They also I think used an invalid assessment of 3.2 passengers for a vehicle based on high school and Carmel, CA. I'm not sure that that assumption is valid and how they can make that assumption of the number of passengers per vehicle based on a high school in a different city.

### ***RESPONSE PM-1-3***

See Response 16-77.

### ***COMMENT PM-1-4***

3 The EIR states that attendees may park on nearby residential streets where it is allowed but, the report includes no environmental assessment of the impact of parking on the streets such as noise, safety, littering, and vandalism due to parking on those residential streets.

### ***RESPONSE PM-1-4***

As public parking is already allowed on nearby residential streets, such as American River Drive, and such parking already occurs during games at the stadium, no new environmental impacts would result from the proposed project, which is installation of stadium lights.

**COMMENT PM-1-5**

- 4 Finally, the environmental impact report states that a pedestrian crossing with enhanced safety features will be installed, but it does not include details of where that crosswalk would be placed or what those the enhanced safety features would be. So I think those details should be evaluated in their report.

**RESPONSE PM-1-5**

Mitigation Measure TR-2 states that the pedestrian crossing would be installed at the intersection of Tennyson Way and American River Drive across from Jesuit High School's southern parking lot. Mitigation Measure TR-2 has been modified to include additional details on safety features and the installation of crosswalk markings on all legs of the intersection of Jacob Lane and American River Drive. See Chapter 10 of the Final EIR for more detail.

## **PUBLIC MEETING COMMENT 2**

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Elizabeth Hughes

### ***COMMENT PM-2-1***

Thank you for allowing me extended time to provide critical feedback on the draft EIR for Jesuit high school stadium lighting proposal. I aim to highlight some key concerns and omissions that require immediate attention for a more thorough and accurate assessment of the project's environmental impact. We find ourselves in a situation where the draft EIR concerning the high schools project falls short of comprehensively addressing the critical issues of cumulative impacts. There are key aspects that require our collective attention and immediate action.

### ***RESPONSE PM-2-1***

Responses to specific comments on the EIR are provided below.

### ***COMMENT PM-2-2***

The applicant did not provide the number of activities and user events at their facility. The applicant provided only a list of practices games and graduation events in its proposal for its own activities. In the technical reports the number of activities studied was less than the applicant's original number. The change in the number of activities to be less than the proposed is doubtful and the change in the number was not fully explained in the study. The number of activities, events, and use of the applicant's field does not include a comprehensive accounting of all other nonprofit and non-applicant organizations. This failure to list all other occasions and activities in which the applicant's fields are used creates a deceptive picture of how frequently the fields are used by these non-applicant and non-school activities and the ability of these non-applicant or organizations to use the field later in the evenings and nights.

### ***RESPONSE PM-2-2***

See Response 6-3. With regard to other entities using the field at night or during the day, the project applicant anticipates the use of the proposed lighting for Jesuit athletic activities, including football, soccer, lacrosse, and track and field. The timing of all other school-affiliated sporting activities that do not utilize the stadium for practices or games would remain the same. Please see Plate PD-5 for a detailed anticipated event lighting schedule, which provides a summary of the anticipated uses of the stadium after the lights are installed.

### ***COMMENT PM-2-3***

A correcting cumulative study of all noise created and generated by the applicant and its affiliated organizations was not studied. The draft EIR states that noise impacts are significant and unavoidable. I disagree that the significant noise levels are unavoidable. We firmly believe that the significant noise levels can be mitigated. A simple solution which the applicant could implement today includes downsizing the PA system, lowering

the volume, and restricting its use. Surprisingly, the draft EIR remains silent on this matter.

***RESPONSE PM-2-3***

Please see Comment Response 35-2, which discusses the Project Environmental Noise Assessment. Please note that the impact rating of “significant and unavoidable” does not connote approval of a project. It refers to an impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the State CEQA Guidelines. Regarding the PA system, please see Comment Response 12-4. Mitigation has been proposed to reduce PA system output when in use, but the rating of “significant and unavoidable” did not come solely from the use of the PA system. The noise levels observed during the ambient noise study, and particularly the October 8<sup>th</sup> varsity football game, were made up of multiple factors. These included crowd noise, the use of the PA system, and the school marching band.

***COMMENT PM-2-4***

The draft EIR does not clarify the type of speakers the applicant used when the noise measurements were taken or whether the speaker system used by the applicant will be the same after building out. Please clarify the type of speaker PA system used by the applicant.

***RESPONSE PM-2-4***

The PA speakers are currently attached to four wooden poles at a height of 44-feet above grade on the home side and 35-feet above grade on the visitors’ side. Please see Response 12-4 regarding noise-related mitigation and the stadium PA system.

***COMMENT PM-2-5***

The initial communication from the applicant to the community was incomplete and, in some cases, misleading. In 2021, it was suggested that only just only 6 to 8 Jesuit games would be played under the new lighting, leading residents to believe that the lights would be used sparingly, however, this could not be further from the truth with over 250 practices and non-applicant activities occurring yearly.

***RESPONSE PM-2-5***

The proposed events that would be played under the new lighting are shown in Plate PD-5. The Draft EIR evaluated this schedule and not previous iterations that may have been communicated to the public.

***COMMENT PM-2-6***

The draft EIR, while attempting to assess noise impacts, fall short of addressing the cumulative noise generation from seven days per week. This comprehensive evaluation is imperative considering the constant noise disruptions and disturbances in our community. The draft EIR attempted to study the potential noise impacts from the

project, but it doesn't comprehensively address the cumulative noise impacts that occur seven days a week.

**RESPONSE PM-2-6**

Please note that the Draft EIR assesses the potential impacts of the proposed project, i.e., installing stadium lighting and shifting events to the evening. The proposed events that would be played under the new lighting are shown in Plate PD-5. As stated in Chapter 9 of the Draft EIR, it was determined that this action would result in a significant and unavoidable impact.

**COMMENT PM-2-7**

While the non-applicant weekend in afternoon activities do not seem to exceed nor noise thresholds except when they are used by the applicants. PA, it should be noted, that the noise generation seven days a week during the day, afternoons, and evenings, and proposed night times until 11:00 PM and weekends and summers training clinics and sports camps and everything else has a cumulative impact that no resident can escape. The applicant needs to provide a complete list of, and schedule practices band use, delta league use. junior marauder use, game use, track meet. Saint Francis cheer practice, parochial league school games, and all other non-applicant organizations that use the field.

**RESPONSE PM-2-7**

Please see Comment Response PM-2-6. Regarding cumulative impacts, please note the following definition per CEQA Guidelines Section 15355:

“Cumulative impacts” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

**COMMENT PM-2-8**

The aesthetic study which is one paragraph in the draft EIR is deficient as it doesn't address how a 100-foot lighting pole the equivalent of a 10-story house is aesthetically acceptable in a residential neighborhood built with primarily single-story homes.

**RESPONSE PM-2-8**

The commenter appears to be referring to the text provided in the NOP rather than the Draft EIR or the Lighting Report attached as Appendix B to the Draft EIR. The purpose of the NOP, as required by the CEQA Guidelines Section 15082, was to inform agencies, organizations, and interested members of the public that an EIR would be prepared; to provide basic details about the proposed project; and to invite comment with regards to potential scope and content for the EIR about the potential environmental impacts from implementing the proposed project.

The Draft EIR provides a thorough and complete analysis of the potential environmental impacts from implementing the proposed stadium lighting in Chapter 5, “Aesthetics.” Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, Master Response 2: Nighttime Light and Glare Impacts, and Draft EIR Appendix B: Lighting Report.

**COMMENT PM-2-9**

I have a lot more comments about how using Carmel high school as an equivalent for occupancy related to Jesuit is inappropriate since it’s a high school that is 200 miles away from a Sacramento.

**RESPONSE PM-2-9**

To supplement the analysis contained in the Draft EIR, W-Trans prepared a supplemental traffic analysis for the proposed project (see Appendix H). W-Trans conducted a survey of parking activity related to a nighttime football game at Jesuit High School. The parking surveys were conducted on a non-football Friday in August 2023 and on the evening of a night football game held under portable lighting in September 2023. Based on those surveys, W-Trans estimated that the vehicle occupancy for the nighttime game in September was approximately 3.22 people per vehicle, which is nearly identical to the 3.24 people per vehicle assumed in the Draft EIR. This survey supports the assumptions made in the Draft EIR pertaining to average vehicle occupancy.

**COMMENT PM-2-10**

The draft EIR traffic analysis assumes high attendance gains rather than the impact of fields being used seven days a week and the circulation aspect throughout the neighborhood was not included in the traffic study.

**RESPONSE PM-2-10**

Pursuant to SB 743, automobile delay, as described solely by level of service or other measures of vehicular capacity or traffic congestion, is not considered a significant impact on the environment under CEQA. The Draft EIR appropriately analyzed potential increases in vehicular travel demand (vehicle miles traveled or VMT), conflicts with transportation policy, traffic hazards, and emergency access.

Though not required by CEQA, Kimley-Horn prepared a *Local Transportation Analysis* that evaluates transportation-related conditions more broadly. These transportation-related conditions include existing LOS on roadways and intersections (including American River Drive and Fair Oaks Boulevard), existing bicycle and pedestrian facilities near campus, parking supply and demand, and a general safety analysis focusing on the transportation infrastructure in the immediate vicinity of the project. This analysis is included as Appendix F to the Draft EIR.

***COMMENT PM-2-11***

In conclusion the draft EIR requires substantial revision.

***RESPONSE PM-2-11***

The County has made revisions detailed throughout this Final EIR, though no substantial changes that affect the overall conclusions were needed.



### **PUBLIC MEETING COMMENT 3**

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Jennifer Hall

#### ***COMMENT PM-3-1***

Contrary to kind of some of the previous things we heard I actually live within 1,500 feet of Jesuit high school and Kipling drive and I'm in support of this project.

#### ***RESPONSE PM-3-1***

The commenter's support for the proposed project is acknowledged. Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024.

#### ***COMMENT PM-3-2***

In Full disclosure I do have a senior at Jesuit high school who plays on the football team, but I'm not going to be able to take advantage of the lights. I've sweated my way through my fair share of football games and this this weekend we got to celebrate the senior game. So, sometimes those PA announcements are really celebrating things some things that are really good. What was sad about this weekend is my Dad actually had to leave early. He didn't get to see Kyle play because it was too hot. 75 degrees is a mild day, you'd think it'd be OK, but it was too hot for an elderly man to be able to watch his grandson play. He was able to watch the Bishop Minogue game earlier in the season, which was a night game that was great because he was able to be there for the whole thing. You know this, I was reflecting on this, that I was thinking back to the Chapel light project and a lot of the same kind of concerns are raised. Home values are going to go down. Traffic's going to be horrendous. It's going to be terrible. There's going to be parties at Arden Hills and those things haven't come to fruition. We have nowhere no more deaths at the intersection which is definitely a plus. Have controlled traffic exit and an agreement with Arden Hills not to use these facilities inappropriately. Our home values haven't decreased. Mine personally has increased 50% since 2019 and a home across the street for me was just sold for \$1.5 million, is significant increase from their purchase. This was after all the disclosures were made about the County planning process. I look at some of the homes on Genesee and Lantern Court which were claimed to have been able to lose their value and those haven't either.

#### ***RESPONSE PM-3-2***

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

#### ***COMMENT PM-3-3***

I'm positive there are some mitigations, some ways that we can say yes, and make sure that we do not adversely affect our neighbors, but also provide opportunities and reflect the clear climate change that is coming. We will have to make some changes to account for that.

**RESPONSE PM-3-3**

Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024.

## **PUBLIC MEETING COMMENT 4**

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Tim Lynch

### ***COMMENT PM-4-1***

At the risk of my friendship with Ms. Hall, I'm going to disagree with some of the comments that she made and note that this project is actually hyper-localized. So for the neighbors that live very close or adjacent to the project, it is quality of life changing project. And for neighbors that are just even a little bit farther away, perhaps it's a mild annoyance. Relative to the heat I find it interesting I don't disagree that a 7:00 game would be cooler than a Saturday at 1:00 game, that also means moving the junior varsity games to, I think, 4:00 or 4:30 on a Friday, which is a warmer time for the JV kids than the current morning time on Saturdays.

### ***RESPONSE PM-4-1***

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

### ***COMMENT PM-4-2***

But I want to focus my comments primarily on the Traffic Safety issues at the intersection of American river drive and Tennyson. I've shared this since the first CPAC meeting in April. That intersection is not safe and that intersection of the three access points to the school one being on Fair Oaks Blvd. One being on Jacob lane and the one on Tennyson and American river drive that is the least safe. Traffic routinely exceeds the 35 mile an hour speed limit on American River Drive with no controls at that intersection.

### ***RESPONSE PM-4-2***

Please see Response PM-1-5 and Master Response 4: Traffic Hazards.

### ***COMMENT PM-4-3***

The reports also don't reflect our lived experience and human behavior where people u-turn on American River Drive. They park on the corners where you turn in our neighborhoods. I shared with the school recently at one of the night games there was a parent back up. This occurs not just at the football games, but at nightly practice pickups, and events are not Jesuit events, over which Jesuit claims to have little influence. I ask for much more attention given to the intersection of Tennyson and American River Drive and the impacts on that neighborhood.

### ***RESPONSE PM-4-3***

Please see Response PM-1-5 and Master Response 4: Traffic Hazards.

**PUBLIC MEETING COMMENT 5**

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Michael Armstrong

**COMMENT PM-5-1**

I want to support Mr. Lynch's observations and say that I live within 100 yards of the Tennyson American River Drive intersection. It does not have in any way anything signage to say that there is egress from the Jesuit parking lot used by students dozens of students every morning. In the morning commute crossing our drive, coming back in singular fashion after they've run only through the neighborhood, which is great, it's all fine and good, but it's dangerous. Any number of students could have been hit. And when something like that occurs and there is the ability to put in a stop sign, there is the ability to put in speed bumps, and other countermeasures I'm actually for.

**RESPONSE PM-5-1**

Traffic hazards related to existing conditions and proposed project conditions are discussed throughout Chapter 10 "Transportation." Mitigation Measure TR-2 (Pedestrian Safety Improvements to Site Plans), which has been revised in the Final EIR, would reduce traffic hazard impacts to a less-than-significant level by requiring a marked and lighted pedestrian crossing at the intersection of Tennyson Way and American River Drive across from Jesuit High School's southern parking lot, as well as crosswalk markings at the stop-controlled intersection of Jacob Lane at American River Drive. Please see Chapter 10 of the Final EIR for more detail.

**COMMENT PM-5-2**

But the project is going to impede the quality of life for the community. The school has been there for 60 years. I've lived in the neighborhood for more than half that time. We oppose these lights because of the lack of transparency about what is going to happen after five home games on Friday night.

**RESPONSE PM-5-2**

Parking availability and hazards associated with parking is discussed thoroughly in Chapter 10 "Transportation."

## **PUBLIC MEETING COMMENT 6**

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Gaylord Moulds

### ***COMMENT PM-6-1***

I live on Piccadilly Circle about the middle of Piccadilly Circle and Jesuit has been increasing their presence in in our area for quite some time without any complaints from us until they installed the speaker system around 2019, I think. It became excessively loud we could not enjoy our backyard during a Saturday afternoon game without hearing play by play description of the game. We complained to the County. The County said that they met the standards and so there was basically nothing we could do about it. So, I find it kind of interesting that the EIR found that the median and maximum noise standards were found to have been exceeded at multiple sites during the October 8th 2022 football game as evaluated in the environmental noise assessment.

### ***RESPONSE PM-6-1***

As stated in Chapter 9 of the Draft EIR, it was determined that the project would result in a significant and unavoidable impact related to noise due to its potential to increase ambient noise levels in the evening.

### ***COMMENT PM-6-2***

So, these speakers were excessive in their noise and they are shifting football games into the evening hours. That will result in increases in ambient noise levels, that would exceed noise thresholds at five of the six sites evaluated in the environmental noise assessment, which determined that playoff football games could result in either even greater noise levels due to larger crowds. Playoff game noise generation was estimated to be one to two decibels higher levels higher than regular season games which would further increase ambient noise levels causing greater exceedance of County noise standards. Therefore, the proposed project would result in a potentially significant impact.

### ***RESPONSE PM-6-2***

The comment is correct. It was determined that the proposed project would result in a significant and unavoidable impact related to noise. Please see Response 12-4 regarding noise-related mitigation and the stadium PA system. An updated Mitigation Measure has been provided in the Final EIR with the goal of reducing the noise output of the stadium PA system. Please refer to updated Mitigation Measure NOI-1, which includes performance standards for the reduction of noise from the stadium PA system.

### ***COMMENT PM-6-3***

Although mitigation would help limit ambient noise from stadium activities, there is no quantifiable evidence that would reduce the potential impact to a less than significant level. Shifting football games to the evening hours has the potential to significantly increase ambient noise.

**RESPONSE PM-6-3**

Please see Response PM-6-2.

**COMMENT PM-6-4**

The varsity game played on October 8th 2022 exceeded the applicable medium standard by up to 8 decibels. Therefore, the proposed project would result in a significant and unavoidable impact regardless of mitigation.

**RESPONSE PM-6-4**

Please see Response PM-6-2.

**COMMENT PM-6-5**

So, I can say at night when we're trying to and enjoy our backyard in the evening on a Friday night, I like to BBQ, we like to have company over and there's absolutely no way with the with the noise level coming from the from the PA system and the stadium that we could even begin to enjoy an evening in our backyard. It's just far too loud.

**RESPONSE PM-6-5**

Please see Response 12-4 regarding noise-related mitigation and the stadium PA system.

**COMMENT PM-6-6**

The other issue I'd like to bring up is parking. I don't think it was covered adequately in the EIR. If people are going to be allowed to park down the side streets surrounding our area, when at the end of the game when you have 1,500 to 2,000 or more people exiting the game between 10:00 and 11:00 at night and coming down our streets. It's going to be very noisy.

**RESPONSE PM-6-6**

Parking availability and hazards associated with parking is discussed in Chapter 10 "Transportation."

**COMMENT PM-6-7**

People who are trying to maybe retire for the evening or are trying to sleep, they're going to be faced with noise. I personally would be a little concerned about security issues as well with that many people exiting a game and coming down our streets that late at night.

**RESPONSE PM-6-7**

Noise is evaluated in Chapter 9 of the Draft EIR. Regarding security issues, see Response 1-1. The project will be implemented consistent with Jesuit's Protocol For Night Events (Appendix I of the Final EIR), which addresses noticing, safety, access, parking, sound, and lighting. See Response 16-19.

## **PUBLIC MEETING COMMENT 7**

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Nora Hamilton

### ***COMMENT PM-7-1***

I believe you each have a copy of some of the pages of the Kimley Horn report and this is a draft, but I do have questions about it. I asked these questions at the CPAC meeting recently. If you look at Table 1 and I just went through and used the math and the calculations that they provided in Table 1. My first question is, and I still really would like to have answers about this information. What months, what years was this data collected and why was it not printed on a professional report. I would never draw conclusions without what months, what dates this information was gathered from, If it was a COVID year, the baseline may be lower just, because people were not attending large events during COVID years. So, a lower baseline would give you a lower projection of what the project would increase.

### ***RESPONSE PM-7-1***

Please see Master Response 5: Attendance Estimates. It appears as though the commenter is referring to Table 1 in the VMT analysis since the next comment is also about the VMT estimates.

### ***COMMENT PM-7-2***

If you just do their math, project conditions, attendees they say 1,500 people. I really question where that information came from - that you'll see it on my notes.

### ***RESPONSE PM-7-2***

Please see Master Response 5: Attendance Estimates.

### ***COMMENT PM-7-3***

I think on a report, this should not be misleading to give a mild environmental impact report result. We don't want results that are mild just to allow this to be approved. We want actual data with documentation, and we want accurate community information sent to the community – the dates with true calculations and documentation that this community deserves.

### ***RESPONSE PM-7-3***

Please see Master Response 5: Attendance Estimates.

### ***COMMENT PM-7-4***

This is a community that is very hard working that pays very high County property taxes, so we deserve actual information.

**RESPONSE PM-7-4**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

**COMMENT PM-7-5**

Also, during the CPAC meeting, it was stated that Arden Hills Country Club and Rio Americano High School would be used for overflow parking. I don't think that information is correct. Arden Hills is going to be sold at the end of the year so the new owners may not agree to that. And if Rio Americano starts having their football games on Saturday nights with lights for their field, then the parking won't be available for Jesuit High School to rent out.

**RESPONSE PM-7-5**

As described on page 3-13 of the Draft EIR, two off-site parking locations that Jesuit High School has previously arranged to use for major events are the Arden Hills Wellness Resort (on the north side of Fair Oaks Boulevard) and the Rio Americano High School Parking Lot on American River Drive approximately 0.5 miles southwest of the stadium.



**PUBLIC MEETING COMMENT 8**

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Barbara Dugal

***COMMENT PM-8-1***

I live on Ashton Drive, about 1,700 feet from the field as the crow flies.

***RESPONSE PM-8-1***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

***COMMENT PM-8-2***

The document does not accurately describe or analyze the proposed project or its objectives and, therefore, cannot be relied on as a basis for the appropriate CEQA analysis. Therefore, I thoughtfully and respectfully ask planning and staff to thoroughly review that document and revise the document and then release another draft EIR for public review.

***RESPONSE PM-8-2***

Responses to specific comments regarding the adequacy of the Draft EIR are provided below.

***COMMENT PM-8-3***

I have detailed some of the deficiencies in previous letters and emails to planning staff and to the CPAC. The following is a summary of the numerous deficiencies errors and admissions, but it is not exhaustive and it does not include every deficiency.

***RESPONSE PM-8-3***

Responses to specific comments regarding the adequacy of the Draft EIR are provided below. Where revisions to the Draft EIR were needed, they have been made, and are reflected in the Final EIR. No substantial changes were needed, and no revisions change the conclusions of the Draft EIR.

***COMMENT PM-8-4***

The purpose of the proposed project only describes the construction of stadium lights, but does not describe the proposed use of the lights, which represents a change in the historic character, nature, and use of the sports field. That needs to be included in the summary of the proposed project. It is stated that the stadium lights would be used on select evenings to accommodate athletic practices and competitions primarily during the winter months and when the sun sets early. In the document, it discusses using the lights when it's hot outside so what's the project? I don't know. This discrepancy is throughout the document and needs to be corrected so that decision makers like yourself and the public can understand what the whole of the project.

**RESPONSE PM-8-4**

Plate PD-5 lists the events proposed to use the stadium lights. The proposed project represents a change in the use of the sports field only to the extent that practices and games that are currently occurring in daytime hours would be able to shift to evening hours. This shift would accomplish multiple project objectives, which are listed on page 3-7 of the Draft EIR. One objective is to allow events to use the stadium after the peak afternoon temperatures (after 4 p.m.). Depending on the season, temperatures could still be elevated during these hours; however, it would represent an improvement over these events occurring earlier in the day and would meet this objective. Another project objective is to provide sufficient time, particularly for fall and winter sports, to train and compete without requiring student-athletes to miss excessive classroom instruction multiple times per month. The comment does not identify a discrepancy in the document, and no change to the Draft EIR is required.

**COMMENT PM-8-5**

Another example is the project description - it doesn't include the removal of four existing wood pools nor any details about their removal except they're going to use a crane.

**RESPONSE PM-8-5**

Removal of the existing wooden poles is described in Construction Methods, a subsection of the Project Description chapter.

**COMMENT PM-8-6**

The project description talks about installation of handicap seating and guardrails, but that's hidden in the aesthetics component. It's not anywhere in the project description. These types of omissions makes me wonder what else is Jesuit proposing, but it has not disclosed to the County.

**RESPONSE PM-8-6**

See Response 15-2.

**COMMENT PM-8-7**

What is an event? There are different words used to describe the use of the lights for athletic practices and competitions, while elsewhere the words competitions and events are used interchangeably. This needs to be corrected throughout the document.

**RESPONSE PM-8-7**

In the context of the proposed project, as shown on Plate PD-5 (Anticipated Event Lighting Schedule), events include both games and practices. The comment does not cite specific examples where the interchangeable use of the words competitions and events would change the environmental analysis.

**COMMENT PM-8-8**

My comment letter to the Commission outlines the issues with the project objectives which are used in order to determine what the alternatives are for the project. However, due to the lack of proper analysis of the objectives, some of the alternatives have been dismissed, such as the no project alternative. While the no project alternative is dismissed, there is a statement that temporary portable lighting could be used with issuance of temporary use permit. This needs to be deleted from the document.

**RESPONSE PM-8-8**

See Response 15-5.

**COMMENT PM-8-9**

Significant aesthetics impacts cannot be mitigated. At the CPAC meeting, County staff confirmed that no temporary lighting permits could be issued in the future because of these significant impacts.

**RESPONSE PM-8-9**

Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Scenic Quality, Master Response 2: Nighttime Light and Glare Impacts, and Master Response 3: Project Approval Where There are Significant and Unavoidable Impacts.

**COMMENT PM-8-10**

All alternatives in the document need to be reanalyzed.

**RESPONSE PM-8-10**

See Chapter 4 of the Draft EIR for a comprehensive evaluation of alternatives. There is no need for any revision to this chapter to ensure that the Draft EIR is sufficient.

**COMMENT PM-8-11**

Cumulative impacts - the document only analyzed the potential project. Another project which has been mentioned before is Arden Hills Country Club. The Jesuit proposed project will result in incremental impacts that will be added to the area and to other closely related past projects like Rio Americano High School. The county needs to analyze Rio Americano outdoor sport games and practices and Rio's proposed outdoor field lighting project. The cumulative impacts need further evaluation.

**RESPONSE PM-8-11**

Please see Response 12-9.

**COMMENT PM-8-12**

Piecemealing is explicitly prohibited by CEQA. Dividing a project into several pieces would allow agencies to minimize the apparent environmental impacts of projects by

evaluating individual pieces separately, each of which may have a less intense impact on the environment, but which together may result in a significant impact. Details of this are provided in my comment letter.

***RESPONSE PM-8-12***

Please see Response 17-2.

***COMMENT PM-8-13***

It is apparent that the previous exemptions and other actions taken by the County have contributed to the negative environmental impacts that the neighborhood currently experiences from Jesuit activities, which is why further review of the overall description project objectives and alternatives etc. is warranted.

***RESPONSE PM-8-13***

The Draft EIR has been made available for public comment on its adequacy. In addition, the Planning Commission will review the analysis and findings prior to making a decision on the project.

***COMMENT PM-8-14***

The staff report outlines the April 2022 CPAC meeting. Jesuit is in the Carmichael CPAC area. By accident, some neighbors learned about this April 2022 CPAC meeting that considered the lights. If we had not known about that they would not have been approved again exacerbating our situation.

***RESPONSE PM-8-14***

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

***COMMENT PM-8-15***

There's no description as to how much soil is going to be excavated.

***RESPONSE PM-8-15***

The exact amount of soil that would be disturbed for the excavation associated with the bottom of the light standards is so small that it was not quantified in the DEIR because it would not affect the existing environmental analysis or the impact conclusions contained in the Draft EIR (because the amount of soil excavation is so small). Nevertheless, as requested by the commenter, the following information is provided: the project applicant has estimated that less than 50 cubic yards of soil would be excavated. In terms of traffic trips, generation of GHGs, air emissions, and noise, the assumptions contained in the modeling performed for the Draft EIR accounted for construction equipment needed to excavate the soil for the light standards. No changes to the Draft EIR are required.

***COMMENT PM-8-16***

There's no description as to the cubic yards of concrete that's going to be used.

**RESPONSE PM-8-16**

For the same reasons described in response to comment PM-8-15, the amount of concrete that would be used to pour the footings to support the light standards is so small that it was not quantified for the Draft EIR. Nevertheless, as requested by the commenter, the following information is provided: the project applicant has estimated that less than 50 cubic yards of concrete would be excavated. In terms of traffic trips, generation of GHGs, air emissions, and noise, the assumptions contained in the modeling performed for the Draft EIR accounted for concrete trucks.

**COMMENT PM-8-17**

There's no description and no mitigation for refueling of the equipment. What happens if the equipment breaks down?

**RESPONSE PM-8-17**

The potential for hazards such as accidental spills associated with the handling of small quantities of construction-related hazardous materials including fuel and soils for construction equipment is evaluated in Draft EIR Chapter 11, under the heading "Hazards and Hazardous Materials," on Draft EIR pages 11-14 and 11-15. This impact was found to be less than significant.

**COMMENT PM-8-18**

I have a long list and it's I don't have time to describe it here. I will put try to put more comments in a letter. But when you start with a project description that is so poorly written and the project objectives from that then flows everything else and so from that is what you see in the document which is difficult.

**RESPONSE PM-8-18**

The comment is noted. Responses to letter comments are provided above.

## **PUBLIC MEETING COMMENT 9**

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Cole Spake

### ***COMMENT PM-9-1***

I actually came here tonight to talk about the Sloughhouse Solar Farm, but you know I just thought I'd comment on this, too. It just seems like a whole lot of discussion just for lights. I'm all in support. I don't go to Jesuit, but I have a lot of buddies that do and are on the football team and I've been to a lot of Friday Night Football games and it's kind of a big part of the high school experience and I know we're not here to talk about the merits of the project, we're talking about the all the EIR, but seems like the Jesuit folks would be more than willing to cooperate on any types of stuff and I just that's all I gotta say about that.

### ***RESPONSE PM-9-1***

Comments for or against approval of the proposed project will be considered by the Planning Commission when a hearing is conducted early in 2024.

## **PUBLIC MEETING COMMENT 10**

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Craig Milligan

### ***COMMENT PM-10-1***

I just wanted to touch on the from the local transportation analysis done by Kimley Horn. It is not very thorough. It misses a very important part regarding vehicle miles traveled. In 2020, the Supervisors adopted significant thresholds for transportation analysis using vehicle miles traveled. That was done in compliance with SB 743 to provide guidance on vehicle miles traveled.

### ***RESPONSE PM-10-1***

In addition to the *Local Transportation Analysis*, Kimley-Horn also prepared a separate *Vehicle Miles Traveled (VMT) Analysis* in March 2023 to support the analysis contained in the Draft EIR. Please see Impact TR-2 and Appendix E of the Draft EIR.

### ***COMMENT PM-10-2***

The amount of vehicle miles traveled will be significant purely based on the number of events that Jesuit is planning to have, so they must have mitigation to lower that amount. SB 743 is clear in its intent that CEQA continues to address noise, air quality, and safety. Section 21099 B 3 - the subdivision does not relieve a public agency of its obligation to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation. And although CEQA guidelines states that generally vehicle miles traveled is the most important measure of impacts, other related considerations may include the project impact on transit and non-motorized transit, which I doubt would happen.

### ***RESPONSE PM-10-2***

The VMT Analysis prepared by Kimley-Horn found that the project's generation of VMT would be less than significant. Please refer to Chapter 10 "Transportation" (Impact TR-2) for the Draft EIR's evaluation of VMT.

### ***COMMENT PM-10-3***

A complete environmental review will generally consider how projects affect VMT vehicle miles traveled in addition to effects of walking, bicycling, transit, and safety. The LTA does not address VMT, the most appropriate measure of impacts under CEQA, and I believe it does not because so few attending sporting events live close enough to provide a favorable outcome and the new number of events would prove a detriment.

### ***RESPONSE PM-10-3***

Please see Response PM-10-1.

**COMMENT PM-10-4**

There have been no concessions that I know of that have been made by Jesuit with regard to vehicle miles traveled. How they could do that I don't know. Many of their players and family members do not live local. They would obviously be increasing vehicle miles traveled.

**RESPONSE PM-10-4**

Please see response to Comment PM-10-1.

**COMMENT PM-10-5**

The only other consideration or concern I would have is because I live close by as regard to parking. Never have I've seen a consideration to have a no parking zone on American River or Jacob. They have this down by Rio Americano during school hours.

**RESPONSE PM-10-5**

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.



## **PUBLIC MEETING COMMENT 11**

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Kris Kobach

### ***COMMENT PM-11-1***

It's my opinion that the EIR has been extremely thorough with a wealth of data throughout.

### ***RESPONSE PM-11-1***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

### ***COMMENT PM-11-2***

As neighbors to an institution that's been around for 60 years, we need to take a hard look at this and see what can be brought into the community in a good form and fashion.

### ***RESPONSE PM-11-2***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

### ***COMMENT PM-11-3***

It's been done through the EIR and I would like to express my gratitude for those that have put it together and would also like to express that as a community, it's easy for us to hide behind semantics hide behind numbers when we really just don't want something to occur but the reality is this is good for everyone and I think it's been very well put together and I support the cause.

### ***RESPONSE PM-11-3***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

## **PUBLIC MEETING COMMENT 12**

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Jim Barnes

### ***COMMENT PM-12-1***

I lived Jesuit High School since 1987 graduated from Jesuit High School in 1974. We moved back to Sacramento and purposely bought to live near Jesuit because it's such a positive institution. My wife and I both look forward to events at Jesuit High School because we can hear happy sounds from our house. The quality of events at Jesuit is really very high end. I was waiting for someone to say, hey everybody get off my lawn, but we're a community and in a community you have a lot of people that should benefit. I understand sacrifices that will be made by homeowners such as myself, but by far it is outweighed by what Jesuit brings to this community. It certainly changed my life my son's life and I think that this would help change a bunch of other people's lives.

### ***RESPONSE PM-12-1***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

## **PUBLIC MEETING COMMENT 13**

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Dana Flags

### ***COMMENT PM-13-1***

We moved to the neighborhood over 10 years ago we're about 2,000 feet away and we moved here for the environment being near the American River. We realized that there were two high schools nearby so obviously there would be some noise. Noise from the speaker system – the play-by-play football is not joyous. It's a nonstop play by play of high school games. I'm not actually against the kids playing and hearing this during the fall for football games. When you move and you live next to a high school that's understood.

### ***RESPONSE PM-13-1***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

### ***COMMENT PM-13-2***

But we're against the change in the environment of this becoming a private Sports Complex rented out to other people. Basically, like having an amphitheater or a commercial business down the street. We're not against the high school having occasional football games but this is a much bigger thing and most of us that live in this neighborhood weren't expecting a private complex that's going to be rented out.

### ***RESPONSE PM-13-2***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

## **PUBLIC MEETING COMMENT 14**

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Ms. Alberg

### ***COMMENT PM-14-1***

We live on Jacob Lane, our biggest concern is safety. The environmental impact report says that there was a pedestrian crossing on American River Drive and Jacob Lane. There is none. I sent pictures to the County of that interception. There is no crosswalk. There's stop signs, but there is no crosswalk.

### ***RESPONSE PM-14-1***

The comment is correct. Therefore, a portion of the first paragraph on page 10-14 of the Draft EIR has been revised as follows:

Along American River Drive, the nearest protected crossing~~crosswalk~~ for pedestrians ~~to~~ is located at the intersection of American River Drive and Jacob Lane, which is further east than the stadium's southern entrance and therefore out of the way for pedestrians walking to the Jesuit High School Stadium from Rio Americano High School or who might be dropped off along American River Drive opposite the stadium. In addition, although this intersection is a four-way stop, it does not contain pavement markings denoting designated crosswalks.

Mitigation Measure TR-2 has also been revised to require that a basic yellow crosswalk be installed on all four legs of the intersection of Jacob Lane and American River Drive. Please see Chapter 10 of the Final EIR for more detail.

### ***COMMENT PM-14-2***

The document mentioned the event attendees - they park in our neighborhood. Because of the presence of the field, our homes have parking completely up and down. My mother-in-law is disabled. She has no place to park in front of our house when there's events at Jesuit.

### ***RESPONSE PM-14-2***

This is not a comment on the Draft EIR, but it is included here for decision maker consideration.

### ***COMMENT PM-14-3***

They walk from their cars to the field crossing the intersection at American River Drive and Jacob Lane and with other crosswalk there. I'm really concerned about the safety of the event attendees and just the community in general.

### ***RESPONSE PM-14-3***

See Response PM-14-1.

**COMMENT PM-14-4**

I've seen people almost get hit by cars. They're young children walking home or crossing the street at school. This was during school pickup hours. At night in the dark it's going to be a bigger issue.

**RESPONSE PM-14-4**

See Master Response 4: Traffic Hazards.

**COMMENT PM-14-5**

We don't have any issue with day games - the day game hasn't been that big of an issue so getting the lights would move to the nighttime. That is going to cause traffic around the neighborhood when it is dark. The street lights are not that bright and without proper crosswalks, I'm concerned.

**RESPONSE PM-14-5**

Mitigation Measure TR-1 (Pedestrian Safety Improvements To Site Plans), as revised would require the installation of two crosswalks on American River Drive: a lighted crosswalk at Tennyson Drive and marked crosswalk at Jacob Lane. To the extent that jaywalking currently occurs on American River Drive because of a lack of crosswalks, this mitigation measure would provide opportunities for pedestrians to cross safely, without jaywalking.

**COMMENT PM-14-6**

I have other concerns as well. The EIR it doesn't go into the value that we'll lose on our properties by bringing these things to the night we have issues with people loitering.

In summary our biggest concern is safety and concerns over the degradation of our property values because of these games being moved to the nighttime and losing money on our homes.

**RESPONSE PM-14-6**

Regarding changes in property values, CEQA requires an analysis of physical impacts to the environment; it does not require analysis of social and economic impacts. Under CEQA, "an economic or social change by itself shall not be considered a significant effect on the environment." (14 CCR §§ 15131 & 15382.) Effects analyzed under CEQA must be related to a physical change. (14 CCR § 15358(b).) Social and economic impacts alone do not constitute a significant effect on the environment. (14 CCR §§ 15064(e), 15131 & 15382.)

## **PUBLIC MEETING COMMENT 15**

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Kelly Hughes

### ***COMMENT PM-15-1***

I live on Piccadilly Circle and find the draft EIR inadequate.

### ***RESPONSE PM-15-1***

Please see the following responses to your comments.

### ***COMMENT PM-15-2***

At the recent CPAC, Jesuit was asked about their research into PA systems that puts the sound in the stadium seats where the spectators are rather than broadcasting the game into the neighborhood homes. They didn't answer the question from the CPAC member, but later stated that the draft EIR says that game noise cannot be mitigated. I don't know who wrote that in the EIR, but everyone knows that isn't correct. PA technology was invented in the 1910s consisting of a microphone, amplifier, and speakers on a pole. 100 plus years later Jesuit is using that same technology. They spend a huge amount of time contracting for expensive stadium lighting, but apparently zero time finding ways to mitigate their stadium noise. Why? Because they're bad neighbors. There is modern stadium PA noise reduction technology available that puts the sound in the stadium seats where the spectators are in use by schools that truly care about the neighborhood they impact. Bluetooth and Wi-Fi are also options of course. There's no safety reason that compels Jesuit to use a PA system at all.

### ***RESPONSE PM-15-2***

Please see Comment Response 12-4 regarding noise-related mitigation and the stadium PA system. Please note that PA system noise is just one factor in the overall noise associated with evening stadium usage. Other factors include crowd noise and the use of the marching band. Therefore, even with PA system mitigation, the noise-related impact is still anticipated to be significant and unavoidable.

### ***COMMENT PM-15-3***

Sound walls can be installed between Jesuit and their neighbors that share a fence line.

### ***RESPONSE PM-15-3***

A sound wall would not be feasible in this circumstance. This is because noise generated by the elevated noise sources (i.e., speakers and upper bleachers) would be largely unaffected by ground-level barriers.

### ***COMMENT PM-15-4***

Making equipment such as cowbells and air horns can be restricted from use at events.

**RESPONSE PM-15-4**

All artificial noise makers, including bullhorns, cowbells, airhorns, and megaphones will be prohibited from use per updated Mitigation Measure NOI-1. However, please note that such noises are one factor among many that make up total noise generated within the stadium, and the proposed project is anticipated to increase noise levels at nearby sensitive receptors by up to 8 to 9 dBA  $L_{50}$  and  $L_{max}$ . Based on this, and the intermittent nature of such noises, restricting their use is not anticipated to reduce the noise-related impact to less-than-significant.

**COMMENT PM-15-5**

None of the people commenting tonight in opposition to the lighting plan had an opportunity to comment on the PA before it was installed.

**RESPONSE PM-15-5**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT PM-15-6**

I call on the County to compel Jesuit to provide that original mailing list unaltered. You'll find that only small group of homes received a notice. The CPAC chairman even said he was surprised when only three people showed up for a meeting on the PA that should have been contentious. Later project meetings had robust attendance. No one asked why that was.

**RESPONSE PM-15-6**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

**COMMENT PM-15-7**

I'm opposed to the project and the draft EIR is inadequate.

**RESPONSE PM-15-7**

This is not a comment on the Draft EIR, but it is included here for transparency and decision maker consideration.

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# **Attachment 1 Annotated Original Comment Letters**

**From:** [Tara Ahlberg](#)  
**To:** [Gutierrez, Kimber](#); [Clerk of the Board Public Email](#)  
**Cc:** [Hunter Ahlberg](#)  
**Subject:** Jesuit Light Proposal: Property Values  
**Date:** Friday, September 15, 2023 11:30:48 PM

---

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Hi Kimber,

1-1

I've been reading the draft EIR for the Jesuit Light Proposal.

Will the county be considering property value decline in a separate report?

I haven't heard back on seeing if our properties can be assessed to determine this neighborhood impact.

Please include this email in public comments.

Thank you,  
Tara

Sent from my iPhone

**From:** [Tara Ahlberg](#)  
**To:** [Gutierrez, Kimber](#); [Clerk of the Board Public Email](#)  
**Cc:** [Hunter Ahlberg](#)  
**Subject:** Jesuit Light Proposal: Gas Emissions Due to Idling (Individual Health Concern)  
**Date:** Saturday, September 16, 2023 12:01:35 AM

---

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Hi Kimber,

2-1 I didn't see any consideration of gas emissions on *individual* neighborhood health when Jesuit event goers and team buses are idling outside our homes at night. This happens during the day too but in the evening and at night we open windows. The fumes then get into our rooms and lungs. This is more than a general environmental issue when the gas fumes are filling our bedrooms and children's bedrooms. Why wasn't this considered?

2-2 I have video of this happening I will share separately. I have video of both busses and cars idling in front of my home on 1050 Jacob Lane. In one instance three cars were idling at the same time! In another instance two buses were idling in back to back time periods.

Please include this email in public comments.

Thank you,  
Tara

Sent from my iPhone

ITEM 2 CARMICHAEL CPAC PUBLIC COMMENT 012

From: Tara Ahlberg [taraahlberg@gmail.com]
Sent: Monday, September 18, 2023 8:26 PM
To: Gutierrez. Kimber [GutierrezK@saccounty.gov]
CC: Clerk of the Board Public Email [BoardClerk@saccounty.gov]; Hunter Ahlberg [hunterahlberg@gmail.com]
Subject: Re: Jesuit Light Proposal: Property Values

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.
If you have concerns about this email, please report it via the Phish Alert button.

Hi Kimber,

3-1 I would like to add that if homeowners lose money due to Jesuit getting lights it will directly impact their health and well-being. For this reason, wouldn't a degrade in property value fall under "general welfare" of homeowners and the county (the county due to tax collection)? Aren't taxes to provide for the health and well-being of the tax payers? The degradation of the neighborhood would have a significant impact. Please let me know.

Thank you,
Tara

Sent from my iPhone

> On Sep 18, 2023, at 5:31 PM, Tara Ahlberg <taraahlberg@gmail.com> wrote:
>
> Wouldn't a degrade in property value fall under "general welfare" or of homeowners and the county (due to tax collection)?
>
> Sent from my iPhone
>
>> On Sep 18, 2023, at 5:08 PM, Gutierrez. Kimber <GutierrezK@saccounty.gov> wrote:
>>
>> Hi Tara,
>>
>> I've attached your email from September 1st just for tracking purposes. This email is to reply to both that email and your email from Friday, September 15th.
>>
>> The County will not be assessing your property. I have broken down the "why" below.

3-2 >> From a CEQA perspective, there is case law that concludes CEQA is not an economic protection statute (Bakersfield Citizens [\*\*120] for Local Control v. City of Bakersfield (2004) 124 Cal.App.4th 1184, 1205 [22 Cal. Rptr. 3d 203] (BCLC); CEQA Guidelines, § 15131, subd. (a).) (Porterville Citizens for Responsible Hillside Development v. City of Porterville, 157 Cal. App. 4th 885, 903.). Landowners surrounding a proposed project site do not state a valid CEQA concern when they express fears that the proposed project could adversely affect their property value. An EIR is required to evaluate the environmental impacts of a project (Pub Res C §21100); a project's economic and social effects are not treated as effects on the environment (14 Cal Code Regs §15131(a)). "Environment" is defined as the physical conditions that exist within an area affected by a proposed project, including land, air, water,

3-2 Cont. minerals, flora and fauna, noise, and objects of historic or aesthetic significance. Pub Res C §21060.5; 14 Cal Code Regs §15360. Further, the impacts analyzed in an EIR must be "related to a physical change." 14 Cal Code Regs §15358(b). Under these definitions, economic and social effects that are not related to physical impacts need not be evaluated in an EIR. 14 Cal Code Regs §15131(a).

>>

3-3 >> From a Planning perspective, staff evaluates a project based on the criteria in the Zoning Code (Chapter 6) for Use Permits and Amendments including whether the establishment, maintenance, or operation of the use, building, or structure applied for will not under the circumstances of the project be detrimental to the health, safety, peace, morals, comfort, or general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County. Consideration should also be given as to whether:

>> a. The proposed use is consistent with the General Plan and all applicable provisions of this Code and applicable state and federal regulations;

>> b. The proposed use is consistent with the purpose and intent of the zoning district in which it is located;

>> c. The proposed use is consistent with any applicable use-specific standards, set forth in Chapter 3, "Use Regulations;"

>> d. The proposed use is compatible with adjacent uses in terms of scale, site design, and operating characteristics (hours of operation, traffic generation, lighting, noise, odor, dust, and other external impacts);

>> e. Any significant adverse impacts anticipated to result from the use will be mitigated or offset to the maximum extent practicable;

>> f. Facilities and services (including sewage and waste disposal, water, gas, electricity, sheriff and fire protection, and roads and transportation, as applicable) will be available to serve the subject property while maintaining adequate levels of service for existing development;

>> g. Adequate assurances of continued maintenance have been provided; and

>> h. Any significant adverse impacts on the natural environment will be mitigated pursuant to CEQA unless overridden;

>> i. The proposed use is consistent with the findings listed in Section 3.6.0;

>> j. The proposed use is consistent with any applicable development standards set forth in Chapter 5, "Development Standards."

>>

>> Kind regards,

>>

>> Kimber Gutierrez, Senior Planner

>> Planning and Environmental Review

>> (916) 874-7529

>>

>>

>> Please note my upcoming vacation starting September 27th through October 13th.

>>

>> Planning & Environmental Review (PER) has limited walk-in hours at our downtown public counter. Appointments can be made for most services. Please see our website at [www.planning.saccounty.net](http://www.planning.saccounty.net) for the most current information on how to obtain services and to schedule an appointment.

>>

>> -----Original Message-----

>> From: Tara Ahlberg <taraahlberg@gmail.com>

>> Sent: Friday, September 15, 2023 11:30 PM

>> To: Gutierrez, Kimber <GutierrezK@saccounty.gov>; Clerk of the Board Public Email

<BoardClerk@saccounty.gov>

>> Cc: Hunter Ahlberg <hunterahlberg@gmail.com>

>> Subject: Jesuit Light Proposal: Property Values

>>

>> EXTERNAL EMAIL: If unknown sender, do not click links/attachments.

>> If you have concerns about this email, please report it via the Phish Alert button.

>>

>>

>> Hi Kimber,

>>

>> I've been reading the draft EIR for the Jesuit Light Proposal.

>>

>> Will the county be considering property value decline in a separate report?

>>

>> I haven't heard back on seeing if our properties can be assessed to determine this neighborhood impact.

>>

>> Please include this email in public comments.

>>

>> Thank you,

>> Tara

>>

>> Sent from my iPhone

>> <mime-attachment>

- 4-1 **Sac County disguised the facts to Planning Commission, regarding notification to citizens, living in the opposite CPAC boundaries of Arden, next to Carmichael CPAC designation. Especially Kimber's incomplete and misleading response to Commissioner(s) - "we notified Arden CPAC" . Can you confirm if neighbors in "Arden" received written notice from Sac County of Jesuits Project? If no one received notices, then Kimbers responded incorrectly and must be corrected. She didn't tell the 5 Commissioner's that the Arden CPAC didn't cause Sac County to send out notices to landowners during 2022-23, so there was no Sac County notice sent to all residents that will be impacted by a mega Jesuit Stadium 3,000 capacity, then Rio stadium lights project with their own 1,923 student enrollment.**
- 4-2 **Maybe get legal minds to declare a Cequa "piecemeal " perpetrated by Sac County Staff before October 30th, that knew the citizen notification deficiencies and abetted the separation of notice to citizens in both CPAC areas!**
- 4-3 **Did anyone in Arden CPAC area receive notices of all the CPAC meetings and hearings from Sac County ? This is a mega project that deserves mega input from all 1,000 residents that will be impacted forever. We are not talking about a 7-11**



4-3  
Cont

**changing their light bulbs , we're dealing with the complete eradication of a 60 year old communities identity, a safe, place to live and raise young kids.**

4-4

**Maybe time to revisit and request all SacCounty Staff and Commissions and Supervisors to swear in and attest to "conflict of interest " policies and ask Sac County staff and Commissions to declare all dates, including weekends, of all contacts and specific discussions with friends and proponents Jesuit light projects.**

**Start with Planning Commissioner Peter Tateishi , Supervisors Desmond (Jesuit HS graduate) and Hume (Jesuit HS graduate).**



5-1 | - Previous traffic, air pollution and parking studies, completed 8 years ago, are outdated and were based on pre-Covid student drop-off practices. Student drop off/pick up zones have drastically increased traffic and car idling on American River Drive involving Jesuit students and non-students, until 8 pm.

5-2 | Jesuit High School currently competes in the Delta League (Elk Grove) and traffic and parking demand studies do not reflect the new reality that in 2024 Jesuit moves to the Sierra Foothill League. The average driving distance to Delta League Schools was 13 miles compared to Sierra Foothill League schools of 22 miles, a 41% increase. The same holds true for the time required to drive to the Sierra Foothill League schools, the average drive time is 35 minutes, a 41% increase, and this increase does not take into account traffic delays of up to 15 minutes during peak Friday afternoon and evening commuter drive time.

5-3 | Consider this- (In my humble opinion, approval conditions encouraging walking and bicycling and promotions to encourage carpooling, public transportation and alternative parking sites will never be enforceable and become a distraction from the real issues. The majority of Jesuit students use their own cars to drive to school and this won't change for night time events. What will change is visitor's attendance, miles driven, unsafe driving, and on campus parking demands that the school is not currently prepared to supply or direct. If the county planning commission wishes to support this project, don't they have an obligation to the citizens to require the applicant to provide on campus parking based on full attendance before approving the project and protect the residents from becoming the permanent nighttime parking lot for all Jesuit High School events by approving Resident Permit Parking Only signs? )

5-4 | -The County issued a Temporary Use Permit PLNP2023-00190 on August 25, 2023, signed by Julie Newton, Environmental Coordinator of Sacramento County and endorsed by Donna Allred, Clerk Recorder granting Jesuit High School a temporary use permit to erect two, 117-foot booms, each with 15 separate spotlights, directed down onto the field rather than shining horizontally. The Notice states, among other reasons why the project is exempt that- "In accordance with CEQA Section 15303...the project would result in temporary installation of small facilities (two light arrays)." And "Therefore, the project is exempt from provisions of CEQA."

5-5 | In 2022, a San Francisco Appeals Court and Justice Stuart Pollak ruled that new 90 foot tall stadium lights did not meet the definition of a 'minor alteration' and "small structures". Justice Pollak wrote, "A 90-foot tall light standard does not qualify as "small" within the meaning of the exemption." I think this fact needs to be acknowledged by county officials and county counsel.

5-6 | -Todd Smith, Planning Director, approved the Temporary Use Permit effective August 18, 2023, which allowed for a 'written notice of appeal, no later than 10 calendar days after the decision is made.'" It is a fact that the Temporary lights were installed and used for a nighttime football game on Friday, August 25, 2023, seven days after the Permit effective date, not the full 10 calendar days required in the Appeal Process to allow comments and appeals. And the Notice of Exemption issued by Julie Newton was endorsed August 25, 2023, the same date that the 117 foot tall light booms were erected and used for a night time football game on the Jesuit High School campus, 3 full days before the appeal deadline expired August 28, 2023, without notice to all the residents in the neighborhood.

5-7 | This appears to be a violation of due process and notification, indicating favoritism towards the school at the expense of concerned citizens. Is this what we should expect in the future?

**From:** [Newton, Julie](#)  
**To:** [Gregory, Carol](#); [Gutierrez, Kimber](#)  
**Subject:** FW: Notice for DEIR Jesuit Lighting  
**Date:** Monday, September 25, 2023 11:20:57 AM

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**From:** PER-CEQA <CEQA@saccounty.gov>  
**Sent:** Monday, September 25, 2023 10:08 AM  
**To:** Newton, Julie <newtonj@saccounty.gov>; Messerschmitt, Kevin <messerschmittk@saccounty.gov>  
**Subject:** FW: Notice for DEIR Jesuit Lighting

FYI

**Andrea Guerra, Senior Office Assistant**  
Planning and Environmental Review  
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 874-2862 (direct)  
[www.planning.saccounty.gov](http://www.planning.saccounty.gov)



*Planning & Environmental Review (PER) has limited walk-in hours at our downtown public counter. Appointments can be made for most services. Please see our website at [www.planning.saccounty.gov](http://www.planning.saccounty.gov) for the most current information on how to obtain services and to schedule an appointment.*

 Please consider the environment before printing this email

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**From:** steven.berke@gmail.com <steven.berke@gmail.com> **On Behalf Of** bock lebock  
**Sent:** Monday, September 25, 2023 10:01 AM  
**To:** PER-CEQA <CEQA@saccounty.gov>; Gutierrez, Kimber <GutierrezK@saccounty.gov>  
**Cc:** Elizabeth Hughes <elizconsulting@hotmail.com>  
**Subject:** Re: Notice for DEIR Jesuit Lighting

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

To: CEQA and Kimber Gutierrez

Hello again Kimber, I have some questions and requests on the recent **Jesuit Stadium Lighting DEIR** made available  
(link: <https://planning.saccounty.gov/Documents/Jesuit%20High%20School%20Stadium%20Lighting/Jesuit%20Stadium%20Lighting%20DEIR.pdf>).

6-1 | **Who is the author of the "Jesuit Stadium Lighting DEIR" and what is their responsibility?**  
I see it is prepared by the County of Sacramento. But I would like to know who is the author and

6-1 their responsibility as I have questions and input.

Cont.

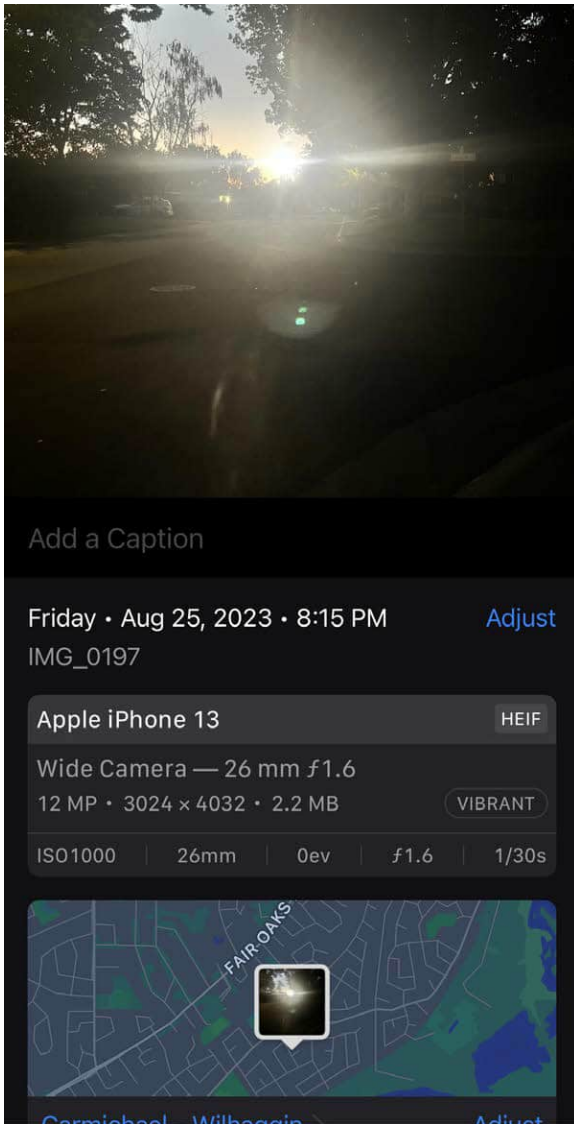
In the meantime, I am sharing input in this email and including you.

I am not aware of what "CEQA" is but I am also including the email address which sent me the correspondence.

6-2 **Can the photo on the title page be removed?**

The photo on the cover shows a perspective of this project. As someone who opposed the permit it seems like an advertisement for the project which I think is biased.

Alternately, could the current photo be replaced with the attached photo (below) which shows another perspective of this project. This photo below was taken while facing North on Tennyson Way and Chaucer CT facing North at 8:15PM on August 25th and is a picture of the lighting used for an evening event at the Jesuit stadium. In my opinion, the lighting was uncomfortable, unappealing, out of place, and not appropriate for the neighborhood.



6-3

**What is the scope of the usage of Jesuit Stadium night events?**

The "PLNP2021-00262\_Project Description-Justification" cites:

Proposed Hanson McClain Stadium and Practice Field Uses and Accommodations

The proposed stadium lighting would allow for an enhanced community atmosphere and student athlete experience by allowing evening football games. Stadium lighting would also allow Jesuit High School soccer to play its home games at reasonable hours without adversely impacting academic attendance.

which implies the scope of night events is for Jesuit High School events.

I did not see where in the "Jesuit High School Stadium LightIng DEIR" where this scope is cited. I did see the "Jesuit High School Stadium LightIng DEIR" cite non Jesuit High School events which did not seem relevant and I am looking for clarification on the scope of the project use and that being accurately cited in the "Jesuit High School Stadium LightIng DEIR".

Thank you  
Steven

On Fri, Sep 15, 2023 at 3:14 PM PER-CEQA <[CEQA@saccounty.gov](mailto:CEQA@saccounty.gov)> wrote:

This is the Notice for PLNP2021-00262 Jesuit High School Stadium Lighting DEIR

**From:** [steph.christensen](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#); [PER-CEQA](#)  
**Subject:** Jesuit High School Permanent Lightening  
**Date:** Monday, October 30, 2023 11:32:04 AM

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**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

7-1 | Hello: My husband, Tom, and I moved to 4848 Sherlock Way in August of 2022 from Arden Park after 44 years. Two reasons we moved - closer to the American River Bike Trail which we daily utilize and a quieter community. We give to the Parkway in both monetary and volunteerism. We were aware there'd be some early Jesuit High School evening games and activities, but we had no idea, Jesuit was working on installing permanent stadium lights resulting in additional traffic, pollution, noise and later games and activities. We feel duped. I wrote an email to the County Planning Commission a few months ago when we heard about the permanent lightening proposal objecting for the above reasons. Tom and I have been following the County process and told Tom this is a done deal. Confirmation was affirmed on October 23rd when I attended the County Planning Commission meeting when no Commission members asked any questions of Jesuit representatives. About a dozen Wilhaggin homeowners (representing 200) expressed their objections to the Jesuit permanent lightening proposal. My daughters attended Rio Americano many years ago and now our three grandchildren — two grandsons - as we're not a wealthy family. (I was employed as administrative assistant for Correctional Health Services for 11 years under the Sheriff's Department and Tom, a retired stationary engineer for private industry.) Anyway, I chuckled when I gazed around the room during the October 23rd meeting and observed seniors on one side of the aisle and on the other side, lawyers and well-financed people. One attorney made reference to "Their Team." We homeowners left feeling dejected. Anyway, I asked myself, what has Jesuit High School invested in our community besides the education of young men, not unimportant, but not much. Jesuit doesn't even contribute to help fund the HOA for our Sheriff security patrol. Our neighborhood pays a lot of taxes to Sacramento County and Jesuit pays zero as a non-profit and is tax exempt. From what I understand, Jesuit grosses \$30M yearly. Money talks. This situation is definitely a David and Goliath moment and David isn't going to win this one. I left a message last week for Jessica Brandt, no response. I guess this is the way the County now rolls. Stephanie Christensen, 916-698-5849

[Sent from Yahoo Mail for iPad](#)

**From:** [JAMES/BETTY COOPER](#)  
**To:** [PER-CEQA](#)  
**Cc:** [Elizabeth Hughes](#)  
**Subject:** Jesuit High School Stadium Lighting Project  
**Date:** Monday, October 2, 2023 12:28:35 PM

You don't often get email from bettycooper@comcast.net. [Learn why this is important](#)

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Attn: Julie Newton

8-1 | The purpose of this email is to present my opposition to this project. I believe it will adversely affect the quality of life and property values in our neighborhood due to excessive noise at late hours as well as increased traffic and parking problems. Both of these issues are present during daytime games and will be even more objectionable if they are allowed to go well into evening hours. Even if the events end at 10pm, there will still be noise, traffic and undesirable activity in what has traditionally been a quiet, residential neighborhood. The amount of off-street parking that is available for the current level of athletic activities is already highly inadequate. I support these alternative solutions in this order:

8-2 | **ALTERNATIVE 2: SHADE STRUCTURE AT MARAUDER STADIUM**  
This alternative would construct a shade structure over the bleachers and field at Marauder Stadium. The shade structure could also potentially be constructed over another field at Jesuit High School. By providing shade over the field, this structure would help make afternoon practices more tolerable for players during the hotter months of early fall and late spring. Alternative 2 would not include lighting to illuminate the field and seating areas after dark.

8-3 | **ALTERNATIVE 1: ALTERNATE STADIUM LOCATIONS**  
Under this alternative, Jesuit High School would arrange for the use of another facility for practices and games that cannot be accommodated between the end of classes and sundown. Two existing lighted stadiums have been identified:  
**Hughes Stadium.** This facility is located at 3835 Freeport Boulevard, Sacramento, at Sacramento City College. It is approximately 10 miles from Jesuit High School. The stadium is surrounded by campus facilities and commercial land uses. The nearest residence is approximately 500 feet to the south.  
**Hornet Stadium.** This facility is located at 6000 Jed Smith Drive, Sacramento, at California State University, Sacramento. It is approximately 6 miles from Jesuit High School. The stadium is surrounded by campus facilities and commercial land uses. The nearest residence is approximately 1,000 feet to the west.

Thank you for the opportunity to respond to this project plan.  
Betty Cooper  
4833 Sherlock Way  
Carmichael, CA

**From:** [Gutierrez, Kimber](#)  
**To:** [Gregory, Carol](#)  
**Subject:** FW: PLNP2021-00262  
**Date:** Tuesday, November 7, 2023 10:50:24 AM  
**Attachments:** [image001.png](#)

---

Another one.

Kind regards,

Kimber Gutierrez, Senior Planner  
Planning and Environmental Review  
(916) 874-7529



*Planning and Environmental Review has several customer service options available and appointments can be made for most services. Please see our website at [planning.saccounty.gov](http://planning.saccounty.gov) for the most current information on how to obtain services including office and public counter hours.*

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**From:** jpdaugherty@aol.com <jpdaugherty@aol.com>  
**Sent:** Tuesday, November 7, 2023 10:32 AM  
**To:** Gutierrez, Kimber <gutierrezk@saccounty.gov>  
**Subject:** PLNP2021-00262

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Kimber, please include this letter of opposition to Jesuit stadium lights when you tabulate the number of letters received in opposition to the installation of lights.

Thank you,  
Jim Daugherty

Sent from my iPad

Begin forwarded message:

**From:** jpdaugherty@aol.com  
**Date:** October 17, 2023 at 1:18:11 PM PDT  
**To:** BoardClerk@saccounty.net  
**Subject:** **Jesuit Stadium Lights, PLNP2021-00262**

Dear Commissioners,

9-1 | I oppose the request to amend zoning regulations that have served our community well for over 60 years. I am deeply disappointed that the CPAC voted 3-2 to recommend this project without completing basic due diligence regarding several issues, in particular adequate parking when the stadium is at full capacity of 3,500 attendees.

9-2 | The applicant verbally represented to CPAC that they have adequate parking based on “parking agreements “ with other property owners (Arden Hills Tennis Club) and a public High School (Rio Americano HS). CPAC made no request to view these agreements to verify their existence, enforceability and durability prior to voting. Wednesday, October 11, 2023 the owners of Arden Hills Tennis Club announced the sale of their property, which would render null and void any existing parking agreements.

9-3 | Prior to your hearing, I strongly suggest that you require both Jesuit HS and Rio American HS to submit written, dated and executed copies of their parking agreements with Certification of Authority and Incumbency to Execute these agreements. If Rio American HS applies and receives approval for stadium lights, then what? Anything less than Jesuit supplying peak parking requirements is sufficient reason to decline the requested zoning amendments. Even if a publicly operated, Rio Americano HS parking lot was available, the lot is 1/2 mile away from Jesuit’s stadium and game attendees will not use the lot because it is too far away. Instead, people park on residential streets next to the stadium that were never designed by county planners for night event parking. In addition, Sacramento County Sheriffs have responded to many complaints and moving vehicle violations at the public high school. Night events will only exacerbate an existing problem at both schools and the entire neighborhood and stretch Sheriff staffing.

9-4 | As you know, Jesuit HS, no one else, should supply all types of on-campus parking for handicapped, over-sized trucks, electric vehicle and bikes on their campus based on peak attendance of 3,500 attendees. Recent events shows parking agreements come and go, but the parking requirements at a 3,500 capacity stadium will be there forever. To ensure that the school shoulders this responsibility, I request that you support the posting of “Resident Permit Parking Only, 1 pm to 11pm, daily” on the four, narrow, residential streets that adjoin the stadium and the main pedestrian entrance at Tennyson Way and American River Drive. Otherwise, require Jesuit HS to close and lock the Tennyson gate parking and pedestrian entrance for all events that take place after 1 pm.

9-5 | This application to amend the zoning benefits only one entity, at the expense of 1,000’s of residents. This is a big deal! It will cancel over 60 years of Sacramento County planning which has successfully built a balanced, thriving community of over 500 homes and thousands of residents.

9-6 | The 60 year old plan works because it set strong, durable and fair boundaries for property owners in an R-4 zone and guaranteed their personal rights to use their



9-6

Cont.

homes and enjoy evening in their back yards. The R-4 zoning allowed county services to be delivered at a consistent and affordable level. This amendment to allow four, gigantic, 100 foot tall commercial lights in a R-4 zone, will drastically change and strip away 1,000s of residents' existing entitled land rights, to enjoy safe, quiet evenings at home.

Common sense tells us, it's just not right, so I urge you, say no to the lights.

Sent from my iPad

From: [jjkdj@aol.com](mailto:jjkdj@aol.com)  
To: [Clerk of the Board Public Email](#); [Rich Desmond](#); [Gutierrez, Kimber](#); [Gregory, Carol](#); [PER-CEOA](#)  
Subject: DEIR Comments PLNP2021-00262 (Carmichael-Old Foothill Farms/Gutierrez)  
Date: Sunday, October 29, 2023 3:10:06 PM

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

October 2023

Thank you for supplying this venue to comment on Jesuit’s proposed amendment to the RD4 zoning currently affixed to their playing fields.

10-1 My name is Joan Daugherty and this is my letter in opposition to Jesuit’s proposed amendment to their current RD4 zoning. I live approximately 200 yards from the football field on Marlborough Way near the intersection of American River Drive and Tennyson Way. We have lived here 30+ years. We expected some extra traffic and noise during the day from both high schools near us. However, since Jesuit has increased the use of their fields to accommodate other entities than the high school, the number of times of increased traffic has greatly increased in our area on weekends due to close proximity to the fields. My husbands and both sons graduated from Jesuit and played sports there including football. They all have a very positive experience and we have supported Jesuit for 46 years. There are several members on the Carmichael CPAC, Planning Commission and Board of Supervisors that have ties to Jesuit High School. As of now, no one has recused themselves from voting on this issue and I will assume that they will be unbiased and objective.

10-2 Jesuit has stated six objectives for this project.

**<!--[if !supportLists]-->1. <!--[endif]-->Develop the capability to host evening athletic events on campus and allow for athletic practices and competitions to occur after the peak afternoon temperatures to protect the health and safety of student-athletes coaches and spectators.**

Jesuit already hosts swimming events and lighted batting practice at night. According to weather.com (charts included on future pages), there were zero days this year of 100 degrees or higher during school days (school started on the 18<sup>th</sup> of August). In the past, Jesuit has been able to mitigate the few days of high heat with misters and increased water breaks. What concerns me regarding the health and safety of the student-athletes is the use of artificial turf and moving the JV football game to 4pm. The JV team would be playing at the hottest time of the day and they are younger and less able to withstand the heat from the field. According to the government website NIH, artificial turf can get up to 60 degrees hotter than turf and there are concerns regarding the toxicity of plastic dust, lead and propensity to cause injuries. Spectators have other viewing options to see the games on websites such as NFHS or Jesuit can stream their games and charge a viewing fee. Jesuits could also choose one of the alternatives mentioned in the DIER and erect a shade structure. In addition, there are no restrictions on Jesuit allowing other entities to use their field at night or during the day. This would greatly increase the number of activities Jesuit has planned.

10-3 **<!--[if !supportLists]-->2. <!--[endif]-->Provide a feasible location at which to increase the athletic opportunities for Jesuit High School students.**

Jesuit appears to be capable of providing multiple opportunities for their students through competitive and intramural activities which they have utilized for the last fifty years.

10-4 **<!--[if !supportLists]-->3. <!--[endif]-->Provide sufficient time, particularly for Fall and Winter sports, to train and compete without requiring student-athletes to miss excessive classroom instruction multiple times per month.**

It would be beneficial to know which sports and how many students miss class time. There are multiple fields available for practice. There are no facts to support their statement.

10-5 | <!--[if !supportLists]-->4. <!--[endif]-->**Spread out on-campus activities over a broader period of time to reduce the number of individuals and vehicles concurrently utilizing school facilities.**  
| By reducing the number of individuals and vehicles concurrently utilizing school facilities they are increasing the number of individuals and vehicles utilizing our neighborhood streets.

10-6 | <!--[if !supportLists]-->5. <!--[endif]-->**Enhance the overall high school athletic experience for students, parents, alumni and the Sacramento community.**  
| Having night games and practices is a small part of the high school athletic experience and is confined to only a few sports.

10-7 | <!--[if !supportLists]-->6. <!--[endif]-->**Continue to build upon Jesuit’s reputation for athletic excellence by providing facilities that allow athletes to achieve peak performance.**  
| Jesuit has continuously produced elite athletes without stadium lights.

10-8 | It is stated in the DEIR that Alternative 1, (Alternate stadium locations), “would meet most of the basic project objectives. However, it may not meet the objective of enable greater participation/attendance by students and their families due to the significantly greater (6-10 mile) travel distance from Jesuit High School.” A large number of students do not live near Jesuit so this would not be a factor. For students remaining on campus, Jesuits could bus these students to the game.

10-9 | According to the Sacramento Planning Code: Planning and Environmental Review (Amended January 15, 2023), “Residential Zoning Districts are established to promote and protect the public health, safety, and general welfare...They are to protect residential areas against...offensive noise, glare and other objectionable influences”. The DEIR stated that aesthetics (glare) and noise would have an unavoidable significant impact on the surrounding community.

10-10 | Traffic and safety are a major concern and stated to have a significant impact which can be mitigated by an enhanced crosswalk. However, an enhanced crosswalk will not prevent jaywalking, and parking on residential streets (oftentimes in front of fire hydrants and on corners).

10-11 | I would like to enjoy my evenings in my backyard or with my windows open and not have to listen to announcers, bands and spectators. I would like to have friends and family over without having them park down the street because cars are parked all along the front of my house.

10-12 | Jesuit has a lot of wants but not needs. They want stadium lighting but it is not needed to continue their reputation as an excellent school with thriving athletic teams. There are multiple schools in the area without lights who also have a successful athletic program. Jesuit built their school in a residential area with RD4 restrictions that apply to all of us. Rio Americano High School is now looking to obtain lighting for their field. I don’t know how you could allow Jesuit to have lights and not Rio. This would have a huge negative cumulative effect on the neighborhood. I don’t believe this is what the city planners had envisioned for this area and is why they zoned the playing fields RD4. The significant impacts outlined in the DEIR are not a minor inconvenience but an infringement on our rights as stipulated by the zoning codes. Please continue to protect our rights to enjoy our RD4 community and decline Jesuit’s request.

# Monthly Weather - Carmichael, CA



















As of 6:37 pm PDT

< Jul

Aug ▼ 2023 ▼

View

Sep >

SUN	MON	TUE	WED	THU	FRI	SAT
30  97° 55°	31  97° 61°	1  91° 57°	2  86° 54°	3  84° 55°	4  93° 55°	5  97° 59°
6  102° 63°	7  100° 63°	8  88° 59°	9  90° 55°	10  91° 57°	11  90° 57°	12  95° 61°
13  100° 64°	14  102° 73°	15  104° 68°	16  106° 64°	17  102° 70°	18  97° 63°	19  93° 61°
20  86° 72°	21  84° 68°	22  90° 63°	23  95° 63°	24  97° 64°	25  90° 59°	26  93° 55°
27  95° 54°	28  97° 55°	29  93° 55°	30  95° 55°	31  95° 61°	1  79° 63°	2  73° 61°

# Monthly Weather - Carmichael, CA











As of 6:37 pm PDT

< Aug

Sep ▾ 2023 ▾

View

Oct >

SUN	MON	TUE	WED	THU	FRI	SAT
27  95° 54°	28  97° 55°	29  93° 55°	30  95° 55°	31  95° 61°	1  79° 63°	2  73° 61°
3  81° 59°	4  86° 54°	5  90° 59°	6  88° 57°	7  77° 55°	8  93° 61°	9  93° 59°
10  93° 55°	11  93° 55°	12  90° 55°	13  91° 59°	14  91° 59°	15  90° 57°	16  81° 59°
17  81° 59°	18  82° 57°	19  82° 55°	20  82° 55°	21  81° 54°	22  81° 52°	23  81° 50°
24  79° 50°	25  79° 52°	26  81° 57°	27  82° 52°	28  84° 52°	29  80° 58°	30  70° 56°

# Monthly Weather - Carmichael, CA




































As of 6:37 pm PDT

< Sep

Oct ▼ 2023 ▼

View

Nov >

SUN	MON	TUE	WED	THU	FRI	SAT
1  77° 50°	2  81° 52°	3  84° 56°	4  91° 60°	5  93° 59°	6  94° 60°	7  95° 59°
8  93° 54°	9  72° 59°	10  73° 51°	11  74° 48°	12  79° 51°	13  80° 60°	14  81° 53°
15  87° 54°	16  83° 53°	17  85° 55°	18  89° 55°	19  93° 56°	20  88° 55°	21  76° 55°
22  69° 57°	23  76° 54°	24  77° 52°	25  67° 46°	26  69° 39°	27  69° 39°	28  -- 43°
29  72° 39°	30  71° 40°	31  72° 40°	1  74° 46°	2  72° 51°	3  71° 51°	4  72° 51°

## ITEM 2 CARMICHAEL CPAC PUBLIC COMMENT 002

**From:** Connie Del Real [cldelreal@yahoo.com]  
**Sent:** Sunday, October 8, 2023 9:36 PM  
**To:** Clerk of the Board Public Email [BoardClerk@saccounty.gov]  
**CC:** Elizabeth Hughes [elizconsulting@hotmail.com]; Gutierrez. Kimber [gutierrezk@saccounty.net]; Brandt. Jessica [brandtj@saccounty.gov]  
**Subject:** RE: Jesuit HS Stadium Lights and Sports Complex Expansion-Control No.: PLN2021-00262

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
 If you have concerns about this email, please report it via the Phish Alert button.

Good evening Board Clerk:

- 11-1 | We are very concerned neighbors in opposition to the Jesuit High School Stadium Lights and Sports Complex Expansion. We definitely and adamantly prefer that Jesuit play its football games (as it has long been its rich and proud standing tradition) and have other types of games, events, activities, and associated practices during the day. Our neighborhood, having two high schools (Jesuit and Rio Americano) within walking distance, currently experiences streams of day traffic on and around American River Drive and, therefore, seeks at least to have peaceful, quiet, and safe nights. If Jesuit prefers night football games, they can (as they have done with the Holy Bowl and as Rio has done) play those games at existing lighted fields.
- 11-2 | It is unreasonable to duplicate existing resources readily available at other school sites. We do foresee that if this proposed Jesuit expansion project is approved it will be fuel for Rio to once again pursue their own lighted football field request, which request was denied by a lawsuit in 2008. One can easily foresee that such expansion(s) will result in the never ending nightly noise pollution, air pollution, trash, cars blocking driveways, guests unable to visit for lack of public parking and emergency vehicles denied swift access. But also that "under the cover of darkness" some misguided individuals could inflict bodily injury and/or cause personal and/or property damage. Such negative consequences could be exacerbated by these two schools having night games, as well as night events and activities on the same dates.
- 11-3 | In addition, if Jesuit and/or Rio are successful with their expansions they will not be trusted or able to do the necessary and required expensive policing. I understand that those living close to Jesuit now experience lack of policing from Jesuit and/or the Sheriff's office. For your information we live closer to Rio and have been informed that Rio has a closed campus but yet we regularly see students wandering the streets during school hours. Last year we saw students smoking marijuana and/or vaping next to our home and were told that proper policing was not in their budget but would be this year. If it is in their current budget they have failed again to keep students on campus.  
 ↓ Therefore, requests from the community (based on past policing requests to the two

11-3  
Cont. } schools and/or Sheriff's office) have and will continue to fall into the least of priorities for the "stretched" Sheriff's team and that of the two schools resulting in a failure to properly and adequately do its policing.

11-4 } Lastly, when you "follow the money" it's obvious that the "deep pockets" of Jesuit, (which I have been informed has an annual revenue of \$30 million and is a private business operating in a residential neighborhood) have and can afford to push through any "road blocks" in quest of their desired goal of continuing to prosper financially.

Sincerely,

Severiano ("Del") and Constance Del Real  
730 Morris Way  
Sacramento, CA 95864  
(916)971-3191  
[cldelreal@yahoo.com](mailto:cldelreal@yahoo.com)



12-1

While I have many comments on the DEIR and will be providing those to the County, my comments tonight are generally limited to Jesuit's Justification and Protocol for Night-time Events. If you have just read the DEIR or listened to how Jesuit describes the activities taking place on the Campus, you would not understand how it is to live near the Campus. I have lived on Ashton Drive for over 36 years and during this time, the neighborhood has not changed much, it is Jesuit, through its changes in the historic use of the campus that have changed the character and nature of the neighborhood community. It feels like the neighborhood has been and will be forever transformed from a nice sleepy neighborhood into something right next to a commercial sports stadium complex. It is a constant bombardment of noise and traffic, every day of the week, not just during typical school days or hours, but on the weekends and evenings too. Living near two high schools can be challenging, but you learn to schedule appointments, etc., around school schedules to avoid traffic and you also grow accustomed to the noise of students, bells, etc., generated during school hours. What isn't mentioned in Jesuit's justification, are the activities that already are taking place and have an impact on the neighborhood, i.e., Junior Marauders (begins later part of July and is 5 evenings a week from 6-8 PM, then in August 3 nights a week 6-8 PM, and the use of diesel lights), Camp Marauders, Nike Basketball Camp, etc., add these and other after school activities that take place on the sports fields and on the Campus, and the opportunity to relax and enjoy our yards, homes or neighborhood becomes difficult or impossible. These are cumulative impacts that effects our rights as homeowners to the quiet use and enjoyment of our homes and neighborhood.

**Jesuit Justification Comments**

12-2

1) Page 2 of Jesuits Projection Description states in part..."the stadium lights will be utilized on select evenings to accommodate athletic practices and competitions, primarily during the winter months when the sun sets early or during home football games. Yet on page 4 of Jesuit's Project Description, it states in part that..."the lights will serve to better protect the health and safety of student athletes..." during Sacramento's hottest months June through September. During practices there will be noise generated from coaches, whistles, and staff. Changing the times for practices will generate noise outside of current general school hours. Page 3 states "that the start times for high school competitions are regulated by the CA Interscholastic Federation (CIF)" This is wrong, only playoffs times are regulated by the CIF.

12-3

2) Project Objectives: "Provide a feasible location at which to increase athletic opportunities for Jesuit students." Any increase in athletic opportunities will negatively affect and be at the expense of the surrounding neighborhood, not Jesuit.

12-4

3) Conclusion: The justification states that the Project will not alter/or affect the PA system. However, the 2023 Bollard analysis states that ..."because this analysis concludes that evening activities and sporting events held under the lights at Jesuit could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods, consideration of noise mitigation for the project is warranted." Therefore, Jesuit's conclusion that the lights will not increase any impacts associated with the school's prior use authorizations, such as the PA system or authorized capacity is incorrect since the 2023 Bollard study concludes that substantial increases in ambient noise will occur. Further

12-4  
Cont.

additional noise will be created by amplifying games that are not currently amplified. Jesuit’s conclusion also states that the project will reduce existing traffic, circulation, and parking issues for the surrounding community. This conclusion is incorrect. If the lights are installed, practices will begin later in the afternoon/evening, yet school gets out at 3:00 (more or less). Unless students are required to stay on campus, it will increase traffic and daily trips when students leave the campus only to return later in the day or evening for practice or games.

**Jesuit’s Protocol for Night Events:**

12-5

1) **Game Day General – Behavior:** It is stated that no tailgating is permitted in parking lots, overflow parking lots or on adjacent public streets, but there was tailgating at the August 25, 2023 football game.

12-6

2) **Tech, Sound, and Lighting:** When and under what authorization(s) was the WIFI installed?

12-7

3) **Food Service and Vendors:** Food trucks were operating on the August 25, 2023 football game. Were all permits and/or licenses obtained in advance to operate the food trucks?

12-8

Despite Jesuit’s assertions, the proposed project will not reduce existing traffic, circulation, and parking issues for the surrounding community. Further, Jesuit’s statements that the state-of-the-art technology for the new lighting system will minimize and avoid impacts to the nearby neighborhoods by limiting glare and spillover, is not supported by the DEIR. Finally, Jesuit states that the installation of the new system “which isn’t defined” will not increase any impacts associated with the school’s prior use authorizations, such as the PA system is incorrect. At the May 21, 2021 Good Neighbor meeting, Ms. Juli Nauman (Jesuit), stated in part that...“if any significant impacts to the neighborhood by the project are identified, they must be analyzed and then mitigated to a level that is “less than significant” or the project cannot be moved ahead.” As there two significant and unavoidable environmental impacts, Aesthetics and Noise, identified in the DEIR that cannot be mitigated to a level of insignificance, because of these and other reasons, I am opposed to Jesuit’s Stadium Lighting Project and the CPAC should recommend denial of a permit amendment.

12-9

The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. As the County and Jesuit know, over ten years ago, the Rio Americano High School boosters (Rio) proposed a football field improvement project that also included lights. While portions of that proposed project were ultimately approved and installed, the lights were not included. On October 24,2022, some residents near Rio were provided with a copy of a letter that stated that Rio would begin using portable lighting on the football field. While neighbors are attempting to understand what permits, if any, have been issued for the portable lights at Rio, if the Jesuit light component is approved a precedent would be set and the County should anticipate receiving an application from Rio for lighting. Therefore, in my comments to the County on the DEIR, I will be requesting that the County study the potential for all Cumulative Impacts (not just Arden Hills, which I understand is not moving forward). The same regards noise, traffic, etc., impacts. Attached is a screenshot from the Rio Boosters announcing that lights are being proposed for Rio.

10:52



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18h · 

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**From:** [barbara dugal](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#)  
**Cc:** [elizconsulting@hotmail.com](mailto:elizconsulting@hotmail.com)  
**Subject:** Jesuit- Arden Hills Cumulative Impacts  
**Date:** Tuesday, October 17, 2023 4:05:33 PM

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13-1

I apologize for all the emails, but trying to get ready for Monday. Has Arden Hills submitted an application to the County? If so, what is the status of the application? My understanding is that members of Arden Hills have been informed that the project is not moving forward. Please advise. Also, since Rio Americano is in the process of obtaining signatures and making plans to apply for lights, please advise why Rio wasn't included in the Cumulative impact Analysis. Per CEQA Guidelines Rio's lights falls within the "reasonably foreseeable probable future projects". Also, if the County has only received five comments to date on the DEIR, there should be an explanation in the staff report explaining that the comment period will continue until Oct 30 and the County will be receiving the bulk on public comments at that time. The wording in the staff report gives the impression that the community is not fully engaged in the process. The public record needs to reflect the entire record, not just Jesuit's position and their desire for the lights. Thank you and please add this email to the public record, Barbara Dugal

Sent from my Verizon, Samsung Galaxy smartphone  
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**From:** [barbara dugal](#)  
**To:** [Elizabeth Hughes](#); [Gutierrez, Kimber](#); [Gregory, Carol](#); [PER-CEQA](#)  
**Cc:** [Newton, Julie](#); [Brandt, Jessica](#); [Clerk of the Board Public Email](#); [Tara Ahlberg](#); [sswatt@aol.com](#); [jpdaugherty@aol.com](#); [Nora Hamilton](#); [Lisa Phenix](#); [James Daugherty](#)  
**Subject:** Re: California moves to restrict synthetic turf over health concerns - DEIR Comments PLNP2021-00262  
**Date:** Saturday, October 21, 2023 10:19:12 AM

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In July 2023, Sacramento County Public Health announced that it joined forces with Blue Zones, the global leader in longevity research and community well-being. The initiative uses an evidence-based approach to make healthy choices easier in all the places people spend the most time in their homes and neighborhoods and to create a healthier place to live, work and thrive. Per the announcement and as quoted by Rich Desmond, Chair Sacramento County Board of Supervisors, "Sacramento County is steadfast in its mission to enhance the health and well-being of all residents, irrespective of zip code, so that they can live a happy, healthy, and long life." How does Jesuit's proposed project advance Public Health and Blue Zones?  
Thank you, Barbara Dugal

---

**From:** Elizabeth Hughes <elizconsulting@hotmail.com>  
**Sent:** Wednesday, October 18, 2023 3:45 PM  
**To:** Gutierrez, Kimber <GutierrezK@saccounty.gov>; Gregory, Carol <GregoryC@saccounty.gov>; PER-CEQA <CEQA@saccounty.gov>  
**Cc:** Newton, Julie <newtonj@saccounty.gov>; Brandt, Jessica <brandtj@saccounty.gov>; Clerk of the Board Public Email <BoardClerk@saccounty.gov>; barbara dugal <babsdugal@hotmail.com>; Tara Ahlberg <taraahlberg@gmail.com>; sswatt@aol.com <sswatt@aol.com>; jpdaugherty@aol.com <jpdaugherty@aol.com>; Nora Hamilton <nhgh1979@yahoo.com>; Lisa Phenix <lisap@winfirst.com>; James Daugherty <jpdaugherty21@me.com>  
**Subject:** California moves to restrict synthetic turf over health concerns - DEIR Comments PLNP2021-00262

Hello Kimber,

14-1 | The Draft EIR is deficient because it does not comprehensively address how the stadium lights and synthetic field turf are environmentally safe. Any activity with artificial turf is environmentally safe, as described in the article below. The Applicant’s desire to play sports at night using the stadium lights to make that possible may cause harm to the students, coaches, parents, guardians, and visitors.

14-2 | Gov. Gavin Newsom’s recently signed law makes the ban on synthetic turf available to cities and counties to implement. “Synthetic grass usually contains PFAS chemicals. According to the Environmental Protection Agency, PFAS chemicals are a known carcinogen that can interfere with hormones, reproduction, immunity and cause developmental delays in children.”

The Applicant's draft EIR does not include a review of the Stadium lighting's contribution to extending play activities on the synthetic turf.

Regards,

Elizabeth Hughes  
916-214-4307

## [Once hailed as a drought fix, California moves to restrict synthetic turf over health concerns](#)

BY [SHREYA AGRAWAL](#) OCTOBER 18, 2023

### IN SUMMARY

California cities can ban synthetic turf under a law Gov. Gavin Newsom signed. He rejected a bill to ban PFAS in fake lawns.

Gov. Gavin Newsom last week passed on a chance to limit the use of the so-called "forever chemicals" in legions of plastic products when he vetoed a bill that would have banned them in synthetic lawns.

His veto of an environmental bill that overwhelmingly passed the Legislature underscores California's convoluted guidance on the plastic turf that some homeowners, schools and businesses use in place of grass in a state accustomed to drought.

Less than a decade ago then-Gov. Jerry Brown signed a law prohibiting cities and counties from banning synthetic grass. At the time, the state was in the middle of a crippling drought and fake lawns were thought to be helpful in saving water.

But this year Democrats in the Legislature went in a different direction, proposing bills that would discourage synthetic turf. They're worried about health risks created by the chemicals present in these lawns, including perfluoroalkyl and polyfluoroalkyl substances, also known as PFAS chemicals. Some chemicals in the crumb rubber base of synthetic turf, such as bisphenol A, commonly known as BPA, can leach out during extreme heat. These chemicals have been linked to various chronic diseases including cancers, diabetes and neurological impairments.

Dianne Woelke, a retired nurse in San Diego, is among the Californians who've grown concerned about their neighbors' synthetic lawns. She joined a group called Safe Healthy Playing Fields to advocate against their use.

"It's staggering the depth of minutia involved in this product. It's just a lot of plastic with a lot of chemicals leaching from it," Woelke said.

One of the bills Newsom signed, for instance, [undoes the Brown-era law](#) and allows cities and counties to again ban artificial turf. Some California cities have already begun moving to prohibit fake lawns, including Millbrae in San Mateo County and San Marino in Los Angeles County.

“Emerging research is making it clear that artificial turf poses an environmental threat due to its lack of recyclability and presence of toxins such as lead and PFAS,” said state Sen. Ben Allen, the Redondo Beach Democrat who authored the bill. With the new law “local governments will again be able to regulate artificial turf in a way to both protect our environment in the face of drought and climate change but also by preventing further contribution to our recycling challenges and toxic runoff,” he said.

Manufacturers of synthetic turf say they are working to address concerns about the materials they use, although for the most part they have been unable to entirely remove PFAS. Some have switched to sand and other safer products in an attempt to replace rubber crumb.

“Our members are already working with existing customers, states, and local governments to demonstrate the continued safety of our products and are committed to ensuring their products contain no intentionally added PFAS,” Melanie Taylor, president of the Synthetic Turf Council, wrote in a statement to CalMatters.

Newsom in vetoing the PFAS chemicals bill wrote that he “strongly” supports the intent of the legislation, but he was concerned that the state was not positioned to ensure its effectiveness.

The bill “does not identify or require any regulatory agency to determine compliance with, or enforce, the proposed statute,” he wrote in his veto message.

He also wrote that he’s directing his administration to consult with lawmakers on “alternative approaches to regulating the use of these harmful chemicals in consumer products,” suggesting the issue could return in the next legislative year.

### **Chemical risks from fake lawns**

Synthetic turf is a man-made, non-living replacement of turfgrass that requires little water or maintenance. The grass blades are made of fibers such as nylon or plastic while the base is typically a crumb rubber made from used tires, plastic pellets or sand.

**Synthetic grass usually contains PFAS chemicals. According to the Environmental Protection Agency, PFAS chemicals are a known carcinogen which can interfere with hormones, reproduction, immunity and cause developmental delays in children.**

Adam Smith, an associate professor of environmental engineering at the University of Southern California, said although research is still being done to understand fully what the health implications of the chemical are, current research suggests that

“PFAS is absolutely bad for human health.”

“Certainly, in terms of the drought, (synthetic turf) seems great, but there’s all of these downsides,” Smith said.

According to experts, these chemicals can enter the human body through contact with skin, by breathing the particles in or through water sources, especially groundwater sources, that can get contaminated during leaching.

Microplastics from the grass blades and crumb rubber can also leach into groundwater and freshwater bodies.

“These molecules are actually entering the food chains in the ocean, and they’re in our system, they’re in our blood, they’re in our muscles,” said Sylvia Earle, a marine life advocate and former chief scientist at the National Oceanic and Atmospheric Administration.

“We’ve changed the nature of nature through actions that we’ve taken. Now they are coming back to haunt us.”

### **At what temperatures is it a risk?**

Research by the National Toxicology Program shows that high heat can cause chemicals to leach out of the crumb rubber base of synthetic turf, which is made of recycled tires. These leached chemicals are known to cause cell death in humans.

Synthetic turf, like other artificial surfaces including asphalt and pavement, heats up by several degrees more than living lawns.

According to Kelly Turner, associate director of the UCLA Luskin Center for Innovation’s Heat Equity Initiative, the material can trap heat and radiate it back slowly, staying warm for longer periods of time.

“It is one of the hottest surface materials,” she said. “It is hotter than asphalt.”

Janet Hartin, horticulture expert at UC Extension in Los Angeles County, measured various types of surfaces in Palm Springs, where air temperatures around 100°F are common during the summer.

On days around 100°F or more, she reported temperatures of synthetic turf and other artificial substances around 175°F.

### **Alternative approaches**

Hartin said the best alternative to any artificial surfaces are living plants.

“We want to increase the population of our habitat pollinators, and plant climate-resilient plants that provide shade, buffer sun exposure, provide windbreaks, help reduce stormwater runoff and reduce soil and water erosion. And you can’t do that



with synthetic grass,” she said.

There are several drought-friendly approaches to landscaping, including warm-season grasses such as Bermuda grass and Buffalo grass, or doing away with grass altogether and planting trees or drought-resilient varieties of plants that are endemic to California.

Hartin said that even though plants require water and maintenance, their cooling benefits and ecosystem benefits go far beyond the water savings one could get through synthetic turf.

“You have choices,” she said. “What we plant today is going to maximize society and urban ecosystem benefits by the time that you’re in your later years.”

October 21, 2023

Kimber Gutierrez, Senior Planner  
CEQA@saccounty.net  
Sacramento County Environmental Coordinator  
Planning and Environmental Review  
827 7th Street, Room 225  
Sacramento, California 95814

Dear Ms. Gutierrez;

Subject: Comments on the DEIR PLNP 2021-0062 – Jesuit High School (Jesuit) Stadium Lighting

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Jesuit’s proposed stadium lighting project (Project). I am providing comments for consideration at the Planning Commission hearing that will take place on October 24, 2023. However, the comment period for the Project DEIR ends October 30, 2023, and I will be providing more specific comments on the DEIR before the end of the public comment period.

15-1

The **Project Description** is the foundation upon which an environmental analysis is constructed. Section 15124 of the CEQA Guidelines defines the types of information that should be included in an EIR project description. The project description should contain enough information so that the impact analysis contains a meaningful assessment of the project’s impacts. This allows the preparer of the document to analyze the impacts of the proposed project and allows the reader to understand the types and intensities of the project’s environmental impacts. Based on my review of the DEIR, the Project Description does not describe the actual project and what is proposed and therefore cannot be relied on.

15-2

Page 3-1 of the DEIR, states in part that....“the purpose of the proposed project is to install permanent light fixtures within the Marauder Stadium at Jesuit”. Page 3-7 of the DEIR, further states that...” the Project consists of two light poles 100-feet high, two 90-feet light poles. The request (it is unclear if this refers to the Project and/or the application), also includes additional code compliant lighting for the bleachers and pedestrian pathways.” However, Page 5-16 of the DEIR (Aesthetics) discusses the addition of wheelchair-accessible seating in the first row of the existing bleachers, and handrails/guardrails. The Project Description also does not include the removal of the existing four wood poles currently located on the property, but are described in Construction Methods Page 3-13 of the DEIR. A reader would not know about the addition of the accessible seating or the wood poles by reading the Project Description, but only by reading the Aesthetics or Construction Methods sections.

15-3

The Project Description should include the number of games, scrimmages, practices, band practices, Junior Marauders, etc., so that the appropriate environmental analysis is undertaken. This should include all activities that would or could, in the foreseeable future, utilize the outdoor fields regardless of time of day so that all potential impacts can be fully identified and analyzed. Because of

15-3  
Cont.

these deficiencies, I am concerned that there could be other Project components that Jesuit proposes for its Project that are not included in the DEIR. Therefore, the Project Description needs to be written to reflect an accurate description of the Project and what is proposed, along with all uses, which may necessitate further environmental evaluation.

15-4

A clearly written statement of **Objectives** is intended to help develop a reasonable range of alternatives to evaluate in the DEIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the purpose of the project. Page 3-7- Project Objectives, states that Jesuit has provided a statement of basic project objectives that includes:

- 1) "Hosting evening athletic events on campus and allow for athletic practices and competitions to occur after peak afternoon temperatures..."
- 2) Provide sufficient time, particularly for fall and winter sports, to train and compete without missing classroom time.... However, Plate PD-5: Anticipated Event Lighting Schedule, which was provided by Jesuit, shows that the following sports will have games outside of peak afternoon temperatures: football games August – October, with playoff games in November, lacrosse games – March – April and soccer games December – February. There is no mention of hosting evening athletic events during fall and winter months and no documentation regarding the loss of classroom time and its affects on students.
- 3) Jesuit states that another objective is to "increase athletic opportunities for Jesuit students." What is the intent of this objective? One can only assume that it means increasing the number of sports activities, competitions, and practices and the County should quantify this and analyze it.
- 4) Spread on-campus activities over a broader period to reduce the number of individuals and vehicles concurrently utilizing school facilities. In fact, this will concentrate activities to the lighted sports complex and extend the overall use of the lights and impacts to the surrounding community and will not reduce the number of individuals or vehicles concurrently using Jesuit's facilities and may increase daily vehicle trips.
- 5) Enhance the overall high school athletic experience for students, parents, alumni, and the Sacramento community. What is the enhancement for the neighborhood community that surrounds Jesuit? The neighborhood is already impacted by the numerous sporting activities and other non-school events that take place outside of regular school hours and days (Saturdays and Sundays).
- 6) Continue to build upon Jesuit's reputation for athletic excellence by providing facilities that allow athletes to achieve peak performance. This objective is very subjective, is not quantifiable and should have been dismissed by the County and not included in the DEIR.

15-5

It appears that the Objectives provided by Jesuit and outlined in the DEIR are an attempt to "justify" the project and thus limit thoughtful analysis of the Alternatives (they describe a Project that is looking for an Objective). Jesuit continuously and whenever the opportunity arises, states that the Project will benefit the "community." However, whenever neighborhood community members ask Jesuit to explain what the benefit is to the neighborhood community, no explanation has been given. It is debatable that Jesuit has met the threshold per Section 15124(b) of the CEQA guidelines and the County



15-5  
Cont. } should more thoroughly analyze Jesuit's project objectives to determine if they meet the CEQA criteria. Additionally, the "No Project" alternative, which is dismissed in the DEIR, and the remaining alternatives require further evaluation considering the issues involving the Project Objectives.

15-6 } As I understand, the intent of the County's design standards is to preserve or enhance the urban design character of a community. These standards help to define the relationship of buildings and structures to the lot, street, parking, and existing site, and neighborhood context while considering human interaction and use. The County's design guidelines seek to promote quality designs that **maintain the community character** and **promote public health, safety, and livability** through the design of the built environment. Pursuant County Code Section 5.2.2.C, which states in part that... "public buildings....houses, school and other similar buildings may not be erected to a height not to exceed 75'...". How do two 90' and two 100' steel light towers comply with this Code? The County's DEIR appears to have relied on commercial lot and commercial and institutional (which appears to include schools) project development standards. Not everyone is familiar with the County's codes, so the County needs to explain in the DEIR why Code Section 5.2.2.C was not relied upon during its review of the application and project.

15-7 } The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. Cumulative Impacts – Page 11-1 – Growth Inducing Impacts – as stated in the Objectives section, one of Jesuit's stated objectives is to "increase athletic" opportunities for students. Has Jesuit provided evidence that students are unable to participate in offered sports activities because of a lack of field availability? If not, then it needs to be provided. Without more discussion or information, one can only conclude that the goal is to increase student enrollment, which would require County authorization.

15-8 } As the County is aware, in 2005 the Rio Americano High School Boosters (Rio) proposed the construction of permanent lights and other sports field improvements at Rio. A lawsuit was brought by community neighborhood members and in December 29, 2008, the Honorable Lloyd G. Connelly filed a judgement (Case No. 06CS00495) and ordered the San Juan School Board District (District) to refrain from constructing and operating the sports field improvements unless and until the District prepared and certified a project EIR in compliance with CEQA. Ultimately, a EIR was adopted by the District on June 5, 2010. While portions of that proposed project were ultimately approved and installed, the sports field lights were not included because of significant environmental impacts. In the event the Jesuit stadium light project is approved, a precedent would be set and it is anticipated Rio that will be moving forward through the District for its own sports field lights. Therefore, the County should study the potential for all Cumulative Impacts (not just Arden Hills, which was recently sold and that the proposal outlined in the cumulative section of the DEIR is not moving forward). The same regards noise, traffic, etc., impacts. Below is a screenshot from the Rio Boosters announcing that lights are being proposed for Rio. Additionally, on October 19, 2023, Rio's football coach was interviewed on Sacramento's local Fox station discussing lights at Rio.

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15-9 | Page 11-3 – Raptors and Nesting Birds – The DEIR states that it is “unlikely that raptors will nest in mature trees in residential areas”. This statement is incorrect and misleading. Even though the neighborhood is located near the American River, it is a fact that hawks, owls, and other raptors and bird species, do nest and forage throughout the neighborhood. In fact, owls’ nest in trees that are directly adjacent to the sports complex. You can frequently hear owls calling out to each other at night. This section needs to be reviewed and rewritten.

15-10 | Jesuit’s Protocol for Night Events: 1) Game Day General – Behavior: It is stated that no tailgating is permitted in parking lots, overflow parking lots or on adjacent public streets, but there was tailgating at the August 25, 2023 football game. 2) Tech, Sound, and Lighting: When and under what authorization(s) was the WIFI installed? 3) Food Service and Vendors: Food trucks were operating at the August 25, 2023 football game. Were all permits and/or licenses obtained in advance to operate the food trucks?

15-11 | Please confirm that Jesuit is fully in compliance with all existing permit conditions, mitigation measures, etc. This is extremely important especially if the County intends to “combine” all of Jesuit’s previous authorizations into the Use Permit Amendment and Design Review that is the subject of this DEIR. An example of Jesuit being out of compliance with the mitigation measures includes leaving the gate on Fair Oaks Boulevard open past 10:00 pm as required and allowing students and their guests to linger in the parking lot and along Fair Oaks Boulevard after attending evening events on the campus and beyond the time allowed.

15-12 | Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into several pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less than-significant impact on the environment, but which together may result in a significant impact.



15-13

In 2013, the County approved a EIR for Jesuit's Chapel project, which I and other community neighborhood members commented on. In June of 2013, I learned that Jesuit was in the process of designing improvements to the football field and track area with a capacity for 3,000 individuals and possibly lights. I immediately contacted the County to get more information and stated that there was the potential for cumulative impacts and pursuant to CEQA, the chapel and stadium improvements should not have been reviewed separately and that these activities could be considered "piecemealed." In fact, the County issued a Notice of Exemption (NOE) in 2015 for a grading permit associated with the track and field improvements, (County Control No: PLER 2015-00039 - see page 3-1 of the DEIR for additional details). In 2019, the County issued another NOE to permit the relocation of the scoreboard and sound system. All evidence and information that supports Jesuit's claims and the statements on Page 3-1 and 3-2 in the DEIR needs to be included in the DEIR. Other temporary use permits associated with temporary lighting for various football games were also granted by the County (see page 3-2 of the DEIR for additional details). It is apparent that the previous exemptions and other actions taken by the County have contributed to the negative environmental impacts to the neighborhood is experiencing, which is why further review of the overall project description, project objectives, and alternatives, etc., is warranted.

15-14

The following needs to be clarified and analyzed in the DEIR: Page 3-9 – states in part... "pre-cast base will be buried approximately 20' below grade..." however Page 11-20 – states in part... "the holes for the pre-cast bases will be 16' below grade..." How wide will the holes be? What is the estimated cubic yard of material to be excavated? Please what will happen with the excavated soil? I cannot locate this information and it needs to be provided in the DEIR and analyzed. Page 3-16 – states that... "underground electrical conduit is existing with pull boxes within ten feet of the pole location." Does underground electrical conduit with pole boxes exist at each proposed hole location? Did the County previously approve the electrical work? These details need to be included in the DEIR and evaluated as needed.

Thank you for considering my comments on the DEIR and for including them in the public record. As mentioned, I will be providing additional specific comments on the DEIR by the close of the public review period which is October 30, 2023.

Sincerely,



Barbara Dugal  
4616 Ashton Drive  
Sacramento 95864

cc: Clerk of the Board  
BoardClerk@saccounty.gov

October 28, 2023

Kimber Gutierrez, Senior Planner  
CEQA@saccounty.net  
Sacramento County Environmental Coordinator  
Planning and Environmental Coordinator  
827 7<sup>th</sup> Street, Room 225  
Sacramento, California 95814

Dear Ms. Gutierrez,

Subject: Comments on the DEIR PLNP 2021-0062 – State Clearinghouse Number –  
2022100645 - Jesuit High School (Jesuit) Stadium Lighting

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Jesuit’s proposed stadium lighting project (Project). I understand that my prior comments to the County, via email and in letter format, my comments to the Carmichael/Old Foothill Farms CPAC, and my comments to the County Planning Commission and the various videos/photos that I have provided to the County, will become a part of the public record and will be evaluated and addressed by the County during the DEIR process.

16-1 | Unfortunately, the DEIR as currently written is extremely deficient in many aspects, and does not accurately detail or describe the Project and what is being analyzed under CEQA. Some of my comments are editorial in nature, but most are substantive.

16-2 | 1) Page 1-1 Executive Summary: While minor 1<sup>st</sup> sentence “The subject of this Environmental Impact Report (EIR). The document is a “Draft Environmental Impact Report” (DEIR) and needs to be corrected throughout the document.

16-3 | 2) Executive Summary – add the following to the end of the 3<sup>rd</sup> line down after at Jesuit High School...”and conduct evening athletic practices and competitions.” This accurately describes was the proposed project is and should be included throughout the DEIR.

16-4 | 3) Page 1-2 – Areas of Controversy – The neighborhood community is not just concerned with the nighttime football games, but all of the other proposed nighttime sports games and practices, etc., as it represents a change in the historic nature and use of the sports fields at Jesuit and needs to be included.

16-5 | 4) Page 2-1 Summary - 6th line down, states that the LED lights will be affixed to the top of the poles, elsewhere in the DEIR it states that the LED lights will be spread out, clarify, revise, reanalyze as needed. Last line of Summary, the activities proposed for nighttime need to be included, as well as pole removal, hadicapped seating and guardrails (include throughout DEIR), additional analysis should be completed as required.

16-6 | 5) Page 2-4, Final EIR add the word “to” after the word “prior”.

16-7 | 6) Page 3-1 – Project Description – Suggest the following edits to the first sentence as follows: “The proposed project involves the removal of four existing wood poles and the installation, operation and use of permanent field light fixtures, installation of code complaint safety



16-7  
Cont.  
16-8  
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lighting, handicapped seating and guardrails within....."All proposed improvements, changes, or additions and proposed uses need to be included. Also, all field activities that are proposed to take place under the lights needs to be provided and detailed, further analysis may be required.

7) Page 3-1 – Background - It is important for the County Planning Commission to understand background details regarding the various improvements that have been authorized by the County and constructed at the project site and the related uses. These details are relevant to the Commission’s consideration of Jesuit’s proposed Planning Amendment. It will provide history and context to the neighborhood’s frustration with Jesuit and the County. I know that there will be many public comments on Jesuit’s proposed project and I do not want this information to be overlooked by the Commissioners, so I will be preparing comments and a summary specifically on the background and it will be sent separately to the County by October 30, 2023.

8) Page 3-2 Background – “A emergency temporary use permit included the installation of seven (7) 20-foot by 40-foot pole tents.” It appears that several white tents are still on site. Information regarding the status of the seven the temporary tents needs to be provided and included in the final EIR.

9) Page 3-7 – Project Objectives – What is meant by the statement that the Applicant has provided a “BASIC” project objective? As detailed in the DEIR, a clearly written statement of objects will help the Lead Agency develop a reasonable range of alternatives and will aid the decision makers preparing findings or a statement of overriding considerations, if necessary. As I stated in my prior letters and at the Planning Commission meeting October 24, 2023, it appears that Jesuit’s objectives aim to “justify” the project and thus limit thoughtful analysis of the Alternatives.

- Suggest replacing host evening events on **campus with Marauder Stadium** since athletic practices and games would be held at the Stadium.
- Provide a feasible location....to increase the athletic opportunities for Jesuit High School students. What are these opportunities, do they represent an increase in the numbers or types of athletic opportunities, or an increase in student enrollment? This needs to be explained and described and may require further analysis particularly in the context of Growth Inducing impacts, ie, increasing student enrollment.
- Has Jesuit provided information to support the Objective **regarding “missing excessive classroom instruction multiple times per month”**? Is there an issue with academic performance, what is the total of missed classes? Requires explanation and details provided. Again, it appears that Jesuit is looking for any objective to support the lights.
- “Spread on-campus activities (should be stadium only activities) over a broader period of time....to reduce the number or individuals and vehicles concurrently utilizing school facilities.” This will lead to the prolonged use of the lights and their impacts on the neighborhood and will increase VTDs (vehicle trips daily), unless students are required to stay on Campus after school.
- “Enhance the overall ....athletic experience for students, parents, alumni and the Sacramento community” ....This is very subjective and cannot be relied upon, quantified, or analyzed under CEQA. Recommend deleting and eliminating



16-15  
Cont. |  
16-16 |  
16-17 |  
16-18 |  
16-19 |

- further analysis or consideration. What is the benefit to the surrounding neighborhood community?
- “Continue to build upon Jesuit’s reputation for athletic excellence...” This needs to be removed from the final EIR as it has no relevance in the CEQA analysis or in the decision-making process. It is offensive to expect the surrounding neighborhood community to shoulder the significant environmental impacts that, if the project is approved, will continue to degrade the homeowners use and enjoyment of their homes and surrounding neighborhood.
- 10) Page 3-7 and Page 3-9- Project Description and Characteristics – **1) Page 3-7**, states, in part, that...”Jesuit is requesting a Use Permit and Design Review....” What action is the County contemplating taking? The DEIR states in part...”The project request would amend the most current comprehensive entitlement of Jesuit High School’s Use Permit (County Control No. PLMP 2008-00237). Does the County intend to “combine” all of Jesuit’s previous authorizations into a single Use Permit Amendment that is the subject of this DEIR? Please clarify and provide in the EIR. If that is the County’s intent, then please confirm that Jesuit is fully in compliance with all existing permit conditions, mitigation measures, etc. I am aware of a few examples of Jesuit being out of compliance with the mitigation measures including, but not limited to, leaving the gate on Fair Oaks Boulevard open past 10:00 pm as required and allowing students and their guests to linger in the parking lot and along Fair Oaks Boulevard after attending evening events on the campus and beyond the time allowed. Additionally, see my comments on page 2 of this Comment Letter on the Background (Page 3-1 of the DEIR). **2) Page 3-7** states in part that...”the proposed light poles will have LED lights affixed to the top...”, however, on page 3-9, it is stated...”the number of luminaires (lighting fixtures) on each lighting pole would range from 14 to 19, with a total for all four poles of 66. These luminaires would be mounted at varying heights, ranging from 15 to 100 feet above grade.” This needs to be explained, clarified, or corrected, etc., additional analysis may be required. **3) Page 3-9** – states in part...”As part of the proposed project.... the wood poles to which the PA speakers are currently attached would be taken down....” How will the poles be taken down and removed? There is discussion later in the DEIR that a crane would be used, but there are no additional details provided. Will soil excavation be required, if so, what is the estimated quantity of material to be excavated (cubic yards), where and how will the poles be transported and disposed of? All details for the pole’s removal need to be provided and included in the EIR which may require further environmental analysis, etc.
- 11) **Page 3-9 – Operations Plan – 1)** Have all guidelines, plans, protocol, etc., referred to or mentioned in the DEIR, been included in the DEIR? If not, they need to be included. I previously provided comments on Jesuit’s Protocol for Night Events: Game Day General – Behavior: It is stated that no tailgating is permitted in parking lots, overflow parking lots or on adjacent public streets, but there was tailgating at the August 25, 2023 football game. **2) Tech, Sound, and Lighting:** When and under what authorization(s) was the WIFI installed? **3) Food Service and Vendors:** Food trucks were operating at the August 25, 2023 football game. Were all permits

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- and/or licenses obtained in advance to operate the food trucks? What is the definition of "high profile/high-capacity events? Needs to be included.
- 12) Page 3-9 – Proposed Improvements – See comment number 10 above of this letter. The improvements listed does not include the handicapped seating, guardrails or bleacher safety lighting that is proposed/outlined on page 5-16 – Aesthetics, all proposed improvements, need to be included in the EIR and analyzed.
- 13) Page 3-10 – The third bullet states..."Designed to meet....and, as such, will not contribute to glare or skyglow." However, Page 5-21 concludes that impacts from skyglow is considered to be to be **significant and unavoidable**. Explain this contradiction.
- 14) Page 3-11 – Schedule of Uses – This represents a historic change in use of the Stadium. What is the timing of all PAL programs/activities/practices? What about the Junior Marauder football league? What about the use of diesel-powered lights? Needs to be included and analyzed.
- 15) Page 3-12 – Plate PD-5 – This does not represent the actual estimated number of practices which is approximately 219 or approximate number of games which is 37. This needs to be analyzed and included in the EIR. If the Junior Marauders will be using the stadium lights, needs to be included and analyzed also. Track and field will "rarely" use the lights, what is the definition of rarely? Needs to be included, and a worse-case scenario analysis should be completed. Has Lacrosse historically been amplified? If not, why now? What about the overlap of practices, how will they be accommodated?
- 16) Page 3-13- Attendance – Throughout the DEIR different attendance numbers are used. Review for consistency throughout DEIR. Worse-case scenario needs to be analyzed.
- 17) Page 3-13 – Parking Needs – Maximum capacity needs to be defined. Other fields could be used for parking, what if rain or wet conditions renders this additional parking area unusable? If damage to these fields occurs, how will be repaired? Needs to be included. As Arden Hills Resort recently sold, will the agreement be honored by purchaser? What about conflicts with Rio Americano High School? Were all potential impacts (traffic, noise, etc.) to those residing near and around Rio analyzed? If not, needs to be included.
- 18) Page 3-13 and 3-16 – Construction Methods – Complete details need to be provided regarding the pole removal process. Different terms are used to describe the wood poles/PA supports. Needs to be consistent throughout the DEIR. Page 3-16 discusses "underground electrical conduit is existing with pull boxes within 10 feet of the pole location." Do these improvements exist at the four proposed light pole locations? When was the conduit/pull boxes installed and under what permits from the County? What was the intended use of these improvements? What is the size of conduit, etc.? Needs to be included and analyzed.
- 19) Page 3-15 – Plate PD-7 – Why include the 539 spaces when the document states they will not all be used, clarification is warranted.
- 20) Page 4-2 – Consideration of Alternatives – Attainment of Project Objectives – See comment #10 of this letter.
- 21) Page 4-4 – Alternatives Considered but Dismissed from Further Evaluation -



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**Alternative Project Location** – As Jesuit is a Sacramento regional school, the student population comes from 90 zip codes, and is diverse geographically. This Alternative requires further evaluation in regards to travel, air pollution and greenhouse gas emissions and not rejected.

- 22) **Page 4-5 – No Project Alternative** – As significant and unmitigable impacts are identified in the DEIR, temporary lights cannot be used in the future and all references to this needs to be deleted throughout the document. The County’s position regarding the use of temporary lights in the future was confirmed by County staff at the October 11, 2023 CPAC public meeting. Additionally, the discussion regarding air quality impacts under the No Project Alternative needs to discuss and analyze the impacts from the use of diesel generator lights that are used by Junior Marauders and possibly others. This Alternative requires further analysis and evaluation and should not be dismissed.
- 23) **Page 4-6 – Alternative 1 -Alternate Stadium Locations** - It is stated that this Alternative would meet most of the basis objectives. However,...”it may not meet the objective of enabling greater participation...by students, etc...due to the significantly greater travel distance from Jesuit.” As Jesuit is a Sacramento regional school, the student population comes from 90 zip codes, and is diverse geographically. The impacts identified for Alternative 1, need to be reevaluated and reconsidered.
- 24) **Page 4 – 8 – Alternative 2: Shade Structure** – States...”this alternative would construct a shade structure over the bleachers and field at Marauder Stadium...and potentially over another field at Jesuit...” What field is this and why is it needed? Additional details and analysis need to be provided, this Alternative requires further consideration. States “could” conflict with applicable zoning...more analysis required.
- 25) **Page 4 – 10 – Table ALT 1 – Comparison of Alternatives – Impact AE-1 – Project impact level rated as LS**, however this requires further evaluation, as significant and unavoidable impacts may occur due to a lack of analysis of potential impacts to the American River Parkway (Parkway). The analysis included was very limited in scope as users of the Parkway utilize the levees immediately adjacent to the Parkway to recreate. Further analysis of the pedestrian access points at Regency Circle and the Jacob Lane needs to be conducted. **Impact AQ-3 – Project impact levels rated as LS**, however as fueling of vehicles and equipment associated with construction and the potential repair of equipment was not discussed or evaluated in the DEIR, rating of LS is inappropriate without further discussion and analysis.
- 26) **Impact TR-2** – Identifies Alternative 1 as potentially significant and greater than the Project. This determination needs to be reevaluated as Jesuit is a regional school, see comment #22 of this letter.
- 27) **Page 4-14 – Environmentally Superior Alternative** – The No Project Alternative - delete reference to portable lights, since there are two unavoidable and significant environmental impacts, this Alternative requires further evaluation and consideration by decision makers.
- 28) **Page 5-1 – Aesthetics – Existing Visual Resources** – Plate AE-1 shows the location of each of the key viewpoints. Photos and analysis also needs to be conducted from

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the Regency Circle and Jacob Lane public access points along the levee area which is used heavily by the public to recreate and access the Parkway. The only photos and analysis of the Parkway is identified as Observation Point #5.

- 29) **Page 5-3 – Existing Visual Character – Project Site** – This section needs to be evaluated and rewritten due to the conflicts which include in part the following; states that a small paved parking lot south of the stadium would serve as temporary construction area. Whereas, it is also stated that the discus/soccer field will be used as a temporary construction area. This conflict needs to be resolved throughout the DEIR. The field is artificial turf not green turf grass, needs to be corrected throughout DEIR. States that the proposed light standards would be installed in existing paved areas.....this is not described or analyzed anywhere in the DEIR. This needs to be corrected, or included and analyzed. This is why a thorough and complete project description is needed throughout the DEIR and its analysis. Delete the word “pleasing” before visual contrast, extremely subjective. The second paragraph on Page 5-3 states that several tall wood poles west of the track, where exactly are these located and what is their purpose? KOP1 and KOP2 (Page 5-4) contain errors. KOP1 states that the aerial view shows the green turf field, the field is synthetic, correct. KOP2 describes a paved sidewalk, but it is concrete and purports to show the view of the proposed construction staging area, but the area cannot be seen in the photo. Photos should be taken from within the Campus and from the sidewalk on the south side of American River Drive.
- 30) **Page 5-3 – Surrounding Land Uses** – states in part...“the areas surrounding the project site are flat.” This requires correction as some of the homes on Piccadilly Circle are located on hills.
- 31) **Page 5-5 - Surrounding Land Uses Continued** – Add the competitive swimming facility, concrete seating/viewing area and tennis courts which are also located on the Campus. The document states in part...“The only public viewpoints of the project site are from motorists traveling on American River Drive....” This statement needs to be corrected as American River Drive is used heavily every day and evening of the week by walkers, joggers and cyclists who also can see the project site.
- 32) **Page 5-6 - Surrounding Land Uses Continued** – Include the distances of the homes on Piccadilly Circle from the construction staging area and project site. KOP-4 – delete the word “isle”.
- 33) **Page 5-6 and Page 5-7 – American River Parkway** – This discussion also needs to include the Regency Circle pedestrian access area and should be added before the Harrington Way access which is further away. On Page 5-7, suggest deleting the word “distance” and replace with “area” ... As stated in comment number 26 in this letter, the analysis needs to include areas on the levees at the Regency Circle and Jacob Lane pedestrian access areas. These areas are elevated and are areas that are used frequently by those that reside in the neighborhood and members of the public. This analysis needs to take place throughout the document, including, but not limited to Aesthetics, and Noise, as Jesuit’s PA and crowd noise can be heard in these areas and was not analyzed in the DEIR. What is the reference to the SARA Park Area Plan?



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34) **Page 5-8 – Light and Glare** – states in part...“Overhead light standards....are present along American River Drive...” These standards are spread out on American River Drive and the light emitted is very dim, please correct. Further....“Nighttime security lighting is also present...at single-family residences...” This sentence requires clarification, not all homes have outdoor lighting (as is the case in the vicinity of my home) or it is very limited in nature and is turned off in the early evening hours. Suggest deleting the word “security” lighting.

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35) **Appendix B – Stadium Lighting Report - Page B-3** – What is the definition of “curfew” as it relates to the stadium lighting and its effect on the operation of the lighting? This is also referred to in the DEIR Page 5-8. Page B-6, summary of Musco Calculations - Please provide additional details regarding the calculated horizontal light levels a 3’-0” grade for the surrounding residential area including the residential property lines. On page B-9 Curfew is listed as 10:30, what is the impact/intention of the curfew? Appendix B – No Page Number – View E - The label on the rendering states that the view from school towards stadium, however, it appears to depict the view from American River Drive towards the school, please correct/verify. (J) View, depicts a view from the American River Parkway, but does not state from where on the Parkway this rendering was made. Needs to be included and approximate the distance. B-22, what does the “triangle” depict? Page B-24 does this depict the spillover? Since most of the reviewers are not lighting experts, more information needs to be provided that explains what the Illumination summaries mean and what are the impacts on the surrounding public streets and homes.

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36) **Page 5-9 – Regulatory Setting** – “Rivers or segments included with” should be “within”, next paragraph....as a “Recreation” should be “Recreational”.

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37) **Page 5-12 – States...**“The proposed light standards...would be approximately 0.45 miles north of the SARA Park Area.” Unsure what this means and how it is used in the DEIR, this sentence is confusing the way it is currently written.

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38) **Page 5-13 – Substantial Adverse Effect on a Scenic Vista** – The DEIR fails to demonstrate that the stadium lighting will not have a significant impact on the scenic vista from the Parkway. Additional analysis is required before a determination can be made.

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39) **Page 5-14 – Methodology** – The DEIR states...“This visual impact analysis is based on field observations conducted by AECOM in May 2023...” The analysis of nighttime lighting impacts (Impact AE-2) relies on the Lighting Report prepared by M. Neils Engineering, Inc. (2023)”. The M. Neils report was prepared in March 2023, and the field observations were conducted in May 2023, please explain the discrepancy in the dates.

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40) **Page 5-15 – Degradation of Visual Character** – States...“The only public viewpoints in the project vicinity are from motorists traveling on American River Drive...” This is not accurate. Walkers, joggers, and cyclists also have a view of the project. This needs to be corrected and further environmental analysis may be required. “Due to the intervening vegetation on the school campus, (see KOPs 2 and 4) views of construction equipment in the staging area would be mostly blocked from motorists traveling on American River Drive.” As mentioned, walkers, joggers, and cyclists would be able to see the equipment. Photos and analysis from the south side of



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American River Drive needs to be completed and included in the DEIR. Further, the documents states... "A crane may be necessary to set the light poles." This needs to be corrected and analyzed, as elsewhere in the DEIR it is stated that a crane would be used to remove the existing wood poles and set the new concrete bases and set up the light poles. "As shown in KOP-2, views of the lower 20 feet of the proposed light poles would be blocked by the intervening hedges..." Analysis needs to be conducted from the south side of American River Drive. I do not believe that the hedges along American River Drive are 20 feet tall, please verify height. "Views of the proposed light poles...from the north end of Tennyson Way...would be mostly blocked by landscape trees..." This sentence should be rewritten to state that the light poles and luminaries would be partially blocked by the landscape trees, etc. As previously outlined, additional analysis also needs to occur from the public access points at Regency Circle and Jacob Lane levee areas. Last sentence on Page 5-15, which continues on Page 5-16, states in part..."The light poles would be visually similar to other existing urban (delete this word) development at the project site." The poles and luminaries will be much taller than the improvements that exist at the project site or in the surrounding neighborhood. Further, it is stated that..."The existing PA speakers on the existing power poles are not visible from any public viewpoints and would not be visible when reinstalled..." This is incorrect as the existing PA speakers are visible from American River Drive and from the north and south sidewalks on American River Drive. This needs to be corrected and analyzed. Further, the DEIR describes..."The proposed additions of wheelchair-accessible seating and...the proposed handrails/guardrails.... in the existing bleacher seating would be composed of the same materials (steel) and would not be visible from any public viewpoint." No where in the DEIR are these improvements described or include construction or installation methods, etc. **ALL improvements** need to be included and analyzed in the DEIR. The distance to the Parkway is stated as 0.05 miles, while elsewhere in the document its stated as 0.40 miles or less. This requires further clarification and analysis. Because of these issues in the Degradation of Visual Character section, this entire section of the DEIR needs to be rewritten, which may trigger that the DEIR be recirculated for public review and comment. The DEIR does not provide sufficient information for members of the public to fully understand and consider the issues raised by the proposed project.

- 41) Page 5-16 – Conflicts with Regulations Governing Scenic Quality – Pursuant to the County’s Design Guidelines, how does this proposed project located on a private high school strengthen the economic vitality of all areas of the County (especially since Jesuit pays no property taxes), advance sustainable development and provide business and user-friendly practices? The Design Guidelines are also intended to improve community planning and design to promote healthy living and balance social, economic, and environmental concerns. The proposed project does not meet the stated Design Guidelines and degrades the overall atmosphere of the neighborhood and prevents homeowners of the full use and enjoyment of their homes and neighborhood. The statement that the proposed project would not conflict with the policies of the American River Parkway Plan is based on errors and omissions and needs to be reanalyzed and as outlined in comment number 40

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- above. The potential significant impacts need to be reanalyzed and which can require the implementation of Mitigation Measures.
- 42) Page 5-17 – Impact AE-2 – The document states in part that...”the project applicant retained the services of M. Niels Engineering, Inc., in consultation with Musco Lighting (delete the word “leading provider” as it has no relevance in the CEQA analysis or DEIR), to design and engineer Jesuit High School’s stadium lighting system. Since M. Niels Engineering designed, engineered, and provided the review of the lighting system that is included in the DEIR, the County needs to conduct an independent analysis of the proposed lighting system.
- 43) Page 5-19, States that....”Nearly all games would end by 10:00 P.M., but no later than 11:00 P.M. with lighting potentially remaining on for a short period afterwards...” However, Appendix B discusses a curfew of 10:30 P.M. this conflict needs to be resolved. If the stadium lights remain on, then they should be dimmed to 50% capacity or less, as the proposed project includes safety lighting. Are there Minor curfew laws that need to be complied with?
- 44) Page 6-6 – Sensitive Receptors – include walkers, joggers, and cyclists at the end of the sentence.
- 45) Page 6-13 – Methodology – Include the analysis of the diesel generators that are used by the Junior Marauders for a minimum of two hours a night, three nights a week. Additionally, parents and others idle their vehicles while waiting to pick up their children, etc., after practice. On Page 6-15, it discusses minimizing vehicle idling. Therefore, the use of diesel generators and the idling of vehicles while waiting to pick up children needs to be included in the Air Quality analysis.
- 46) Page 6-18 – Operational Emissions – Vehicle trips needs to be further analyzed unless students are required to remain on Campus until their practice or game begins. Additionally, on a Friday night or during other evening games, more individuals will drive straight from work and this represents additional trips that needs to be analyzed.
- 47) Page 6-22 – Recommend deleting the word “quite” before subjective, at the end of the last sentence.
- 48) Page 7-2 – Environmental Setting, suggest replacing global warming with climate change throughout the DEIR.
- 49) Page 7-4 – Regulatory Setting – The sentence states...”While most do not...” What/who does most refer to?
- 50) Page 7-5 – Assembly Bill 1279 – Clarify last sentence.
- 51) Page 7-9 – Impact GHG-1 – The second paragraph states in part...”The intermittent increase in operational vehicle trip would generally be limited to special events.” What are “special events” and from where is this statement derived? Clarification needed.
- 52) Page 7-10 – Impact GHG 2- When does the County anticipate the finalization of the Draft CAP.
- 53) Page 7-11 – Impact GHG 2 – Suggest deleting “local” before school needs as the proposed project only serves Jesuit.
- 54) Page 8-1 – Introduction – This section should include the following after stadium lights...”and an increase in nighttime sports practices and games”, which accurately



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- describes the intended use of the stadium lights. Further, the statement that the County did not receive any responses to the NOP that directly addressed impacts to, appears to be incorrect. In response to the NOP, I did provide a comment regarding land use as follows: This area needs to be reviewed by the County. There is the potential to increase student population growth from Jesuit's proposed project. Student growth will result in adverse secondary effects beyond what is anticipated by local jurisdictions; therefore, the County needs to address the degree to which student growth will or will not be consistent with applicable land use plans.
- 55) Page 8-4 Land Use – Suggest the following edit ...”with single-family homes that make up a suburban neighborhood that was established in the 1960’s.”
  - 56) Page 8-7 – Issues not Discussed Further – Add the following to the first sentence, “The project is a request for stadium lighting **and the use of the lights for nighttime athletic games and practices.**” The general purposes of residential land use zone as outlined in the Zoning Code, under Section 2.6.1, state in part that ...”Protect residential areas, as far as possible, against heavy traffic and through traffic.” Further ...”To provide appropriate space....and similar facilities that serve the needs of nearby residents, to generally perform their own activities more effectively in a residential environment and do not create objectionable influences.” The direct impacts to the existing neighborhood needs to be discussed further as the proposed project does not serve the needs of the neighborhood. The County needs to protect the neighborhood from the increase in noise, traffic, degradation of visual quality, etc.
  - 57) Page 8-7 - Methodology – What agencies were consulted, please provide, and include in EIR.
  - 58) Page 8-7 – Zoning Code Consistency – Needs to include the increase in evening/nighttime athletic games and practices.
  - 59) Page 9-18 – Short Term Impacts – Last paragraph, verify the distances stated conflicts with the distances on Page 9-21.
  - 60) Page 9-19 – Identify where the 70 dBA locations are located.
  - 61) Page 9-20 – The Junior Marauders also use the PA system on weekends, needs to be included. Recommend conducting additional noise studies as it appears that data was only collected from one football game October 8, 2022.
  - 62) Page 9-24 – Mitigation Measure NOI-1 – Delete entirely from NOI-1 “To the maximum extent feasible” this statement is open to interpretation. Jesuit should be required to install a state-of-the-art PA system that will limit noise. Need to list the games that Jesuit is allowed to use the PA system, should not be used on the weekends by Junior Marauders or others.
  - 63) Page 9-25 – Distance of residence on Piccadilly Circle conflicts with Page 9-21, correct.
  - 64) Page 10-3 – Project study area American River Drive, last sentence needs to be clarified.
  - 65) Page 10-4 – Parking – States up to 2,500 attendees why wasn’t this number used in analysis instead of 1,500? This analysis conflicts with Environmental Setting on Page 10-1 and with TR-1 Page 10-11, resolve throughout document. Local LTA data needs to be used in analysis not data from high school in Carmel. As Arden Hills just sold,



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will the parking arrangement continue? What about conflicts with Rio Americano's schedule. Needs to be reanalyzed. The term "major event" needs to be defined. All impacts to the surrounding residential areas from parking at Rio Americano needs to be analyzed.

66) Page 10-9 – Construction – Crane needs to be included along with concrete trucks, verify that all construction vehicles are included.

67) Page 10-10 – Roadway Access – The analysis does not consider when Jesuit hosts non-athletic events on Campus. An example of this is the recent car show which caused congestion and traffic backups. See my previous comments regarding off site parking at Arden Hills and Rio Americano.

68) Page 10-13 – The document is intended to analyze impacts at the proposed project site, not regionally, and that "it can be presumed" (no assumptions) that the project would have a less than significant impact on transportation. This needs to be further analyzed for potential impacts to the neighborhood.

69) Page 10-13 – Operation – Copies the parking agreements between Jesuit and Arden Hills and Rio Americano need to be provided and made a part of the document.

70) Page 10-14 – A crosswalk does not exist at American River Drive and Jacob Lane, correct.

71) Page 10-15 – Construction – "Temporary facilities would be developed"....what are these, where would they be developed? Needs to be described and analyzed for potential impacts.

72) Page 11-1 – Growth Inducing Impacts – One of Jesuit's stated objectives is to "increase athletic" opportunities for students. Has Jesuit provided evidence that students are unable to participate in offered sports activities because of a lack of field availability? If not, then it needs to be provided. Without more discussion or information, one can only conclude that the goal is to increase student enrollment, which would require the County's environmental analysis and authorization.

73) Page 11- 3 - Raptors and Nesting Birds - Even though the neighborhood is located near the American River, it is a fact that hawks, owls, other raptors, and bird species, do nest and forage throughout the neighborhood. In fact, owls' nest in trees that are directly adjacent to the sports complex. You can frequently hear owls calling out to each other at night. This section needs to be reviewed and rewritten.

74) Page 11-5 – Consider deleting "or construction foreman", what is the intent/purpose of including the construction foreman?

75) Page 11-5 – Lighting Impacts – see my comment on the discrepancies of how the luminaires will be distributed on the light poles. Add "four" after top of four 90 and 100-foot poles. Potential impacts to owls, etc., who forage at night needs to be analyzed.

76) Page 11-6 – Noise Impacts – Delete "immediate vicinity" and replace with surrounding neighborhood (the PA system can be heard when on the Parkway and throughout the neighborhood). All evening/nighttime games and practices represents a change in the historic nature and use of the stadium and all these activities represent a increase in noise levels throughout the neighborhood.

77) Page 11-7 – Cultural Resources – The size of the four holes to be used for the concrete bases needs to be provided throughout the DEIR.

- 16-90 | 78) Page 11-8 – Mitigation Measure CR-1 – Delete reference to “unusual amounts” of bone...and delete reference to “development” activities and replace with construction activities.
- 16-91 | 79) Page 11-14 – The area and amount of soil that will be disturbed/removed for installation of the four steel light poles needs to be provided (throughout document). Statement that the area is “very small” needs to be deleted and rewritten which may change the impact determination.
- 16-92 | 80) Page 11-15 – No discussion or analysis in the DEIR regarding refueling of construction equipment or vehicles or equipment maintenance in the event of a breakdown. Needs to be included and analyzed throughout DEIR.
- 16-93 | 81) Page 11-17 – Construction – Will the turf discuss field be restored/repared after completion of construction? If so, needs to be detailed and included in DEIR. Delete reference to “outdoor baseball fields” as they are not a part of the proposed project.
- 16-94 | 82) Page 11-18 – Document states....“Traffic conditions are monitored” delete “are” and replace with would be.
- 16-95 | 83) Page 11-20 – Hydrology – Include more details regarding the excavation of the four holes for the new steel poles. The details need to be incorporated throughout the document.
- 16-96 | 84) Page 11-22 – Delete references to “ancestral” channels of the American River throughout document and replace with “historic” channel(s).
- 16-97 | 85) Page 11-24 – Recreation – First full paragraph needs to include all games and practices that are proposed to use the stadium lights. Further, as the document states the proposed installation would not change the capacity of the stadium, then the capacity needs to be set.
- 16-98 | 86) Page 11-24 – Tribal Concerns – What does “indicated positive results” mean? “In the case that an object...is uncovered, construction can halt...” Delete the word “can” and replace with “will”. More specifics are required regarding next steps.
- 16-99 | 87) Page 11-27 – Cumulative Impacts – The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. As the County is aware, in 2005 the Rio Americano High School Boosters (Rio) proposed the construction of permanent lights and other sports field improvements at Rio. A lawsuit was brought by community neighborhood members and in December 29, 2008, the Honorable Lloyd G. Connelly filed a judgement (Case No. 06CS00495) and ordered the San Juan School Board District (District) to refrain from constructing and operating the sports field improvements unless and until the District prepared and certified a project EIR in compliance with CEQA. Ultimately, a EIR was adopted by the District on June 5, 2010. While portions of that proposed project were ultimately approved and installed, the sports field lights were not included because of significant environmental impacts. In the event the Jesuit stadium light project is approved, a precedent would be set and it is anticipated Rio that will be moving forward through the District for its own sports field lights. Therefore, the County should study the potential for all Cumulative Impacts (not just



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Arden Hills, which was recently sold and that the proposal outlined in the cumulative section of the DEIR is not moving forward). The same regards noise, traffic, etc., impacts. Also, the County needs to analyze and consider the impacts that the proposed project will add to existing noise, traffic, etc., from Rio Americano's outdoor athletic games and practices (water polo, baseball, etc).

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General comments:

1) Please confirm that Jesuit is fully in compliance with all existing permit conditions, mitigation measures, etc. This is extremely important especially if the County intends to "combine" all of Jesuit's previous authorizations into the Use Permit Amendment and Design Review that is the subject of this DEIR. An example of Jesuit being out of compliance with the mitigation measures includes leaving the gate on Fair Oaks Boulevard open past 10:00 pm as required and allowing students and their guests to linger in the parking lot and along Fair Oaks Boulevard after attending evening events on the campus and beyond the time allowed.

16-101

2) Approximately 60 years ago, County planners designed roads, land use and restrictions for this Residential 4 (RD-4) Zoning District which prohibited stadium lighting in the community. Since then, the hundreds of individuals who have purchased homes in the neighborhood have relied on these standards. Neighbors protested when Jesuit and then Rio Americano HS (2015-16) petitioned to amend the Land Use permits which prohibit Stadium lights. Approximately 85% of the Jesuit High School campus footprint adjoins residential property. In both cases, the CPAC and Supervisors ruled to maintain the status quo and preserve the original plan, which ensures the beauty of the American River Parkway and our peaceful enjoyment of our homes and streets during the evening.

Thank you for the consideration and the inclusion of my comments into the public record.

Sincerely,



Barbara Dugal  
4616 Ashton Drive  
Sacramento CA 95864

October 30, 2023

Kimber Gutierrez, Senior Planner  
CEQA@saccounty.net  
Sacramento County Environmental Coordinator  
Planning and Environmental Review  
827 7th Street, Room 225  
Sacramento, California 95814

Dear Ms. Gutierrez;

Subject: Comments on the DEIR PLNP 2021-0062 – Jesuit High School (Jesuit) Stadium Lighting

This letter provides additional comment on the above referenced environmental document. It is important that the County Planning Commission understand background details regarding the various improvements that have been previously authorized by the County at the proposed project site. These details are relevant to the Commission’s consideration of Jesuit’s proposed Planning Amendment and the DEIR specially background information and serves to provide additional history and context to the neighborhood’s frustration with Jesuit and the County.

17-1

The CEQA Guidelines define a project under CEQA as “the whole of the action” that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis.

17-2

The proposed project site has a history of entitlements associated with the athletic uses at Jesuit High School. In 2015, a Notice of Exemption (NOE) for a grading permit associated with track and field improvements was released (County Control No: PLER2015-00039). The project consisted of upgrading the existing track and field facilities with construction of a 400-meter, 8 lane all-weather running track, a synthetic turf stadium field with permanent field markings for football and soccer, and stadium seating on home and visitor sides. The project was authorized as a Categorical Exemption under CEQA Statue 15301, Class 1. The County determined that the project qualified under this exemption class because it consisted of repair and maintenance of existing facilities involving negligible or no expansion of use beyond that existing at the time of determination. This project should not have been exempted as all, or



17-2  
Cont.

nearly all, existing improvements were removed and new improvements were constructed. It also appears that the seating capacity was increased from what existed wood bleachers. In 2013, the County approved a EIR for Jesuit's Chapel project, which I and other community neighborhood members commented on. In June of 2013, I learned that Jesuit was in the process of designing improvements to the football field and track area with a capacity for 3,000 individuals and possibly lights. I immediately contacted the County to get more information and stated that there was the potential for cumulative impacts and pursuant to CEQA, the chapel and stadium improvements should not have been reviewed separately and that these activities could be considered "piecemealed." I was not informed about the County's proposed exemption of the construction project. Did the "catwalk" from the upper parking area to the football stadium exist previously or the concession stand? I am requesting a complete copy of the County's files, records, etc., as it relates to No: PLER2015-00039.

17-3

Sometime after 2015, exact timeframe is unclear, the neighborhood began experiencing excessive noise coming from Jesuit's PA system and community members began registering complaints with County staff. During this time, Jesuit also relocated the existing scoreboard to its current location without prior authorization from the County. Despite the complaints, in 2019, the County issued another NOE for a Use Permit Amendment to PLNP2008-00237 for the "after the fact" relocation of the scoreboard and sound system on the Jesuit's athletic field. This action was as a Categorical Exemption under CEQA Guidelines Section 15323, Class 23. Class 23 consists of the normal operations of existing facilities for public gatherings for which the facilities were designed, where there is a past history of the facility being used for the same or similar kind of purpose. For the purposes of this section, "past history" shall mean that the same or similar kind of activity has been occurring for at least three years and that there is a reasonable expectation that the future occurrence of the activity would not represent a change in the operation of the facility. It was determined that this Categorical Exemption applied to the previous project because Jesuit High School had been operating at the location since 1963, and the subject parcel had been developed with sports fields during that time. Please provide a complete copy of the County's files, records, etc, as it relates to PLNP2008-00237.

17-4

All evidence and information that supports the statements on Page 3-1 and 3-2 in the DEIR needs to be included in the DEIR. Other temporary use permits associated with temporary lighting for various football games were also granted by the County (see page 3-2 of the DEIR for additional details). It is apparent that the previous exemptions and other actions taken by the County have contributed to the negative environmental impacts the neighborhood currently experiences.

I appreciate the inclusion of this letter as a part of the public record and working through the further review of the proposed project.

Sincerely,



Barbara Dugal  
4616 Ashton Drive  
Sacramento CA 95864

**From:** [Molly Dugdale](#)  
**To:** [Gregory. Carol](#)  
**Subject:** Fwd: draft Neighborhood Proposed Conditions of Approval for the Jesuit project.  
**Date:** Monday, October 23, 2023 12:30:39 PM

---

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Sent from my iPhone

Begin forwarded message:

**From:** Elizabeth Hughes <[elizconsulting@hotmail.com](mailto:elizconsulting@hotmail.com)>  
**Date:** October 22, 2023 at 1:45:37 PM PDT  
**To:** Molly Dugdale <[mollydugdale@comcast.net](mailto:mollydugdale@comcast.net)>  
**Subject: RE: draft Neighborhood Proposed Conditions of Approval for the Jesuit project.**

You raise very good points. Please send your comments to the City Planners using the emails below.

Gutierrez. Kimber [GutierrezK@saccounty.gov](mailto:GutierrezK@saccounty.gov)  
**Copy to:** Gregory. Carol [GregoryC@saccounty.gov](mailto:GregoryC@saccounty.gov)

Regards,

Elizabeth Hughes  
916-214-4307

---

**From:** Molly Dugdale <[mollydugdale@comcast.net](mailto:mollydugdale@comcast.net)>  
**Sent:** Thursday, October 19, 2023 3:09 PM  
**To:** Elizabeth Hughes <[elizconsulting@hotmail.com](mailto:elizconsulting@hotmail.com)>  
**Subject:** Re: draft Neighborhood Proposed Conditions of Approval for the Jesuit project.

18-1

Hello Elizabeth. We have lived in Piccadilly street wimbledon court area for 53 years. Jesuit started in 63 and adds each year. When construction of parking lot and chapel began 2014? They opened the alleyway for temporary parking and entrance. Somehow that became during COVID a Jesuit expansion  
We cannot get in or out of our street at certain times of day and need to close access there in alleyway

- 18-2 | They need to stop evening games as parking on American River not monitored. People leave car doors open and walk across street as they please. At dusk is dangerous and not designed for the traffic. No night games. Rio does not have that issue as is designed for local use. Not regional. No evening games
- 18-3 | Who secretly allowed this construction on the lower field
- 18-4 | There is no traffic monitoring and noise control. I feel for those who live along fence line. They have stuck score boards in their back yards. Plus the noise
- 18-5 | We never received notices about what Jesuit intends to do and does not resemble the end result. Nor seen plans of end result. They used COVID to hide the construction Molly in Wimbledon court

Sent from my iPhone

On Oct 17, 2023, at 5:57 PM, Elizabeth Hughes  
<[elizconsulting@hotmail.com](mailto:elizconsulting@hotmail.com)> wrote:

Hello Neighbors,

Attached for your immediate review and feedback is the draft neighborhood proposed conditions of approval for the Jesuit project.

The County asked us to tell them what we want should the project receive approval.

Please review the document, make notes or comments, and feel free to edit or add any text and content. Once you are done.... **please return it to me by this Friday or sooner if possible.**

I will consolidate all the comments into one document and submit it to the County.

Thank you. I appreciate your support.

Regards,

Elizabeth Hughes  
916-214-4307

<khConditions Mitigation Penalties 10-17-23.docx>



**From:** [Larry Galizio](#)  
**To:** [PER-CEQA](#); [Gregory Carol](#)  
**Subject:** Jesuit HS PLNP2021-00262  
**Date:** Saturday, September 16, 2023 8:30:27 AM

You don't often get email from galiziolarry@gmail.com. [Learn why this is important](#)

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19-1 | After reading the Environmental Impact Report, and experiencing the issues of concern in this report and beyond, we write in opposition to the proposed Jesuit High School Stadium Lighting Proposal.

19-2 | As noted in 3-1, "The Jesuit High School campus is surrounded entirely by single-family residences with the exception of the County Oaks Pet Hospital." With two high schools located on the same street, residents already contend with considerable traffic, hazardous driving, noise, parking problems, and litter. The project would substantially increase all of the aforementioned problems, and the primary beneficiaries of the proposal would be an exclusive, single-sex, sectarian institution that is exempt from the considerable property taxes paid by the area's residents.

19-3 | Tellingly, four of the six "basic project objectives" are specific to athletics or the institution's reputation for athletics. While athletics can supplement a high school education, the educational value is hardly mentioned in the project. And conspicuously absent from the discussion is the institution's plan to increase its revenue streams while the daughters of tax-paying families in the area are prohibited from reaping its benefits.

19-4 | The proposal is replete with purposefully ambiguous language such as "...capacity crowds are *anticipated* to be held between 7 and 10 times per year." And that use by football, soccer, lacrosse, and track & field teams would occur during "*select* evenings". And once the massive stadium lights were built, if there were to be 15-20 events with capacity crowds, and far more nights with "light" use of the stadium lights with crowds, exactly what recourse would residents affected by the project have? What if athletic events end at 10:15 or 10:30 p.m.? Or when the crush of traffic means that area residents are awakened by cars, people yelling, dogs barking at 11 p.m. when people are walking to their cars after a game? The answer is simple: we will have no recourse whatsoever.

19-5 | Parking and hazardous driving are an issue in the status quo. One merely needs to review any of the reports by the Sheriff Patrols in the Wilhaggin Del Dayo Neighborhood Association concerning the number of stop signs that are ignored and citations and warnings given to drivers in the area to recognize that substantially increasing the number of night time events would constitute a significant danger to pedestrians and anyone in the area. The number of illegal U-turns on American River Drive is already a hazard - the proposed project would amplify this considerably.

19-6 | The proposal identifies 539 parking spots at Jesuit H.S., and posits 300 + 100 potential spaces on fields on campus. Apart from being woefully inadequate for the anticipated number of event attendees, it's difficult to believe that the athletic director and campus maintenance - or parents paying \$16,435 in tuition - are going to permit and tolerate 300 SUV's and Ford-F150

19-6 Y  
Cont. | trucks on their soccer and athletic fields.

19-7 | The tax-paying residents of this primarily R-4 residential area are being asked to support a project that will forever negatively affect the quality of life in the neighborhood in myriad significant ways so that a private, tax-exempt, exclusively male institution can enhance its reputation for athletics.

We strongly oppose this project and urge its rejection.

Larry Galizio & Janice O'Malley Galizio  
4951 Kipling Drive  
Carmichael, CA 95608

--

**Larry Galizio**

**From:** [Gutierrez, Kimber](#)  
**To:** [Gregory, Carol](#)  
**Subject:** FW: In Re: Jesuit High School Stadium Lighting (PLNP2021-00262)  
**Date:** Tuesday, October 31, 2023 9:43:07 AM  
**Attachments:** [image003.png](#)

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Kind regards,

Kimber Gutierrez, Senior Planner  
Planning and Environmental Review  
(916) 874-7529



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**From:** PER-CEQA <CEQA@saccounty.gov>  
**Sent:** Tuesday, October 31, 2023 9:29 AM  
**To:** Messerschmitt, Kevin <messerschmittk@saccounty.gov>; Newton, Julie <newtonj@saccounty.gov>; Little, Alison <littlea@saccounty.gov>  
**Cc:** Gutierrez, Kimber <GutierrezK@saccounty.gov>  
**Subject:** FW: In Re: Jesuit High School Stadium Lighting (PLNP2021-00262)

***Andrea Guerra, Senior Office Assistant***

Planning and Environmental Review  
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 874-2862 (direct)  
[www.planning.saccounty.gov](http://www.planning.saccounty.gov)



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**From:** Thayer Goodenow <thayerg@hotmail.com>  
**Sent:** Monday, October 30, 2023 4:33 PM  
**To:** PER-CEQA <CEQA@saccounty.net>  
**Subject:** In Re: Jesuit High School Stadium Lighting (PLNP2021-00262)

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20-1 | While I fully support the existence of the schools in our neighborhood, that support is due to the academics provided by those schools and efforts of the schools to positively contribute to the neighborhood. Jesuit's lighting proposal and their plan for evening sports events is contrary to the character of this neighborhood, and the county should reject the lighting proposal.

20-2 | Jesuit's lighting proposal raises significant concerns for the surrounding neighborhood, and the submissions demonstrate that they do not feel the need to attempt to reasonably mitigate the impacts in the area. Jesuit is a private commuter school and as such, already significantly impacts the RD-4 suburban neighborhood that surrounds it. Although Jesuit indicates its intent to limit evening events to certain days and parking to certain areas, it is clear from public comment that Jesuit's *current* efforts to mitigate its impact of its daytime sports events have been ineffective.

20-3 | Based on lack of notice, both Jesuit and the county appear to consider Kingsford Dr. as outside of the area that would be influenced by this proposal, however, that is anything but true. Already when Jesuit lets out, we see a significant increase in traffic on Kingsford Dr. This after-school traffic moves far in excess of posted limits, despite existing speed calming efforts. Like American River Dr., Kingsford Dr. is popular with significant amounts of pedestrians and bicyclists, both day and evening. As it is, traffic enforcement is inadequate to address the issue. We expect to see an unreasonable increase in the number of speeding drivers on Kingsford in the evenings if Jesuit's permit is granted with associated risks to evening foot traffic. The county's reliance on the already overstretched CHP for traffic enforcement, all but ensures that little will be done, especially since Jesuit has taken a somewhat myopic view of the area of impact of potential evening events.

20-4 | Parking on American River and in the surrounding areas is already impacted during weekend events at Jesuit. This results in erratic driving as individuals hunt for spaces or their turns, making illegal u-turns, with pedestrians illegally crossing without warning. Transferring this type of behavior to the evening hours, on a poorly lit streets is sure to increase the number of accidents, especially pedestrian accidents. Jesuit's plans do not adequately contemplate the need for mitigation in the surrounding areas, merely at American River and Tennyson Way.

20-5 | The DEIR minimizes the above, as well as the overwhelming number of concerns about this project raised by neighbors and documented in the powerpoint submitted by Ms. Hughes on 12/6/22. No permits for lighting (and thus evening events) should be granted unless and until these concerns are adequately addressed.

Thank you for your consideration.

T Goodenow

**From:** [Tom Guilderson](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#); [PER-CEQA](#)  
**Subject:** DEIR Comments PLNP2021-00262  
**Date:** Monday, October 30, 2023 5:11:48 PM  
**Attachments:** [DEIR comment.pdf](#)

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Dear Ms. Gutierrez, and county commissioners.

21-1

Attached please find a pdf file with comments on the DEIR for the Jesuit High School lighting proposal. As noted during the public comments at last week's board meeting, there is a requirement under CEQA for mitigation of environmental impacts, including cumulative vehicle miles. The JHS proposal will add vehicle miles at a rate that is not appropriately captured in the report. There is no statement in the report regarding JHS' proposed mitigation of the encumbered vehicle miles and emissions. I am unfamiliar with the full process, and assume that this will be part of the final report. I did not include this in the attached document, because as part of the commission's board meeting last week, you are already aware of this issue.

Sincerely,  
Tom Guilderson

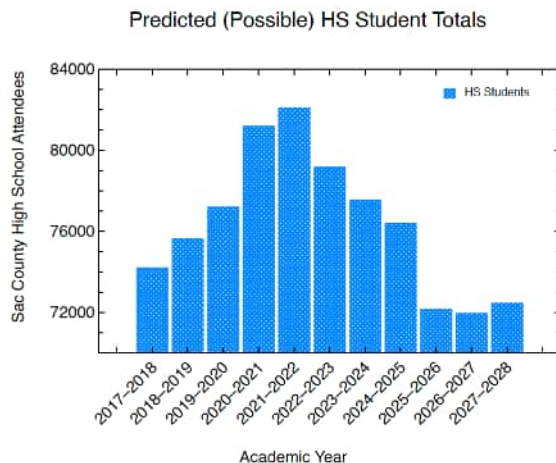
Ms. Kimber Gutierrez  
Assoc. Planner  
Sacramento County

RE: PLNP2021-00262

Dear Ms. Gutierrez.

21-2 This letter is regarding the DEIR for the Jesuit High School (JHS) lighting facility proposal. With regards to a specific outcome of the DEIR of putatively unavoidable impacts of aesthetics and sound (noise level), at least the sound level could be addressed and remediated. JHS currently uses an open speaker based public address (PA) system which, if the statements by the neighbors are correct, was previously approved by the county under what might be considered “odd” circumstances. In discussions with JHS during their “good neighbor” meetings, it seems that JHS keeps their PA system at the highest level allowed without considering the ability to turn it down to a lower level and still maintain play by play analysis for the spectators. A more technological approach would be for the county to require JHS to replace their extant PA system with dedicated speakers in the bleachers and a bluetooth/wireless option.

21-3 Whether a flaw or by design of the request, it was surprising to not see an assessment of the cumulative impacts of the stadium lighting proposal. If JHS is successful in obtaining their lighting system, the county should anticipate activities at the sports fields well beyond JHS’ stated handful of football games and practices: with larger potential attendees/vehicles and the antecedent impacts (parking, safety, etc) beyond the streets directly fronting JHS. This is simply because of the business and income requirements that JHS, as a private school requires. An unspoken goal of the JHS lighting project is for JHS to maintain recruitment and income levels in the face of an upcoming substantial drop in HS aged kids in Sacramento County. Demographic shifts such as these can have an outsized impact on private relative to public schools. A sports field complex complete with lighting that could operate to 10 or 11pm could be an attractive add-on for JHS’ marketing and sales staff whether for prospect sports-minded parents or for non-profits which could rent the fields.



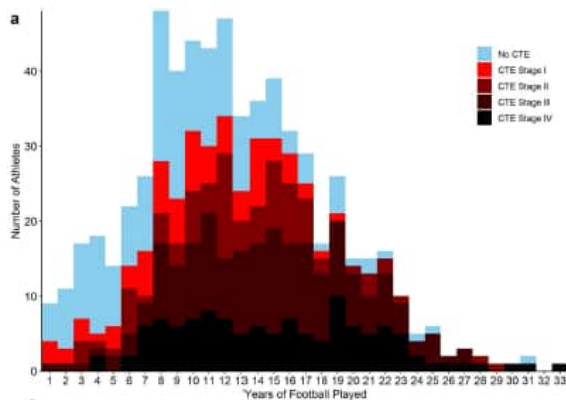
*Demographics of high-school aged children in Sacramento County. Assumes 100% matriculation from preceding grades (age-cohorts). Data from CA Department of Education.*

21-4

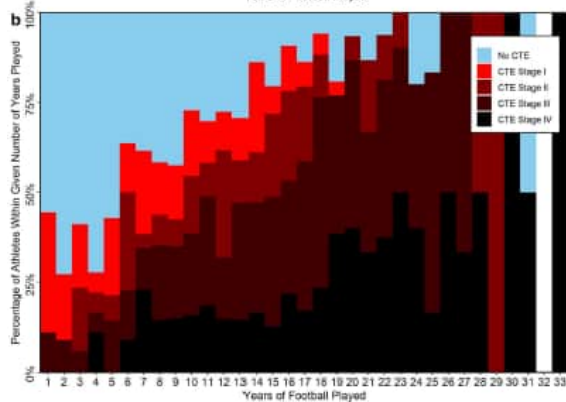
Although this is not a ‘merits’ of the project review, it is “interesting” that one of the initial reasons for the lighting project stated by JHS to the community neighbors was the ‘safety’ of the students playing football. The rationale being that with climate change, days and nights will become hotter and practice/playing time will be restricted. The most recent Intergovernmental Panel Climate Change (IPCC) report implies that under the current rate of fossil fuel emissions, the RCP8.5 scenario, by mid-century Sacramento, including Carmichael, is predicted to experience more than 124 >90°F days. Nighttime temperatures are unlikely to cool fast enough during the end of summer and early fall for football players to practice outdoors at ‘reasonable’ evening hours. Early morning, near dawn, will still be the coolest time of the day, but it is difficult to convince parents and participants of the need for 5:30am practices.

21-5

Moreover, if JHS were facilitating the long-term health and safety of their students they might not support football at all because of the well documented relationship between football and chronic traumatic encephalopathy (CTE). Individuals with CTE have higher occurrences of dementia, Alzheimer’s, as well as general cognitive, behavioral, and motor issues as adults. CTE individuals have a shorter life span than non CTE individuals. The rate of CTE in football players far exceeds that in the general population. Within the last decade, CTE and traumatic brain injuries (TBI) have been well studied. All of the peer reviewed studies indicate that CTE in football players occurs regardless of concussion events or TBIs, simply playing the sport leads to CTE. Daneshvar et al., (Nature Communications, 2023) studied 631 former football players, school level all the way through professional, and the results reinforce the potential damage even a few years of contact sports can have. Of the candidates studied, nearly three out of four (72%) had CTE. Of the 95 individuals who played only through high school, more than 50% had CTE.



A) Histogram of number of individuals studied (all football players) who were diagnosed with CTE, and stage, as a function of years of football played. B) The same data transformed into percentage of players in a given year of football cohort with CTE (Figure 1 from Daneshvar et al., Nature Communications, 2023). An inference from these data is that even a few years playing football leads to a significant CTE rate. The rate of CTE in the general population is ~1%.



21-6 [ The results of Daneshvar are similar to a more age-restricted CTE study of 152 young athletes who played contact sports, all under the age of 30 at the time of death (McKee et al., JAMA Neurology, 2023). In this study, more than 40% of the athletes had full-blown CTE and nearly all had mild CTE (stages I and II). Simply, and regardless of waivers and indemnity clauses, JHS is making a conscious choice to put their students at risk of CTE.

Sincerely yours,

*Thomas P. Guilderson*

Thomas Guilderson  
4819 Paisley Way  
Carmichael CA



**From:** [Gutierrez, Kimber](#)  
**To:** [Gregory, Carol](#)  
**Subject:** FW: Jesuit High School Stadium Lights  
**Date:** Tuesday, October 31, 2023 8:50:50 AM  
**Attachments:** [image001.png](#)

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DEIR Comment

Kind regards,

Kimber Gutierrez, Senior Planner  
Planning and Environmental Review  
(916) 874-7529



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**From:** Dave Higgins Jr. <klondike15@gmail.com>  
**Sent:** Monday, October 30, 2023 4:56 PM  
**To:** Gutierrez, Kimber <gutierrezk@saccounty.net>  
**Subject:** Jesuit High School Stadium Lights

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22-1

I'm writing in support of the draft EIR and the project. There are a couple of key issues related to this project 1. Lighting - The project is using the best available technology to reduce glare, so this issue appears to have been fully addressed. 2. Traffic - The Kimley Horn study notes that the school already has football games and other sporting events, the only change is the time of use - shift from Saturday afternoons to Friday evenings. This isn't a significant change in the use of the facility. 3. Sound - The Bollard Noise Assessment notes that the P/A system should be re-evaluated to minimize the spillover of noise into the surrounding residential areas. This should be followed up on and further work should be required with additional modeling of the existing P/A system to reduce the impact to the neighbors.

Overall it appears to be complete and in compliance with CEQA.

Dave Higgins, Jr  
Sacramento, CA

**TECHNICAL REPORT FINDINGS**  
**JESUIT HIGH SCHOOL**  
**STADIUM LIGHTING PROPOSAL**

Revision 1  
October 10, 2023

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## Overview

This is a report citing deficiencies in the impact reports made public regarding Jesuit High School Stadium Lighting Proposal as cited on the Sacramento County's website:

[planning.saccounty.gov/Pages/Jesuit-High-School-Stadium-Lighting.aspx](http://planning.saccounty.gov/Pages/Jesuit-High-School-Stadium-Lighting.aspx)

## Background

23-1 | **What is a "project" under CEQA?** Project: activity undertaken by a public agency or a private activity that may cause a change in the environment and must receive **discretionary approval** from a government agency. This means the Applicant is not guaranteed to obtain approvals for their proposed project, and the County officials have discretion and a requirement to consider all cumulative impacts beyond the stated physical installation of 100' stadium lighting poles.

23-2 | **Will the project have a significant impact on the environment?** The following is a list of expected reports for the project per the Draft EIR released on September 15, 2023.

When reports were not provided, the expected report was cited as "no report provided," which is a deficiency in the project.

When a report or set of reports was provided for a category, a specific section in this document cites deficiencies found.

## Deficiencies

This section cites the specific deficiencies per the reports.

### Project deficiencies due to lack of report

The following expected reports have not been made available or were not done.

1. Aesthetics – no report provided
2. Agriculture – no report provided
3. Biology – no report provided
4. Cultural – no report provided
5. Geology – no report provided
6. Hazards – no report provided
7. Hydrology – no report provided
8. Land Use – no report provided
9. Minerals – no report provided
10. Population/Housing – no report provided
11. Public Services/Utilities – no report provided
12. Recreation – no report provided
13. Urban decay – no report provided

23-3 | **What is a "significant impact on the environment?"**  
A significant impact on the environment includes substantial, or potentially substantial, adverse change(s) in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. A social or economic change by itself shall not be considered a significant effect on the environment (CCR §15382).

23-4 | The results from the Applicant's proposed lighting project will decrease safety, increase neighborhood disruptions, affect the character of the surrounding community, create significant noise, traffic, and pedestrian impacts, and affect the surrounding wildlife environment. Schools are conditionally permitted to use in areas designated as Single-Family Residential. The Applicant's proposed stadium lighting project is a land-use change that reflects a sporting complex. This change in land use is inconsistent with RD-R residential neighborhoods.

The following sections reflect deficiencies of the technical studies used in the Applicant's Draft EIR.

## Report Deficiencies

### NOISE

#### **Bollard Acoustical Consultants (March 6, 2023)**

This section cites difficulties related to [Bollard Acoustical Consultants – Jesuit High School Stadium Lights Project Noise Assessment](https://acrobat.adobe.com/id/urn:aaid:sc:US:d5378b3c-6bbe-4ae1-86ac-1ade1cf8c951) (<https://acrobat.adobe.com/id/urn:aaid:sc:US:d5378b3c-6bbe-4ae1-86ac-1ade1cf8c951>)

23-5 | The Noise Assessment is insufficient and does not meet expectations of a Noise Impact Analysis – Environment Impact Reviews should include a Noise Impact Analysis. The included Bollard Acoustical Noise Assessment, dated March 6, 2023, is an "assessment" and does not meet the expectations of an EIR, which should include a **Noise Impact Analysis**. An Environmental Noise Assessment is a comprehensive study to evaluate existing or potential noise sources in an area. It aims to assess the environment's current or projected noise levels and analyze their potential impacts on human health, well-being, and the surrounding community. On the other hand, Noise Impact Analysis focuses on evaluating and assessing the potential noise impacts of a specific development project. It is often conducted as part of an Environmental Impact Report or as a requirement for obtaining permits or approvals for a construction project. *An Environmental Noise Assessment assesses an area's existing or potential noise sources and their environmental and community impacts. A Noise Impact Analysis, on the other hand, examines explicitly the potential noise impacts of a development project and aims to propose mitigation measures to manage those impacts.*

23-6 | ↓

- The Bollard Acoustical Noise Assessment did not conduct a normal daytime high school activity baseline.

Cont.

The Bollard Acoustical Noise Assessment's specific purposes were to quantify pre-project (baseline) ambient noise conditions in the residential areas surrounding the JHS stadium, to evaluate the impacts of noise generated during evening hours at the stadium within those residential areas, and to evaluate measures to reduce the noise generation of those activities where appropriate and feasible. The Bollard Acoustical Noise Assessment did not conduct a normal daytime high school activity baseline. The baseline study inappropriately defined a "baseline" during high-level noise activities rather than non-activities. A baseline should study normal noises and then compare this to high-level noises.

- 23-7 • The Bollard Assessment did not study actual high-level football game night activities and noise.

Bollard's earlier Study dated January 14, 2016, Attachment C-1, states high school P/A sound level at maximum volume was 75-83 dBA in Piccadilly residential area, exceeding desired levels. Only after a manual downward adjustment by school representatives did the noise levels drop to 70 dBA at exterior locations of Piccadilly residents. The Bollard Assessment assumes "the [Jesuit] P/A system sound levels can be maintained at 70 dB Lmax or less within the nearest exterior residential back yard, the predicted sound level of 40 dB Lmax (for interior homes) would be within compliance."

- 23-8 • The Bollard early "assumptions" do not provide appropriate data for a noise compliance assessment as no description supports the assumption. Any assumptions made are arguably due to the last measured data provided. In addition, there is a lack of data on PA system volumes, usage, and noise. The 2016 Bollard assumptions are inappropriate for use in the 2023 Noise Assessment.

The Bollard Assessment states existing P/A speakers, attached 35-45 feet above ground, will be re-attached to the proposed 90-foot-high light towers, and no change of sound levels would result. Only one football event was relied upon for sound measurement: "sound levels at Site 2, Piccadilly Circle "was exceeded at this location during 3 of the hours monitored," and "maximum sound levels measured at Site 2 exceeded the County's 70 dBA Lmax daytime noise standards by an average of 4 dBA during the October 8 football game."

- 23-9 • The noise study is deficient because it omitted noise levels generated by food truck vendors, crowds (bullhorns, cowbells, airhorns, cheering, etc.), the band, and music during breaks and cheerleading activities.

On October 22, 2022, at a recent meeting between the school representatives and neighbors, attended by Supervisor Desmond, a neighbor asked if the school monitors or tests their compliance with mandated dBA noise levels, and the school representative answered, "No." The Applicant does not monitor its noise impacts.

Adjacent neighbors have tracked and recorded DBA levels during the last five years, indicating the school exceeded county guidelines.

23-10

- The Bollard Noise Assessment is inadequate because it did not study the Applicant's actual performance and ability to monitor or maintain noise levels within County code compliance levels. The Bollard recommendations do not include any feature to hold the Applicant or the County to monitoring or testing (or penalties) to maintain noise compliance.

Page 3. of the Bollard Noise Assessment indicates, "DNL represents a 24-hour average." An average data set **disguises** short-term variations in the noise environment, such as those generated during activities within the JHS stadium." Using a smoothed 24-hour "average" data set is inappropriate to represent specific noise-intense activities the Applicant generates.

23-11

- The Bollard Noise assessment incorrectly uses average data to smooth environmental sound variations. The Assessment should reflect actual noise and sound variations created by the Applicant.

Page 15. of the Bollard Noise Assessment's anticipated use chart is incorrect; the intended use far exceeds those noted.

23-12

- The sample set used by The Bollard Noise Assessment is too small.

Page 16. of the Bollard Noise Assessment indicates the October 1 and October 16 test games were smaller and likely quieter than league and playoff events. The Noise Assessment should reflect high-attendance and high-activity games and events.

23-13

- The Bollard Noise Assessment did not measure a sufficient variety of events and data points to assess the impact adequately.

The events and attendance can vary due to multiple reasons. To have a better understanding of noise and the type of attendance it represents, the following measures and scales should be considered with the noise-based measurements:

1. Number of Attendees – Measured the number of people at the event's start.
2. Number of vehicles – Measured the number of cars in JHS parking lot(s).
3. Number of vehicles – Measured the number of cars parked on relevant street parking.
4. Length of game – measured in minutes
5. Start time of game – recorded in date and time PDT
6. Temperature at start of game – measured in degrees Fahrenheit
7. Event – Measured by the sporting event taking place.
8. Division – measured by varsity, Junior varsity, or otherwise.

23-14

Page 27. "If noise generated by evening football games held at the JHS stadium **were not exempt** from the local Sacramento County Code noise standards, noise generated by certain events and activities held at the stadium (primarily football games) would exceed those standards at some residential areas surrounding the stadium."

23-15 | Knowing lights and speakers were not part of the initial approval for the stadium made it easy to make many improvements. The speakers (and lights), however, were not part of what has been accepted by neighbors and why a "new" or "exception to existing facility" should not be granted. Based on the many years the facility has existed, JHS should not be exempt from county noise standards. The noise study does not explore the no-build option and using existing facilities with lights.

23-16 | Bollard's Assessment claims the county noise ordinances do not "technically" apply to the high school (letter to Mr. Dave Higgins Jr. January 14, 2016, pg. 5.) and are exempt from county noise ordinances. This would seem logical if the legal parcels of the school athletic fields were zoned identically to the school buildings. But the athletic fields are a legally separate parcel zoned by the County as R-4, not zoned for secondary school buildings. This statement that R-4 zoned school property is exempt from noise ordinances must be litigated. **Logic:** If the school needs the County to exempt them from lights, the same argument applies to noise ordinances involving R-4 zoning.

23-17 | The night activities push the sound above the 55 dBA levels, which has a significant impact. That being the case, mitigation must bring that down to a less-than-significant impact.

23-18 | The noise impact of the PA system is a pain point for residents. Opinions have been shared that it can be too loud, and usage later in the evening is uncomfortable. There is no record of an active partnership with JHS (the Applicant) and the community on the level of the PA system. The alarming noise assessment data states, "[evening events] could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods." The concern is that the noise is going to get worse. As cited in the Assessment, "people react to nighttime noise exposures as though they were twice as loud as daytime exposures." (Page 3)

23-19 | Another pain point for residents is frustration on what to do when JSH events are too loud. Residents are unclear of (1) what oversight is done to ensure JSH events meet existing permits and expectations and (2) what action they can take to be heard and find a compromise to continue a healthy co-existence between the residents and JHS. As shown in the report, the noise of the PA is at 70 dbs.

23-20 | Technically, R-4 zoning excludes buildings and outside structures greater than 25 feet in height, and while 150 households that surround the football and baseball field must comply with height and noise levels, shouldn't ALL R-4 zoned property owners comply? **Why does JHS have a professional-sized batting cage that exceeds 25 feet in height with LED lights on R-4 zoned property?**

23-21 |

- The Noise Assessment does not consider how speakers affect neighbors and the neighborhood. Numbers and collected data are only a part of the whole picture. The Assessment Study does not represent the cumulative impacts and neighborhood effects, including football games and nearby Rio Americano High School activities.

23-22 |

- The Noise Assessment did not consider the sound decibels of the crowds, airhorns,



23-22  
Cont. | cowbells, or honking horns as spectators leave at 11:00 at night when some of us go to bed at 9 p.m. and our children at 8 p.m.

23-23 | The Noise Assessment indicates that noise generated by the project is expected to exceed county standards for RD-4 zoned properties. However, the proposed project is exempt from these standards as it is related to school sports, entertainment, etc. Such an exemption seriously impedes the process considering noise impacts on the surrounding neighborhood.

- **Does the Project's EIR look beyond this county exemption in assessing the proposed project's overall and cumulative environmental impacts?**

23-24 | The Assessment does not include mitigation measures, monitoring, or reporting to ensure less than significant noise-related impacts generated by evening and nighttime games and events. Program monitoring and enforcement requirements should address PA issues, crowd noise, and band and cheer noise, which greatly concern neighbors near Jesuit High School.

23-25 | The Noise Assessment did not conduct a comprehensive scope. Baseline noise studies need to be undertaken along the American River Parkway as the noise from activities taking place at Jesuit can be heard on the American River Parkway.

The existing baseline study does not appear to consider the portable diesel lights used for the Junior Marauders and weeknight practices and must be included in the analysis.

23-26 | Page 14 of the Bollard Assessment conflicts with the number of games provided by Jesuit.

- The Assessment also does not analyze evening and nighttime team practices, which must be included.

23-27 | The Noise Assessment justification states that the project will not alter/or affect the PA system. However, the 2023 Bollard Assessment states that ..." **because this analysis concludes that evening activities and sporting events held under the lights at Jesuit could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods, consideration of noise mitigation for the project is warranted.**" Therefore, the conclusion that the lights will not increase any impacts associated with the school's prior use authorizations, such as the PA system or authorized capacity, is irrelevant since the 2023 Bollard Assessment concludes that substantial increases in ambient noise will occur. Further additional noise will be created by amplifying games that are not currently amplified.

## TRAFFIC

[Kimley Horn Jesuit High School Stadium Lighting – Local Transportation Analysis \(LTA\)  
https://acrobat.adobe.com/id/urn:aaid:sc:US:7455f7d9-d51b-491a-83ec-5b61ab568c0a](https://acrobat.adobe.com/id/urn:aaid:sc:US:7455f7d9-d51b-491a-83ec-5b61ab568c0a)

23-28 | Tyler Mickelson, EIT, et al., report dated March 10, 2023, poorly depicts what happens on the streets of Carmichael, Football, Soccer, Water Polo, and "Jr. Marauder's" Football events

23-28 Y  
Cont. | conducted at JHS. The authors relied upon an old, stale report completed in 2015 and "assumed" this represented current conditions eight years later.

23-29 | 

- The Traffic study is deficient because it used dated assumptions to calculate its findings.

Since 2015, both Rio and Jesuit HS have increased enrollment; single student driver/car have increased for both schools; complaints against students parking on residential street has mushroomed (Ref. R Desmond meeting with Rio and Wilhaggin-Del Dayo Association); incidence of juvenile reckless driving have increased; Jesuit HS moved drop-off and pick up site from Jacob Lane to American River Drive at Tennyson Way intersection; Jesuit JR. Marauders (10-14 year olds) increased their enrollment and now include cheerleaders who claim Jesuit's Tennyson/American River Drive parking lot as their home turf.

23-30 | The March 10, 2023, report states, "As this analysis was completed after football season had ended, the number of attendees at football games was not counted, "and "this analysis used attendance numbers provided by Jesuit High School" and "to be conservative... we assumed an increase from 1,200 attendees for Saturday games to 1,500 for Friday night games." (Page 2/8) Since when do public decision-makers rely upon the Applicant's data without validating the information's accuracy? News flash! Attendance at the Friday, August 25, 2023, game was 2,000 plus... and the out-of-town visitor's team only purchased 200 tickets. When local schools pack up their cars and buses for a cross-town rivalry night game at JHS, it will be standing room only. All studies presented to the Sac County Planning Board should be based on maximum occupancy, 3,500 in attendance.

23-31 | 

- The Traffic study did not include a spectrum of scenarios to estimate the impacts of possible events.

23-32 | 

- The stadium occupancy is 3,500, yet no analysis was provided with attendance of this size.

23-33 | 

- The Traffic Study did not cover the impact of all stadium events.

23-34 | The Traffic study used data collected for a high school stadium lighting project in Carmel, CA. The Carmel High School data indicated an average occupancy of 3.24 persons per vehicle. The data For Carmel High School vehicle occupancy was real-time, observed data.

- The Traffic Study for the Applicant's project is deficient and incorrectly uses assumptions for a High School in Carmel, California, and did not collect real-time, observed data at Jesuit High School during a football game. Therefore, a 3.24 vehicle occupancy can not be attributed to the Applicant's projects based on an assumption.

23-35 | The traffic analysis report and event lighting schedule provided by JHS inaccurately omitted all Jr Marauder football and cheer squad weekly, night practice, and weekend game activity conducted at the stadium. IF Jesuit moves their games to Friday, the Jr. Marauders football and cheer club will use the field and P/A speakers from 9 a.m. until 6 p.m. on Saturday and/or Sunday without JHS supervision.

- 23-36
- The Traffic Study was deficient as the data is potentially inaccurate due to being from 2015.

The data sets are from 2015, roughly eight years old, and potentially not representative of JHS usage.

- 23-37
- If attendance numbers of more recent events are not known, then a focus should be made on obtaining those numbers so a more accurate impact assessment can be published.

- The Traffic Study is deficient because it doesn't include any cumulative traffic impact discussion when Rio Americano High School has an event or activities on the same day as Jesuit's practices or games.

- 23-38
- The number of passengers per car (AVO) calculations are off if you consider the capacity attendance of these games.

- 23-39
- The traffic report gives an overview of the traffic/use of roads on Fair Oaks Blvd., the cross street at the Chapel and Arden Hills; and a brief mention of Jacob and American River Drive on the residential streets that surround Jesuit High School.

- However, the report does not indicate that any of the residents were interviewed by the engineers who wrote these reports to determine if the residents had any concerns about the increase in street usage, i.e., overflow parking during evening games, the impact of before and after games with increased attendees, and no mention of adding crosswalks and increased street lightening if this project is approved.

- 23-40
- The Traffic Study does not consider that the roads surrounding Jesuit are degrading County roads.

The more roadway used from Jesuit traffic, the faster they will continue to degrade. We are dismayed that the County does not seem to have regard for our neighborhood .... Yet look at the property taxes that the County receives from Del Dayo, Wilhaggin, and Sierra Oaks.... homes sold today are roughly a million dollars....that is about \$10K in property taxes a year per sale. Our roads are horrible in our area, with potholes, poor quality repairs, and only 1/2 of a street was repaved when remedial works were done this past Spring.

- 23-41
- Additionally, the conclusion states that the project will reduce traffic, circulation, and parking issues for the surrounding community. This conclusion is incorrect also. During warm days, practices will begin later in the evening, yet school gets out at 3:00 (more or less) unless students are required to stay on campus; traffic and daily trips will increase when students leave the campus only to return later in the evening for practice.

- The Traffic Study does not accurately reflect student trips between school, after school, and to games as additional trips generated by nighttime games. Also, shifting daytime trips to peak hours impacts commuters in the neighborhood.

23-42 | In the traffic studies, "peak hours" are mentioned.

- The traffic report does not consider the evening commuter traffic that would coincide with the Friday evening games.

**Kimley Horn Traffic Study LTA**

23-43 | 1) There is no mention of the time of day of impacted traffic. It's hard to fathom not considering this. Saturday afternoon, we can and have dealt with it for years, but Friday and many other nights = bad!

23-44 | 2) No Traffic and Engineering study

23-45 | 3) Page 2. Attendance based on current Saturday day games is unrealistic – "number of attendees was assumed to increase from an average of 1,200 attendees for Saturday games to 1,500 attendees for Friday night games."

23-46 | 4) Page 3. Valley High, St. Vincent, and Carmel are not in residential neighborhoods and are not known as "football schools." – look at Google Earth to compare; using these two schools without stating the obvious is insulting. Carmel HS Pic: <https://3.files.edl.io/c8e7/21/01/15/202418-efad18ec-ba8d-45ca-afe3-7ad96597996d.jpg> Note surrounding property, not encroaching on private residence.

23-47 | 5) Page 3. The Traffic Study did not count student athlete vehicles that will drive home and back in for practices and games.

23-48 | 6) Page 8. "An average event vehicle occupancy of 3.0 or higher is needed not to exceed the parking supply on campus assuming 1,500 attendees. While the County has been provided feedback from the public that vehicles park offsite during football games, this is likely due to inefficiencies in managing the parking on-site rather than a deficient number of parking stalls." So, if riders per car (an estimate only) are off by .24, there is not enough parking? Also, inefficiencies in managing parking on-site have nothing to do with cars parked on surface streets; it is the proximity to the field that encourages visitors to park on nearby streets.

23-49 | 7) Page 19. The Planned Event Lighting Calendar used is not even close to the planned use of lights-this wrecks of bait and switch; JHS has updated this numerous times. Why hasn't K. Horn been informed??

- The Traffic Study did not use the same figures provided to the public in the Applicant's proposal.

Jesuit's claim that no more than 1,500 attendees would attend a night game seems disingenuous. They built the stadium for 3,000 attendees; why would they build it for double the maximum? The traffic study seems to take Jesuit's word for the number of attendees without any question or data to support it. Did they ask Jesuit for the information Jesuit accumulated in deciding to build a 3000-seat stadium? What about the information provided to the donors who paid for the new stadium? It seems those materials would have made representations concerning why the Applicant needed such a large stadium; I doubt it says only 1,500 people will attend otherwise. How would they have justified building such a large stadium or getting people to pay for it?

23-51 | 

- Therefore, more Study needs to be done to determine a true basis for the number of attendees. The two games being used to "test" a night game are also unrealistic vis-a-vis the numbers since they are against out-of-town and out-of-state teams.

23-52 | The comments in the traffic study that Jesuit has enough parking but doesn't manage it correctly were very concerning. It seems to dismiss notions that the Applicant must have more parking before it can have night games without a real analysis. It ignores that people are still parking in the neighborhood and does not propose how we can be assured that Jesuit will appropriately manage its parking and its patrons will park on campus. At night event this evening (September 1), Jesuit has many cars parking on the grass. Is Jesuit willing to allow parking on its grass areas for night games, particularly during a rainy season? This is highly doubtful, but Jesuit will argue it kept cars off the street, at least for the "test" game evenings.

23-53 | The Kimley Horn analyses were based on attendance estimates (1,200 persons) provided by JHS. I feel these studies should have relied upon actual attendance figures verified by an independent third party.

23-54 | The Kimley Horn studies use 1,500 persons to measure the expected traffic and parking impacts of "the project." However, a mere 10% increase (to 1,650) would overwhelm the 36 surplus parking spots projected in the JHS parking lot and further exacerbate the expected "storage" shortage indicated in the queuing analysis.

23-55 | The local transportation analysis calls out JHS as inefficient in its on-campus parking management, impacting surrounding residential streets.

- The analysis, however, is lacking in suggesting possible remedies for such inefficiencies.

23-56 | The map provided in the Jesuit proposal shows traffic and parking problems.

- However, the proposal does not give realistic solutions or adequately address the lack of on-site parking or how to control future high traffic volume.

23-57 | Marauder Stadium seats 3,000, 2,000 home seats plus 1,000 guest seats for those attending the "regular/plus low to high profile/high-intensity events." The Jesuit proposals have various parking availability numbers from 450-550 listed as Jesuit variable parking slots available, some only with payment, and states additional parking will be available blocks away in the Rio Americano High School's parking lot.

- 1) Will Jesuit provide security for the parking lot at Rio Americano High School?
- 2) Will Jesuit provide a shuttle for the long walk, or will attendees need to walk, even late at night, between Jesuit High School and Rio Americano High School?
- 3) Will traffic jams likely occur at entry points along American River Drive or Fair Oaks Blvd. and become a new, common occurrence for neighborhood residents on event days and nights?

- 23-58 | • NO EMERGENCY EVACUATION plans are stated in any Jesuit proposal for 500, 1500, or the 'sold out" possible 3000 people attempting to suddenly pour out to American River Drive or Fair Oaks Boulevard.
- 23-59 | • There is no mention of the Applicant preparing a Special Events Transportation Systems Management Plan. Enforcement of the TSM program and events will be assured, including coordination of the school to troubleshoot issues and handle complaints promptly.

### Kimley Horn Vehicle Miles Traveled (VMT)

- 23-60 | 1) The analysis does not explore the likelihood that more people per vehicle will likely have a Saturday afternoon game rather than a Friday night. Family members would ride together, whereas single families would be more likely to take separate vehicles on a Friday night (parents coming from work, etc.)
- 23-61 | 2) Page 4. "Alternative use of the stadium on Saturdays would likely not occur." There is no way to know this, nor any way JHS can commit to not using the facility on Saturdays and Sundays. There exists a significant chance of increased vehicle trips to JHS on Saturdays that does not exist now.
- 23-62 | 3) Page 4 of the Kimley Horn report states, "They would rent out the football field on Saturdays with the absence of the 4-6 home games that occur today."

**Does that mean renting out the football field to other football teams in the Sacramento area to play on Saturdays?**

**Would this mean even more football games played during the day on Saturdays OR also more football games played on Saturday evenings?**

**Would renting out the football field on Saturdays involve renting to another type of sport being played? Or, renting out the football field for practice time for other sports?**

If other sports or teams play on the football field during the day on Saturdays, what happened to the concern for players, staff, and attendees being exposed to the hot outdoor temperatures of climate change? Is this concern only for Jesuit teams, Jesuit staff, and Jesuit attendees? This contradicts Jesuit's need to change to Friday night football games.

- Attachment A is entirely inadequate and falsely represents the intended, planned, and anticipated use of the stadium during evenings with lights on.

## LIGHTING

[M. Neils Engineering Inc. – Jesuit High School Stadium Lighting Report](https://acrobat.adobe.com/id/urn:aaid:sc:US:1350a30f-b018-4418-934b-fbbf089668cc)  
<https://acrobat.adobe.com/id/urn:aaid:sc:US:1350a30f-b018-4418-934b-fbbf089668cc>

- 23-63 | 1) **Page 3.** The words curfew and curfews appear, but nothing tells us what they are.

23-64

- The lighting study does not include evidence that they considered using other stadiums with existing lights.

23-65

- The lighting study does not identify recommended curfew criteria.

23-66

- The Lighting study is deficient because the Applicant provided the report, and the County did not have a neutral, third-party consultant expert complete the work.

23-67

The Light study does not consider how nighttime lights affect neighbors and the neighborhood. Numbers and collected data are only a part of the whole picture.

1) **Page 2** states in part..." the stadium lights will be utilized on select evenings to accommodate athletic practices and competitions, primarily during the winter when the sun sets early or during home football games. "Yet on page 4, it states in part that..." the lights will serve to better protect the health and safety of student-athletes..." during Sacramento's hottest months, June through September. There will be noise from coaches yelling, whistles, and staff during practices. Changing practice times will generate noise outside of current general school hours. The Applicant's initial and ongoing communications with the neighborhood and residents stated the purpose of the permanent lighting request was to save the children from playing during very hot days. Now, the DEIR states the purpose is so the Applicant can play games and conduct practices during the winter when it's dark, further expanding activities, noise, and traffic impacts.

23-68

2) **Page 3**, all stadium lights will cease approximately one hour after the end of the competition to allow safe egress. Why is this needed since Jesuit has applied for path lights for safety purposes? Once a competition has ended, the stadium lights should be immediately dimmed and/or turned off completely within 15 minutes or sooner.

23-69

3) **Page 3** how was "near capacity" crowds determined?

23-70

4) How will operating lights 120 + nights/year affect all the migratory birds and waterfowl that call this area their home? Geese regularly used to rest on the Jesuit baseball fields, but in 2022, I noticed them fleeing their normal patch of grass on the lower fields. So far this year, the geese have not been observed. Were electronic or sonic devices installed to harass or harm the waterfowl? Who chased these beautiful birds away?

Light pollution, climate change, pesticide use, and habitat loss are driving the decline of some 40 percent of insect species, with the global population of insects shrinking by an estimated 2 percent per year in what some call an "insect apocalypse." That threatens the pollination of crops and plants and, ultimately, the entire food web. Light pollution is also contributing to the decline in bird population. The number of birds in the United States has dropped by 29 percent since 1970, which means nearly 3 billion fewer birds in our skies, according to a comprehensive study by the Cornell Lab of Ornithology and others.

Artificial light has altered migration, mating, foraging, pollination, and predation rhythms that developed over eons. Light pollution isn't as severe an ecological threat as climate change or habitat loss, but it's accelerating the decline of many animal populations.

23-70  
Cont.

Insects, drawn to light, are fried or become easy targets for predators. Bright lights lure nocturnally migrating birds and sea birds into the danger of urban areas, and millions of birds die in collisions with floodlit buildings and communications towers. Sea turtle hatchlings are likewise drawn to artificial lights – and into the jaws of predators.

Lights at night also act as barriers to nocturnal animals, ranging from bats to mountain lions, fragmenting their habitats and marooning them on ecological islands. Predatory creatures – certain snakes, salamanders, small mammals, insects – that rely on the darkness of a new moon to find food no longer have that protection.

"The dark places are a refuge," says Travis Longcore, a professor at UCLA's Institute of the Environment and Sustainability. But now, "you have light pollution and skyglow that is as bright as the full moon," and that means certain animals "don't come out to forage when they should because it's a danger signal if it's too bright."

Animals find their circadian and seasonal rhythms disrupted by artificial light. Urban birds call earlier in the morning, altering the mating process. Plants produce flowers and fruit at the wrong times. And humans lose sleep because of artificial light (whether from streetlights or our digital devices), potentially contributing to increased obesity and cancer.

"There's days of research that one could go through on how physiology is affected," Longcore says, "but it all makes sense when you think that this planet has had day/night and lunar cycles for the whole period of the evolution of life." Until now.

The biggest share of light pollution comes from commercial sources – gas stations, strip malls and the like – followed by outdoor sports facilities. After that comes residential lights, streetlights, and industrial lights. Municipalities can regulate much of that light pollution, and some already do dimming streetlights during certain hours, requiring dark-sky-friendly exterior lights in new construction and renovations, and simply turning off lights that serve no public safety purpose.

**Source:** Will somebody please turn down the lights? Dana Milbank, The Washington Post, May 5, 2023 [https://eedition.sacbee.com/popovers/dynamic\\_article\\_popover.aspx?artguid=b3b0fa0a-05aa-46bf-85f5-d3594b5f8f18&appcode=SACBEE&eguid=a1374dfa-81b4-47b2-b080-9fbabe5711c5&pnum=73](https://eedition.sacbee.com/popovers/dynamic_article_popover.aspx?artguid=b3b0fa0a-05aa-46bf-85f5-d3594b5f8f18&appcode=SACBEE&eguid=a1374dfa-81b4-47b2-b080-9fbabe5711c5&pnum=73)



## GENERAL COMMENTS

23-71 | The JHS stadium light request is a "want," not a necessity. JHS has an illustrious list of alum scholars and athletes who competed for over 50 years and succeeded without stadium lights. Contrary to the school's case for lights, most athletes excel academically during the sports season because their schedules require them to remain focused and avoid distractions. Jesuit Administrators, not global warming, created the "hot" and "unsafe" playing fields in 2015 when they switched from a cool, natural grass field to a plastic/artificial field with a Big Marauder logo at midfield. When that surface became dangerous to play on in 2022, they installed another plastic grass surface that retains heat instead of returning to natural grass and a cooler playing surface. They argue that the surface is "too hot," so we want lights to play in the cooler evenings.

23-72 |

- Is Jesuit currently in compliance with all mitigation/permit measures and/or requirements?

23-73 |

- Why does Jesuit High School need permanent stadium lighting now when they haven't needed it for the past 60 years?

23-74 | The original county planners got it right, and they excluded tall structures and lights on the athletic field parcel so there would be open air, space, and views of nature to act as a buffer between the high school activities and every day and evening activities of the 400 families trying to raise children at a place, they call home. Stadium lights aglow for five nights/week, and all the noise nuisances will destroy the quiet and safe sanctuary families need to relax, restore, and rest for the next days' work.

23-75 | The Applicant purchased the property with the zoning restrictions and must honor their decision. For 60 years, families purchased homes knowing these zoning limits. A change in zoning limits by the County would be a tax on every homeowner in the neighborhood. While JHS does not rent the use of their athletic venues, they have a long history of donating the facilities. Private girls' high schools, public high schools, parochial schools, colleges, and professional teams in need of a practice site for field sports, including baseball, will ask for a donation. High schools needing a playoff sight will petition the County for a temporary use permit to use Jesuit Stadium. Then, the noise and interior residential parking problems follow because JHS does not supervise non-JHS or low attendance events in their game day protocol. Allowing this Jesuit requested variance will not "Implement the objectives and policies of the county plan to" "Enhance, protect and maintain the value of a property," "Enhance, maintain, and preserve community quality of life," or "Promote compatibility between new and existing development."

23-76 | **What are the feasible alternatives? Why are the current alternatives not feasible to continue? Where is the Initial Study?** What potential impacts were identified in the Initial Study? Initial Study is not required if it is known an EIR will be prepared.

23-77 | **Where is the arborist report?**

23-78 | **Where is the Safety Report?** They haven't considered the neighborhood's safety, which changes when games are at night vs. during the day!

23-79 | **Where is the wildlife report?** From a biological standpoint, have there been any studies on the effect of night lighting on nocturnal wildlife, such as bats? With additional traffic on FO Blvd and AR Drive, I would suspect more wildlife will be mowed down by vehicles.

23-80 | **Where is the Parking Study?**

23-81 | **What other Jesuit use permits will be consolidated into the proposed stadium lighting use permit?** The Applicant's lighting proposal expands its ability to conduct evening and nighttime activities in addition to daytime and afternoon activities. The Applicant's proposal does not benefit the surrounding tax-paying residents and does not benefit the neighborhood. The neighborhood should not be responsible for subsidizing or accommodating the Applicant's expansion plan or opportunities for families and students from outside the community. The granting of the application is inconsistent with the County's Comprehensive Plan and the purposes of the Zoning Ordinance.

23-82 | The proposed project (used as a sports stadium) allows for over-height limit structures. Neighborhood changes include degrading the site's visual character and are incompatible with the surrounding residential neighborhood. The project has an incoherent design that:

- a. Creates a sense of disorder and undesirable environment for occupants, visitors, and the general community,
- b. does not preserve, respect, and integrate existing natural features that contribute positively to the site and the neighborhood character, including historic resources of the area when relevant,
- c. is inconsistent with the context-based design criteria of the applicable RD-4 zone district,
- d. creates disharmonious transitions in scale, mass, and character to adjacent land uses and land use designations,
- e. degrades, negatively impacts, and encroaches and infringes on living conditions in adjacent residential areas.

## AIR QUALITY

23-83 | Air Quality impacts essentially have been moved from Saturday afternoon to Friday night. That is a baseline, but doesn't Jesuit plan on hosting tournaments and renting out their facilities at other times? If so, the EIR must address the additional impact of extra traffic and the pollution created.

23-84 | 

- The Air Quality report did not address vehicle idling during practices when parents or caregivers wait for students. The idling of vehicles and visiting school buses needs to be addressed. It is inappropriate for family members and school buses to idle their vehicles for long periods, polluting the area and impacting nearby residents.

## Jesuit High School's Event Management Protocols

- 23-85 | **Insufficient Jesuit Protocol for Night Event**  
This section cites items deemed insufficient in the [Jesuit's Protocol for Night Events](https://acrobat.adobe.com/id/urn:aaid:sc:US:476221e2-286b-4607-87fb-23027d7d5d14) (<https://acrobat.adobe.com/id/urn:aaid:sc:US:476221e2-286b-4607-87fb-23027d7d5d14>). In some cases, the inadequate aspects are the rationale for the proposed conditions of approval.
- 23-86 | 1) Page 3: The location of the crossing guard at American River Drive is unclear and insufficient.
- "Serve as a crossing guard at American River Drive from the south side of the street to campus." More context and details need to be provided.
- 23-87 | 2) Monitoring trash is not sufficient. Monitoring for 'loitering' is not sufficient.
- "Monitor the perimeter for loitering and trash."
- 23-88 | 3) The "Visiting School Information Sheet" cited on page 1 should be included to know what is and is not communicated and how the visiting team's school will communicate to their students and parents.
- 23-89 | 4) The scope of the protocol is not clear, and the application of the protocol is not consistent with other events. The original intention of the lights was for Jesuit High School events only. The Jesuit High School Stadium Lighting DEIR (Jesuit High School Stadium LightIng DEIR, 2023) discusses use is not specific to Jesuit High School. If there is to be a protocol for night events, it seems reasonable to have a protocol for all events or specific conditions when the protocol is to be applied.
- 23-90 | Is The Event Management Protocol a living document? Will neighbors have an influence on changes/improvements?
- 23-91 | 1) Page 4. "Sound limits will be set per county guidelines." – What are the guidelines??
- 23-92 | 2) Page 6. What is the good neighbor's phone line number? Will it be available for all events?? What is the alternative phone number to call if there is no response from a Jesuit representative?
- 23-93 | 3) Page 7. Games going beyond 10 p.m. PA will be turned down – but are not defined to what level.
- 23-94 | 4) Page 8. Who specifically replies to "neighbors or community concerns"?
- 23-95 | "Jesuit's protocol for night events" seems to cover the parking and security issues, although I don't know how they can legally keep people from parking on public streets.

23-96 | **Game Day General:** states that the CCT will be on-site 90 minutes before an event and remain 90 minutes after or until the venue is clear. What is considered the "venue"? It needs to ensure that the streets are cleared. Under "Identify and report vehicles parking in an illegal or unsafe location, who will this information be reported to?"

23-97 | **Behavior:** It is stated that no tailgating is permitted in parking lots, overflow parking lots, or on adjacent public streets, but there was tailgating at the August 25, 2023, football game.

23-98 | **Tech, Sound, and Lighting:** When and under what authorization(s) was the WIFI installed?

23-99 | **Parking:** States in part that to incentivize carpooling, a designated ride-share area will be established at the front of the Chapel. This designated ride-share area should be closer to the venue to encourage ridesharing. No purchasing of parking spaces should be allowed. Jesuit will implement a shared parking agreement with Rio Americano High School during maximum capacity events.

- However, that would impact other parts of the neighborhood and must be analyzed in the EIR.

23-100 | **Food Service and Vendors:** Food trucks were operating on the August 25, 2023, football game.

- What permits and/or licenses were obtained in advance to operate the food trucks?

23-101 | **Question:** If it is too hot to practice sports outside in the afternoon, will they suspend all sports practice, excluding swimming? Or will some sports decide 90 degrees is not too hot and others delay until evening? I am concerned that practice may continue for afternoons and evenings on the same day.

23-102 | **Question:** The data shows 41 events with over 500 in attendance. With only five home games in football, which sports account for the other 35 events?

23-103 | **Question:** I thought lacrosse was a "club sport," not a varsity sport throughout Sacramento.

23-104 | **Question:** Soccer season is November- February. Same with Track and lacrosse. Heat is not an issue. Why does Jesuit need lights on until 9 p.m.? Remember, the new headmaster cited "heat" in his TV interview for days with late practices.

23-105 | **Comment:** The online notice is only for high (1,500+) events. Very few events draw 1,500 at Jesuit. But crowds of 800 spectators can quickly impact the neighborhood. So why limit the online notice to only a handful of annual events? The notice is based upon anticipated attendance- not enough notice to "good neighbors." Especially since these concern lights and nighttime events. Notice that it is not as necessary for daytime events on the weekends.

23-106 | **Comment:** Signage must be at American River Drive and Tennyson because of the Jesuit parking lot on Tennyson.

TECHNICAL REPORT FINDINGS – JESUIT HIGH SCHOOL STADIUM LIGHTING PROPOSAL

- 23-107 | **Comment:** Volunteer crossing guards for events of 1,500+?! They should be off-duty police, at the least, not parent volunteers steering traffic.
- 23-108 | **Comment:** Who do we report "tailgating" to in real time? And if we can hear the loudspeakers clearly from 500 yards away, is that too loud?
- 23-109 | **Comment:** Tennyson should be closed on Football home games to avoid overflow south into Del Dayo Estates. Posting "no parking" is too often ignored.
- 23-110 | **Comment:** Using Rio's parking lot for big events (Football playoff games) is a great idea.
- 23-111 | **Comment:** Post the "good neighbor" phone number. We all need to have it.
- 23-112 | **Comment:** No vendor trucks, please, unless they are inside the Jesuit fences. Creates crowds and waste if they are parked on American River Drive.
- 23-113 | **Comment:** Lights can remain on for over an hour after the event because they have a permit—no use of the speakers to request attendees to exit and turn the lights off ASAP.
- 23-114 | **Comment:** We need a STOP SIGN on American River Drive and Tennyson. Rio has one. Jesuit has a light on Fair Oaks and a stop sign on Jacob. A driver was ticketed on American River Drive going over 60mph a few weeks ago. We don't even have speed bumps to slow traffic in front of the Jesuit lot on Tennyson. Jesuit should advocate for either speed bumps before and after Tennyson or a STOP SIGN. It will create a safer environment for all in a lasting, meaningful way.
- 23-115 | The "Visiting School Information Sheet" cited on page 1 does not identify what is and is not communicated.
- 23-116 | Jesuit should pay for the off-duty sheriff patrol that that we home owners pay for through the Del Dayo Association for all events and practice to patrol the outside areas of the neighborhood (river access roads, side streets with in 1/4 mile of the school, Del Dayo elementary school, Ashton Park)
- 23-117 | Jesuit needs to have a person assigned at each stop sign 90 minutes before and after each game (Jacob and Oak Vista, Jacob Lane, and American River Drive).
- 23-118 | Jesuit needs to sign a legal document that the protocol will continue if Jesuit has a campus in the neighborhood.
- 23-119 | Jesuit needs to sign a legal document that if any incident take place (car crash, hit and run, pedestrian hit by automobile, violence caused by guns or knives, drunk drivers or high on drugs). Jesuit cannot redeem themselves from any law suit.

23-119  
Cont.

- Jesuit High School shall publish the "Visiting School Information Sheet" online.
- The "Visiting School Information Sheet" shall cite crosswalk locations.
- The "Visiting School Information Sheet" shall cite that parking is primarily in Lot A
- The "Visiting School Information Sheet" shall cite that parking is discouraged on American River Drive.
- The "Visiting School Information Sheet" shall cite "South Entrance" (S) on page 10 has no pedestrian access and is for vehicles only.
- The "Visiting School Information Sheet" shall use an alternate icon for "South Entrance" (S) on page 10 as this is NOT the primary or recommended access for vehicles or pedestrians.

**From:** [Elizabeth Hughes](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#); [PER-CEQA](#)  
**Cc:** [Newton, Julie](#); [Brandt, Jessica](#); [Clerk of the Board Public Email](#)  
**Subject:** Illegal Land-use Zoning Changes - # PLNP2021-00262 - Jesuit High School Stadium Lighting Proposal  
**Date:** Sunday, October 15, 2023 3:49:46 PM

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Hello Kimber and Carol,

24-1 | Imagine a project submitted to the County that encompasses the creation of a cutting-edge sports track and field, a grandiose scoreboard, stadium-style bleachers, a state-of-the-art press box, a booming PA system, permanent lighting, and extended operating hours from 7:00 a.m. to 10:00 p.m. A project with the described components would be a "sports complex" land use, not a "school" land use.

24-2 | Jesuit has approached this vision gradually, seeking separate approvals for each aspect of their plan over several years. Their aim, however, is clear: to build a comprehensive sports complex that defies the conventional zoning norms of an RD or a typical school use within an RD zone. Their expansion into the realm of athletics has far surpassed the boundaries of traditional "school use."

24-3 | In Sacramento County, a sporting complex typically resides in an M-1 zone, and the kind that Jesuit aspires to create doesn't belong in an RD-4 residential neighborhood and exceeds the needs of a school. If the County were to endorse such a land use change in this strategic, multi-year manner, it could become the crux of our appeal and legal challenge when the Planning Commission gives the green light to the project.

24-4 | This project's only beneficiary is Jesuit High School (a private business) and its ambitious expansion plans, with little thought given to the neighborhood. The cumulative effects of this venture stand to benefit Jesuit by boosting their sports program and student enrollment, all at the expense of the hardworking, tax-paying residents and their families. When asked "what does Jesuit believe its project does to benefit the community," they responded that by allowing the school to play Friday night games, they would not play on Saturdays, which is the benefit they are offering to the residents. I surveyed 200 residents to ask if they preferred Jesuit to play games on Friday nights or during the day on Saturdays. Ninety-eight percent of respondents chose games to play on Saturday rather than intrude on our Friday nights. The Jesuit-defined "benefit" offered to the community is not a "benefit" desired by the residents. Remember that Jesuit allows many other non-profit organizations to use their fields on Saturdays and Sundays, so having Jesuit not playing games on Saturdays does not mean we will have one single day of quiet in the neighborhood.

24-5 | There has never been one public community meeting to involve the residents in this planning process. Supervisor Desmond offered to hold a meeting but now says it won't occur until after the EIR is approved.

24-6 | The big question remains: What tangible benefits does Jesuit's development proposal offer to offset

24-6  
Cont.

the significant impact it will have on our community? Regrettably, there seems to be no silver lining for the neighborhood—only challenges to confront.

Regards,

Elizabeth Hughes  
916-214-4307



**From:** [Elizabeth Hughes](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#); [PER-CEQA](#)  
**Cc:** [Newton, Julie](#); [Brandt, Jessica](#); [Clerk of the Board Public Email](#)  
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Elizabeth Hughes  
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**TECHNICAL REPORT FINDINGS**  
**JESUIT HIGH SCHOOL**  
**STADIUM LIGHTING PROPOSAL**

*Updated Revision 2*  
October 18, 2023

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**Attachment** - Neighborhood Record of Jesuit’s Excess dBA Activities

## Overview

This report includes comments provided by community members and is an overview of the potential deficiencies in the reports made public by the County regarding Jesuit High School Stadium Lighting Proposal as cited on Sacramento County's website: [planning.saccounty.gov/Pages/Jesuit-High-School-Stadium-Lighting.aspx](http://planning.saccounty.gov/Pages/Jesuit-High-School-Stadium-Lighting.aspx)

## Background

26-1 **What is a "project" under CEQA?** Project: activity undertaken by a public agency or a private activity that may cause a change in the environment and must receive **discretionary approval** from a government agency. This means the Applicant is not guaranteed to obtain approvals for their proposed project, and the County officials have discretion and a requirement to consider all cumulative impacts beyond the stated physical installation of 100' stadium lighting poles.

26-2 **Will the project have a significant impact on the environment?** The following is a list of expected reports for the project per the Draft EIR released on September 15, 2023.

When reports were not provided, the expected report was cited as "no report provided," which is a deficiency in the project.

When a report or set of reports was provided for a category, a specific section in this document cites deficiencies found.

## Deficiencies

This section cites the specific deficiencies per the reports.

### Project deficiencies due to lack of report

The following expected reports have not been made available or were not done.

1. Aesthetics – no report provided
2. Agriculture – no report provided
3. Biology – no report provided
4. Cultural – no report provided
5. Geology – no report provided
6. Hazards – no report provided
7. Hydrology – no report provided
8. Land Use – no report provided
9. Minerals – no report provided
10. Population/Housing – no report provided
11. Public Services/Utilities – no report provided
12. Recreation – no report provided
13. Urban decay – no report provided

26-3

**What is a "significant impact on the environment?"**

A significant impact on the environment includes substantial, or potentially substantial, adverse change(s) in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. A social or economic change by itself shall not be considered a significant effect on the environment (CCR §15382).

The results from the Applicant's proposed lighting project will decrease safety, increase neighborhood disruptions, affect the character of the surrounding community, create significant noise, traffic, and pedestrian impacts, and affect the surrounding wildlife environment.

Schools are conditionally permitted to use in areas designated as Single-Family Residential. The Applicant's proposed stadium lighting project is a land-use change that reflects a sporting complex. This change in land use is inconsistent with RD-R residential neighborhoods.

The following sections reflect deficiencies of the technical studies used in the County's Draft EIR for the Applicant's proposed project.

## Report Deficiencies

### NOISE

#### **Bollard Acoustical Consultants (March 6, 2023)**

This section cites difficulties related to [Bollard Acoustical Consultants – Jesuit High School Stadium Lights Project Noise Assessment](https://acrobat.adobe.com/id/urn:aaid:sc:US:d5378b3c-6bbe-4ae1-86ac-1ade1cf8c951) (<https://acrobat.adobe.com/id/urn:aaid:sc:US:d5378b3c-6bbe-4ae1-86ac-1ade1cf8c951>)

26-4

The Noise Assessment is insufficient and does not meet expectations of a Noise Impact Analysis – Environment Impact Reviews should include a Noise Impact Analysis. The Bollard Acoustical Noise Assessment, dated March 6, 2023, is an "assessment" and does not meet the expectations of an EIR, which should include a **Noise Impact Analysis**. An Environmental Noise Assessment is a comprehensive study to evaluate existing or potential noise sources in an area. It aims to assess the environment's current or projected noise levels and analyze their potential impacts on human health, well-being, and the surrounding community. On the other hand, Noise Impact Analysis focuses on evaluating and assessing the potential noise impacts of a specific development project. It is often conducted as part of an Environmental Impact Report or as a requirement for obtaining permits or approvals for a construction project. *An Environmental Noise Assessment assesses an area's existing or potential noise sources and their environmental and community impacts. A Noise Impact Analysis, on the other hand, examines explicitly the potential noise impacts of a development project and aims to propose mitigation measures to manage those impacts.*

26-5

- The Bollard Acoustical Noise Assessment did not conduct a normal daytime high school activity baseline.

26-5 Cont. The Bollard Acoustical Noise Assessment's specific purposes were to quantify pre-project (baseline) ambient noise conditions in the residential areas surrounding the JHS stadium, to evaluate the impacts of noise generated during evening hours at the stadium within those residential areas, and to evaluate measures to reduce the noise generation of those activities where appropriate and feasible. The Bollard Acoustical Noise Assessment did not conduct a normal daytime high school activity baseline. The baseline study inappropriately defined a "baseline" during high-level noise activities rather than non-activities. A baseline study should be required to analyze normal noises and then compare this to high-level noises.

- The Bollard Assessment did not study actual high-level football game night activities and noise.

26-6 Bollard's earlier Study dated January 14, 2016, Attachment C-1, states high school P/A sound level at maximum volume was 75-83 dBA in Piccadilly residential area, exceeding desired levels. Only after a manual downward adjustment by school representatives did the noise levels drop to 70 dBA at exterior locations of Piccadilly residents. The Bollard Assessment assumes "the [Jesuit] P/A system sound levels can be maintained at 70 dB Lmax or less within the nearest exterior residential back yard, the predicted sound level of 40 dB Lmax (for interior homes) would be within compliance."

- The Bollard early "assumptions" do not provide appropriate data for a noise compliance assessment as no description supports the assumption. Any assumptions made are arguably due to the last measured data provided. In addition, there is a lack of data on PA system volumes, usage, and noise. The 2016 Bollard assumptions are inappropriate for use in the 2023 Noise Assessment.

26-7 The Bollard Assessment states existing P/A speakers, attached 35-45 feet above ground, will be re-attached to the proposed 90-foot-high light towers, and no change of sound levels would result. Only one football event was relied upon for sound measurement: "sound levels at Site 2, Piccadilly Circle "was exceeded at this location during 3 of the hours monitored," and "maximum sound levels measured at Site 2 exceeded the County's 70 dBA Lmax daytime noise standards by an average of 4 dBA during the October 8 football game."

- The noise assessment is deficient because it omitted noise levels generated by food truck vendors, crowds (bullhorns, cowbells, airhorns, cheering, etc.), the band, and music during breaks and cheerleading activities.

26-8 On October 22, 2022, at a recent meeting between the school representatives and neighbors, attended by Supervisor Desmond, a neighbor asked if the school monitors or tests their compliance with mandated dBA noise levels, and the school representative answered, "No." The Applicant does not monitor its noise impacts.

26-9 Adjacent neighbors have tracked and recorded DBA levels during the last five years, indicating the school exceeded county guidelines. Attached is a copy of this neighborhood record of excess dBA emanating from Jesuit's fields.

26-9  
Cont.

- The Bollard Noise Assessment is inadequate because it did not study the Applicant's actual performance and ability to monitor or maintain noise levels within County code compliance levels. The Bollard recommendations do not include any feature to hold the Applicant or the County to monitoring or testing (or penalties) to maintain noise compliance.

26-10

Page 3. of the Bollard Noise Assessment indicates, "DNL represents a 24-hour average." An average data set **disguises** short-term variations in the noise environment, such as those generated during activities within the JHS stadium." Using a smoothed 24-hour "average" data set is inappropriate to represent specific noise-intense activities the Applicant generates.

- The Bollard Noise assessment incorrectly uses average data to smooth environmental sound variations. The Assessment should reflect actual noise and sound variations created by the Applicant.

26-11

Page 4. of the Bollard Assessment failed to reveal that the sample set is smaller than first reported because the high school chose to silence the PA system for the entire mid-morning JV game versus Clayton Valley HS, conducted between 10 am - 1:30 pm so that students taking the SAT test would not be disturbed.

26-12

Page 15. of the Bollard Noise Assessment's anticipated use chart is incorrect; the intended use far exceeds those noted.

- The sample set used by The Bollard Noise Assessment is too small.

26-13

Page 16. of the Bollard Noise Assessment indicates the October 1 and October 16 test games were smaller and likely quieter than league and playoff events. The Noise Assessment should reflect high-attendance and high-activity games and events, worse case scenarios.

- The Bollard Noise Assessment did not measure a sufficient variety of events and data points to assess the impact adequately.

26-14

The events and attendance can vary due to multiple reasons. To have a better understanding of noise and the type of attendance it represents, the following measures and scales should be considered with the noise-based measurements:

1. Number of Attendees – Measured the number of people at the event's start.
2. Number of vehicles – Measured the number of cars in JHS parking lot(s).
3. Number of vehicles – Measured the number of cars parked on relevant street parking.
4. Length of game – measured in minutes
5. Start time of game – recorded in date and time PDT
6. Temperature at start of game – measured in degrees Fahrenheit
7. Event – Measured by the sporting event taking place.
8. Division – measured by varsity, Junior varsity, or otherwise.



26-15 Page 27. "If noise generated by evening football games held at the JHS stadium **were not exempt** from the local Sacramento County Code noise standards, noise generated by certain events and activities held at the stadium (primarily football games) would exceed those standards at some residential areas surrounding the stadium."

26-16 Knowing lights and speakers were not part of the initial approval for the stadium made it easy to make many improvements. The speakers (and lights), however, were not part of what has been accepted by neighbors and why a "new" or "exception to existing facility" should not be granted. Based on the many years the facility has existed, JHS should not be exempt from county noise standards. The noise study does not explore the no-build option and using existing facilities with lights.

26-17 Bollard's Assessment claims the county noise ordinances do not "technically" apply to the high school (letter to Mr. Dave Higgins Jr. January 14, 2016, pg. 5.) and are exempt from county noise ordinances. This would seem logical if the legal parcels of the school athletic fields were zoned identically to the school buildings. But the athletic fields are a legally separate parcel zoned by the County as R-4, not zoned for secondary school buildings. This statement that R-4 zoned school property is exempt from noise ordinances must be litigated. If the Applicant needs the County to review and approve the lights, the same applies to noise ordinances involving R-4 zoning.

26-18 The proposed night activities push the sound above the 55 dBA levels, which creates a significant environmental impact. That being the case, mitigation must bring that down to a less-than-significant impact, which, as outlined in the DEIR, cannot be mitigated to a level of insignificance.

26-19 The noise impact of the PA system is a pain point for residents. Opinions have been shared that it can be too loud, and usage later in the evening is uncomfortable. There is no record of an active partnership with JHS (the Applicant) and the community on the level of the PA system. The noise assessment data states, "[evening events] could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods." If approved, the noise levels will increase. As cited in the Assessment, "people react to nighttime noise exposures as though they were twice as loud as daytime exposures." (Page 3)

26-20 Another pain point for residents is frustration on what to do when JSH events are too loud. Residents are unclear of (1) what oversight is done to ensure JSH events meet existing permits and expectations and (2) what action they can take to be heard and find a compromise to continue a healthy co-existence between the residents and JHS. As shown in the report, the noise of the PA is at 70 dbs.

26-21 Technically, R-4 zoning excludes buildings and outside structures greater than 25 feet in height, and while 150 households that surround the football and baseball field must comply with height and noise levels, shouldn't ALL R-4 zoned property owners comply? **Why does JHS have a professional-sized batting cage that exceeds 25 feet in height with LED lights on R-4 zoned property?**

26-22 | • The Noise Assessment does not consider how speakers affect neighbors and the neighborhood. Numbers and collected data are only a part of the whole picture. The Assessment Study does not represent the cumulative impacts and neighborhood effects, including football games and nearby Rio Americano High School activities.

26-23 | • The Noise Assessment did not consider the sound decibels of the crowds, airhorns, cowbells, or honking horns as spectators leave at 11:00 at night when some of us go to bed at 9 p.m. and our children at 8 p.m.

26-24 | The Noise Assessment indicates that noise generated by the project is expected to exceed county standards for RD-4 zoned properties. However, the proposed project is exempt from these standards as it is related to school sports, entertainment, etc. Such an exemption seriously impedes the process considering noise impacts on the surrounding neighborhood.

- **Does the Project's EIR look beyond this county exemption in assessing the proposed project's overall and cumulative environmental impacts?**

26-25 | • The Assessment does not include mitigation measures, monitoring, or reporting to ensure less than significant noise-related impacts generated by evening and nighttime games and events. Program monitoring and enforcement requirements should address PA issues, crowd noise, and band and cheer noise, which greatly concern neighbors near Jesuit High School.

26-26 | The Noise Assessment did not conduct a comprehensive scope. Baseline noise studies need to be undertaken along the American River Parkway as the noise from activities taking place at Jesuit can be heard on the American River Parkway.

The existing baseline study does not appear to consider the portable diesel lights used for the Junior Marauders and weeknight practices and must be included in the analysis.

26-27 | Page 14 of the Bollard Assessment conflicts with the number of games provided by Jesuit.

- The Assessment also does not analyze evening and nighttime team practices, which must be included.

The Noise Assessment justification states that the project will not alter/or affect the PA system. However, the 2023 Bollard Assessment states that ... "because this analysis concludes that evening activities and sporting events held under the lights at Jesuit could result in substantial increases in ambient noise levels in the adjacent residential neighborhoods, consideration of noise mitigation for the project is warranted." Therefore, the conclusion that the lights will not increase any impacts associated with the school's prior use authorizations, such as the PA system or authorized capacity, is irrelevant since the 2023 Bollard Assessment concludes that substantial increases in ambient noise will occur. Further additional noise will be created by amplifying games that are not currently amplified.

## TRAFFIC

[Kimley Horn Jesuit High School Stadium Lighting – Local Transportation Analysis \(LTA\)  
https://acrobat.adobe.com/id/urn:aaid:sc:US:7455f7d9-d51b-491a-83ec-5b61ab568c0a](https://acrobat.adobe.com/id/urn:aaid:sc:US:7455f7d9-d51b-491a-83ec-5b61ab568c0a)

26-28 | Tyler Mickelson, EIT, et al., report dated March 10, 2023, poorly depicts what happens on the streets of Carmichael, Football, Soccer, Water Polo, and "Jr. Marauder's" Football events conducted at JHS. The authors relied upon an old, stale report completed in 2015 and "assumed" this represented current conditions eight years later.

- The Traffic study is deficient because it used dated assumptions to calculate its findings.

26-29 | Since 2015, both Rio and Jesuit HS have increased enrollment; single student driver/car have increased for both schools; complaints against students parking on residential street has mushroomed (Ref. R Desmond meeting with Rio and Wilhaggin-Del Dayo Association); incidence of juvenile reckless driving have increased; Jesuit HS moved drop-off and pick up site from Jacob Lane to American River Drive at Tennyson Way intersection; Jesuit JR. Marauders (10-14 year olds) increased their enrollment and now include cheerleaders who claim Jesuit's Tennyson/American River Drive parking lot as their home turf.

26-30 | The March 10, 2023, report states, "As this analysis was completed after football season had ended, the number of attendees at football games was not counted," and "this analysis used attendance numbers provided by Jesuit High School" and "to be conservative... we assumed an increase from 1,200 attendees for Saturday games to 1,500 for Friday night games." (Page 2/8) Since when do public decision-makers rely upon the Applicant's data without validating the information's accuracy? News flash! Attendance at the Friday, August 25, 2023, game was 2,000 plus... and the out-of-town visitor's team only purchased 200 tickets. When local schools pack up their cars and buses for a cross-town rivalry night game at JHS, it will be standing room only. All studies presented to the Sac County Planning Board should be based on maximum occupancy (or the worst-case scenario), 3,500 in attendance.

- The Traffic study did not include a spectrum of scenarios to estimate the impacts of possible events.
- The stadium occupancy is 3,500, yet no analysis was provided with attendance of this size.
- The Traffic Study did not cover the impact of all stadium events.

26-31 | The Traffic study used data collected for a high school stadium lighting project in Carmel, CA. The Carmel High School data indicated an average occupancy of 3.24 people per vehicle. The data For Carmel High School vehicle occupancy was real-time, observed data.

- The Traffic Study for the Applicant's project is deficient and incorrectly uses assumptions for a High School in Carmel, California, and did not collect real-time, observed data at Jesuit High School during a football game. Therefore, a 3.24 vehicle occupancy cannot be attributed to the Applicant's projects based on an assumption.

26-32 | The traffic analysis report and event lighting schedule provided by JHS inaccurately omitted all Jr Marauder football and cheer squad weekly, night practice, and weekend game activity conducted at the stadium. IF Jesuit moves their games to Friday, the Jr. Marauders football and cheer club could use the field and P/A speakers from 9 a.m. until 6 p.m. on Saturday and/or Sunday without JHS supervision and without an analysis of the potential environmental impacts as required by CEQA.

26-33 | 

- The Traffic Study was deficient as the data is potentially inaccurate due to being from 2015.

The data sets are from 2015, roughly eight years old, and potentially not representative of JHS usage.

26-34 | If attendance numbers of more recent events are not known, then a focus should be made on obtaining those numbers so a more accurate impact assessment can be conducted and published.

26-35 | 

- The Traffic Study is deficient because it doesn't include any cumulative traffic impact discussion when Rio Americano High School has an event or activities on the same day as Jesuit's practices or games.

26-36 | 

- The number of passengers per car (AVO) calculations are off if you consider the capacity attendance of these games.

26-37 | The traffic report gives an overview of the traffic/use of roads on Fair Oaks Blvd., the cross street at the Chapel and Arden Hills; and a brief mention of Jacob and American River Drive on the residential streets that surround Jesuit High School.

- However, the report does not indicate that any of the residents were interviewed by the engineers who wrote these reports to determine if the residents had any concerns about the increase in street usage, i.e., overflow parking during evening games, the impact of before and after games with increased attendees, and no mention of adding crosswalks and increased street lightening if this project is approved.

26-38 | 

- The Traffic Study does not consider that the roads surrounding Jesuit are degrading County roads.

The more roadway used from Jesuit traffic, the faster they will continue to degrade. We are dismayed that the County does not seem to have regard for our neighborhood .... Yet look at the property taxes that the County receives from Del Dayo, Wilhaggin, and Sierra Oaks.... homes sold today are roughly a million dollars....that is about \$10K in property taxes a year per sale. Our roads are horrible in our area, with potholes, poor quality repairs, and only 1/2 of a street was repaved when remedial works were done this past Spring.

26-39 | Additionally, the conclusion states that the project will reduce traffic, circulation, and parking issues for the surrounding community. This conclusion is incorrect also. If lights are installed, practices will begin later in the afternoon/evening, yet school gets out at 3:00 (more or less)

- 26-39  
Cont. unless students are required to stay on campus; traffic and daily trips will increase when students leave the campus only to return later in the evening for practice.
- The Traffic Study does not accurately reflect student trips between school, after school, and to games as additional trips generated by nighttime games. Also, shifting daytime trips to peak hours impacts commuters in the neighborhood.
- 26-40 In the traffic studies, "peak hours" are mentioned.
- The traffic report does not consider the evening commuter traffic that would coincide with the Friday evening games. An example of impact include the recent October 2023 car show held at Jesuit.
- 26-41 **Kimley Horn Traffic Study LTA**
- 26-42 1) There is no mention of the time of day of impacted traffic. It's hard to fathom not considering this. Saturday afternoon, we can and have dealt with it for years, but Friday and many other nights = bad!
- 26-43 2) No Traffic and Engineering study
- 26-43 3) Page 2. Attendance based on current Saturday day games is unrealistic – "number of attendees was assumed to increase from an average of 1,200 attendees for Saturday games to 1,500 attendees for Friday night games."
- 26-44 4) Page 3. Valley High, St. Vincent, and Carmel are not in residential neighborhoods and are not known as "football schools." – look at Google Earth to compare; using these two schools without stating the obvious is insulting. Carmel HS Pic: <https://3.files.edl.io/c8e7/21/01/15/202418-efad18ec-ba8d-45ca-afe3-7ad96597996d.jpg> Note surrounding property, not encroaching on private residence.
- 26-45 5) Page 3. The Traffic Study did not count student athlete vehicles that will drive home and back in for practices and games.
- 26-46 6) Page 8. "An average event vehicle occupancy of 3.0 or higher is needed not to exceed the parking supply on campus assuming 1,500 attendees. While the County has been provided feedback from the public that vehicles park offsite during football games, this is likely due to inefficiencies in managing the parking on-site rather than a deficient number of parking stalls." So, if riders per car (an estimate only) are off by .24, there is not enough parking? Also, inefficiencies in managing parking on-site have nothing to do with cars parked on surface streets; it is the proximity to the field that encourages visitors to park on nearby streets.
- 26-47 7) Page 19. The Planned Event Lighting Calendar prepared by the Applicant and used by K. Horn does not reflect the proposed use of lights; JHS has updated this Calendar numerous times, and the County should reanalyze this. Who independently analyzed the data provided by the Applicant?
- 26-48
- The Traffic Study did not use the same figures provided to the public in the Applicant's proposal.

26-49 Jesuit's claim that no more than 1,500 attendees would attend a night game seems disingenuous. They built the stadium for 3,000 attendees; why would they build it for double the maximum? The traffic study seems to take Jesuit's word for the number of attendees without any question or data to support it. Did they ask Jesuit for the information Jesuit accumulated in deciding to build a 3000-seat stadium? What about the information provided to the donors who paid for the new stadium? It seems those materials would have made representations concerning why the Applicant needed such a large stadium; I doubt it says only 1,500 people will attend otherwise. How would they have justified building such a large stadium or getting people to pay for it?

- Therefore, more Study needs to be done to determine a true basis for the number of attendees. The two games being used to "test" a night game is also unrealistic vis-a-vis the numbers since they are against out-of-town and out-of-state teams.

26-50 The comments in the traffic study that Jesuit has enough parking but doesn't manage it correctly were very concerning. It seems to dismiss notions that the Applicant must have more parking before it can have night games without a real analysis. It ignores that people are still parking in the neighborhood and does not propose how we can be assured that Jesuit will appropriately manage its parking and its patrons will park on campus. At a night event on September 1, Jesuit had many cars parking on the grass. Is Jesuit willing to allow parking on its grass areas for night games/events, etc., particularly during a rainy season? This is highly doubtful, but Jesuit will argue it kept cars off the street, at least for the "test" game evenings.

26-51 The Kimley Horn analyses were based on attendance estimates (1,200 persons) provided by JHS. These studies should have relied upon actual attendance figures verified by an independent third party.

26-52 The Kimley Horn studies use 1,500 persons to measure the expected traffic and parking impacts of "the project." However, a mere 10% increase (to 1,650) would overwhelm the 36 surplus parking spots projected in the JHS parking lot and further exacerbate the expected "storage" shortage indicated in the queuing analysis.

26-53 The local transportation analysis calls out JHS as inefficient in its on-campus parking management, impacting surrounding residential streets.

- The analysis, however, is lacking in suggesting possible remedies for such inefficiencies.

26-54 The map provided in the Jesuit proposal shows traffic and parking problems.

- However, the proposal does not give realistic solutions or adequately address the lack of on-site parking or how to control future high traffic volume.

26-55 Marauder Stadium seats 3,000, 2,000 home seats plus 1,000 guest seats for those attending the "regular/plus low to high profile/high-intensity events." The Jesuit proposals have various parking availability numbers from 450-550 listed as Jesuit variable parking slots available, some only with

26-55 Y  
Cont. | payment, and states additional parking will be available blocks away in the Rio Americano High School's parking lot.

- 26-56 |
- 1) Will Jesuit provide security for the parking lot at Rio Americano High School?
  - 2) Will Jesuit provide a shuttle for the long walk, or will attendees need to walk, even late at night, between Jesuit High School and Rio Americano High School?
  - 3) Will traffic jams likely occur at entry points along American River Drive or Fair Oaks Blvd. and become a new, common occurrence for neighborhood residents on event days and nights?

26-57 | The Traffic Report (page 8) does not include health and safety studies, specifically the ability of Sacramento County Fire and Rescue and Emergency response services to navigate and pass through neighborhood street intersections and interior streets, to respond to residents when Extra Duty SUV vehicles are parked at the corner intersections and/or on opposite sides of the streets, which are only 26 feet wide.

26-58 | **Traffic, Parking** - Jesuit HS stated to CPAC members that it has parking agreements with Arden Hills CC and Rio Americano HS to handle overflow parking. The applicant should be required to produce written copies of these agreements for legal review and durability. Arden Hills has a new owner, so any previous "parking agreement "is null and void. Regardless, Sacramento County planners know Jesuit HS alone, no one else, must supply on-campus parking for all guests and the public, based on peak attendance, for all types and sizes of vehicles so that it does not endanger the safety of next-door neighbors.

26-59 | **Traffic, Parking, and adherence to county parking code** - Night Games conducted on August 25, 2023 (vs. Bishop Manogue of Reno) and September 1, 2023 (vs. St Ignatius of San Francisco) are not a proxy for future events, not even close. The August 25th game only attracted 200 visitors from Reno, and the St Ignatius contest on September 1, Labor Day weekend, only attracted 100 visitors. The game did go into overtime. The only traffic, parking, and crowd behavior problems were that of the home team. What happens when the powerhouse top-ranked teams and 1,000 fans from Folsom, Del Oro, and Rocklin invade the neighborhood with KCRA cameras rolling? Contrary to the Staff report, these two isolated, under-attended games do not represent the realities and chaos of attempting to squeeze a night event sports complex into a residential neighborhood. Combine any future large-scale game with a Friday Night game at Rio Americano High School, and the neighborhood will have gridlock.

26-60 |

- NO EMERGENCY EVACUATION plans are stated in any Jesuit proposal for 500, 1500, or the "sold out" possible 3000 people attempting to suddenly pour out to American River Drive or Fair Oaks Boulevard.

26-61 |

- There is no mention of the Applicant preparing a Special Events Transportation Systems Management Plan. Enforcement of the TSM program and events will be assured, including coordination of the school to troubleshoot issues and handle complaints promptly.

**Kimley Horn Vehicle Miles Traveled (VMT)**

26-62 ↓ | 1) The analysis does not explore the likelihood that more people per vehicle will likely attend a Saturday afternoon game rather than a Friday night. On a Saturday event, one could

- 26-62 Cont. assume that most family members would ride together, whereas for a Friday event, families would be more likely to take separate vehicles as parents may be coming from work, etc.
- 26-63 2) Page 4. "Alternative use of the stadium on Saturdays would likely not occur." There is no way to know this, nor any way JHS can commit to not using the facility on Saturdays and Sundays. There exists a significant chance of increased vehicle trips to JHS on Saturdays that does not exist now.
- 26-64 3) Page 4 of the Kimley Horn report states, "They would rent out the football field on Saturdays with the absence of the 4-6 home games that occur today."
- 26-65 4) Page 11 refers to "rent out the football field on Saturday....". Jesuit will restate that "renting" is a misrepresentation, and they rephrased this to "donating" the field to other "non-profits." No matter what they call it, the Deficiencies are still valid. Still, I think it best to avoid a rebuttal and dismissal of the deficiencies by amending this and other sections (page 15, page 11) to read "donating the field use" to "non-profits." Then ask, if they "donate" the field to a "non-profit," and that same non-profit makes a dollar donation back to Jesuit, it's reported as revenue on their non-profit IRS tax return?

26-66 **What does this mean as the Applicant has stated publicly that they are a non-profit and cannot rent out the fields, etc. The information that K. Horn relied on came directly from the Applicant. Does it mean renting out the field for football or other sporting activities/events in the Sacramento area to play or practice on Saturdays?**

**Would this mean even more football games played during the day on Saturdays OR also more football games played on Saturday evenings?**

**Would renting out the football field on Saturdays involve renting out another type of sport being played? Or, renting out the football field for practice time for other sports?**

If other sports or teams play on the football field during the day on Saturdays, what happened to the concern for players, staff, and attendees being exposed to the hot outdoor temperatures of climate change? Is this concern only for Jesuit teams, Jesuit staff, and Jesuit attendees? **This contradicts Jesuit's need to change to Friday night football games.**

- Attachment A is entirely inadequate and falsely represents the intended, planned, and anticipated use of the stadium during evenings with lights on.

## LIGHTING

[M. Neils Engineering Inc. – Jesuit High School Stadium Lighting Report](https://acrobat.adobe.com/id/urn:aaid:sc:US:1350a30f-b018-4418-934b-fbbf089668cc)

<https://acrobat.adobe.com/id/urn:aaid:sc:US:1350a30f-b018-4418-934b-fbbf089668cc>

- 26-67 1) **Page 3.** The words curfew and curfews appear, but nothing tells us what they are.
- 26-68 • The lighting study does not include evidence that they considered using other stadiums with existing lights.
- 26-69 • The lighting study does not identify or recommend curfew criteria.



- 26-70
- The Lighting study is deficient because the Applicant provided the report, and the County did not have a neutral, third-party consultant expert complete the work.

26-71 The Light study does not consider how nighttime lights affect neighbors and the neighborhood. Numbers and collected data are only a part of the whole picture.

26-72 1) **Page 2** states in part..." the stadium lights will be utilized on select evenings to accommodate athletic practices and competitions, primarily during the winter when the sun sets early or during home football games. "Yet on page 4, it states in part that..." the lights will serve to better protect the health and safety of student-athletes..." during Sacramento's hottest months, June through September. There will be noise from coaches yelling, whistles, and staff during practices. Changing practice times will generate noise outside of current general school hours. The Applicant's initial and ongoing communications with the neighborhood and residents stated the purpose of the permanent lighting request was to save the children from playing during very hot days. Now, the DEIR states the purpose is so the Applicant can play games and conduct practices during the winter when it's dark, further expanding activities, noise, and traffic impacts.

26-73 2) **Page 3**, all stadium lights will cease approximately one hour after the end of the competition to allow safe egress. Why is this needed since Jesuit has applied for path lights for safety purposes? Once a competition has ended, the stadium lights should be immediately dimmed and/or turned off completely within 15 minutes or sooner.

26-74 3) **Page 3** how was "near capacity" crowds determined?

26-75 4) How will operating lights 120 + nights/year affect all the migratory birds and waterfowl that call this area their home? Canada geese regularly used to rest on the Jesuit baseball fields, but in 2022, neighbors noticed them fleeing their normal patch of grass on the lower fields. So far this year, the geese have not been observed. Were electronic or sonic devices installed to harass or harm the waterfowl? Who/what chased these beautiful birds away? This same activity was observed at Rio Americano when they began using portable diesel lights last year.

Light pollution, climate change, pesticide use, and habitat loss are driving the decline of some 40 percent of insect species, with the global population of insects shrinking by an estimated 2 percent per year in what some call an "insect apocalypse." That threatens the pollination of crops and plants and, ultimately, the entire food web. Light pollution is also contributing to the decline in bird population. The number of birds in the United States has dropped by 29 percent since 1970, which means nearly 3 billion fewer birds in our skies, according to a comprehensive study by the Cornell Lab of Ornithology and others.

Artificial light has altered migration, mating, foraging, pollination, and predation rhythms that developed over eons. Light pollution isn't as severe an ecological threat as climate change or habitat loss, but it's accelerating the decline of many animal populations.

Insects, drawn to light, are fried, or become easy targets for predators. Bright lights lure nocturnally migrating birds and sea birds into the danger of urban areas, and millions of birds

26-75  
Cont.

die in collisions with floodlit buildings and communications towers. Sea turtle hatchlings are likewise drawn to artificial lights – and into the jaws of predators.

Lights at night also act as barriers to nocturnal animals, ranging from bats to mountain lions, fragmenting their habitats and marooning them on ecological islands. Predatory creatures – certain snakes, salamanders, small mammals, insects – that rely on the darkness of a new moon to find food no longer have that protection.

"The dark places are a refuge," says Travis Longcore, a professor at UCLA's Institute of the Environment and Sustainability. But now, "you have light pollution and skyglow that is as bright as the full moon," and that means certain animals "don't come out to forage when they should because it's a danger signal if it's too bright."

Animals find their circadian and seasonal rhythms disrupted by artificial light. Urban birds call earlier in the morning, altering the mating process. Plants produce flowers and fruit at the wrong times. And humans lose sleep because of artificial light (whether from streetlights or our digital devices), potentially contributing to increased obesity and cancer.

"There's days of research that one could go through on how physiology is affected," Longcore says, "but it all makes sense when you think that this planet has had day/night and lunar cycles for the whole period of the evolution of life." Until now.

The biggest share of light pollution comes from commercial sources – gas stations, strip malls and the like – followed by outdoor sports facilities. After that comes residential lights, streetlights, and industrial lights. Municipalities can regulate much of that light pollution, and some already do dimming streetlights during certain hours, requiring dark-sky-friendly exterior lights in new construction and renovations, and simply turning off lights that serve no public safety purpose.

**Source:** Will somebody please turn down the lights? Dana Milbank, The Washington Post, May 5, 2023 [https://edition.sacbee.com/popovers/dynamic\\_article\\_popover.aspx?artguid=b3b0fa0a-05aa-46bf-85f5-d3594b5f8f18&appcode=SACBEE&eguid=a1374dfa-81b4-47b2-b080-9fbabe5711c5&pnum=73](https://edition.sacbee.com/popovers/dynamic_article_popover.aspx?artguid=b3b0fa0a-05aa-46bf-85f5-d3594b5f8f18&appcode=SACBEE&eguid=a1374dfa-81b4-47b2-b080-9fbabe5711c5&pnum=73)

## GENERAL COMMENTS

- 26-76 | The JHS stadium light request is a "want," not a necessity. JHS has an illustrious list of alum scholars and athletes who competed for over 50 years and succeeded without stadium lights. Contrary to the school's case for lights, most athletes excel academically during the sports season because their schedules require them to remain focused and avoid distractions. Jesuit Administrators, not global warming, created the "hot" and "unsafe" playing fields in 2015 when they switched from a cool, natural grass field to a plastic/artificial field with a Big Marauder logo at midfield and removed the wood bleachers which were replaced with metal bleachers. When that surface became dangerous to play on in 2022, they installed another plastic grass surface that retains heat instead of returning to natural grass and a cooler playing surface. They argue that the surface is "too hot," so we want lights to play in the cooler evenings.
- 26-77 |
- Is Jesuit currently in compliance with all mitigation/permit measures and/or requirements?
- 26-78 |
- Why does Jesuit High School need permanent stadium lighting now when they haven't needed it for the past 60 years?
- 26-79 | The original county planners got it right, and they excluded tall structures and lights on the athletic field parcel so there would be open air, space, and views of nature to act as a buffer between the high school activities and every day and evening activities of the 400 families trying to raise children at a place, they call home. Stadium lights aglow for five nights/week, and all the noise nuisances will destroy the quiet and safe sanctuary families need to relax, restore, and rest for the next days' work.
- 26-80 | The Applicant purchased the property with the zoning restrictions and must honor their decision. For 60 years, families purchased homes knowing these zoning limits. A change in zoning limits by the County would be a tax on every homeowner in the neighborhood.
- 26-81 | While JHS does not rent the use of their athletic venues, they have a long history of donating the facilities. Private girls' high schools, public high schools, parochial schools, colleges, and professional teams in need of a practice site for field sports, including baseball, will ask for a donation. High schools needing a playoff sight will petition the County for a temporary use permit to use Jesuit Stadium. Then, the noise and interior residential parking problems follow because JHS does not supervise non-JHS or low attendance events in their game day protocol.
- 26-82 | Approving the requested Permit amendment to the Applicant will not "Implement the objectives and policies of the county plan to" "Enhance, protect, and maintain the value of a property," "Enhance, maintain, and preserve community quality of life," or "Promote compatibility between new and existing development."
- 26-83 | **Why are the current alternatives not feasible to continue to be used by the Applicant?**
- 26-84 | **Where is the Initial Study?** What potential impacts were identified in the Initial Study? Initial Study is not required if it is known an EIR will be prepared.

26-85 | **Where is the arborist report?**

26-86 | **Where is the Safety Report?** They haven't considered the neighborhood's safety, which changes when games are at night vs. during the day!

26-87 | **Where is the wildlife report?** From a biological standpoint, have there been any studies on the effect of night lighting on nocturnal wildlife, such as bats? With additional traffic on FO Blvd and AR Drive, I would suspect more wildlife will be mowed down by vehicles.

26-88 | **Where is the Parking Study?**

26-89 | **What other Jesuit use permits will be consolidated into the proposed stadium lighting use permit?** The Applicant's lighting proposal expands its ability to conduct evening and nighttime activities in addition to daytime and afternoon activities. The Applicant's proposal does not benefit the surrounding tax-paying residents and does not benefit the neighborhood. The neighborhood should not be responsible for subsidizing or accommodating the Applicant's expansion plan or opportunities for families and students from outside the community. The granting of the application is inconsistent with the County's Comprehensive Plan and the purposes of the Zoning Ordinance.

26-90 | The proposed project (used as a sports stadium) allows for over-height limit structures. Neighborhood changes include degrading the site's visual character and are incompatible with the surrounding residential neighborhood. The project has an incoherent design that:

- a. Creates a sense of disorder and undesirable environment for occupants, visitors, and the general community,
- b. does not preserve, respect, and integrate existing natural features that contribute positively to the site and the neighborhood character, including historic resources of the area when relevant,
- c. is inconsistent with the context-based design criteria of the applicable RD-4 zone district,
- d. creates disharmonious transitions in scale, mass, and character to adjacent land uses and land use designations,
- e. degrades, negatively impacts, and encroaches and infringes on living conditions in adjacent residential areas.

## AIR QUALITY

26-91 | Air Quality impacts essentially have been moved from Saturday afternoon to Friday night. That is a baseline, but doesn't the Applicant plan on hosting tournaments and renting out their facilities at other times? If so, the EIR must address the additional impact of extra traffic and the pollution created.

- The Air Quality report did not address vehicle idling during practices or during games when parents or caregivers wait for students/athletes, etc. The idling of vehicles and visiting school buses needs to be analyzed to assess potential significant environmental impacts.

26-91  
Cont.

- Jesuit High School's Event Management Protocols

**Insufficient Jesuit Protocol for Night Event**

This section cites items deemed insufficient in the [Jesuit's Protocol for Night Events \(https://acrobat.adobe.com/id/urn:aaid:sc:US:476221e2-286b-4607-87fb-23027d7d5d14\)](https://acrobat.adobe.com/id/urn:aaid:sc:US:476221e2-286b-4607-87fb-23027d7d5d14). In some cases, the inadequate aspects are the rationale for the proposed conditions of approval.

26-92 | 1) Page 3: The location of the crossing guard at American River Drive is unclear and insufficient.

- "Serve as a crossing guard at American River Drive from the south side of the street to campus." More context and details need to be provided.

26-93 | 2) Monitoring trash is not sufficient. Monitoring for 'loitering' is not sufficient.

- "Monitor the perimeter for loitering and trash."

26-94 | 3) The "Visiting School Information Sheet" cited on page 1 should be included to know what is and is not communicated and how the visiting team's school will communicate to their students and parents.

26-95 | 4) The scope of the protocol is not clear, and the application of the protocol is not consistent with other events. The original intention of the lights was for Jesuit High School events only. The Jesuit High School Stadium Lighting DEIR (Jesuit High School Stadium Lighting DEIR, 2023) discusses activities not specific to Jesuit High School. If there is to be a protocol for night events, it seems reasonable to have a protocol for all events or specific conditions when the protocol is to be applied.

26-96 | Is The Event Management Protocol a living document? Will neighbors have an influence on changes/improvements?

26-97 | 1) Page 4. "Sound limits will be set per county guidelines." – What are the guidelines??

26-98 | 2) Page 6. What is the Applicant's Good Neighbor's phone line number? Will it be available for all events?? What is the alternative phone number to call if there is no response from a Jesuit representative?

26-99 | 3) Page 7. Games going beyond 10 p.m. PA will be turned down – but are not defined to what level.

26-100 | 4) Page 8. Who will specifically reply to "neighbors or community concerns"?

26-101 | 5) Pages 16-17. A resident monitored the entrance to Tennyson Way residential street on August 25, 2023. There was no sign or CCT or otherwise, directing cars away from Tennyson and into the school visitors' parking lot. Tennyson Way is directly across from

- 26-101 Cont. | the stadium's one and only pedestrian entrance. Visitors and home team fans use this gate to avoid the inadequate parking spaces on campus. Over 25 cars, two parked illegally in front of fire hydrants, were reported to sheriff deputies and should be disclosed in the school's incident report. Ask to view the incident report for both nighttime games. If the high school couldn't follow its protocols with 100 visiting fans, what happens when 1,000 fill the visitor's bleachers?
- 26-102 | "Jesuit's protocol for night events" seems to cover the parking and security issues, although I don't know how they can legally keep people from parking on public streets.
- 26-103 | **Game Day General:** states that the CCT will be on-site 90 minutes before an event and remain 90 minutes after or until the venue is clear. What is considered the "venue"? It needs to ensure that the streets are cleared. Under "Identify and report vehicles parking in an illegal or unsafe location, who will this information be reported to?"
- 26-104 | **Behavior:** It is stated that no tailgating is permitted in parking lots, overflow parking lots, or on adjacent public streets, but there was tailgating at the August 25, 2023, football game.
- 26-105 | **Tech, Sound, and Lighting:** When and under what authorization(s) was the WIFI installed?
- 26-106 | **Parking:** States in part that to incentivize carpooling, a designated ride-share area will be established at the front of the Chapel. This designated ride-share area should be closer to the venue to encourage ride sharing. No purchasing of parking spaces should be allowed. Jesuit will implement a shared parking agreement with Rio Americano High School during maximum capacity events.
- However, that would impact other parts of the neighborhood and must be analyzed in the EIR.
- 26-107 | **Food Service and Vendors:** Food trucks were operating on the August 25, 2023, football game.
- What permits and/or licenses were obtained in advance to operate the food trucks?
- 26-108 | **Question:** If it is too hot to practice sports outside in the afternoon, will they suspend all sports practice, excluding swimming? Or will some sports decide 90 degrees is not too hot and others delay until evening? There are concerns that practice may continue from the afternoon and into the evening on the same day.
- 26-109 | **Question:** The data shows 41 events with over 500 in attendance. With only five home games in football, which sports account for the other 35 events?
- 26-110 | **Question:** I thought lacrosse was a "club sport," not a varsity sport throughout Sacramento.

TECHNICAL REPORT FINDINGS – JESUIT HIGH SCHOOL STADIUM LIGHTING PROPOSAL

- 26-111 | **Question:** Soccer season is November- February. Same with Track and lacrosse. Heat is not an issue. Why does Jesuit need lights on until 9 p.m.? The new headmaster cited "heat" in his TV interview for days with late practices.
- 26-112 | **Comment:** The online notice is only for high (1,500+) events. Very few events draw 1,500 at Jesuit. But crowds of 800 spectators can quickly impact the neighborhood. So why limit the online notice to only a handful of annual events? The notice is based upon anticipated attendance- not enough notice to "Good Neighbors." Especially since these concern lights and nighttime events. Notice that it is not as necessary for daytime events on the weekends.
- 26-113 | **Comment:** Signage must be at American River Drive and Tennyson because of the Jesuit parking lot on Tennyson.
- 26-114 | **Comment:** Volunteer crossing guards for events of 1,500+. They should be off-duty police, at the least, not parent volunteers steering traffic.
- 26-115 | **Comment:** Who do we report "tailgating" to in real time? And if we can hear the loudspeakers clearly from 500 yards away, is that too loud?
- 26-116 | **Comment:** Tennyson should be closed on Football home games to avoid overflow south into Del Dayo Estates. Posting "no parking" is too often ignored.
- 26-117 | **Comment:** Using Rio's parking lot for big events (Football playoff games) is a great idea.
- 26-118 | **Comment:** Post the "Good Neighbor" phone number. We all need to have it.
- 26-119 | **Comment:** No vendor trucks, please, unless they are inside the Jesuit fences. Creates crowds and waste if they are parked on American River Drive.
- 26-120 | **Comment:** Lights can remain on for over an hour after the event because they have a permit—no use of the speakers to request attendees to exit and turn the lights off ASAP.
- 26-121 | **Comment:** We need a STOP SIGN on American River Drive and Tennyson. Rio has one. Jesuit has a light on Fair Oaks and a stop sign on Jacob. A driver was ticketed on American River Drive going over 60mph a few weeks ago. We don't even have speed bumps to slow traffic in front of the Jesuit lot on Tennyson. Jesuit should advocate for either speed bumps before and after Tennyson or a STOP SIGN. It will create a safer environment for all in a lasting, meaningful way.
- 26-122 | The "Visiting School Information Sheet" cited on page 1 does not identify what is and is not communicated.
- 26-123 | Jesuit should pay for the off-duty sheriff patrol that the home owners pay for through the Willhaggin/Del Dayo Association for all events and practice to patrol the outside areas of the neighborhood (river access roads, side streets with in 1/4 mile of the school, Del Dayo elementary school, Ashton Park)

26-124 | Jesuit needs to have a person assigned at each stop sign 90 minutes before and after each game (Jacob and Oak Vista, Jacob Lane, and American River Drive).

26-125 | Jesuit needs to sign a legal document that the protocol will continue if Jesuit has a campus in the neighborhood.

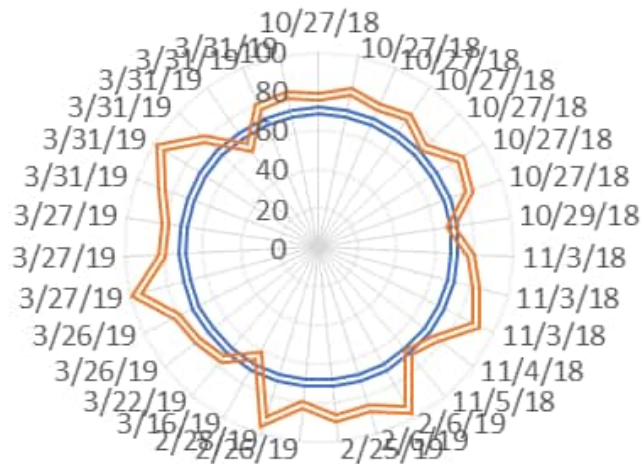
26-126 | Jesuit needs to sign a legal document that if any incident takes place (car crash, hit and run, pedestrian hit by automobile, violence caused by guns or knives, drunk drivers or high on drugs). Jesuit cannot redeem themselves from any law suit.

- Jesuit High School shall publish the "Visiting School Information Sheet" online.
- The "Visiting School Information Sheet" shall cite crosswalk locations.
- The "Visiting School Information Sheet" shall cite that parking is primarily in Lot A
- The "Visiting School Information Sheet" shall cite that parking is discouraged on American River Drive.
- The "Visiting School Information Sheet" shall cite "South Entrance" (S) on page 10 has no pedestrian access and is for vehicles only.
- The "Visiting School Information Sheet" shall use an alternate icon for "South Entrance" (S) on page 10 as this is NOT the primary or recommended access for vehicles or pedestrians.

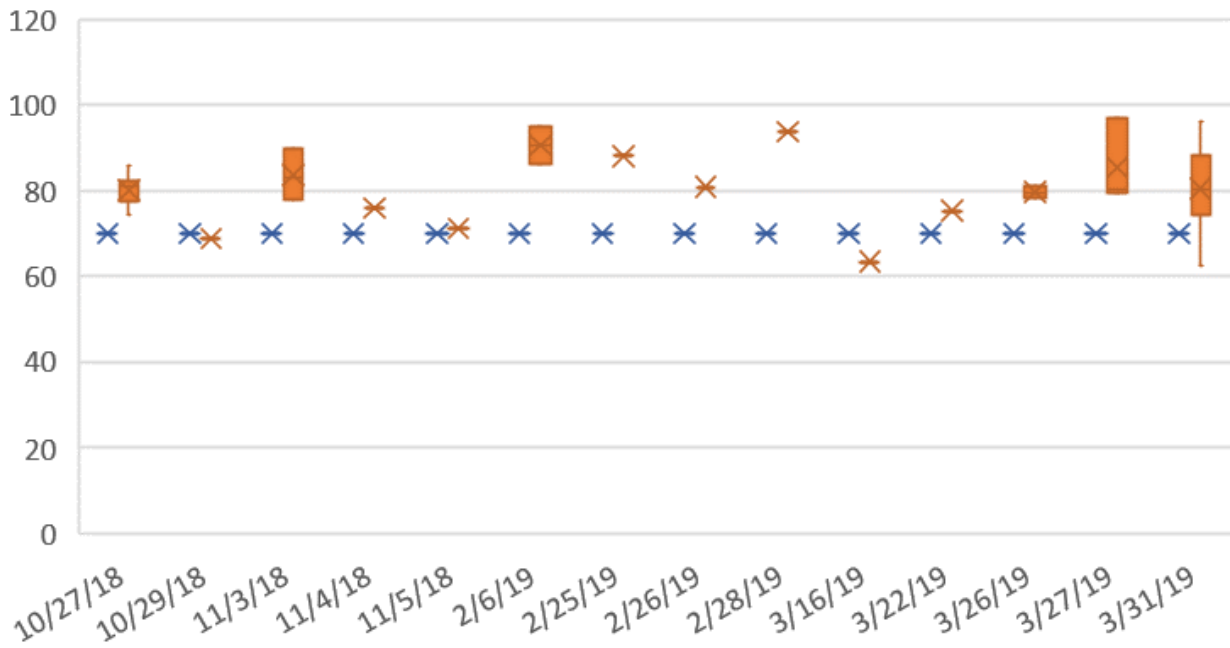


## CURRENT JESUIT HIGH SCHOOL FIELD DECIBEL LEVELS

— Acceptable Decibels     — Decibel Reading



### Current Jesuit High School Field Decibel Levels



**Decibel Tracking Report – 844 Piccadilly Circle  
October 2018 – March 2019**

<b>Event</b>	<b>Event Date</b>	<b>Acceptable Decibels</b>	<b>Decibel Reading</b>
cheer squads with light set generators operating	10/29/18	70	68.7
multiple teams playing rugby with no PA (it's possible to have successful games w/out a PA system)	3/16/19	70	63.4
	3/31/19	70	62.6

<b>Reference Noise</b>	<b>Decibels</b>
clothes dryer/normal conversation	60
November 2015 Acoustical report	70
vacuum cleaner	80
beginning of OSHA regulations for workplaces	85
lawn mower	88
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11/3/18	70	83	13		1:55 PM
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2/6/19	70	86.3	16.3	typical	
2/25/19	70	88.1	18.1		
2/26/19	70	80.8	10.8		
2/28/19	70	93.7	23.7		
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3/22/19	70	75.3	5.3		5:35 PM
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3/26/19	70	81	11		
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Meterk MK09 Sound Level Meter

Kelly and Elizabeth Hughes  
916-214-4307

**From:** [Elizabeth Hughes](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#); [PER-CEQA](#)  
**Cc:** [Newton, Julie](#); [Brandt, Jessica](#); [Clerk of the Board Public Email](#); [barbara dugal](#); [Tara Ahlberg](#); [sswatt@aol.com](#); [jpdagherty@aol.com](#); [Nora Hamilton](#); [Lisa Phenix](#); [James Daugherty](#)  
**Subject:** California moves to restrict synthetic turf over health concerns - DEIR Comments PLNP2021-00262  
**Date:** Wednesday, October 18, 2023 3:46:20 PM

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Hello Kimber,

27-1 | The Draft EIR is deficient because it does not comprehensively address how the stadium lights and synthetic field turf are environmentally safe. Any activity with artificial turf is environmentally safe, as described in the article below. The Applicant’s desire to play sports at night using the stadium lights to make that possible may cause harm to the students, coaches, parents, guardians, and visitors.

27-2 | Gov. Gavin Newsom’s recently signed law makes the ban on synthetic turf available to cities and counties to implement. “Synthetic grass usually contains PFAS chemicals. According to the Environmental Protection Agency, PFAS chemicals are a known carcinogen that can interfere with hormones, reproduction, immunity and cause developmental delays in children.”

The Applicant’s draft EIR does not include a review of the Stadium lighting’s contribution to extending play activities on the synthetic turf.

Regards,

Elizabeth Hughes  
916-214-4307

**[Once hailed as a drought fix, California moves to restrict synthetic turf over health concerns](#)**

**BY [SHREYA AGRAWAL](#) OCTOBER 18, 2023**

**IN SUMMARY**

California cities can ban synthetic turf under a law Gov. Gavin Newsom signed. He rejected a bill to ban PFAS in fake lawns.

Gov. Gavin Newsom last week passed on a chance to limit the use of the so-called “forever chemicals” in legions of plastic products when he vetoed a bill that would have banned them in synthetic lawns.

His veto of an environmental bill that overwhelmingly passed the Legislature underscores California's convoluted guidance on the plastic turf that some homeowners, schools and businesses use in place of grass in a state accustomed to drought.

Less than a decade ago then-Gov. Jerry Brown signed a law prohibiting cities and counties from banning synthetic grass. At the time, the state was in the middle of a crippling drought and fake lawns were thought to be helpful in saving water.

But this year Democrats in the Legislature went in a different direction, proposing bills that would discourage synthetic turf. They're worried about health risks created by the chemicals present in these lawns, including perfluoroalkyl and polyfluoroalkyl substances, also known as PFAS chemicals. Some chemicals in the crumb rubber base of synthetic turf, such as bisphenol A, commonly known as BPA, can leach out during extreme heat. These chemicals have been linked to various chronic diseases including cancers, diabetes and neurological impairments.

Dianne Woelke, a retired nurse in San Diego, is among the Californians who've grown concerned about their neighbors' synthetic lawns. She joined a group called Safe Healthy Playing Fields to advocate against their use.

"It's staggering the depth of minutia involved in this product. It's just a lot of plastic with a lot of chemicals leaching from it," Woelke said.

One of the bills Newsom signed, for instance, [undoes the Brown-era law](#) and allows cities and counties to again ban artificial turf. Some California cities have already begun moving to prohibit fake lawns, including Millbrae in San Mateo County and San Marino in Los Angeles County.

"Emerging research is making it clear that artificial turf poses an environmental threat due to its lack of recyclability and presence of toxins such as lead and PFAS," said state Sen. Ben Allen, the Redondo Beach Democrat who authored the bill. With the new law "local governments will again be able to regulate artificial turf in a way to both protect our environment in the face of drought and climate change but also by preventing further contribution to our recycling challenges and toxic runoff," he said.

Manufacturers of synthetic turf say they are working to address concerns about the materials they use, although for the most part they have been unable to entirely remove PFAS. Some have switched to sand and other safer products in an attempt to replace rubber crumb.

"Our members are already working with existing customers, states, and local governments to demonstrate the continued safety of our products and are committed to ensuring their products contain no intentionally added PFAS," Melanie Taylor, president of the Synthetic Turf Council, wrote in a statement to CalMatters.

Newsom in vetoing the PFAS chemicals bill wrote that he "strongly" supports the intent of the legislation, but he was concerned that the state was not positioned to

ensure its effectiveness.

The bill “does not identify or require any regulatory agency to determine compliance with, or enforce, the proposed statute,” he wrote in his veto message.

He also wrote that he’s directing his administration to consult with lawmakers on “alternative approaches to regulating the use of these harmful chemicals in consumer products,” suggesting the issue could return in the next legislative year.

### **Chemical risks from fake lawns**

Synthetic turf is a man-made, non-living replacement of turfgrass that requires little water or maintenance. The grass blades are made of fibers such as nylon or plastic while the base is typically a crumb rubber made from used tires, plastic pellets or sand.

Synthetic grass usually contains PFAS chemicals. According to the Environmental Protection Agency, PFAS chemicals are a known carcinogen which can interfere with hormones, reproduction, immunity and cause developmental delays in children.

Adam Smith, an associate professor of environmental engineering at the University of Southern California, said although research is still being done to understand fully what the health implications of the chemical are, current research suggests that “PFAS is absolutely bad for human health.”

“Certainly, in terms of the drought, (synthetic turf) seems great, but there’s all of these downsides,” Smith said.

According to experts, these chemicals can enter the human body through contact with skin, by breathing the particles in or through water sources, especially groundwater sources, that can get contaminated during leaching.

Microplastics from the grass blades and crumb rubber can also leach into groundwater and freshwater bodies.

“These molecules are actually entering the food chains in the ocean, and they’re in our system, they’re in our blood, they’re in our muscles,” said Sylvia Earle, a marine life advocate and former chief scientist at the National Oceanic and Atmospheric Administration.

“We’ve changed the nature of nature through actions that we’ve taken. Now they are coming back to haunt us.”

### **At what temperatures is it a risk?**

Research by the National Toxicology Program shows that high heat can cause chemicals to leach out of the crumb rubber base of synthetic turf, which is made of recycled tires. These leached chemicals are known to cause cell death in humans.

Synthetic turf, like other artificial surfaces including asphalt and pavement, heats up

by several degrees more than living lawns.

According to Kelly Turner, associate director of the UCLA Luskin Center for Innovation's Heat Equity Initiative, the material can trap heat and radiate it back slowly, staying warm for longer periods of time.

"It is one of the hottest surface materials," she said. "It is hotter than asphalt."

Janet Hartin, horticulture expert at UC Extension in Los Angeles County, measured various types of surfaces in Palm Springs, where air temperatures around 100°F are common during the summer.

On days around 100°F or more, she reported temperatures of synthetic turf and other artificial substances around 175°F.

### **Alternative approaches**

Hartin said the best alternative to any artificial surfaces are living plants.

"We want to increase the population of our habitat pollinators, and plant climate-resilient plants that provide shade, buffer sun exposure, provide windbreaks, help reduce stormwater runoff and reduce soil and water erosion. And you can't do that with synthetic grass," she said.

There are several drought-friendly approaches to landscaping, including warm-season grasses such as Bermuda grass and Buffalo grass, or doing away with grass altogether and planting trees or drought-resilient varieties of plants that are endemic to California.

Hartin said that even though plants require water and maintenance, their cooling benefits and ecosystem benefits go far beyond the water savings one could get through synthetic turf.

"You have choices," she said. "What we plant today is going to maximize society and urban ecosystem benefits by the time that you're in your later years."

**Elizabeth Hughes**

**844 Piccadilly Cir.**

**October 23, 2023 - Planning Commission**

**DEIR Comments: PLNP 2021-0062 Jesuit High School Stadium Lighting Proposal**

28-1 | Thank you for allowing me extended time to provide critical feedback on the Draft Environmental Impact Report (DEIR) for Jesuit High School's Stadium Lighting Proposal.

I aim to highlight some key concerns and omissions that require immediate attention for a more thorough and accurate assessment of the project's environmental impact.

We find ourselves in a situation where the draft Environmental Impact Report (DEIR) concerning the Jesuit High School Stadium Lighting Proposal falls short of comprehensively addressing the critical issue of cumulative impacts. There are key aspects that require our collective attention and immediate action.

**Cumulative Noise**

28-2 | The applicant did not provide the number of activities and user events at their facility. The applicant provided only a list of practices, games, and graduation events in its proposal from its own activities. In the technical reports, the number of activities studied was less than the applicant's original number. The change in the number of activities to be less than proposed is doubtful, and the change in the number was not explained in the study. The number of activities, events, and use of the applicant's fields does not include a comprehensive accounting of all the other non-profit and non-applicant organizations. This failure to list all other occasions and activities in which the applicant's fields are used creates a deceptive picture of how frequently the fields are used for non-applicant and non-school activities and the ability of these non-applicant organizations to use the fields later in the evenings and nights. A correct and cumulative study of all noise created and generated by the applicant and its affiliated organization was not studied.



28-3 | The draft EIR states that noise impacts are significant and unavoidable. I disagree that significant noise levels are unavoidable. However, we firmly believe that significant noise levels can be mitigated. A simple solution, which the applicant could implement today, includes downsizing the PA system, lowering the volume, and restricting its use. Surprisingly, the DEIR remains silent on this matter. The draft EIR does not clarify the type of speakers the applicant used when the noise measurements were taken or whether the speaker (PA) system used by the applicant will be the same after buildout. Please clarify the type of speaker/PA system used by the applicant.

28-4 | The initial communication from the applicant to the community was incomplete and, in some cases, misleading. In 2021, it was suggested that only 6-8 Jesuit games would be played under the new lighting, leading residents to believe that the lights would be used sparingly. However, this could not be further from the truth, with over 250 practices and non-applicant activities occurring yearly. The DEIR, while attempting to assess noise impacts, falls short of addressing the cumulative noise generated seven days a week. This comprehensive evaluation is imperative, considering the constant noise disturbance in our community. The draft EIR attempted to study the potential noise impacts of the project, but it doesn't comprehensively address cumulative noise that occurs seven days per week. While the non-applicant weekend and afternoon activities do not seem to exceed noise thresholds except when they use the applicant's PA system, it should be noted that noise generation seven days per week, during the day, afternoons, and evenings, and proposed nighttime until 11 p.m., and weekends and summers (training clinics, sports camps, etc.) has a cumulative impact that no resident can escape.

28-5 | The applicant needs to provide a complete list and schedule of practices, band use, Delta League use, Junior Marauders use, games use, track meets, St. Francis cheer practices, parochial league games, and all the other non-applicant organizations that use the fields. The applicant, a non-profit organization, operates as a thriving business, allowing non-school activities to occur in its fields. The EIR consultant should consider the cumulative impacts and duration of the ongoing noises, applicant and non-applicant uses, seven days per week and 12

28-5  
Cont.

months per year, and how those impacts and impacts exacerbate our opposition to allow extend noise activities until 11:00 p.m. Our neighborhood already accommodates school-related activities on weekdays, but the continuous presence of non-school-related noises from the applicant's private fields on weekends and afternoons is unreasonable.

The Planning Commission should know that the applicant currently uses temporary lights to practice on its fields until 8 p.m. They can do this because the temporary lights are not too large to require a permit. Neighborhood residents accommodate weekday school noises from 7:00 p.m. until 3:00 p.m. and then again from sports and practices from 3:00 p.m. until 8:00 p.m. (five days per week). The neighborhood residents should not have to accommodate non-school-related noises from the applicant's private fields daily on weekends and afternoons.

28-6

### **Aesthetics**

The aesthetics study, which is one paragraph in the draft EIR, is deficient as it doesn't address how a 100-foot lighting pole, the equivalent of a 10-story house, is aesthetically acceptable in a residential neighborhood built with primary single-story homes.

28-7

### **Cumulative Traffic**

The draft EIR's traffic study is deficient because it does not cumulatively address the circulation impacts of traffic in the surrounding neighborhood. The traffic study provided information about what could happen with traffic, not what does happen with traffic. No observations were made to study vehicle trips in the neighborhood on non-game nights or game nights. No observations were made to study parking counts or average vehicle occupancy. The traffic analysis relied on a study of Carmel High School, which is 200 miles away, to assume the average vehicle occupancy is insufficient for the applicant's project. The study is irrelevant to our situation. We must insist on a more comprehensive and locally relevant study. An EIR must address the secondary effects of scarce parking, such as traffic and air quality, which indirectly impact the physical environment.

28-8 | The draft EIR traffic analysis assumed high-attendance games rather than the impacts of all field uses seven days per week. A cumulative traffic analysis of all field use and activities during the week and weekends would detect additional trips resulting in an unacceptable level of services (LOS) in the community. Why was the analysis of American River Drive during weekday a.m. and p.m. peak hours excluded from the existing conditions, which are already at a deficient LOS? If there is no justification for this omission, please revise the traffic analysis to analyze and disclose the potential impacts on American River Drive during the weekday a.m. and p.m. peak hours.

28-9 | In conclusion, the DEIR requires substantial revision to address critical noise, traffic, and aesthetics concerns. As neighborhood residents, except for the few Jesuit families and out-of-town supporters, we oppose the applicant's project. We are striving to protect what is left of our neighborhood's tranquility and well-being.

Thank you for your attention and understanding.

**From:** [Elizabeth Hughes](#)  
**To:** [Gutierrez, Kimber](#)  
**Cc:** [PER-CEOA; Gregory, Carol; CPAC-Forwarder-mcoronams](#)  
**Subject:** FW: Context regarding CPAC notification about the Jesuit PA issue  
**Date:** Monday, November 6, 2023 4:53:01 PM  
**Attachments:** [Decibel tracking report.pdf](#)  
[Before and after scoreboard.pptx](#)

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
 If you have concerns about this email, please report it via the Phish Alert button.

Hello Kimber,

29-1

Please correct the record regarding your response to Commissioner Mariana about community notifications for Jesuit's illegal scoreboard installation and public address system installations (see below). The western community of Jesuit's field, the closest location to the PA sound system and the MOST affected, was not notified about the Carmichael CPAC meeting 2019. We subsequently did receive a county notification for a planning commission hearing. Still, we missed the opportunity to learn about the project or engage with CPAC in opposition to the project. The County Planning Department established a process for Jesuits to seek approval for their new scoreboard and PA speaker placement without discussing the alternative that the scoreboard and PA speaker placement should not have been built in the first place. The only option provided to the Planning Commission was approving an existing installation as a formality without discussing the project's alternative of not being built or made in its current location.

I await your response.

Regards,

Elizabeth Hughes  
 916-214-4307

---

**From:** Elizabeth Hughes  
**Sent:** Tuesday, October 24, 2023 2:32 PM  
**To:** Mariana Corona Sabeniano <mcoronams@gmail.com>  
**Subject:** Context regarding CPAC notification about the Jesuit PA issue

Hello Commissioner Mariana,  
 You asked Kimber last evening to describe how the County notified residents about Jesuit's 2019 CPAC hearing. I believe Kimber misunderstood you and responded contrary to Mr. Hughes' statement that Sacramento residents did not receive notifications for the Carmichael CPAC meeting. I think Kimber described what the County did to notify residents about the current proposal.  
 Jesuit installed its scoreboard and PA structure in 2015 **without a permit**. When the County began receiving resident complaints, it realized the Jesuit needed to comply and obtain a permit. Our neighborhood, the west side of Jesuit (my home is on Piccadilly), is in Sacramento County and not within the Carmichael CPAC sphere; hence, we and our

neighbors were not notified about the CPAC meeting. Only residents within a 300' radius of the High School received [Carmichael] CPAC notification. Attached is a photo of where Jesuit positioned their PA speakers.

Had our community known about the CPAC meeting, we would have attended and provided you with the 2018-2019 decibel tracking report showing that nearly all of the events hosted by Jesuit exceeded normal thresholds. Thankfully, we learned about the Planning Commission hearing, which we attended, and required Jesuit to relocate its PA off our fence line. Without the opportunity to engage in the PA community review, we could not learn or protest that the PA system had been installed in the first place. Had we had the opportunity, we would have objected to the PA system. The County exempted Jesuit from any environmental review for its PA system.

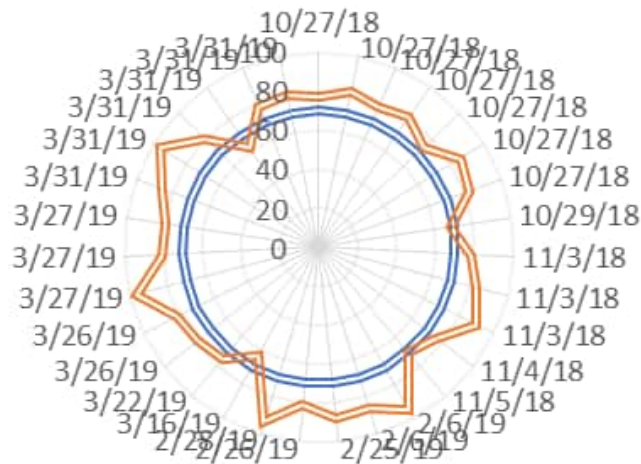
Unfortunately, the County did not hold Jesuit accountable for monitoring mitigation or penalties for non-compliance. Virtually none of Jesuit's approved use permits include any conditions, monitoring, or penalties for non-compliance, and the County does not hold them accountable. Several long-time residents said the original Jesuit project (60 years ago) was restricted from installing field lighting. When trying to research this issue, I was informed by the County that no information is available for Jesuit beyond 1980, so there is no way to prove or confirm. I find it hard to believe that the County does not have records prior to 1980.

Regards,

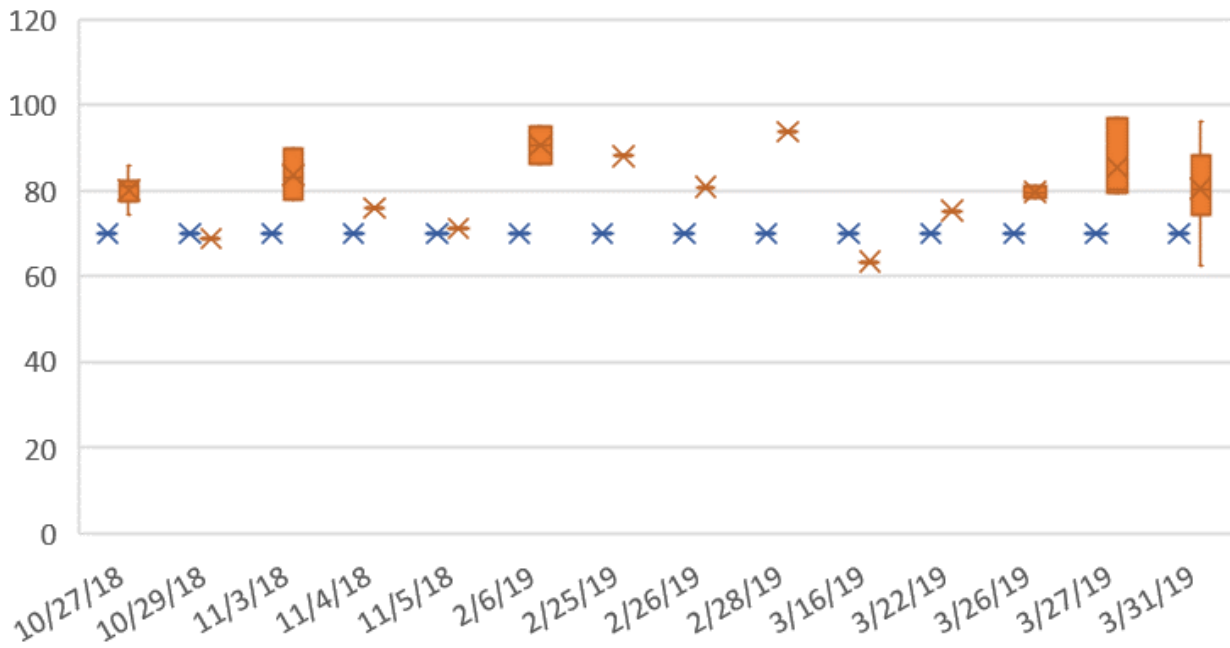
Elizabeth Hughes  
916-214-4307

## CURRENT JESUIT HIGH SCHOOL FIELD DECIBEL LEVELS

— Acceptable Decibels     — Decibel Reading



### Current Jesuit High School Field Decibel Levels



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Meterk MK09 Sound Level Meter

Kelly and Elizabeth Hughes  
916-214-4307



The newspaper image showing the old scoreboard was taken long before April 2015. The old scoreboard was in the eastern portion of the old football field. The current scoreboard was installed without a permit in 2015. The PA system was installed on the scoreboard, along the neighborhood fence line until the County require it to be removed in 2019. the image to the right is from a house on Piccadilly Circle.



**Top Row:** S. Bradford, F. Zavrel, M. Brownfield, J. Cates, P. Rooney, M. Morgan, B. Street, S. Jasper, B. Sheely, P. Wight, E. Ross, T. Hornback, J. Braustein, M. Zanze, G. Chelini, B. Flynn, K. Burton, G. Wagner, B. Sheeders **Middle Row:** Coach Meyers, Coach Cummings, D. Van Dyke, T. Gannaway, B. Cates, J. Calderon, C. Simao, M. Ryan, B. Sharp, M. Terra, S. Martin, J. Poole, C. Stone, N. Slavich, M. Donahue, M. Hillyer, J. Sevey, Coach Aull, Coach Warren, **Bottom Row:** J. Schaeffe, E. Arnoldy, D. Ford, A. Navotny, J. Imrie, D. Armond, Nelson, B. Stauffer, C. Kaeser, C. Takagishi, J. Powell, M. Danto, D. Kennedy, S. Kennedy, E. Ross, J. Phillips, Spencer, J. Pallegirini, P. Nuxoll



**From:** [Elizabeth Hughes](#)  
**To:** [Gutierrez, Kimber](#)  
**Cc:** [PER-CEOA](#); [Gregory, Carol](#); [heidi goodman](#); [Tara Ahlberg](#); [Jill](#); [barbara dugal](#)  
**Subject:** Ongoing pedestrian safety concern - Jesuit PLNP2021-00262  
**Date:** Tuesday, November 7, 2023 11:39:48 AM  
**Attachments:** [image001.png](#)  
[Another example of how Jesuit parents.docx](#)

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Hello Kimber,

30-1 | Please include the attached pedestrian safety issue in the Jesuit project record. This vehicle habitually parks in front of and blocks the location to cross American River Dr. at Tennyson Way. I will also submit this to the sheriff’s office. The County should know that Jesuit-generated vehicle activity along American River Dr. frequently includes this type of unsafe parking, illegal U-turns, and speeding.

30-2 | Below is another example of how Jesuit make it hard for the residents to attend a Good Neighbor meeting by changing the time they host the meeting to 8:30 a.m. when residents are at work. Several years ago, the community complained to Jesuit that their 4:00 p.m. Good Neighbor meetings did not allow residents to attend because they were still at work. Jesuit accommodated this issue by changing the meeting times to 6:00 p.m. Jesuit has changed its weekday meeting time to 8:30 a.m., which doesn’t work for most residents. This time change makes it harder for residents to attend Good Neighbor meetings.

**Join Us  
IN THE JESUIT LIBRARY**

Chris Alling, President of Jesuit High School, and Michael Wood '99, Principal, invite you and all neighbors to the **2023-2024 Good Neighbor meetings** in the school library.

- August 23 at 6:00 p.m. (past)
- **November 1 at 8:30 a.m.**
- **March 6 at 6:00 p.m.**
- **June 5 at 8:30 a.m.**

*For closest access & parking use Jacob Lane entrance.*

Now in their fifth year, these meetings are an opportunity to come together for hospitality and conversation. Agendas will be posted to the Good Neighbor web page in advance and include topics to help our community learn more about Jesuit’s mission, be informed on school happenings, and hear updates on campus projects.

**SUBMIT A QUESTION. GET MORE INFO.**  
[jesuithighschool.org/good-neighbor](http://jesuithighschool.org/good-neighbor)

Regards,

Elizabeth Hughes  
916-214-4307



This is another example of how Jesuit parents, coaches, and students create unsafe pedestrian access.

Fair Oaks Blvd. and Tennyson Way – habitual activity







**From:** [Kelly Hughes](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#)  
**Subject:** Comment on PLNP2021 - 00262 Draft EIR  
**Date:** Thursday, October 19, 2023 4:42:40 PM

---

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Dear Senior Planners Gutierrez and Gregory:

- 31-1 | Regarding PLNP2021-00262, I respectfully comment that the Draft EIR is incomplete and inadequate.
- 31-2 | --The EIR should include a full biological assessment of the Project's impact on the nearby American River Parkway, its habitat, and protected wildlife, birds, reptiles, amphibians, insects, and fish.
- 31-3 | Additionally, a full assessment should be done on species potentially impacted by the Project that live in the immediate area of Jesuit's football field sports complex. These would include avian species such as the nocturnal owls that live in the tall trees on Piccadilly Circle next to the campus and football field, the hawks that live in those trees that prey on the local doves and other small birds that frequent Piccadilly Circle's trees, and the migratory geese that occasionally use the football field as nighttime rest areas.
- 31-4 | --The EIR should include a full assessment of the air pollution burden from Jesuit High School's ongoing activities and the additional air pollution that this Project would bring.
- 31-5 | Our traffic count shows over 200 vehicle trips per school day occur down the alleyway between Piccadilly Circle and the football field. Students and/or parents use the alleyway to circumvent waiting at the Fair Oaks Boulevard and O'Donnell Drive stoplight. This stoplight intersection is provided by the County as the intended ingress/egress route to the school for drop-off of students and access to the school parking lot. The alleyway is intended for emergency egress use and maintenance traffic only. The school allows regular use of the alleyway so students and/or parents don't have to wait in a queue at the stoplight.
- 31-6 | The air pollution impacts of this 5-days-a-week traffic flow within feet of the houses on Piccadilly Circle must be evaluated and modeled, and a full health risk assessment should be included in the EIR so that Jesuit's continuing violation of this existing requirement be understood within the context of this Project and its added air pollution component to our neighborhoods.

Thank you in advance for your unbiased work on this Project and consideration of my comments.

Regards, Kelly Hughes, Jesuit neighbor

Comments of JP regarding Draft EIR for Jesuit Highschool Stadium Lighting Project

32-1 | I live within 1500 feet of Jesuit' High School as well as its stadium. Jesuit has 1000 students. I had a student who attended Jesuit. I oppose the application for stadium lights.

32-2 | I also live within 1500 feet of Rio Americano High School. Rio has over 1900 students. Jesuit and Rio Americano are across the street from each other. That means we have 3000 high school students attending school in our neighborhood. These two campuses generate a huge amount of traffic (and inexperienced drivers) before and after school, as well as a great amount of noise coming from PA systems and athletic events. Beyond normal school and athletic activities, we have kids doing wheelies in the parking lot at Rio Americano, for example, and other issues that result from the fact that high schools can be an attractive nuisance for teens. Yes, we knew we had two high schools by us when we moved in and we had three children who attended both Rio and Jesuit. BUT we were never told we would be moving next door to a regional sports complex that would operate well into the night. That is something Jesuit is asking for and it will change the very nature of our neighborhood. This change will impact our families and the enjoyment of our homes in a way that cannot be addressed unless the project is denied. Our ability to sit on our patios, walk in our neighborhoods, and even enjoy quiet inside our homes will be significantly impacted no matter what kind of mitigation Jesuit proposes.

32-3 | **As far as the Draft EIR, I join in the comments presented in the Technical Report Findings that include the deficiencies in the Draft EIR.** In addition, I would emphasize how many of the assumptions in the studies in the Draft EIR are basically statements made by Jesuit with no back up evidence to establish the information provided. For example, their claim that there won't be more than 1500 in attendance defies logic .... Why would they have built a stadium for 3000 if they only intended to use it for 1500? Has anyone asked Jesuit staff for the studies they used to determine how many seats to have? What information or promises were provided to their donors to convince them to pay for a 3000-person stadium. No doubt they never told their donors there would only be 1500 attendees, otherwise they would not have been able to raise the money to put in the 3000 seats. Also, the two "sample" games to test out their protocols, and analyze traffic, etc. are based on a fallacy. These were games with out-of-town teams and not

32-3 Cont. | the league in which they play. Clearly this caused a false set of information as they were not realistic about the number of participants.

32-4 | Also, there are so many weaknesses in the protocols Jesuit touts. Jesuit reserves so much discretion as to when they will open up parking on their school grounds, when they will seek off site parking at another location, when and how many volunteers they will have, when and how many off-duty sheriffs will be hired --- ALL OF THIS IS WITHIN JESUIT'S DISCRETION UNDER ITS PROTOCOLS, ONLY IF JESUIT "THINKS" IT IS NEEDED BASED ON THE NUBMER OF ATTENDEES JESUIT "THINKS" WILL BE COMING. These protocols should not be at the whim of Jesuit. There should be absolute minimum numbers of volunteers and off duty sheriffs at all games, and additional onsite parking at Jesuit (e.g., Jesuit can't say no parking on its fields when it is raining). More tests need to be done that include games with local teams, and significant conditions must be placed on any approval.

32-5 | The other issue is that Rio Americano High School is also considering making a similar application. This must be factored into any decision. The application cannot be approved indefinitely. If the application is to be approved, it must come up for renewal and re-evaluation periodically so we aren't stuck without any redress when things do not go as Jesuit says they will.

32-6 | There is discussion that our neighborhood will have to switch over to having parking permits on our vehicles to park here so that people at games will not be able to park in our neighborhood. How is that fair to us? What if I want to have an event at my house? Now my friends can't park in the neighborhood to come see me because Jesuit has insisted on having night games?

32-7 | Jesuit is a private school, so unlike its counter part Rio, our neighborhood is not allowed to use its fields, tracks, or other athletic amenities. Moreover, unlike Rio, the majority of the students do not live in the neighborhood. This is a key factor. These families will not bear the brunt of the changes as they live elsewhere. How is that fair? They wouldn't want a stadium in their neighborhood going well into the night in addition to all of the daytime activities. The fact that hundreds of families in our neighborhood will be negatively impacted so that the solely male students who attend Jesuit can have night games makes no sense.



32-8 | Jesuit has no problem in adding another 200 plus events a year at night with no respect on the impact it will have on our quality of life and neighborhood. Jesuit announces at every meeting with anyone that it “is a good neighbor.” Since when does someone self-identify as a good neighbor, shouldn’t Jesuit’s neighbors be a judge of whether they are acting as a good neighbor? Simply calling yourself a good neighbor and hosting a few meetings a year (although many are cancelled by Jesuit) does not mean you are a good neighbor.

32-9 | These impacts will come in noise (not only the crowds cheering, but traffic, as well as a PA system that can be heard from miles away well into the night). Moreover, the noise that comes from crowds leaving events at 10-11 at night in our neighborhoods will also result in vandalism and other activities in our neighborhood that are less likely to occur during the day.

32-10 | There is no benefit to our neighborhood, only negative impacts. The only benefit that Jesuit says we will have is not to have Saturday day games. We are fine with Saturday day games, we prefer them! And when Jesuit moves its games to evenings, they will most likely allow other non-profits to fill the Saturday slots, so that benefit also goes out the door!

32-11 | While we now deal with noise 12 hours a day, we will no longer be able to have evenings free of noise and events late into the night. How is this fair and how can this make sense when Jesuit and Rio have done fine for 60 years without these night games. The reason they have not had them before is because this is a residential neighborhood that already deals with a great deal of traffic and noise during the day and common decency would lead anyone reasonable to conclude that adding another 4 or more hours a day to the noise and commotion is no only not being a good neighbor, but sacrificing the qualify of life for our neighborhood simply so the Jesuit boosters can be satisfied and Jesuit can grow as a business. Its own Rev. McGarey has stated that if Jesuit can't grow, it cannot survive and stay in business. Jesuit is a BUSINESS—that is not what we understood the high schools to be.

32-12 | The challenges claimed by Jesuit such as student schedules and heat can be addressed through other means rather than night games. While Jesuit claims it must do this because of the heat, it also admits the hottest time of the year is June through September. But Jesuit is not limiting

32-12  
Cont. | night events to those four months but wants them all year long. So, this is simply a convenient reason for the application, but not based in actual need. If heat is really the cause, then night games should only be played during those four months of the year. My son played soccer at Jesuit and there was no issue about needing a venue for practice or games at night. Just wasn't an issue.

32-13 | In addition, we are fortunate to live near the American River Parkway, however, the access point at Jacob and other locations near Jesuit also bring more traffic to our area in addition to the two high schools. Making Jesuit an event venue for sporting events well into the evenings for so many evenings of the year and weekends will exacerbate this traffic, and negatively affect our air quality while increasing GHG emissions. This does not even address the impact of lighting on the environment. These emissions and the air quality impacts not only the people who live here, but the wildlife on the parkway.

32-14 | We were never told we would be moving next door to a regional sports complex. That is something now being changed and will impact our families and the enjoyment of our homes in a way that cannot be addressed, unless the project is denied. Our ability to sit on our patios, walk in our neighborhoods, and even enjoy quiet inside our homes will be significantly impacted no matter what kind of mitigation Jesuit proposes.

Re: Do you Oppose Jesuit's Stadium Lighting Project - Assistance Needed

From: sellsta@aol.com (sellsta@aol.com)

To: elizabeth.hughes@tdmspecialists.com

Date: Friday, September 1, 2023 at 04:21 PM PDT

RECEIVED

SEP 2 4 2023

County of Sacramento  
Department of Community Development  
Planning and Environmental Review Division

To Whom It May Concern,

- 33-1 [ We have lived near Jesuit High School for over 30 years and have enjoyed the quiet and safety of our neighborhood. We opposed the installation of lights when it was announced that Rio Americano High School was considering adding field lights. Why should Jesuit be treated any differently? Thousands of high school sports occur all over the country in locations much hotter and more humid than Sacramento without adding 100 foot light poles resulting in increased light annoyance and also increased night traffic and noise.
- 33-2 [ I have been an electrical contractor for more than 35 years and reviewed the lighting documents. When a light fixture is 100 feet in the air there is no way to avoid the brightness or glare as the light beam shines out causing annoyance for the neighbors much like you would see in the surrounding area of an airport.
- 33-3 [ Over the years we've been fine with hearing the PA system during Saturday games but hearing the PA system on Friday nights is taking it to a whole different level and honestly is inconsiderate to our neighborhood.
- 33-4 [ I am concerned about the increased evening traffic and that young drivers will be driving throughout our neighborhood when pedestrians are out walking. Just last week my car was almost side swiped by a reckless driver trying to turn into the school entrance off of Fair Oaks Blvd. This occurred last Friday evening right as the football game was starting.
- 33-5 [ We are also concerned that Jesuit will continue to expand the availability of the field for Jesuit as well as other sporting events taking place in the evenings. It seems to us that Jesuit has not been completely transparent throughout this process.
- 33-6 [ We would hope that Jesuit would take into consideration the negative effects of this proposal and be a good neighbor by not going through with this project.

The Leibovitz Family

4890 Kipling Dr  
Carmichael, Ca

S. Leibovitz  
4890 Kipling Dr  
Carmichael, CA 95608

SACRAMENTO CA 957  
27 SEP 2023 PM 2 L



Office of Planning & Environmental Review  
827 7th Street  
Room 225  
Sacramento, CA 95814

RECEIVED

SEP 29 2023

County of Sacramento  
Department of Community Development  
Planning and Environmental Review Division





**From:** [Craig Milligan](#)  
**To:** [Gutierrez, Kimber](#); [PER-CEQA](#)  
**Cc:** [Gregory, Carol](#)  
**Subject:** Jesuit Stadium Lighting Proposal (SCH# 2022100645; COUNTY CONTROL #PLNP2021-00262)  
**Date:** Monday, October 30, 2023 4:36:00 PM

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Hello:

34-1 | I am writing to provide concern and opposition to approval and note approximately 200 home owners in surrounding neighborhoods that oppose approval. Neighbors of Jesuit moved to the area knowing there were no night games and based on location, in a residential neighborhood there would be none going forward.

34-2 | While there are numerous, seemingly small issues with data collected and it’s use that has seriously squeed results in favor of applicant, the aggregate is alarming and need be noted.

34-3 | Applicants basic project objectives are not consistent with provided Calendar, page 35 applicant claims use will be for practice and competition, but does not note the number of practices, which is significant, and why it is not noted!  
Through out the EIR the proposed Anticipated Event Calendar is used (see page 40 of PLNP2021-00262), and it is entirely inaccurate! CPAC members questioned JHS at the last meeting on October 11, 2023 and they lied about the number of planned events. Their own Calendar shows 228 events (to include practices) and the Calendar provided to all study agencies in preparation of the EIR claims only 29-36! This is far to large a discrepancy and clearly impacts a proper assessment. Opportunity to correct the Calendar was given and JHS stood by their submitted Calendar. As such, it would be fair and appropriate to limit light usage if approved to the the number of nights submitted numerous times and used in the following assessments: noise, traffic, lighting. Leaving it as such does not limit use of lights!  
Furthermore, the calendar only examines JHS team use of the complex and makes no mention of potential use by Parochial Athletic League, Junior Marauders and or any other league (soccer, lacrosse, etc.) seeking night use of a complex. Not limiting nights allowed would leave open the chance for complex use 365 nights a year as the field has synthetic turf and track that could hold up to such use.

34-4 | Concession/Mitigation:

There are none! While several have been suggested, JHS has offered none! CPAC members made it clear they needed to offer something, and to date none have been offered.

Here are some that make good sense whether or not approval is granted, as these conditions are currently issues, albeit at different times of the day.

1. Street parking: make it illegal, applicant claims to have adequate parking, but need to insure its use. This would enhance safety and lower environmental effects on neighbors.
2. Noise barriers to lessen encroachment to RD4 neighbors.
3. Limit number of nights lights can be used, to include games and practices. Currently, there is a huge discrepancy and this would hold applicant accountable to a known Calendar restricting the number of nights lights can be used, the concern here is that approval could be granted based on far fewer events than those applicant is actually planning to use stadium lights.
4. Complete all “suggested” items in traffic study, also be aware the study claims a crosswalk exists at American River and Jacob which is not true, none exists. Good neighbors should willingly offer to enhance the safety of students, guests and neighbors.

34-4 Y  
Cont. |

5. Join and help pay for neighborhood patrol. Hosting meeting's is a start, but not good enough.

Craig Milligan  
4836 Oak Vista Drive  
Carmichael, CA 95608  
916 425-4720

**From:** [Gutierrez, Kimber](#)  
**To:** [Gregory, Carol](#)  
**Subject:** FW: DEIR Comments PLNP2021-00262  
**Date:** Tuesday, October 31, 2023 8:50:29 AM

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DEIR Comment

Kind regards,

Kimber Gutierrez, Senior Planner  
Planning and Environmental Review  
(916) 874-7529

Planning and Environmental Review has several customer service options available and appointments can be made for most services. Please see our website at [planning.saccounty.gov](http://planning.saccounty.gov) for the most current information on how to obtain services including office and public counter hours.

-----Original Message-----

From: Milligan, Wendy <Wendy.Milligan@cbnorcal.com>  
Sent: Monday, October 30, 2023 4:52 PM  
To: PER-CEQA <CEQA@saccounty.net>  
Cc: Gutierrez, Kimber <GutierrezK@saccounty.gov>  
Subject: DEIR Comments PLNP2021-00262

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

35-1 | I am writing in an effort to point out significant issues with data being used for the Jesuit High School stadium lighting proposal and oppose approval.  
>>  
>> 1. Bollard Noise Assessment:

35-2 | >> A. Numerous noises not assessed, most notably: ref whistles, air horns, bull horns, car horns and cheer leading

35-3 | >> B. Sample set for assessment was too small and done at games that were not well attended yielding inaccurate data/results

35-4 | >> C. Anticipated use "Table 7" is entirely incorrect and significant! The chart shows 37 events, yet the number of events provided by Jesuit is clearly written as 258 nights!

35-5 | >> D. Table 3 - Acoustic Analysis. None done! No prescribed mitigation measures!  
\*Wire Fraud is Real\*. Before wiring any money, call the intended recipient at a number you know is valid to confirm the instructions. Additionally, please note that the sender does not have authority to bind a party to a real estate contract via written or verbal communication.

**ITEM 2 CARMICHAEL CPAC PUBLIC COMMENT 009**

**From:** Patrick Moore [onemoore53@yahoo.com]  
**Sent:** Monday, October 2, 2023 9:01 PM  
**To:** Clerk of the Board Public Email [BoardClerk@saccounty.gov]  
**Subject:** Jesuit High School Stadium Lighting

You don't often get email from onemoore53@yahoo.com. [Learn why this is important](#)

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

To members of the Carmichael/Old Foothill Farms CPAC:

- 36-1 [ It may not be in the purview of the Council to address the Draft EIR , but the only new information to comment on is in reference to this report. As a longtime resident on Tennyson Way, I remain deeply opposed to the project. Noise and Transportation, my worries, are both covered in the DEIR. Noise will have a big impact on neighbors. Not surprisingly, the closer you live to the stadium the worse it will be. The report lists several ways to mitigate the effects. I hope that the school will be required to implement all of them.
- 36-2 [ For us, the worry is increased traffic and cars clogging our streets on game nights. Here, I don't believe the DEIR gives enough weight to the impacts of many more cars, many more pedestrians, and all occurring at night. The congestion will be greatest at the end of the game with noise, litter, pollution, much worse than occurs now. The only mitigation offered is a designated crosswalk where currently there is none. The school must be required to provide alternatives to overflow parking covering our streets at nighttime. Personnel from Traffic control must be present to direct cars and pedestrians during the critical times before and after the biggest events.
- 36-3 [ Lastly, I believe if approved, the addition of stadium lighting will prove to be a big success, if success is measured by more events, larger crowds, more parking congestion, and more noise. Soccer, lacrosse, flag football, rugby, and track and field will all benefit in the same way as football. Increased ticket sales will mean more revenue and gradually many more events will be added to the schedule. Our peaceful neighborhood will be negatively impacted unnecessarily.
- 36-4 [ It is for all of the above reasons we oppose the project.

Sincerely,

Patrick Moore  
1040 Tennyson Way



**From:** [Gutierrez, Kimber](#)  
**To:** [Gregory, Carol](#)  
**Subject:** FW: Jesuit High School Stadium Lighting (PLNP2021-00262)  
**Date:** Tuesday, October 31, 2023 8:51:49 AM  
**Attachments:** [image001.png](#)

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DEIR Comments

Kind regards,

Kimber Gutierrez, Senior Planner  
Planning and Environmental Review  
(916) 874-7529



*Planning and Environmental Review has several customer service options available and appointments can be made for most services. Please see our website at [planning.saccounty.gov](http://planning.saccounty.gov) for the most current information on how to obtain services including office and public counter hours.*

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**From:** gjmoulds@surewest.net <gjmoulds@surewest.net>  
**Sent:** Monday, October 30, 2023 6:01 PM  
**To:** Gutierrez, Kimber <GutierrezK@saccounty.gov>  
**Subject:** Jesuit High School Stadium Lighting (PLNP2021-00262)

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
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37-1 ] I believe that the two most important Items in the EIR which have the most impact on the neighborhood and which I feel were not adequately covered in the EIR were solutions to the noise, especially the volume of the public address system, and parking alternatives, so people are discouraged from parking down side streets.

Thank you,  
Gaylord Moulds

**ITEM 2 CARMICHAEL CPAC PUBLIC COMMENT 003**

**From:** gjmoulds@surewest.net

**Sent:** Sunday, October 8, 2023 4:25 PM

**To:** Clerk of the Board Public Email [BoardClerk@saccounty.gov]

**Subject:** Jesuit High School Stadium Lighting, control no: PLNP2021-00262

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

To whom it may concern:

38-1 | Jesuit continues to pursue building a major sports complex in the Wilhaggin/Del Dayo community, a lovely, quiet neighborhood of single family homes. Homeowners pay a premium price for their homes and high property taxes for the privilege of living here. Yet, Jesuit continues to get approval to expand their presence in the neighborhood even if it's at the expense of its neighbors.

38-2 | Jesuit's request to now install stadium lights in order to play Friday night football games as well as other sporting events will further disrupt the lives of neighbors living in close proximity. Friday night football games that last at least until 10:00 pm concern us as follows:

38-3 | **NOISE:**

Excessive noise from the public address system (P.A.), the band and a crowded stadium are more than enough to send neighboring homeowners and potential guests indoors, unable to enjoy an evening outdoors in their backyard. The Environmental Impact Report (EIR) said it best by describing the noise level in our area as a "significant and unavoidable impact regardless of mitigation". Otherwise, it's saying significant noise is something we'll have endure for the duration of a three hour game lasting until 10:00pm. Further, excessive noise will continue between 10:00 pm and at least 11:00 pm as potentially 1500 to 2000 or more exuberant fans exit the stadium after a game. This noise will be even more severe if people attending the game are allowed to park down side streets. This, of course, at a time when many homeowners have retired for the night and are trying to sleep.

38-4 | **PARKING/SECURITY**

Jesuit has identified a number of parking locations including overflow lots at Arden Hills and Rio Americano High School for games with between 2000 and 3000 people attending. Jesuit also proposes to have signs and/or monitors to keep people from parking down side streets. While this is an excellent idea, I'm not sure they can legally do that. And if not, people will most often choose parking that is most convenient which more than likely will be down side streets. If that occurs, residents will be confronted with additional chaos after the game including parking issues, noise, and potentially security issues late into the night.

## CONCLUSION

38-5

Neither the EIR or "JESUIT'S PROTOCOL FOR NIGHT EVENTS" were fully able to provide adequate solutions to the noise or parking concerns brought about by the installation of stadium lights and that are of considerable concern to the neighbors who live on streets surrounding Jesuit's stadium complex. A major sports complex with stadium lights and games lasting until 10:00 pm should not be allowed in the middle of a quiet residential neighborhood. And the P.A. system as it exists, is far too loud and invasive. For these reasons, I would definitely disapprove of Jesuit's stadium lighting project.

Thank You,  
Gaylord Moulds

**ITEM 2 CARMICHAEL CPAC PUBLIC COMMENT 008**

**From:** susquilt@aol.com  
**Sent:** Thursday, October 5, 2023 2:35 PM  
**To:** Clerk of the Board Public Email [BoardClerk@saccounty.gov]  
**Subject:** Comments regarding Jesuit H.S. Lighting Project

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Hello,

My comments regarding the published EIRD:

- 39-1 | 1. I currently live about 1/4 mile from Jesuit. Everytime there are announcements made to the student body and faculty, my husband and I, sitting in our backyard, can clearly hear their words. The study of noise levels in the neighborhood are sorely lacking in the report. There is enough new technology available, there is no reason these messages could not be sent by txt or email to reduce this noise pollution. If there were then to be added night games with the use of speakers, the report again is deficient in correctly measuring the change in noise levels. Averaging noise level measurements will incorrectly state the impact on the neighborhood and give a false assessment of what we have to endure.
- 39-2 | 2. Parking along American River Drive should be limited to the sidewalk adjacent to the Jesuit High School property line. This is a requirement the city imposed on Sacramento Country Day School. Jesuit's situation is no different and should be applied to them as well. And there should not be any parking allowed in any of the neighborhood streets surrounding Jesuit High School. If there is not enough parking on site at Jesuit High School, there should not be activities scheduled.
- 39-3 | 3. Many of us moved to this neighborhood to be able to enjoy the American River Parkway. To install lighting that could endanger the species of animals that live in and around the Parkway is a travesty. The EIRD does not adequately assess the damage that could be done to the wildlife living in the Parkway. A study should be done to fully define any damage to their living environment and put a halt to the temporary lighting currently used by Jesuit until this assessment has been completed.
- 39-4 | 4. Lastly, It is only a minority of the student body that represents families in this community around Jesuit High School. As a community member, it makes no sense that people from other areas of the Sacramento region are trying to define what our neighborhood should put up with in terms of noise, traffic, outdoor lighting and impact on the wildlife. Our representatives in our government should be responsible for ensuring these studies and documents of what will actually occur from this lighting project be accurate and comprehensive in order for both Jesuit and the neighborhood to reach a successful conclusion as to whether this project should proceed.

Thank you for listening,  
Susan Myers

[Sent from AOL on Android](#)

**From:** [Susan Myers](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#)  
**Subject:** PLNP2021-00262 – Deficient Draft EIR Jesuit Lighting Proposal  
**Date:** Sunday, October 22, 2023 3:29:29 PM

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**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Hello Kimber,

40-1 ] An environmental study of wildlife impacts is essential before the Jesuit expansion project sign-off. We currently see owls in our backyard and geese on Jesuit's lawn. I'd hate to think those lights would create dangerous conditions for them when there wasn't any danger before.

40-2 ] The Draft EIR is not complete and does not include wildlife impacts.

Sincerely,

Susan Myers

4981 Keane Dr, Carmichael, CA 95608

October 17, 2023

Sacramento County  
Planning and Review  
827 7th St, Room 225  
Sacramento, CA 95814

RECEIVED

OCT 25 2023

County of Sacramento  
Department of Community Development  
Planning and Environmental Review Division

Re: Jesuit High School Stadium Lighting

- 41-1 [ We oppose the Use Permit Amendment to PLNP2018-00190 to allow stadium lighting at Jesuit High School athletic field.
- 41-2 [ The negative impact on traffic, noise, air, and light during night time hours is a paramount concern.
- 41-3 [ Many cars on American River Dr., Jacob Lane, and especially Fair Oaks Blvd. exceed the speed limit. Accessing Fair Oaks Blvd. from Day and Del Dayo Drives is a challenge and often dangerous. Added heavy night traffic from Jesuit and other school activities will greatly exacerbate this problem.
- 41-4 [ Listening to announcements, games, bells during the day is welcome, but on a nightly basis would not be. How often and for how long the field will be used and lit is not clear.
- 41-5 [ The light from two 100 foot and two 90 foot poles, sidewalks, other pathways, and multiple vehicles will extend well into neighbor residential areas. The lit night sky may negatively affect both humans and animals.
- 41-6 [ Is Jesuit renting, or contracting out field use for financial gain or subsidy?
- 41-7 [ Jesuit High School is a renowned institution and has/does contribute positively to the lives of many. This permit amendment, however, does not positively affect the residential community surrounding its campus.

Sincerely,

Patricia G Baker

1630 Del Dayo Dr

Jonathan H. Baker

1630 Del Dayo Dr

Jan R. Baker

1657 Del Dayo Dr

Stephanie Baker

1658 Del Dayo Dr

Carmichael CA

95608

Mary Myles

1662 Del Dayo Dr

Candy Jolly

1661 Del Dayo Dr

Liv Hottinger

1670 Del Dayo Dr.

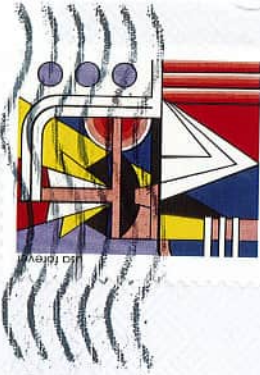
Lynne Cleo 1657 Del Dayo Dr.

[Signature] s/a



M.C. Myers  
1662 Del Dayo Dr.  
Carmichael, CA 95608

SACRAMENTO CA 957  
23 OCT 2023 PM 4 P



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County of Sacramento  
Planning and Review  
827 7th St. Room 225  
SACRAMENTO, CA 95811

OCT 25 2023

County of Sacramento  
Department of Community Development  
Planning and Environmental Review Division

95814-249699



Sacramento County Planning and Environmental Review  
Attn: Julie Newton  
Environmental Coordinator  
827 7<sup>th</sup> Street, Room 225  
Sacramento, California 95814  
CEQA@saccounty.gov

Dear Ms. Newton,

42-1 | This is a comment letter on the Draft Environmental Impact Report (DEIR) regarding the Jesuit High School Stadium Lighting Project (Project), Control Number PLNP2021-00262, State Clearinghouse Number 2022100645.

42-2 | Air Quality  
How will air quality be impacted above the baseline vehicle emissions by allowing post-season games, which were held at Hughes Stadium, and the rental of the facilities at Jesuit High School? Though post-season games are very few, how many activities will be held at Jesuit High School for those who rent their facilities? This needs to be assessed.

42-3 | Biological Resources  
Impact BIO-1: Swainson's Hawk (SWHA), which is a California listed threatened species, has been known to nest along the American River Parkway, which is in close proximity to the Project area. A common mitigation measure for nesting SWHA is to establish a 0.25-mile radius buffer. A nest survey must encompass a 0.25-mile radius from the Project site to ensure that SWHA is not present.

42-4 | Brazilian Free-Tailed Bats and Hoary Bats, the latter which is on California Department of Fish and Wildlife's Special Animals List, occur in the area. Though Hoary Bats have the ranking of S4-Apparently Secure, which translates to a fairly low risk of extirpation in the state due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors. How are these bats affected by the night lighting and noise? Have the nearby trees been surveyed for bat occupation?

42-5 | Cultural and Tribal Resources  
As a mitigation measure, due to the proximity to the American River Parkway, a high probability of subsurface resources may occur. A cultural resources monitor should be onsite during any ground disturbance activity should a cultural resource be discovered.

42-6 | Noise  
The proposed night games at Jesuit High School would result in a significant and unavoidable impact, regardless of mitigation if using the current PA system. Other measures not discussed are researching and using a better sound system, limiting the number of night events, and not allowing the rental of the facilities during the night, just to mention a few.

42-7 | Transportation  
Increased traffic along two-way roads such as American River Drive and Jacob Lane will increase during night games. As a resident near American River Drive (ARD), lighting is dim at the intersections.  
↓ Pedestrian crossings at ARD become dangerous when vehicles are leaving a nighttime event. Having



42-7  
Cont. | improvements at Tennyson Way and ARD is a start. More safety features as stated in Mitigation Measure TR-2 for more intersections along ARD should be considered.  
| Respectfully submitted,

Joy Hiroko Nishida

430 Claydon Way  
Sacramento, California 95864

**ITEM 2 CARMICHAEL CPAC PUBLIC COMMENT 004**

**From:** Richard Paleski [rpaleski@comcast.net]  
**Sent:** Sunday, October 8, 2023 3:28 PM  
**To:** Clerk of the Board Public Email [BoardClerk@saccounty.net]  
**Subject:** Public comment Oct 11, 2023 meeting Agenda item PLNP2021-00262

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Agenda item # PLNP2021-00262

Jesuit High School Stadium Lighting

To all CPAC members and neighborhood residents,

43-1 | Currently our neighborhood is subject to two distinct and separate traffic cycles when Jesuit High School and Rio Americano schools are in session. We are subject daily to a huge surge in vehicles driven by enrolled students and other vehicles transporting student/students to be dropped off at these two schools. The first influx of vehicles, totaling many hundreds of them, occurs mostly every weekday between approximately 7:30 and 8:45 AM. This massive influx of cars and trucks creates a large increase in street traffic, noise, and pedestrian activity. The streets surrounding these schools are all impacted by this activity every weekday.

43-2 | Later in the day-again every weekday-from around 3:00 PM until 4:00 PM the same surge of traffic will occur when these schools are in session.

Allowing the installation of Stadium Lighting and the nighttime scheduling of more than two hundred plus sporting events throughout the year at the Jesuit High School will set up a second set of two more traffic cycles in our neighborhoods at times of the day that currently do not see vehicular and pedestrian traffic beyond that of local residents transiting to and from their homes on a normal weekday evening. Prior to each evening event each of these visiting vehicles will enter the local streets and search for parking, discharge passengers, and create noise as they leave and head to the stadium. At the finish of these events—at a time when many people, infants, young and old are in their homes-many already sleeping-the quiet of their neighborhood (and their daily rest) will be disturbed by the return of the crowds of event goers who will now again start their vehicles, slamming doors, trunks and playing music while talking outside of homes, idling their vehicles in traffic while waiting to enter the flow of traffic all leaving at the same time.

43-3 |  
↓

- The installation of stadium lighting at Jesuit High School, the creation of their commercial Sports Complex, the timing of their proposed annual schedule of

43-3  
Cont.



evening events are all components of a program that has no place in our residential neighborhood and will result in the complete negative transformation of the tranquil and peaceful **environment** we currently reside in. In short the stadium lighting and all proposed changes and additions should not be allowed to be built in any form.

Richard Paleski

**From:** [Lisa Phenix](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#)  
**Subject:** Public Comment that the Draft EIR related to Jesuit Stadium Lighting, PLNP2021-00262 Staff Report UPP-DRS  
**Date:** Wednesday, October 18, 2023 10:31:32 PM

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
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Dear Senior Planners Gutierrez and Gregory:

44-1 | As to PLNP2021-00262, I respectfully comment that the Draft EIR is incomplete and inadequate. I respectfully request that a full biological assessment be done regarding the impacts of the proposal on the very nearby American River Parkway, its habitat, and protected wildlife, birds, reptiles, amphibians, insects and fish. I request that this assessment include but not be limited to the impacts on habitat and wildlife from the fact that many mammals, birds, insects, amphibians access, traverse and forage our neighborhood and Jesuit property to and from the parkway. It is well documented that light, sound, vibration, and increased human activity detracts many protected species, plants, and degrades their habitat. As the proposal will result in more traffic which will increase air pollution in my neighborhood, I respectfully request an in depth assessment of air pollution and its impact in our neighborhood be included.

44-2 | As this proposal will result in and is connected with construction, existing landscape disruption, and artificial turf, I request study of the impact of any and all chemicals that will likely be used, off gassed, etc, in relation to this project. Also please study and review the impact of increased human waste, trash, and construction disruption to the area's soil as Jesuit and all of our neighborhood drainage drains directly into the American River. In 2015, Jesuit was digging and invasive Japanese beetles were found. Jesuit allowed California Department of Food and Agriculture (CDFA) to aggressively spray the athletic fields every 2 weeks all summer and continued to run summer school and have summer sports camps on these sprayed athletic fields, despite requests from parents to delay student exposure. The pesticides are proven to cause cancer and affect adolescent brain development. Due to Jesuit's size, pesticide lingered in the air, and drifted. Our entire neighborhood was doused with toxic pesticides including Neonicotinoids (highly toxic to pollinators and aquatic invertebrates), and cancer causing Carbaryl. All amphibians in the area where died, Children and grandparents got sick, cancer survivors were impacted, wildlife, bees, birds etc were harmed and died. Although Jesuit was advised of the toxicity of the pesticides sprayed and neighbors asked that Jesuit actively monitor CDFA, to spray in the least invasive manner, Jesuit failed to make any accommodation. Our teen boys played on Jesuit fields exposed to many toxins unnecessarily. CDFA was found to be in violation of state law.

<https://www.ewg.org/news-insights/news-release/2022/05/court-rejects-californias-blanket-approval-pesticide-spraying>

44-3 | Our neighborhood is slowly recovering. Jesuit keeps expanding to the detriment of its neighbors. Please respect that this is a family area near the American River Parkway with health conscious people and protected wildlife, nesting birds, and protected plants that will be exposed to much greater air, water, light, sound, and vibration pollution. Thank you in advance for your careful consideration of my comments.

Sincerely, Lisa Phenix, Jesuit neighbor

**From:** [Marybeth Primeau](#)  
**To:** [Clerk of the Board Public Email](#); [Gutierrez, Kimber](#); [Gregory, Carol](#); [PER-CEQA](#)  
**Subject:** Draft EIR for Jesuit High School Stadium Lighting UPP-DRS DEIR Comments PLNP2021-00262  
**Date:** Thursday, October 26, 2023 1:02:38 PM

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Commissioners,

45-1 | It has come to my attention that you are looking for flaws or deficiencies in the draft EIR. As a resident of the neighborhood surrounding Jesuit, I find a few things that need to be considered before a decision is made.

45-2 | 1. The traffic assessment in the draft assumes 1,500 attendees for football games. That appears to be too low of an estimate. The stadium capacity is 3,000 and a recent exhibition night game on 8/25/23 had 2,000 attendees. The draft EIR plate PD-5 estimates crowds up to 3,000 people for the playoffs. Such crowds should also be expected for games with rival teams. The traffic assessment needs to be revised, assessing for 3,000 attendees.

45-3 | 2. The traffic assessment in the EIR draft assumed 3.2 passengers per vehicle, based on a high school in Carmel, CA. No basis for this assumption is provided. There is no reason to believe this is a valid assumption. Driving patterns will be different in the Sacramento area. Jesuit HS has students from a very wide geographic area. On a Friday evening, it is likely that parents, families and friends will be traveling from different workplaces to the stadium, often traveling alone in each car. The number of passengers per vehicle needs to be directly determined for Jesuit HS events.

45-4 | 3. The EIR draft says "Attendees also park on nearby residential streets where it is allowed" But the draft does not address the impact of this parking. Environmental impacts such as littering, loitering, vandalism, noise and safety need to be assessed.

45-5 | 4.. The EIR draft also states that Jesuit will "install pedestrian crossings with enhanced safety features..." but it does not offer any specific locations or details. The specific location and details of this proposed safety upgrade need to be included.

I look forward to seeing these above mentioned items in the final EIR.

Thank you,  
Marybeth Primeau  
1081 Harrington Way  
Carmichael, CA 95608

**From:** [Newton, Julie](#)  
**To:** [Gregory, Carol](#)  
**Subject:** FW: Jesuit High School Stadium Lighting - PLNP2021-00262  
**Date:** Monday, November 6, 2023 8:20:20 AM

---

-----Original Message-----

From: PER-CEQA <CEQA@saccounty.gov>  
Sent: Monday, November 6, 2023 7:13 AM  
To: Messerschmitt, Kevin <messerschmittk@saccounty.gov>; Little, Alison <littlea@saccounty.gov>; Newton, Julie <newtonj@saccounty.gov>  
Cc: Gutierrez, Kimber <GutierrezK@saccounty.gov>  
Subject: FW: Jesuit High School Stadium Lighting - PLNP2021-00262

Andrea Guerra, Senior Office Assistant  
Planning and Environmental Review  
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 874-2862 (direct) [www.planning.saccounty.gov](http://www.planning.saccounty.gov)

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-----Original Message-----

From: Kanwal Randhawa <kanwald\_randhawa@yahoo.com>  
Sent: Sunday, November 5, 2023 10:40 PM  
To: PER-CEQA <CEQA@saccounty.net>  
Subject: Jesuit High School Stadium Lighting - PLNP2021-00262

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Hello,

46-1 I have a property on 1099 Stewart Road, Sacramento CA 95864. I am opposed to the Stadium lighting as I believe it would adversely affect the night time ambients in that neighborhood. I'm hoping this project will not be approved. I would appreciate being apprised of what is happening with this project. Thank you!

Kanwal Randhawa  
Cell 916-943-6336

Sent from my iPhone

**Ann Edwards**  
County Executive



**Dave Defanti**  
Deputy County Executive  
Community Services Agency

**Regional Parks**  
Liz Bellas - Director

**County of Sacramento**

October 27, 2023

Kimber Gutierrez, Senior Planner  
Carol Gregory, Environmental Analyst  
Sacramento County Office of Planning and Environmental Review  
827 – 7<sup>th</sup> St., Room 225  
Sacramento, CA 95814

RE: DEIR FOR JESUIT HIGH SCHOOL STADIUM LIGHTING/SOUND

Dear Kimber Gutierrez and Carol Gregory:

47-1 | Thank you for providing Sacramento County Department of Regional Parks the opportunity to provide comments on the Draft EIR for Jesuit High School Stadium Lighting/Sound. Our comments pertain to the visual impacts of the lights to the American River Parkway.

47-2 | Artificial lighting is a concern as it can impact public night sky aesthetics and diminish habitat function by acting as an environmental stressor. Effects could include loss and/or redistribution of nesting and shelter locations, decreased foraging and predation success, a shift in migration patterns, disruption of terrestrial and aquatic wildlife’s circadian rhythms and behavior, and adverse impact to wildlife survival. Glare from lighting sources outside of the Parkway can also affect the visibility for Parkway cyclists after dusk.


47-3 | The project, as described in the DEIR and appendixes, is visible to the American River Parkway, and appears to be in compliance with Sacramento County American River Parkway Plan (ARP Plan). The ARP Plan includes recommendations for minimizing visual impacts upon the Parkway from uses and facilities adjacent to the Parkway. These recommendations include setbacks or buffers, screening, using colors and materials of non-reflective surfaces using colors that blend with the colors of the surrounding vegetation. The ARP Plan also recommends

47-3  
Cont. } using techniques to discourage intrusive lighting, such as optimizing foot candle ratios, shielding, re-aiming, non-glare lighting, full cut off optics (FCOs), short heights, timers, motion sensors, and adjacent native tree and shrubbery plantings.

47-4 } While artificial lighting that is visible to the American River Parkway is not ideal, our staff appreciates that the Jesuit High School Stadium Lighting project has been designed to minimize intrusive lighting and visual impacts upon the Parkway. We appreciate the opportunity to comment and look forward to a visually unobtrusive lighting project.

If you have any questions please contact Mary Maret at (916) 875-4918 or [MaretM@saccounty.gov](mailto:MaretM@saccounty.gov).

Cordially,

DocuSigned by:  
  
4FA1447F54B14F8...

Liz Bellas





# Save the American River Association

8836 Greenback Lane, Suite C • Orangevale, CA 95662

916-936-4555 • E-mail: [info@SARAriverwatch.org](mailto:info@SARAriverwatch.org) • [www.SARAriverwatch.org](http://www.SARAriverwatch.org)

RECEIVED

OCT 18 2023

October 16, 2023

County of Sacramento  
Department of Community Development  
Planning and Environmental Review Division

Kimber Gutierrez, Senior Planner

Carol Gregory, Environmental Analyst  
Sacramento County Office of Planning &  
Environmental Review  
827 – 7<sup>th</sup> St., Room 225  
Sacramento, CA 95814

RE: Draft EIR for Jesuit High School Stadium  
Lighting/Sound.

Dear Ms. Gutierrez and Gregory:

48-1

It has come to the attention of Save the American River Association (SARA) that Jesuit High School proposes to add stadium lighting and sound to its athletic fields located at American River Drive and Jacob Lane. (<https://planning.saccounty.gov/Pages/Jesuit-High-School-Stadium-Lighting.aspx>). Although the DEIR notes the proximity to the American River Parkway, SARA and other entities that developed the American River Parkway Plan were not contacted, notified, or consulted by Sacramento County. (see page 65 of DEIR)

**2022 Board of Directors**

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- Randy Smith
- Dale Steele
- Ron Stork
- Ron Suter
- David Thesell
- Eric Webb
- Dan Winkelman

48-1  
Cont. | Since SARA has just recently been advised of this proposal by a nearby neighbor, it appears that the County's public outreach has not been effective.

48-2 | This athletic field is approximately .3 miles from the American River Parkway. Parkway access is right at the end of Jacob Lane.

48-3 | A review of Sacramento County's DEIR as to Jesuit's proposal reveals that it fails to consider the impact of the proposal on the Parkway's habitat, protected wildlife, plants, and wild and scenic river.

48-4 | Recent studies document serious impacts of light, sound, traffic, vibration, pollutants and more caused by proposals such as Jesuit's on the wildlife, plants and habitat of the Parkway. Moreover, the DEIR acknowledges negative health impact to persons using the Parkway for its intended recreational purposes.

48-5 | SARA respectfully requests that a full Biological Assessment be required as part of the EIR for this proposal.

48-6 | SARA also requests that Sacramento County consult directly the following local area organizations regarding this proposal for feedback: County Regional Parks, California Native Plant Society, Water Forum, Lower American River Conservancy and Environmental Council of Sacramento. Extensive restoration is occurring at or near this point of the Parkway. Such restoration could be impacted.

48-7 | SARA respectfully requests that Sacramento County pull existing approved and withhold approval of any further proposed temporary use permits pending biological assessment above requested to maximize Parkway protection as required by county and state laws.

48-8 | The DEIR documents that this proposal will increase pollution which will harm students on site, nearby residents, and recreational users of the parkway. As presented, SARA respectfully objects to the proposal and requests that it be declined.

Sincerely,



Stephen Green

President

## NOTES

1. Studies showing harmful effects to habitat, plants, wildlife, etc by light.

Light Pollution Harms Us- - Missing the Dark: Health Effects of Light Pollution by Ron Chepesiuk, In Environmental Health

Perspectives V. 117, No. 1; 2009

Jan, <https://ehp.niehs.nih.gov/doi/10.1289/ehp.117-a20>

Want to Help Wildlife? Turn off your Lights by Sarah Gibbens,  
Published in National Geographic April 5, 2023

2. Sound harms wildlife and habitat

Effects of Noise on Wildlife, by National Parks Service February 2, 2018 Natural Division, [https](https://www.nps.gov/orgs/1050/index.htm) Dark Side of Light: How Artificial Light is Harming the Natural World by Aisling Irwin, in Nature 553, 268-270, Jan. 29,

2018, <https://www.nature.com/articles/d41586-018-00665-7>, doi:<https://doi.org/10.1038/d41586-018-00665-7>:// Sounds

Sound Harm Wildlife and Habitat and Night Skies

[www.nps.gov/orgs/1050/index.htm](http://www.nps.gov/orgs/1050/index.htm)

3. Vibration harms wildlife and habitat

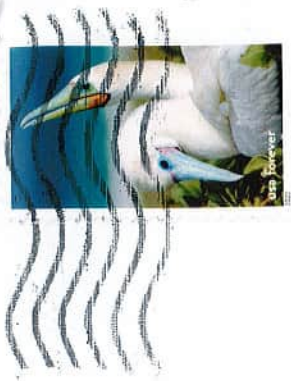
Comparative Vibration Levels Perceived Among Species in a Laboratory Animal Facility by John Norton, Will Knard and Randall Reynolds, Sin Journal of the American Association for Laboratory Animal Science, September 2011, Vol 50, No 5, Pages 653-659.

Cc: Mary Maret, Sacramento County Regional Parks Dept.  
Michael Wood, Principal, Jesuit High School





**Save the American River Association**  
8836 Greenback Lane, Suite C • Orangetide, CA 95662  
Phone: 916-936-4555 • E-mail: [info@SARAriverrwatch.org](mailto:info@SARAriverrwatch.org)



SACRAMENTO CA 957  
16 OCT 2023 PM 7 L

KIMBER GUTIERREZ, SENIOR PLANNER  
CAROL GREGORY, ENVIRONMENTAL ANALYST  
SACRAMENTO COUNTY OFFICE OF PLANNING & ENV.  
REVIEW  
827 - 7TH ST., ROOM 225  
SACRAMENTO, CA 95814



## ITEM 2 CARMICHAEL CPAC PUBLIC COMMENT 021

**From:** Elizabeth Hughes [elizconsulting@hotmail.com]  
**Sent:** Tuesday, September 12, 2023 9:30 AM  
**To:** Gutierrez. Kimber [GutierrezK@saccounty.gov]  
**CC:** Gregory. Carol [GregoryC@saccounty.gov]; Clerk of the Board Public Email [BoardClerk@saccounty.gov]; Mary Ann Shepperd [mashepp@sbcglobal.net]  
**Subject:** Oppose Jesuit's Stadium Lighting Project

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
 If you have concerns about this email, please report it via the Phish Alert button.

Hello Kimberly,

Please include the public comments below from Mary Ann Shepperd to the Jesuit High School Lighting Proposal records.

Regards,

Elizabeth Hughes  
 916-214-4307

---

**From:** Mary Ann Shepperd <[mashepp@sbcglobal.net](mailto:mashepp@sbcglobal.net)>  
**Sent:** Friday, September 1, 2023 7:51 PM  
**To:** Elizabeth Hughes <[Elizabeth.Hughes@tdmspecialists.com](mailto:Elizabeth.Hughes@tdmspecialists.com)>  
**Subject:** Re: Do you Oppose Jesuit's Stadium Lighting Project - Assistance Needed

49-1 | I strongly oppose Stadium Lighting at Jesuit High School.

49-2 | I have lived on Keane Drive since 1972. I have seen the stop sign at Jacob and Fair Oaks changed to a stop light which was a great safety measure. I have seen the enrollment of students increase from 100 to 1000.

49-3 | Schools should be in neighborhoods, however they **should enhance the neighborhood**, not deter from it. Parking in front of residential homes, cars running stop signs, speeding is becoming a real danger in this neighborhood. I feel that the stadium lights will increase these dangers exponentially!

49-4 | I hear the noise from baseball and football games and band practice inside my home. I don't mind it because it is during the day or early evening. I actually enjoy hearing the baseball and football scores on the PA. It is "tolerable" now. **I WILL NOT** enjoy listening to the noise until 10pm followed by yelling and many cars zooming through the neighborhood for **ANOTHER HOUR OR SO (11PM)**.

49-5 | *The studies that have been done are meaningless to a point. Jesuit **IS** in a neighborhood and I would hope that Jesuit would continue the good relationship with the neighbors surrounding the school and take into consideration of how this would impact the neighborhood.*

It's a shame that this is even being considered!

Please do what is "right" for a continued relationship with us, your neighbors.

Thank you.

**From:** [Mary Ann Shepperd](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#)  
**Subject:** Jesuit Proposed Project  
**Date:** Sunday, October 22, 2023 8:36:30 PM

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
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Sacramento County,

50-1 | I am opposed to the Jesuit "Lighting" Project for the reasons below.  
I appreciate your time to read my concerns.

50-2 | - All of the noise reduction improvements will help very **minimally**. **Noise is noise is noise!** There will still be the "roar" of the crowd and PA. These improvements will **also** not help with people walking and talking loudly to their cars, car doors slamming, motors starting, horns honking, etc. from 8-9pm and 10-11pm. (after the games end)

50-3 | **The bottom line is how does this benefit the neighborhood and it's residences?**  
Jesuit will benefit by getting revenue from "leasing" out their "sports complex".

50-4 | The neighborhood will **suffer**. We get NOISE 261 days each year, 300 to 600 + or - cars and shuttles and buses and 1000 or 2000 people on the neighborhood streets that are not "made" for that kind of traffic. All of this traffic will overwhelm our peaceful **established** neighborhood.

50-5 | - This is a NEIGHBORHOOD and can't nor should we have to accommodate the immense extra traffic these constant games will cause. Even with all of their "plans" for safety there is still a very real danger to ALL pedestrians, neighbors included.

50-6 | - I find is inconceivable that Jesuit finds it is **reasonable** for our neighborhood "to have one weekday afternoon and evening free" and Saturdays from noise.

This would be "**your worst nightmare neighbor**"!! Is constant noise for 261 days a year reasonable?  
Would you want that in a neighbor?  
I enjoy my backyard and my windows open for fresh air but not if I have to listen to constant noise 261 days a year which will be unfair to me and many other neighbors.

50-7 | Schools should be in neighborhoods but as anyone who lives in a neighborhood it comes with a responsibility of being a "good neighbor". I find this total disruption 261 days a year is definitely NOT neighborly.

I think it a huge imposition for our community as the residences WILL suffer.

50-8 | - I have a great concern of the **increase in crime in the neighborhood**...a very real threat.

50-9 | - I am also greatly concerned for our house values...though not measurable at this time. Personally, I would not move to a neighborhood with constant noise the majority of the whole year.

50-10 | - I support Jesuit and it's sports program BUT not other schools or clubs to use their facilities...**which affects my enjoyment of living in this neighborhood**. Other venues are more suited to a "sports complex".

50-11 | - This draft mentioned "Sports Complex". Shouldn't that be in a different location that is zoned for that...on public or commercial land, not near residences across the street and in Jesuits "back yard". This



50-11 Y  
Cont. | is a fully established neighborhood and has been for years. I understand Jesuit wants to enhance their sports program but NOT to the detriment of this neighborhood.

50-12 | I think the best solution, which was mentioned in this draft, is for Jesuit and maybe other high schools "explore the possibility of holding events at other schools or locations" that is more suited to the extra traffic and the safety of the attendees, not in the middle of a long established neighborhood.

50-13 | -Unfortunately I know very little about zoning laws but I believe there is a reason for them...to avoid this sort of thing happening where it "shouldn't be allowed.

50-14 | - Jesuit has been a "good neighbor" for years. I'm greatly saddened that Jesuit wants to do this to our neighborhood.

- Please have consideration for our children and the working.

- Please help our neighborhood.

Thank you for your consideration.

Mary Ann Shepperd

**From:** [Maryam Mehrkhast Smitheman](#)  
**To:** [PER-CEQA; Gutierrez. Kimber; Gregory. Carol](#)  
**Cc:** [Elizabeth Hughes](#)  
**Subject:** DEIR Comments PLNP2021-00262  
**Date:** Friday, October 27, 2023 6:09:02 PM  
**Attachments:** [Video.mov](#)

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Hello planning Commission,

51-1

This afternoon along with so many we have encountered here on Piccadilly Cir. is Jesuit fans filling up our street & having difficulty even just turning into Piccadilly due to spectators walking to their cars, running across American River Drive & the amount of traffic going down American River drive!

Today I noticed many single driver cars, some with more but it's not the norm for there to be multiple people in the car as the draft EIR states.

Signs were up yet people completely disregarded them!



**From:** [Maryam Mehrkhasht Smitheman](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#); [PER-CEQA](#)  
**Cc:** [Elizabeth Hughes](#)  
**Subject:** DEIR Comments PLNP2021-00262  
**Date:** Friday, October 27, 2023 6:24:29 PM

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Download full resolution images  
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Dear planning commission,

52-1 | Your draft EIR has not taken into account the accurate number of participants & cars to these  
52-2 | Jesuit events!  
I have also not seen any consideration to the community's disruption in getting access to their  
homes, emergency services or policing of these events!  
With this proposal we will no longer be living next to a high school, instead we'll be living  
next to a full fledged sports complex with all of the pitfalls & dangers of one!  
Please consider all of these things when reviewing this project!

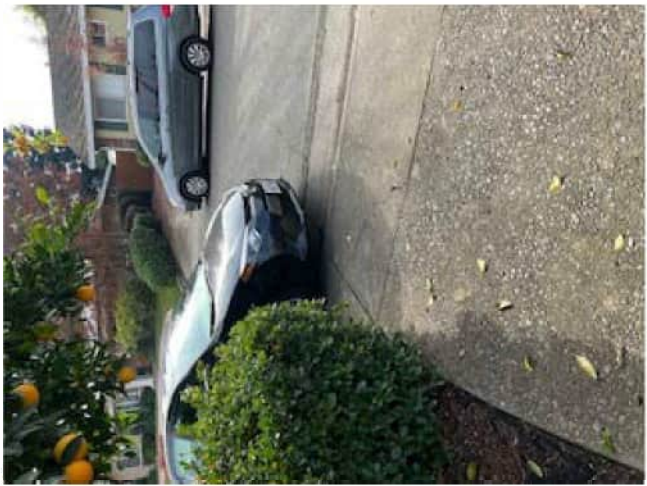
Thank you!

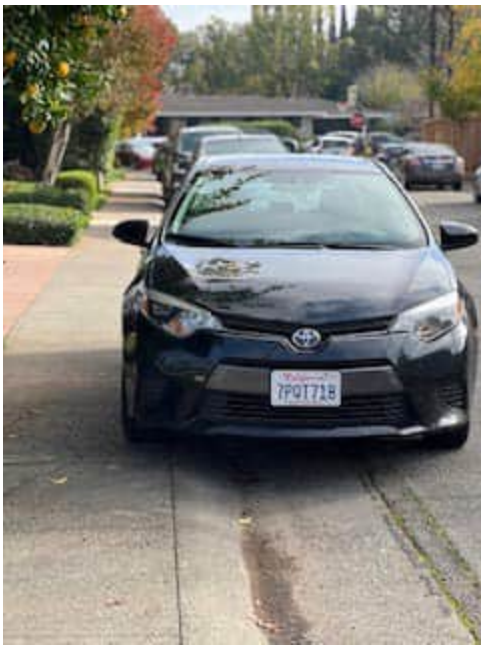
Maryam Smitheman  
Piccadilly Cir

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IMG\_2761.MOV

0 bytes





Sent from my iPhone

**From:** [Newton, Julie](#)  
**To:** [Gutierrez, Kimber](#); [Gregory, Carol](#)  
**Subject:** FW: APN: 289-0210-045-000  
**Date:** Tuesday, September 26, 2023 4:32:40 PM

FYI

**From:** PER-CEQA <CEQA@saccounty.gov>  
**Sent:** Tuesday, September 26, 2023 2:57 PM  
**To:** Newton, Julie <newtonj@saccounty.gov>; Messerschmitt, Kevin <messerschmittk@saccounty.gov>  
**Subject:** FW: APN: 289-0210-045-000

Jesuit

**Andrea Guerra, Senior Office Assistant**  
Planning and Environmental Review  
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 874-2862 (direct)  
[www.planning.saccounty.gov](http://www.planning.saccounty.gov)



*Planning & Environmental Review (PER) has limited walk-in hours at our downtown public counter. Appointments can be made for most services. Please see our website at [www.planning.saccounty.gov](http://www.planning.saccounty.gov) for the most current information on how to obtain services and to schedule an appointment.*

 Please consider the environment before printing this email

**From:** Todd Sperber <todd@sperberinvestments.com>  
**Sent:** Tuesday, September 26, 2023 2:33 PM  
**To:** PER-CEQA <CEQA@saccounty.gov>  
**Subject:** APN: 289-0210-045-000

You don't often get email from todd@sperberinvestments.com. [Learn why this is important](#)

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Jesuit High School Lighting (PLNP2021-00262)

53-1

I am writing because I received a letter, "Notice of Availability", from the County of Sacramento in reference to the lighting of the stadium.

I am a neighbor that lives right next to the school. My three oldest kids are all in college now, one went to Rio Americano, one to Jesuit, and one to El Camino. I am 100% in favor of lighting the

53-1  
Cont.

stadium. Our schools are what make our community great and the more we can do to support them and the kids the better. The noise is not a bother, but rather a blessing. It's wonderful to hear kids participating in whatever even is going on in the community. I can also hear the morning announcements at Del Dayo elementary, every morning, and it's great. It makes me feel part of the community where I live. I wish Rio was applying for lights as well because they too should have them at their stadium.

Please approve this project.

Todd Sperber



**From:** [sellsta@aol.com](mailto:sellsta@aol.com)  
**To:** [Gregory. Carol](#)  
**Date:** Saturday, October 28, 2023 2:04:06 PM

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54-1

I am sad and disappointed with the decision that the 5 board members have made. We have lived in the neighborhood for over 30 years and have enjoyed the quietness and small amount of traffic in the area. I would bet that all 5 board members would not like to have a sports complex in there backyard. I can assume that all 5 board members have a friend or family member who has attended Jesuit High School and that is why you made this decision. I would ask that as you are reviewing the request of the neighbors you take it seriously the request that we are asking for and limit the damage that you have already bestowed upon the neighborhood. Please be mind full of the decisions that you make because they do have consequences.  
Steve



**From:** [Gutierrez, Kimber](#)  
**To:** [Gregory, Carol](#)  
**Subject:** FW: Jesuit Stadium Lighting- DEIR comments  
**Date:** Tuesday, October 31, 2023 9:43:27 AM  
**Attachments:** [image003.png](#)

---

Kind regards,

Kimber Gutierrez, Senior Planner  
Planning and Environmental Review  
(916) 874-7529



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---


**From:** PER-CEQA <CEQA@saccounty.gov>  
**Sent:** Tuesday, October 31, 2023 9:31 AM  
**To:** Messerschmitt, Kevin <messerschmittk@saccounty.gov>; Little, Alison <littlea@saccounty.gov>; Newton, Julie <newtonj@saccounty.gov>  
**Cc:** Gutierrez, Kimber <GutierrezK@saccounty.gov>  
**Subject:** FW: Jesuit Stadium Lighting- DEIR comments

***Andrea Guerra, Senior Office Assistant***

Planning and Environmental Review  
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 874-2862 (direct)  
[www.planning.saccounty.gov](http://www.planning.saccounty.gov)



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**From:** David Tait <David@thetaitgroup.com>  
**Sent:** Monday, October 30, 2023 11:47 PM  
**To:** PER-CEQA <ceqa@saccounty.net>; David Tait <David@thetaitgroup.com>  
**Subject:** Jesuit Stadium Lighting- DEIR comments

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Hello Project Coordinator,

55-1 | My name is David Tait and I am **supportive** of the stadium lights.

Born and raised in Carmichael, Jesuit alumni, parent of two graduates and one current student. Resident of Wilhaggen on nearby Ashton drive.

**A little History on Jesuit High School:**

Founded in 1963.....school and the fields built, as I understand, before the levees and before the neighborhood developed along American River Drive. In fact, nearby Rio HS was built only a few years after Jesuit. Since the 1960's, area home buyers have always been well aware of two nearby high schools and all that entails, including the potential for future stadium lights.

55-2 | **Are lights at Jesuit unique in the Sacramento region?**

I would estimate that most high schools in region have stadium lights. I would estimate that most of those HS are surrounded by neighborhoods. These stadiums for youth sports provide a gathering place for their communities. With lights at Jesuit, the communities of Del Dayo, Wilhaggen, Sierra Oaks, Arden park, Carmichael, where many Jesuit students and alumni reside, will have a gathering place to encourage and enjoy youth sports. Events are open to all neighbors.

In years past, when Jesuit rented lights for the Rio/Jesuit American River drive rivalry game.....tickets sold out within hours. It was a memorable community event. It felt like we lived in a small town with "Friday night lights".

55-3 | **Concerns about traffic and parking**

HS sporting events generate traffic whether during the day or evening. Daytime events have occurred since the 1960's. At recent Friday night light events, I think Jesuit did a good job encouraging and managing traffic off Fair Oaks Blvd., had parking on the upper athletic field, and had signs discouraging parking into the streets off American River Drive. I am confident future traffic and parking plans will greatly reduce the impacts to the nearby neighborhood.

55-4 | **Concerns about house value reduction**

Because Jesuit and Rio HS are located in the neighborhood, this is a sought after area to live. There will always be plenty of buyers willing to pay a premium. That's why I moved here!!!

I am confident that Jesuit will take all reasonable measures to limit impacts to the neighborhood. As an active parent, alumni and neighbor I am interested to see that happen.

On behalf of myself and many alumni and parents, we are supportive and excited for the project.

thanks  
David Tait  
Ashton Drive

October 18, 2023

56-1 | We live at 719 Whitehall Way, Sacramento CA, off American River Drive. We are two blocks from Rio Americano High School and two blocks away from Jesuit High School. Our children went to both Rio and Jesuit.

| We oppose Jesuit's Lighting Project.

56-2 | In reference to the "Proposed Conditions of Approval". It is a vague document and does not provide specifics for the neighbors to consider.

56-3 | 1. Who will monitor PA System? Will it be done for every event?

56-4 | 2. Who will monitor the traffic control, issue tickets? What about crossing guards? This should be done by off duty sheriff's and not Jesuit volunteers. Who will pay for the Sheriffs?

56-5 | 3. Food Vendors on our streets are totally inappropriate. It should be on Jesuit property and with the appropriate permits.

56-6 | 4. Where/when has Jesuit/County explored alternative event locations? Should a neighborhood representative be with them when they do this?

56-7 | 5. Should the Jesuit community outreach/ liaison program have several people on call to take complaints and report inappropriate behavior and traffic violations during every event?

56-8 | 6. What are the fines/penalties to Jesuit for non compliance of sound violations? Other violations?

56-9 | 7. The County has a lot to monitor that goes with Sound Compliance : Complaint Logs, On Site Inspections, Collection of Documentation and Evidence Collection, Issue Warnings, Issue Formal Notices of Violation, Community Engagement, Compliance Checks. Also, the Country has to monitor the traffic and parking and issue fines. This looks like a full time job for a County Employee just monitoring Jesuit Events plus being at these events.

56-10 | 8. Traffic and Parking. Where are the designated drop off locations? How many Jesuit volunteers would be directing traffic to parking lots? Use of public transportation and shuttles, that's a lot of buses in the neighborhood to accommodate 2000-3000 fans. What about the noise and pollution from the buses?

56-11 | 9. Where are the nearby parking lots? Is that Rio Americano High School, Del Dayo Elementary School, or William B Pond Park?

56-12 | 10. **Whitehall Way on the south side of American River Drive and the west side of Piccadilly Circle has not been addressed. These streets will be parked solidly with cars as the proposal only addresses Jacob Lane, Piccadilly Circle East, Tennyson, and American River Drive. There is no crosswalk here.**

56-13 | 11. **Jesuit implementing traffic control measures, road closures, detours or one way traffic traffic flow during events. This is absolutely a huge inconvenience to the neighbors if we can't leave or return from our homes without taking a detour.**

56-14 | 12. **As for Jesuit offering the neighbors ONE WEEKEND and ONE WEEK DAY free of events I find this absolutely ridiculous and saying it is "reasonable " is just**



56-14  
Cont.

**insulting. Jesuit High School should not be able to dictate to us when we can enjoy our homes and backyards. We should be able to enjoy the peace and quiet when we come home from work every night like most neighbors and neighborhoods.**

56-15

**13. As for Jesuit building a parking structure off Fair Oaks Boulevard... Perhaps they should build it first before asking to approve lighting.**

56-16

**14. The height of the lights and glow emitted from the lights at Jesuit for hours will ruin the look and serenity of our neighborhood. And will disturb any neighbors facing the Jesuit field.**

56-17

**15. Jesuit recommends people ride bikes to the stadium. That doesn't make sense for bikes to be leaving the stadium at night.**

56-18

In conclusion our neighborhood will be inundated with Increased traffic in the evenings and weekends. People do not obey traffic rules. Besides Speeding down American River Drive and not stopping at stop signs, people make u-turns, park in front of fire hydrants, park on the corners and in turn lanes. This makes it very difficult for residents to see oncoming traffic coming in and out of the side streets to turn onto American River Drive. Everyday on Whitehall Way we have to pull our cars out almost into the traffic lane to see if it is clear to turn left or right onto American River Drive. I'm sure it is the same on Tennyson as we do not have 4 way stops.

56-19

We recommend several traffic studies be done at different times of the day. Under the cover of darkness it becomes extremely dangerous for Adult Residents/Children walking or riding bikes in the neighborhood and crossing the streets

56-20

Jesuit is also a commuter school. People will be coming into our neighborhood from all different areas of Sacramento, Woodland, Roseville, Rocklin, Auburn etc. who do not necessarily share our values and the respect and pride we have for our neighborhood. The possibility of drugs/alcohol, crime, property damage and garbage coming into our neighborhood is a big reality. Who will pay for extra security in our neighborhood for damages done to our property and cars? Jesuit provides security that is for their property only.

56-21

In March of 2023 we had a guest who was, spending the night and parked her car in front of our house. In the morning she found it covered in syrup and flour. It cost \$200.00 to have it detailed as. We reported it to the Wilhaggin Neighborhood Association. Rio had a dance that Friday night.....Coincidence?

56-22

Parking in front of our own homes for our own families and guests will become impossible. Also our property values will go down as a result of the lights and evening events from Jesuit High School.

56-23

The noise level will carry at night. We live two blocks away from Jesuit but hear their loudspeakers, cheering, cowbells, the drum line and horns honking from Jesuit in our backyard during the day. The noise will be carried louder and farther at night time.

56-24 | On Saturday, October 7, 2023, Jesuit had an alumni party outside with a live band. I am assuming this was in their Quad. There was no audio control of the speakers that the band was using. It was extremely loud in our backyard which would be approximately 5 blocks away from their Quad. We were trying to enjoy a glass of wine with friends in our backyard, as it was a lovely fall evening. We had to go inside because the music was so loud. The music started at 6pm and ended at 9pm. There went our enjoyable evening.

We are becoming prisoners in our homes and are losing our rights to the quiet enjoyment of our homes and backyards in the evenings and weekends. We all put up with traffic and noise from both schools 7 days a week. Please don't ask more from us.

56-25 | We are all law abiding citizens and pay very high taxes in our neighborhood. Jesuit High School pays none. The responsibility of our County Supervisors is to protect the neighbors and neighborhood to make it a better and safer place to live. Allowing Jesuit High School to have lights and night games does not do that. Our elected officials need to step up and work for the people who voted and elected them.

56-26 | Times have changed and Jesuit has outgrown the neighborhood. Perhaps they should look at purchasing a piece of property elsewhere for their stadium and or their school.

Yours sincerely,  
Dale and Darlene Vaira

**From:** [Gutierrez, Kimber](#)  
**To:** [Gregory, Carol](#)  
**Subject:** FW: Jesuit Lights  
**Date:** Tuesday, October 31, 2023 8:48:33 AM  
**Attachments:** [image001.png](#)

FYI

Kind regards,

Kimber Gutierrez, Senior Planner  
Planning and Environmental Review  
(916) 874-7529



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**From:** Phil Vercruyssen <47huge@gmail.com>  
**Sent:** Monday, October 30, 2023 9:20 PM  
**To:** Gutierrez, Kimber <GutierrezK@saccounty.gov>  
**Subject:** Jesuit Lights

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
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- Ms. Gutierrez
- 57-1 | There is no mention of the maximum number of night events that may be held at J-Hi.  
 That makes the Draft EIR deficient.
- 57-2 | No lights or PA system at J Hi is my proposal as a neighbor.  
 TOO LIGHT.  
 TOO LOUD  
 TOO MUCH TRAFFIC.
- | NO LIGHTS AT JESUIT HIGH SCHOOL IS MY PROPOSAL.

Respectfully, Carole & Philip Vercruyssen

**From:** [carking8604@yahoo.com](mailto:carking8604@yahoo.com)  
**To:** [Gregory, Carol](#); [Gutierrez, Kimber](#); [PER-CEQA](#)  
**Subject:** DEIR Comments PLNP2021-00262  
**Date:** Sunday, October 29, 2023 5:12:57 PM

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.  
If you have concerns about this email, please report it via the Phish Alert button.

Dear County Planning Commission,

58-1 | This letter is to voice our family’s opposition to the proposed stadium lighting at Jesuit High School.

58-2 | In 2021, we purchased a Del Dayo Estates home knowing that there is a high school nearby with parameters for field and sports activities already established. Thus far, most of Jesuit outdoor activities produce acceptable levels of light (from current, permanent lighting) and noise (from sports participants, attendees, and band).

58-3 | Jesuit’s plan to turn its sports fields into an ever expanding sports complex with taller, brighter lighting (and hours expanding later into the evening) will negatively impact our neighborhood in the following ways:

- 58-4 | 1. Stadium lighting will increase (both the reach and intensity of) the light pollution we already experience in our homes and yards.
- 58-5 | 2. Jesuit already employs a booming broadcast system, and extra lighting with extending evening/night activities will continue to deteriorate the quality of life for neighbors, who should not be subjected to broadcasting voices and booming music any later than the current schedule.
- 58-6 | 3. We already deal with inconsiderate driving (including speed and traffic violators), parking issues, and discarded litter from sports attendees at Jesuit. Shifting sports activities to later times (aided by new lighting) increases the traffic issues that will happen during periods when homeowners are home trying to enjoy our homes and private yards.

58-7 | Our home not only faces West, beelined towards the proposed project, but it also sits directly on the busiest thoroughfare in the neighborhood - Jacob Lane. Hence, we shudder at the thought of how our quality of life will be affected by the project.

Additionally, the findings in the EIR only solidifies our absolute opposition of the stadium lighting proposed by Jesuit High School.

Regards,

Nick Vinciguerra & Brian O’Neill  
1150 Jacob Lane  
Carmichael, CA 95608



RECORDING REQUESTED BY AND WHEN  
RECORDED MAIL TO:

County of Sacramento  
Department of Community Development  
Planning and Environmental Review Division

COUNTY MAIL CODE: 01-225  
No Fee – For the Benefit of County of  
Sacramento (Code 6103)

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

**COUNTY OF SACRAMENTO**  
**PLANNING AND ENVIRONMENTAL REVIEW**  
**MITIGATION MONITORING AND REPORTING PROGRAM**

**CONTROL NUMBER:** PLNP2021-00262

**NAME:** Jesuit High School Stadium Lighting

**LOCATION:** The project site is located at 1200 Jacob Lane, in the Carmichael/Old Foothill Farms community.

**ASSESSOR'S PARCEL NUMBER:** 289-0210-045-0000

**OWNER/APPLICANT:** Jesuit High School  
1200 Jacob Lane  
Carmichael, CA 95608  
Attention: Anne Long/Tim Murchison

**PROJECT DESCRIPTION:**

1. A **Use Permit Amendment** to PLNP2018-00190 to allow stadium lighting on the Jesuit High School athletic field in the Residential 4 (RD-4) zoning district.
2. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

**TYPE OF ENVIRONMENTAL DOCUMENT:** Final Environmental Impact Report

**PREPARED BY:** County of Sacramento  
Planning and Environmental Review  
827 7<sup>th</sup> Street, Room 225  
Sacramento, CA 95814

**PHONE:** (916) 874-6141



## DECLARATION OF AGREEMENT

This Mitigation Monitoring and Reporting Program applies to certain real property, a Legal Description of which is attached as Exhibit A. I (We) the undersigned agree that this Mitigation Monitoring and Reporting Program applies to the real property described in Exhibit A. I (We) the undersigned am (are) the legal owner(s) of that property, and agree to comply with the requirements of this Mitigation Monitoring and Reporting Program (Summary and Mitigation Measures attached).

**IN WITNESS WHEREOF**, this declaration is hereby executed by the undersigned named legal owner(s) of the subject property on this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

OWNER(S): \_\_\_\_\_  
(Print name above) (title above)

Title: \_\_\_\_\_  
(Print company, corporation, trust or organization name above, if applicable)

Signature: \_\_\_\_\_  
(Signature above)

### California All-Purpose Acknowledgment

Pursuant to SB 1050 (Chapter 197, Statutes of 2014), Civil Code section 1189 has been amended to provide that any certificate of acknowledgment taken within the State of California shall be in the following form:

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )  
 )  
County of \_\_\_\_\_ )

On \_\_\_\_\_ before me, \_\_\_\_\_, Notary Public,  
(Insert name and title of officer)  
personally appeared \_\_\_\_\_ who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

Witness my hand and official seal.

\_\_\_\_\_  
(Signature) (Seal)

## **TABLE OF MEASURES**

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<input type="checkbox"/> <b>MITIGATION MEASURE AQ-1: SMAQMD BASIC CONSTRUCTION EMISSION CONTROL PRACTICES.....</b>	<b>8</b>
<input type="checkbox"/> <b>MITIGATION MEASURE BIO-1: NESTING BIRD SURVEYS .....</b>	<b>11</b>
<input type="checkbox"/> <b>MITIGATION MEASURE NOI-1: AMBIENT NOISE REDUCTION STRATEGIES .....</b>	<b>14</b>
<input type="checkbox"/> <b>MITIGATION MEASURE TR-2: PEDESTRIAN SAFETY IMPROVEMENTS TO SITE PLANS..</b>	<b>16</b>
<input type="checkbox"/> <b>MITIGATION MEASURE CR-1: INADVERTENT DISCOVERY OF CULTURAL RESOURCES.</b>	<b>18</b>
<input type="checkbox"/> <b>MITIGATION MEASURE CR-2: UNANTICIPATED HUMAN REMAINS.....</b>	<b>20</b>
<input type="checkbox"/> <b>MITIGATION MEASURE TCR-1: INADVERTENT DISCOVERY OF TRIBAL CULTURAL RESOURCES (TCRs).....</b>	<b>22</b>

## **PURPOSE AND PROCEDURES**

---

Pursuant to Section 21081.6 of the Public Resources Code and Chapter 20.02 of the County of Sacramento Code, a Mitigation Monitoring and Reporting Program has been established for the project entitled Jesuit High School Stadium Lighting (Control Number: PLNP2021-00262).

### **PURPOSE**

The purpose of this program is to assure diligent and good faith compliance with the Mitigation Measures which have been recommended in the environmental document, and adopted as part of the project or made conditions of project approval, in order to avoid or mitigate potentially significant effects on the environment.

### **NOTIFICATION AND COMPLIANCE**

It shall be the responsibility of the project applicant/owner to provide written notification to the Environmental Coordinator, in a timely manner, of the completion of each Mitigation Measure as identified on the following pages. The Environmental Coordinator will verify that the project is in compliance with the adopted Mitigation Monitoring and Reporting Program (MMRP). Any non-compliance will be reported to the project applicant/owner, and it shall be the project applicant's/owner's responsibility to rectify the situation by bringing the project into compliance and re-notifying the Environmental Coordinator. Any indication that the project is proceeding without good-faith compliance could result in the imposition of administrative, civil and/or criminal penalties upon the project applicant/owner in accordance with Chapter 20.02 of the County of Sacramento Code.

### **PAYMENT**

1. The proponent shall comply with the MMRP for this project, including the payment of a flat fee to cover the Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is \$4,300.00. If the project is not expected to go to construction within the next two years, an administrative fee of \$1,103.00 may be paid. The administrative fee will be deducted from the total MMRP fee when construction plans are submitted.
2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from County of Sacramento shall be approved.

### **RECORDATION**

In order to record the adopted Mitigation Monitoring and Reporting Program with the County Recorder as required by Section 20.02.050(b)(2) of the County of Sacramento

Code, the project applicant/owner shall provide to the Planning and Environmental Review a Legal Description for the real property that is the subject of the project.

## **COMPLETION**

Pursuant to Section 20.02.060 of the County of Sacramento Code, upon the determination of the Environmental Coordinator that compliance with the terms of the approved Mitigation Monitoring and Reporting Program has been achieved, and that there has been full payment of all fees for the project, the Environmental Coordinator shall record and issue a Program Completion Certificate for the project.

## **PROPERTY TRANSFER**

The requirements of this adopted Program run with the real property that is the subject of the project, as described in Exhibit A. Successive owners, heirs and assigns of this real property are bound to comply with all of the requirements of the adopted Program.

Prior to any lease, sale, transfer or conveyance of any portion of the real property that is the subject of the project, the record owner(s) at the time of the application for the project, or his or her successor's in interest, shall provide a copy of the adopted Program to the prospective lessee, buyer, transferee, or one to whom the conveyance is made.

## **PENALTIES**

Chapter 20.02 of the County of Sacramento Code permits civil remedies and criminal penalties to be imposed in the event of non-compliance with an adopted Mitigation Monitoring and Reporting Program. The civil remedies, which are found in Section 20.02.090 of the County of Sacramento Code, include injunctive relief, stop work orders, revocation of any special permit granted concurrently with the approval of a Program, and the abatement of any resulting nuisance. The criminal penalties, which are found in Section 20.02.080 of the County of Sacramento Code, include a fine not to exceed five hundred dollars or imprisonment in the County jail not to exceed six months, or both.

Plans that are inconsistent with the adopted Mitigation Measures will not be approved.

In the event of an ongoing, serious non-compliance issue, the Environmental Coordinator may call for a "stop work order" on the project.

## **STANDARD PROVISIONS**

---

**Page one of all Project Plans must include the following statement in a conspicuous location:**

"All Plans associated with this project are subject to the conditions of Mitigation Monitoring and Reporting Program PLNP2021-00262. For any

questions regarding compliance with the MMRP document, contact MMRP staff at (916) 874-6141.”

All Project Plans and any revisions to those Plans shall be in full compliance with the adopted Mitigation Monitoring and Reporting Program (MMRP). The project applicant/owner shall submit one copy of all such Plans and any revisions to the Environmental Coordinator prior to final approval by the County of Sacramento Building Permits and Inspection Division (BPID) or Site Improvement and Permit Section (SIPS). If the Environmental Coordinator determines that the Plans are not in full compliance with the adopted MMRP, the Plans shall be returned to the project applicant/owner with a letter specifying the items of non-compliance, and instructing the applicant/owner to revise the Plans, and then resubmit one copy of the revised Plans to the Environmental Coordinator, for determination of compliance, prior to final approval by BPID or SIPS.

Additionally, the project applicant/owner shall notify the Environmental Coordinator no later than 48 hours prior to the start of construction and no later than 24 hours after its completion. The applicant/owner shall notify the Environmental Coordinator no later than 48 hours prior to any/all Final Inspection(s) by the County of Sacramento.

**□ MITIGATION MEASURE AQ-1: SMAQMD BASIC CONSTRUCTION  
EMISSION CONTROL PRACTICES**

The construction contractor shall comply with Basic Construction Emission Control Practices identified by the SMAQMD and listed below or as they may be updated in the future:

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Provide current certificate(s) of compliance for ARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1]. For more information contact ARB at 877-593-6677, [doors@arb.ca.gov](mailto:doors@arb.ca.gov), or [www.arb.ca.gov/doors/compliance\\_cert1.html](http://www.arb.ca.gov/doors/compliance_cert1.html).
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

**Implementation and Notification (Action by Project Applicant):**

1. Comply fully with the above measure.
2. Include the above measure verbatim as a Construction Note and incorporate it into all Plans and Specifications for the project, and submit one copy to the Environmental Coordinator for review and approval prior to the start of any construction work (including clearing and grubbing).

**Verification (Action by the Environmental Coordinator):**

1. Review the Project Plans prior to the start of construction. Approve Project Plans that are determined to be in compliance with all required mitigation.



2. Monitor compliance during periodic site inspections of the construction work.
3. Participate in any Final Inspection(s) as necessary.

**Comments:**

**Completion of Mitigation Verified:**

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**MITIGATION MEASURE BIO-1: NESTING BIRD SURVEYS**

Prior to demolition and construction activities, to avoid impacts to nesting birds during the nesting season (February 15 to August 30 for common small bird species (e.g., California scrub-jay) and February 15 to September 15 for raptors (e.g., Cooper's hawk)), or if construction activities are suspended for at least 14 days and recommence during the nesting season, a qualified biologist will conduct nesting bird surveys.

- A. Two surveys for active bird nests will occur within 14 days prior to start of construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. A report documenting survey results and plan for active bird nest avoidance (if needed) shall be completed by the qualified biologist prior to construction activities and submitted to the Sacramento County Environmental Coordinator.
  
- B. If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction will be established. The buffer will be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist will conduct baseline monitoring of each nest to characterize "normal" bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist will monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman will have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active.

Jesuit High School and contractors shall be responsible for implementation of this mitigation measure. Compliance with this measure will be documented, prior to the start of construction activities.

**Implementation and Notification (Action by Project Applicant):**

- 1. Comply fully with the above measure.
  
- 2. Include the above measure verbatim as a Construction Note and incorporate it into all Plans and Specifications for the project, and submit one copy to the

Environmental Coordinator for review and approval prior to the start of any construction work (including clearing and grubbing).

**Verification (Action by the Environmental Coordinator):**

1. Review the Project Plans prior to the start of construction. Approve Project Plans that are determined to be in compliance with all required mitigation.
2. Monitor compliance during periodic site inspections of the construction work.
3. Participate in any Final Inspection(s) as necessary.

**Comments:**

**Completion of Mitigation Verified:**

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**MITIGATION MEASURE NOI-1: AMBIENT NOISE REDUCTION STRATEGIES**

- **Scheduling evening events to conclude by 10 pm.** Evening events at the stadium shall be scheduled to conclude by no later than 10 pm, recognizing that events such as football games may occasionally go into overtime.
- **Reduce PA System Output and Usage.** Measures to reduce PA system output shall be employed to focus the sound within the bleacher areas and minimize spillover of PA system sound into surrounding residential areas. Additionally, PA system settings shall also be established at the minimum levels required for intelligibility over background crowd noise. PA settings shall be set and maintained for all evening and nighttime events so that the maximum noise level at the edge of the Jesuit High School property boundary adjacent to noise-sensitive uses shall not exceed 70 dBA Lmax, which is anticipated to result in at least a 3 dBA reduction compared to documented current PA noise levels at the property line. A limiter shall be included in the PA system to ensure that this performance standard is met. Prior to building permit approval, the applicant shall test the PA system and adjust settings and design, if necessary, to document compliance with this performance standard. Finally, where usage of the proposed PA system is not specifically needed for certain events or activities, the usage of the PA system shall be prohibited.
- **Restrict Usage of Artificial Noise Makers.** Artificial noisemakers (including bullhorns, cowbells, airhorns, megaphones, etc.) are prohibited items. All bags are subject to search at the gates, and attendees will not be permitted entry with such items.

**Implementation and Notification (Action by Project Applicant):**

1. Comply fully with the above measure.
2. Include the above measure verbatim as a Construction Note and incorporate it into all Plans and Specifications for the project, and submit one copy to the Environmental Coordinator for review and approval prior to the start of any construction work (including clearing and grubbing).

**Verification (Action by the Environmental Coordinator):**

1. Review the Project Plans prior to the start of construction. Approve Project Plans that are determined to be in compliance with all required mitigation.
2. Monitor compliance during periodic site inspections of the construction work.
3. Participate in any Final Inspection(s) as necessary.

**Comments:**

**Completion of Mitigation Verified:**

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**MITIGATION MEASURE TR-2: PEDESTRIAN SAFETY IMPROVEMENTS TO SITE PLANS**

Prior to building permit approval, the project proponent shall prepare improvement plans for review and approval by the Sacramento County Transportation Department which shall include the following improvements at the western side of the intersection of Tennyson Way and American River Drive across from Jesuit High School's southern parking lot and at the four-way stop-controlled intersection at Jacob Lane and American River Drive:

- **Tennyson Way and American River Drive.** Install pedestrian crossing with enhanced safety features, which would include a striped, high visibility (Caltrans "ladder") crosswalk, flashing beacons with signage, parking restrictions as needed to improve crosswalk visibility and safety, and lighting improvements, as determined by Sacramento County Department of Transportation and based on Sacramento County Improvement Standards.
- **Jacob Lane and American River Drive.** Install basic yellow crosswalk on all legs of the intersection.

**Implementation and Notification (Action by Project Applicant):**

1. Comply fully with the above measure.
2. Include the above measure verbatim as a Construction Note and incorporate it into all Plans and Specifications for the project, and submit one copy to the Environmental Coordinator for review and approval prior to the start of any construction work (including clearing and grubbing).

**Verification (Action by the Environmental Coordinator):**

1. Review the Project Plans prior to the start of construction. Approve Project Plans that are determined to be in compliance with all required mitigation.
2. Monitor compliance during periodic site inspections of the construction work.
3. Participate in any Final Inspection(s) as necessary.



**Comments:**

**Completion of Mitigation Verified:**

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**MITIGATION MEASURE CR-1: INADVERTENT DISCOVERY OF CULTURAL RESOURCES**

Should any cultural resources, such as structural features, unusual amounts of bone or shell, artifacts, human remains, or architectural remains be encountered during any development activities, work shall be suspended to allow for review by tribal monitors. Designated staff implementing the MMRP shall be immediately notified. The project applicant shall be required to implement any mitigation deemed necessary for the protection of the cultural resources, as outlined in Mitigation Measure TCR-1 detailed below.

**Implementation and Notification (Action by Project Applicant):**

1. Comply fully with the above measure.
2. Include the above measure verbatim as a Construction Note and incorporate it into all Plans and Specifications for the project, and submit one copy to the Environmental Coordinator for review and approval prior to the start of any construction work (including clearing and grubbing).

**Verification (Action by the Environmental Coordinator):**

1. Review the Project Plans prior to the start of construction. Approve Project Plans that are determined to be in compliance with all required mitigation.
2. Monitor compliance during periodic site inspections of the construction work.
3. Participate in any Final Inspection(s) as necessary.

**Comments:**

**MITIGATION MEASURE CR-2: UNANTICIPATED HUMAN REMAINS**

Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop and the County Coroner and Planning and Environmental Review shall be immediately notified. If the remains are determined to be Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods.

**Implementation and Notification (Action by Project Applicant):**

1. Comply fully with the above measure.
2. Include the above measure verbatim as a Construction Note and incorporate it into all Plans and Specifications for the project, and submit one copy to the Environmental Coordinator for review and approval prior to the start of any construction work (including clearing and grubbing).

**Verification (Action by the Environmental Coordinator):**

1. Review the Project Plans prior to the start of construction. Approve Project Plans that are determined to be in compliance with all required mitigation.
2. Monitor compliance during periodic site inspections of the construction work.
3. Participate in any Final Inspection(s) as necessary.

**Comments:**

**□ MITIGATION MEASURE TCR-1: INADVERTENT DISCOVERY OF TRIBAL CULTURAL RESOURCES (TCRs)**

1. If subsurface deposits believed to be cultural or human in origin are discovered during ground disturbance, site preparation, or construction activities, then all work must halt within a 100-foot radius of the discovery. A qualified professional archeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained at the Applicant's expense to evaluate the significance of the find. If it is determined due to the types of deposits discovered that a Native American monitor is required, the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission shall be followed, and the monitor shall be retained at the Applicant's expense.
2. Work shall not continue within the 100-foot radius of the discovery site until the archeologist conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources.
  - a) If a potentially-eligible resource is encountered, then the archeologist, and the project proponent shall coordinate with the Sacramento County Planning and Environmental Review (PER), and arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to PER as verification that the provisions of CEQA for managing unanticipated discoveries have been met.
  - b) Section 5097.98 of the State Public Resources Code and Section 7050.5 of the State Health and Safety Code, in the event of the discovery of human remains, all work must stop and the County Coroner shall be immediately notified. If the remains are determined to be Native American, guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains.

**Implementation and Notification (Action by Project Applicant):**

1. Comply fully with the above measure.
2. Include the above measure verbatim as a Construction Note and incorporate it into all Plans and Specifications for the project, and submit one copy to the Environmental Coordinator for review and approval prior to the start of any construction work (including clearing and grubbing).

**Verification (Action by the Environmental Coordinator):**

1. Review the Project Plans prior to the start of construction. Approve Project Plans that are determined to be in compliance with all required mitigation.
2. Monitor compliance during periodic site inspections of the construction work.
3. Participate in any Final Inspection(s) as necessary.

**Comments:**



## **EXHIBIT A: LEGAL DESCRIPTION**

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MMRP-25

[https://aecom.sharepoint.com/sites/JesuitStadiumLightingProjectEIR/Shared Documents/General/500\\_Deliverables/502\\_Final EIR/Printcheck Final EIR/WP/Pdfs/VII/PLNP2021-00262\\_MMRP.docx](https://aecom.sharepoint.com/sites/JesuitStadiumLightingProjectEIR/Shared Documents/General/500_Deliverables/502_Final EIR/Printcheck Final EIR/WP/Pdfs/VII/PLNP2021-00262_MMRP.docx)