



September 25, 2017

VIA HAND DELIVERED

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

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

Dear Ms. Zareczny:

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

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

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



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It is without question that our community will be severely and negatively impacted by the construction of one or more lighted athletic fields at the CdM campus. Our community is built on a hill. A significant portion of that hill overlooks the CdM campus and, therefore, the location of the Proposed Project. The homes in our community nearest to the high school are less than 150 feet from the Proposed Project. Starting there, our community rises on our hill all the way to Jamboree Road. The top of our community is approximately 100 feet higher in elevation than the Proposed Project's site.

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

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

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

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

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

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

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

GENERAL COMMENTS

BOARD DIRECTION OR POLICY DURING EIR PREPARATION

The Eastbluff Association would like to acknowledge the following actions taken by the Board of Education during the preparation of the Draft EIR (February 2017) or following release of the Draft EIR:

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

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

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

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

In addition, at Board of Education and/or community meetings, District staff has confirmed:

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

GOOD NEIGHBOR APPROACH

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

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

Introductory Wording

"Good Neighbor" Policy

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

- 1: The number of night-time activities beyond 6:00 PM.
- 2: The beginning and ending times for all weekend activities.
- 3: The number of weekend activities.
- 4: The use and control of public address systems for outdoor events.
- 5: The use and control of lighting systems for outdoor facilities.
- 6: The number of supervisory staff in relation to the number of participants.
- 7: Method of control and enforcement for traffic and parking during large or simultaneous events at the school.
- 8: The inclusion of an annual review, discussion, and possible modification of the individual schools' "Good Neighbor" policy.

New Policy

To comply with the California Environmental Quality Act Final Environmental Impact Reports for

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

In addition, we recommend that all Good Neighbor Policies be included as Project Design Features in the EIR Project Description.

USE AGREEMENT WITH DISTRICT, CITY, AND EASTBLUFF ASSOCIATION

The Marian Bergeson Aquatic Center (MBAC) is operated and maintained under a Joint Powers Agreement between the Newport-Mesa Unified School District (District) and the City of Newport Beach (City). The agreement includes Rules and Regulations and Code of Conduct that apply to use of the MBAC by approved users.

The Eastbluff Association is adamant about the need for a similar use agreement for the new sports fields between the District, the City, and the Eastbluff Association. This agreement would provide additional assurances to the Eastbluff homeowners relative to facility hours and use, lighting, noise, parking, etc. should Board Policy change in the future. The use agreement could include language articulating the process for modifications to the agreement.

SUPPORT FOR ALTERNATIVE 3: TWO FIELDS, NO LIGHTS IN RECIRCULATED DRAFT EIR

The Eastbluff Association supports Recirculated Draft EIR Alternative 3: Two Fields, No Lights. Under this Alternative, there would be a bleacher seat capacity of 664 seats and all seating would be provided on the south side of the main field. In addition, a localized public-address system and lighting would not be installed. Also, no practices or games would occur past sunset. We do not support any portable or permanent lighting on the two fields. Under Alternative 3, impacts relative to field lighting and noise are significantly reduced to the Eastbluff Association.

OPPOSED TO PROPOSED PROJECT OPTIONS AND OTHER ALTERNATIVES IN RECIRCULATED DRAFT EIR

The Eastbluff Association does not support the Proposed Project Option A or Option B, Alternative 1: No Project Alternative, or Alternative 2: Two Fields with Portable Lights. With the exception of Alternative 1, Proposed Project Option A or Option B and Alternative 2 create significant negative field lighting and noise environmental impacts on the Eastbluff Association community.

COMMENTS ON RECIRCULATED DRAFT EIR

CEQA GUIDELINES SECTION 15088.5, RECIRCULATION ON AN EIR PRIOR TO CERTIFICATION

CEQA Guidelines Section 15088.5 articulates the procedures relative to recirculation of an EIR prior to certification. Key sections are cited below.

“(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.

(f) The lead agency shall evaluate and respond to comments as provided in Section 15088. Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR. In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues.” (emphasis added)

“(1) When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.

(3) As part of providing notice of recirculation as required by Public Resources Code Section 21092.1, the lead agency shall send a notice of recirculation to every agency, person, or organization that commented on the prior EIR. The notice shall indicate, at a minimum, whether new comments may be submitted only on the recirculated portions of the EIR or on the entire EIR in order to be considered by the agency.

g) When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR.”

THE RECIRCULATED DRAFT EIR AND THE NOTICE OF AVAILABILITY OF RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT FOR CORONA DEL MAR MIDDLE AND HIGH SCHOOL SPORTS FIELD(S) PROJECT DO NOT COMPLY WITH CEQA GUIDELINES SECTIONS 15088.5(F)(1) AND 15088.5(F)(3)

The Recirculated Draft EIR (RDEIR) (August 2017) and the Notice of Availability of Recirculated Draft Environmental Impact Report for Corona del Mar Middle and High School Sports Field(s) Project (NOA) are silent:

- 1) As to the need for the RDEIR,
- 2) Whether the entire EIR was revised or only specific portions of the EIR,
- 3) Whether written response to comments on the Draft EIR (DEIR) (February 2017) will be prepared,
- 4) Whether the District will or will not be responding to comments received on the DEIR,
- 5) How comments on the DEIR will be addressed and incorporated into the Final EIR,
- 6) Whether comments should be provided only on the RDEIR, and
- 7) How the District is responding to pertinent comments on significant environmental issues on the DEIR and RDEIR.

THE RECIRCULATED DRAFT EIR DOES NOT COMPLY WITH CEQA GUIDELINES SECTION 15088.5(G)

While RDEIR Section 2.3 briefly notes that the changes in the Project Description (Chapter 3.0) warranted recirculation of the EIR, the RDEIR does not provide a summary of the revisions made that differ from the previously circulated Draft EIR including, but not limited to, modifications to the project description (Chapter 3.0), revisions to technical analyses (various technical appendices), revisions to environmental analyses (Chapter 5.0), and revisions to alternatives (Chapter 7.0). In addition, it is not possible to determine whether comments on the Draft EIR were considered in updating any EIR chapters or technical studies in the RDEIR.

THE RECIRCULATED DRAFT EIR LACKS A REASONABLE RANGE OF ALTERNATIVES

The RDEIR did not fully analyze a range of reasonable alternatives that could feasibly attain most of the project objectives. We recommended the review of two additional alternatives:

- Alternative 4: Two Fields, Lighting Field 2 Only
- Alternative 5: Two Fields, Fields and Lights Below Sight Line

Both Alternatives 4 and 5 offer solutions to reduce or eliminate significant unavoidable impacts related to visual character, light and glare, and noise.

Alternative 4 would be similar to Proposed Project Option B, with the exception that only Field 2 would have nighttime lighting with four fully-shielded and full cutoff 70-foot light poles. Also, no permanent public-address system would be installed, but portable public-address systems could be used.

Alternative 5 would be similar to Proposed Project Option A, but would require the two fields and lighting systems be placed below grade and the sight line of adjacent residential uses. Also, no permanent public-address system would be installed, but portable public-address systems could be used. Alternative 5 would provide a design approach that has been applied throughout the City of Newport Beach, including the Eastbluff Village Center, Bonita Creek Park (La Vida and University Drive), Newport Beach City Hall on Civic Center Drive near Fashion Island, and St. Mark Presbyterian Church (northwest corner of San Joaquin Hills Road and MacArthur Boulevard). Installing the fields and lights below grade, along with berms, landscaping, and trees that mature to heights that block or shield lighting fixtures (similar to Bonita Creek Park) would greatly reduce the visual character, and light and glare impacts to the surrounding community.

This additional analysis would constitute new information and requires recirculation of the EIR per CEQA Guidelines Section 15088.5.

CURRENT APPLICABLE BOARD POLICIES

CEQA is about the public disclosure of information. All Board Policies cited through the RDEIR should be included in a new technical appendix. This will make the information more easily accessible to all readers of the document, but will also have the policies be more fully integrated into the Final EIR.

CHAPTER 3 - PROJECT DESCRIPTION/CHAPTER 4 - ENVIRONMENTAL SETTING

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

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

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

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

"The 37-acre CdM campus is currently developed with high school classroom buildings, middle school enclave, administration, a gymnasium, a 350-seat performing arts center, three parking lots totaling 592 stalls, a high school student loading zone, a middle school student loading zone, a baseball field, multipurpose athletic fields, eight tennis courts, hardcourts, swimming pool, outdoor lunch quad, pedestrian walkways, and landscaped planters (see Figure 3-3, Aerial Photograph). The existing sports field contains a score board, discus area, and long-jump area. A small storage

hut and a storage box are at the northwest corner of the sports field. Thirty mature trees are planted along and near Vista Del Oro and Eastbluff Drive. There are no permanent bleachers on the sports field but 664-seat portable bleachers are available. The back-field area contains four goal posts and six portable bleachers providing a total 200-seat capacity. These portable bleachers could be moved around anywhere in the backfield area and the swimming pool.

The total 2016–17 school year enrollment at CdM campus was 2,631 students—857 in the 7th and 8th grade middle school, and 1,774 in the 9th through 12th grade high school. Many of the 111 certified staff (i.e., teachers, administrators, and pupil services) were part-time employees, so the full-time-equivalent staff was 50 staff (CDE 2016). Additionally, there were approximately 20 volunteers.

Parking and Access

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

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

The CdM MS/HS allows parking permits to students in “good standing” with attendance and discipline the previous school year. Seniors get priority and then juniors.

Existing Use and Schedule

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

Various authorized outside groups use CdM campus facilities on weekdays and weekends throughout the year. Regularly occurring activities include: CalCoast Track Club uses the track and field, generally between 4 and 7 PM (average of 50 attendees); Volleyball Enterprises uses the gymnasiums,

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generally between 6:30 and 9:00 PM (50 to 250 attendees); and various groups use the swimming pool until 8 PM (average of 50 attendees). The baseball fields are also used for Little League on weekends and fall baseball academy from 3:30 to 5:30 PM. The existing turf field and synthetic track is also open to community uses, where residents are allowed outside of normal school hours for walking, running, and various recreational purposes without prior authorization from the District.”

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

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

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

Good Neighbor Policies

Separately, a new section should be added to discuss the good neighbor policies the District intends to adopt and implement for the CdM campus. Such a section is necessary in order to properly analyze the proposed mitigation measures to decrease the Proposed Project's significant negative environmental impacts on the community, including the Eastbluff Association community. As previously stated, we recommend that all Good Neighbor Policies be included as Project Design Features in the EIR Project Description.

CHAPTER 3 – PROJECT DESCRIPTION

Table 3-1, Demand for Field Use by CdM Athletic Teams for Practices and Games (Page 3-2)

Please clarify if the demand for field use is limited only to high school athletics or if middle school athletics would have demand for the new fields as well.

Table 3-2, Practice and Game Attendance Summary for Field and Track Programs (Page 3-9)

Please clarify the summary is based upon the 2016-2017 or 2017-2018 school year.

Section 3.3, Statement of Objectives (Page 3-10)

Objective 6 includes two sentences. It seems that the second sentence should be a separate objective (7), which would renumber the current numbers 7 and 8 to numbers 8 and 9. Any references to the objectives throughout the RDEIR would need to be revised and renumbered in accordance with this change.

Lighting System (Page 3-17)

Additional clarification and assurances relative to the lighting system are needed in the project description. The first paragraph, first sentence and second paragraph, first sentence on RDEIR page 3-17 under the subheading Lighting System should be revised as shown below.

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

Option B. Identical nighttime lighting systems would be used on Field 1 as for Option A and four **fully shielded and full cutoff** 70-foot light poles are proposed on Field 2.

Policy on Use of School Facilities (Page 3-17)

A complete copy of the N-MUSD's "Use of School Facilities Under the Civic Center Act" was not included as Appendix D of the RDEIR. RDEIR Appendix D includes Lighting Plans.

As previously noted in this comment letter, all Board Policies cited through the RDEIR should be included in a new technical appendix, including the policy regarding the "Use of School Facilities Under the Civic Center Act" referenced in this section on RDEIR page 3-17.

Table 3-3, Adopted Artificial Field Use District Policy: Option A Use Restrictions (Page 3-19)

The source cited in the table should be expanded to reference the Board Policy number, and the date the policy was adopted.

Table 3-4, Adopted Artificial Field Use District Policy: Option B Use Restrictions (Page 3-19)

The source cited in the table should be expanded to state this is not current adopted Board Policy, and that the policy would be modified specifically for Option B, if selected.

Also, Table 3-4 should be included as a Project Design Feature for Option B to provide the necessary assurances and compliance with the use restrictions.

SECTIONS 5.1 THROUGH 5.10 - CUMULATIVE IMPACT ANALYSIS

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

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

(1) Either:

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

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

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

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

SECTION 5.1 - AESTHETICS

Night Sky, CCR Title 24, Outdoor Lighting (Page 5.1-1)

Night Sky should be deleted from the subheading, as Title Part 6, Article 1 establishes the rules for all outdoor lighting. Also, the entire paragraph should be updated to reflect the recently adopted versions of Title 24 by the California Energy Commission, which are used by the California Division of State Architect.

It should also clearly note that the regulations in Title 24, Part 6, Section 10-114, Table 10-114-A, Lighting Zone Characteristics and Rules for Amendments by Local Jurisdictions, are energy standards and not lighting standards for the outdoor lighting zones, nor do are they intended to serve as a CEQA light or glare threshold. In addition, all of Table 10-114-A should be included in the EIR to provide the reader with the full understanding of the zones, ambient illumination, and statewide default location

Page 5.1-45, Top Six Paragraphs

The text should be updated to reflect all IES lighting categories (LZ0, LZ1, LZ2, LZ3, and LZ4) and reference both the user's guide and model text descriptions referenced in the Joint IDA – IES Model Lighting Ordinance (MLO) with User's Guide, June 15, 2011, and be placed in a comparative table, as shown below.

LIGHTING ZONES AND DESCRIPTIONS			
Lighting Zone	User's Guide Text – Recommended Uses or Area	Lighting Zone	Model Ordinance Text
LZ0	Lighting Zone 0 should be applied to areas in which permanent lighting is not expected and when used, is limited in the amount of lighting and the period of operation. LZ-0 typically includes undeveloped areas of open space, wilderness parks and preserves, areas near astronomical observatories, or any other area where the protection of a dark environment is critical. Special review should be required for any permanent lighting in this zone. Some rural communities may choose to adopt LZ-0 for residential areas.	LZ0: No Ambient Lighting	Areas where the natural environment will be seriously and adversely affected by lighting. Impacts include disturbing the biological cycles of flora and fauna and/or detracting from human enjoyment and appreciation of the natural environment. Human activity is subordinate in importance to nature. The vision of human residents and users is adapted to the darkness, and they expect to see little or no lighting. When not needed, lighting should be extinguished.
LZ1	Lighting Zone 1 pertains to areas that desire low ambient lighting levels. These typically include single and two family residential communities, rural town centers, business parks, and other commercial or industrial/storage areas typically with limited nighttime activity.	LZ1: Low Ambient Lighting	Areas where lighting might adversely affect flora and fauna or disturb the character of the area. The vision of human residents and users is adapted to low light levels. Lighting may be used for safety and convenience but it is not necessarily uniform or continuous. After curfew, most lighting should be

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	May also include the developed areas in parks and other natural settings.		extinguished or reduced as activity levels decline.
LZ2	Lighting Zone 2 pertains to areas with moderate ambient lighting levels. These typically include multifamily residential uses, institutional residential uses, schools, churches, hospitals, hotels/motels, commercial and/or businesses areas with evening activities embedded in predominately residential areas, neighborhood serving recreational and playing fields and/or mixed-use development with a predominance of residential uses. Can be used to accommodate a district of outdoor sales or industry in an area otherwise zoned LZ-1.	LZ2: Moderate Ambient Lighting	Areas of human activity where the vision of human residents and users is adapted to moderate light levels. Lighting may typically be used for safety and convenience but it is not necessarily uniform or continuous. After curfew, lighting may be extinguished or reduced as activity levels decline.
LZ3	Lighting Zone 3 pertains to areas with moderately high lighting levels. These typically include commercial corridors, high intensity suburban commercial areas, town centers, mixed use areas, industrial uses and shipping and rail yards with high night time activity, high use recreational and playing fields, regional shopping malls, car dealerships, gas stations, and other nighttime active exterior retail areas.	LZ3: Moderately High Ambient Lighting	Areas of human activity where the vision of human residents and users is adapted to moderately high light levels. Lighting is generally desired for safety, security and/or convenience and it is often uniform and/or continuous. After curfew, lighting may be extinguished or reduced in most areas as activity levels decline.
LZ4	Lighting zone 4 pertains to areas of very high ambient lighting levels. LZ-4 should only be used for special cases and is not appropriate for most cities. LZ-4 may be used for extremely unusual installations such as high-density entertainment districts, and heavy industrial uses.	LZ4: High Ambient Lighting	Areas of human activity where the vision of human residents and users is adapted to high light levels. Lighting is generally considered necessary for safety, security and/or convenience and it is mostly uniform and/or continuous. After curfew, lighting may be extinguished or reduced in some areas as activity levels decline.
Source: Joint IDA – IES Model Lighting Ordinance (MLO) with User’s Guide, June 15, 2011			

The project site and surrounding area were determined to be located within LZ3 for energy standards and usage per the California Energy Commission’s statewide default location determination in Title 24, Part 6, Section 10-114, Energy Standards Table 10-114-A (urban areas based on U.S. Census).

However, the project site and surrounding area are most closely represented by LZ2, as described above for the User’s Guide Text – Recommended Uses or Area. Thus, LZ2 is the most appropriate standard to use for CEQA thresholds and analysis for light and glare impacts, and the analysis needs to be revised accordingly. This additional analysis would constitute new information, which requires recirculation of the EIR per CEQA Guidelines Section 15088.5.

General Comment

Daytime and Nighttime Visual Simulations

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

Change in Visual Character

A project is considered to have a significant aesthetic impact if the project substantially changes the character of the project site such that it becomes visually incompatible or visually unexpected when viewed in the context of its surroundings. The installation of permanent lighting IS A SIGNIFICANT CHANGE over the existing conditions, by creating additional light pollution on and emanating from the CdM campus that substantially changes the nighttime views of residents surrounding the campus. The permanent lighting for the Proposed Project or alternatively proposed lit athletic fields 1) does change the character of the project site and 2) does make the Proposed Project and alternatively proposed lit athletic fields visually incompatible with respect to light and glare. These impacts are significant, especially when viewed in the context of the existing surrounding residential and institutional neighborhood, as required by CEQA. The proposed impact conclusion of less than significant is incorrect, incomplete, unsupported, and needs to be revised. The project impact conclusion is Significant and Unavoidable; this conclusion revision requires revision and recirculation of the EIR per CEQA Guidelines Section 15088.5.

Proposed Sports Field Lighting

The Eastbluff Association has stated their concerns about the proposed lighting of the Proposed Project in its public comment letter on the Draft EIR, dated March 22, 2017, and its public comment letter on the Revised Initial Study, dated May 23, 2016. The concerns from pages A-5 and A-6 of the May 2016 letter were:

The Recirculated Initial Study indicates that measurements of “existing nighttime light levels” will occur at certain locations prior to the preparation of the Draft Environmental Impact Report. Only one location within the Eastbluff Association is proposed to be measured on Figure 13—this is referenced as “View 4.” Additional locations with the Eastbluff Association must be measured. As more specifically described in our cover letter and Exhibit “B” thereto, the Eastbluff Association uniquely overlooks the Proposed Project site. Given the change of elevation, topography, and orientation, the residences in the Eastbluff Association will be most affected by the Proposed Project’s anticipated light and glare.

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

*Eastbluff Homeowners Community Association's Public Comment Letter
on NMUSD Recirculated Draft Environmental Impact Report*

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

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

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

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

The Proposed Project Option B includes the addition of permanent lighting to the new artificial turf sports field, which would be permitted Monday through Saturday up to 8:00 PM for practices and up to 9:00 PM for games. These 9:00 PM lighting time limits for games are proposed and would require the Board to modify the District's Rule and Regulation, Use of School Facilities Under the Civic Center Act, revised February 2017.

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

The Proposed Project is located immediately north of the lighted tennis courts, which are immediately north of the lighted swimming pool. Thus, the Proposed Project increases and concentrates the combined amount of nighttime sports lighting allowed in the central and northeastern portions of the CdM campus. However, the cumulative effect of all the CdM campus nighttime sports lighting has not been modeled or sufficient cumulative light and glare impact analysis provided. Such modeling and analysis is mandated by CEQA. The impact conclusion of less than significant is incorrect, incomplete, unsupported, and needs to be revised. This conclusion revision requires recirculation of the EIR per CEQA Guidelines Section 15088.5.

Visual Simulations and Associated Aesthetics and Light/Glare Analysis

We provided the comments below on the Draft EIR, which requested additional visual simulation locations and analysis. We are providing them again as our comments were not addressed in the RDEIR, nor was any additional simulation locations or analysis provided.

General Comments

RDEIR Figure 5.1-7 - Daytime Visual Simulation Location Map, Community Views incorporates Recirculated Initial Study (RIS) Figure 13, which identified four View Simulation (Day and Night) Locations, including two locations within the Eastbluff Association – Location 3 from Aralia Street and Location 4 from what is not specifically specified in the RDEIR but appears to be Alta Vista Street. The Draft EIR includes generic text on page 5.1-21, second paragraph, regarding Locations 3 and 4. The EIR needs to identify the locations with the street name and any additional pertinent information about Locations 3 and 4.

RDEIR Figure 5.1-24, Option A: Nighttime Visual Simulation Location Map, Community Views, and Figure 5.1-28, Option B: Nighttime Visual Simulation Location Map, Community Views, show the locations of three nighttime community view locations (north, northeast, and west) and the view angles to the lights. This is problematic for several reasons: (1) there are not comparable nighttime views for any of the Community View Daytime Locations; and (2) the four daytime locations are equally important to represent nighttime impacts to residences located, west, north, and east of the sports field site.

Daytime Visual Simulations

Figure 5.1-10, Option A: Visual Simulation from Residential Neighborhoods (View 3), Figure 5.1-11, Option A: Visual Simulation from Residential Neighborhoods (View 4), Figure 5.1-14, Option B: Visual Simulation from Residential Neighborhoods (View 3), and Figure 5.1-15, Option B: Visual Simulation from Residential Neighborhoods (View 4) show views from residences located east of Eastbluff Drive. The EIR needs to identify the street locations for Daytime View 3 and View 4 and add text to the Figures and report text detailing the location.

Nighttime Visual Simulations

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

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

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

lighting and glare impacts were identified were identified as Areas of Controversy in the RDEIR, the importance of these simulations is well known.

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

The Proposed Project does not protect the current night sky views, but significantly degrades the views from adjacent residential areas. The introduction of permanent lighting for the Proposed Project or alternative lit athletic fields does create a new source of substantial light and glare that affects nighttime views for the surrounding residences. The permanent lighting for the Proposed Project or alternative lit athletic fields needs to be appropriately analyzed and addressed, particularly with respect to the impact on the Eastbluff community, as this neighborhood will be adversely impacted by the Proposed Project's lighting or lighting of alternative athletic fields due to the proximity to the sports field and the topography of the Eastbluff homes being elevated above the sports field. The impact conclusion of less than significant is incorrect, incomplete, unsupported, and needs to be revised. This conclusion revision requires recirculation of the EIR per CEQA Guidelines Section 15088.5.

Cumulative Lighting and Glare Impacts

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

SECTION 5.6 - NOISE

Noise from Sports Field

The Eastbluff Association stated their concerns about the proposed noise associated with the Proposed Project in its public comment letter on the Draft EIR, dated March 22, 2017, and its comment letter on the Revised Initial Study, dated May 23, 2016. The concerns from pages A-12 and A-13 of the May 2016 letter were:

The Recirculated Initial Study indicates that noise monitoring at certain locations will occur prior to the preparation of the Draft Environmental Impact Report. Only two locations within the Eastbluff Association are proposed to be monitored on Figure 14 and Table 3—those are

*Eastbluff Homeowners Community Association's Public Comment Letter
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referenced as "N-4" and "N-8". Additional locations with the Eastbluff Association must be monitored. As more specifically described in our cover letter and Exhibit "B" thereto, the Eastbluff Association uniquely overlooks the Proposed Project site.

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

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

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

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

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

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

Given Eastbluff's close proximity to the CDM campus and the need for representative locations within Eastbluff for noise measurements, we requested six additional noise measurement locations be added to those shown in RIS Figure 14 for the RDEIR analysis. This request was included in our comments on the Recirculated Initial Study, and specifically requested locations be added on Aralia Street, Aleppo Street, Arbutus Street, Alta Vista Drive, Bamboo Street, and Blackthorn Street.

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

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

Noise from Private Users of Proposed Project

In its comment letter on the Recirculated Initial Study, the Eastbluff Association expressed concerns about noise from private users of the Proposed Project. The notes included in the revisions to the Use of School Facilities Under the Civic Center Act adopted by the Board of Education in August 2016 have provided the Eastbluff Association with the necessary assurances regarding no private use of the artificial turf field area.

Performance Standards for Mitigation Measures

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

Noise Mitigation Measures

- "N-1 Prior to holding the first spectator event, the Newport-Mesa Unified School District shall develop and enforce a good-neighbor policy for sports field events. The District shall authorize a representative responsible for enforcing this policy. Signs shall be erected at entry points that state prohibited activities during an event (e.g., use of air horns, unapproved audio amplification systems, bleacher foot-stomping, boisterous activity in parking lots upon exiting the field) and present a contact name and telephone number of the District-authorized representative to contact in the event of a noise complaint. If the authorized representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District.*
- N-2 The Newport-Mesa Unified School District shall not include a PA System in the Option A Design. Table 5.6-21 shows a building façade analysis for the residential buildings in Model Receiver Locations A and S in terms of project Option A with mitigation (no PA System). The table shows that with implementation of this mitigation measure, there would be no discernable noise increase over 3 dB at any of the nearby buildings."*

The Eastbluff Association believes there is need for performance standards and monitoring to ensure noise levels remain at or below those quantified in the RDEIR.

The Eastbluff Association also believes that the good neighbor policies we've mentioned earlier in this letter should include the policy measures identified in Mitigation Measure N-1. While Mitigation Measure N-1 addresses only noise, the good neighbor policies would be broader and more comprehensive, and provide assurances for both the Eastbluff Association and Corona del Mar Middle and High Schools.

Cumulative Noise Impacts

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

SECTION 5.9 – TRANSPORTATION AND TRAFFIC

The RDEIR has eliminated all discussion and references to a Traffic Management Plan (November 2016). However, the Eastbluff Association believes that a Traffic Management Plan is still needed for large events on the CdM campus, inclusive of Proposed Project Option A or Option B.

The event traffic management plan (TMP) is important for the community as it would identify strategies and procedures to help reduce traffic and parking impacts. The TMP should provide strategies for the following three situations:

1. Pre-Event. Strategies and procedures intended to help guide traffic into the site prior to an event(s) taking place.
2. Pre-Event (Alternative Parking Location). Identification of an alternative parking location for larger events or special events that are concurrent with other activities at the school site, and recommendations for additional traffic management procedures and devices that would be required to direct traffic to the alternative location.
3. Post-Event. Strategies and procedures to assist attendee egress/departure from the event(s).

Draft EIR (February 2017) Appendix G – Traffic Management Plan should be updated per our comments below and incorporated into the RDEIR.

Revise Traffic Management Plan

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

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

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

Given the removal of the TMP from the RDEIR, along with the previously-identified deficiencies in the TMP, it is not possible to conclude that Proposed Project would result in less than significant traffic access and parking impacts to the surrounding community. The impact conclusion of less than significant is incorrect, incomplete, unsupported, and needs to be revised. This conclusion revision requires recirculation of the EIR per CEQA Guidelines Section 15088.5.

Cumulative Parking Impacts

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

CHAPTER 7 – ALTERNATIVES

We are pleased to see that the RDEIR includes Table 7-1, Summary of Proposed Project – Option A Impacts and Alternatives, and Table 7-2, Summary of Proposed Project – Option B Impacts and Alternatives. These tables provide a quick summary for the reader of the impact comparison (greater than, equal to, or less than) of the alternatives with the Proposed Project.

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In addition, the RDEIR includes Table 7-3, Ability of Each Alternative to Meet the Project Objectives, which provides a yes or no response relative to meeting the project objective. However, Chapter 7 is missing a more meaningful discussion for Alternatives 1, 2, and 3 of why they do not meet the project objectives, besides the No answer in Table 7-3. A new subsection should be added under Sections 7.4, 7.5, and 7.6 entitled Ability to Meet Project Objectives. The discussion in this subsection should clearly identify if the alternative fully meets, partially meets, or does not meet the project objectives. An explanation should be provided for all partially meets or does not meet determinations. This additional analysis would constitute new information and requires recirculation of the EIR per CEQA Guidelines Section 15088.5.

Section 7.7 identifies Alternative 3: Two Fields, No Lights as the environmental superior alternative to the Proposed Project Option A or Option B, and meets five of the ten stated project objectives.

Under Alternative 3: Two Fields, No Lights, impacts relative to field lighting and noise are significantly reduced to the Eastbluff Association. It is for these reasons that the Eastbluff Association supports Alternative 3: Two Fields, No Lights.

CONCLUSION

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

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

Respectfully submitted,

The Eastbluff Community Homeowners Association
Board of Directors by

R. Rubino

Ronald Rubino, President



ATTACHMENT A

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





ATTACHMENT B

Eastbluff Homeowners Community Association's Public Comment on the Draft Environmental Impact Report for the Proposed Corona del Mar High School Sports Field Project (March 22, 2017)

