

September 14, 2016

Dear Ms. Drake and Supervisor Rice:

I am writing to provide follow-up comments regarding the Marin Catholic High School Use Permit and Design Review application<sup>1</sup> to those I submitted on February 5. There is nothing in the August and September additions to the application that in any way alter my serious concerns about the adverse impacts of the proposal or the significant flaws in the methodology used to assess those impacts. We have lived on lower Vista Grande since 1988, and are thoroughly familiar with the sound impacts of afternoon football and other sports activity at Marin Catholic. The shift to night games and the impacts of lighting would significantly and negatively impact the quality of life in our neighborhood. I want to particularly reiterate that the proposal is in direct conflict with the Kentfield/Greenbrae Area Plan<sup>2</sup> referenced on the application web page. The second paragraph of this Plan's executive summary states:

“The vast majority of the land in this study area is zoned single family residential and is used for housing. In general, the intent of the plan is to protect those qualities of the community which enhances it as a predominately single family residential area.”

Based on the Plan's intent, I continue to believe that the use permit amendment application can and should be denied without further review.

### **Improperly Failing to Base Impact Analyses on Conservative Assumptions**

The recently submitted materials purporting to address and quantify the direct impacts of the lights on the community and the consequential impacts on the natural environment fail to follow standard practice for such analyses. Whether conducting technical analyses in support of industrial operating permits, environmental impact reports (EIRs) or statements (EISs), health risk assessments, or compliance with Prevention of Significant Deterioration (PSD) rules, the accepted norm is to begin with intentionally conservative “screening-level” analyses. If the results of such analyses suggest potentially unacceptable impacts, more refined modeling is required before project approval can be considered. There is a major flaw in the lighting analysis that carries over to the Biological Site Assessment.

As I mentioned in my comments of February 5, the lighting analysis addresses only direct “glare” or light shining directly onto areas around the stadium. It ignores light scattering caused by fine particles that result in a glow over the stadium and decreased visual range. Such “air light” also can adversely affect wildlife in and around Creekside Marsh. Before the results of

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<sup>1</sup> Project ID P1123, as described at [http://www.marincounty.org/depts/cd/divisions/planning/projects/kentfield/marin-catholic-high-school\\_dr\\_up\\_p1123\\_kf](http://www.marincounty.org/depts/cd/divisions/planning/projects/kentfield/marin-catholic-high-school_dr_up_p1123_kf)

<sup>2</sup> Link to Community Plan: [http://www.marincounty.org/~media/files/departments/cd/planning/currentplanning/publications/communityandareaplans/kentfield\\_greenbrae\\_community\\_plan\\_1987.PDF](http://www.marincounty.org/~media/files/departments/cd/planning/currentplanning/publications/communityandareaplans/kentfield_greenbrae_community_plan_1987.PDF)

such a narrow approach can be accepted, at least a screening analysis is needed that shows unequivocally that light scattering impacts would be nonexistent or negligible, including evenings with appreciable haze. See my previous comments for further discussion about the physics of this process.

My concerns regarding night time noise and the potential for noise impacts at even greater distances due to night time temperature inversions also have not been addressed in the most recent submittals. Like the lighting and biological impact assessment, the noise analysis appears to have been based on an approach that will yield the minimum predicted impact.

### **The Project is Not Needed**

As detailed in my previous comments, the project does not appear to be needed to accommodate the school's field needs. A recent letter to the Marin IJ supporting the project based this support on the expanded availability of the field for use by outside youth sports and other groups. The application suggests that there would be no increase in use of the field. I suspect that by freeing up field time during the day, the school is in fact hoping to generate revenue from additional field rentals.

As I stated in my previous comments

“... I believe that the field lights proposal and planned uses are not in character with Greenbrae and Kentfield neighborhoods, and would adversely affect the quality of life of a large number of residents. As such, I believe it to be in direct conflict with the stated intent of the Kentfield/Greenbrae Area Plan. I find the project description itself and its supporting analyses to be incomplete and intentionally misleading in their statements of absence of adverse impacts. The beneficiaries of the proposed project are Marin Catholic High School, due to its presumed intent to generate field rental revenue from the field time freed up by the proposed use of lights, and students and families from outside the Greenbrae/Kentfield area. The project application should be deemed incomplete. The application to amend the use permit can and should be denied due to the project being inconsistent with the applicable Community Plan for the area.”

Sincerely,

Robert G. Ireson, Ph.D.