



## PRESERVE ROSS VALLEY

---

Anne Petersen  
Kentfield Planning Advisory Board  
PO Box 304  
Kentfield, CA 94914

January 27, 2016

### **RE: Marin Catholic's Application for Stadium Lighting**

Dear Ms. Petersen:

I have reviewed the information submitted to the Marin County Community Development Agency by Marin Catholic (MC) regarding the referenced application. The application should be deemed incomplete and also be designated for an Initial Study as part of CEQA compliance. Many of the defects relate to areas of public concern expressed during the June 2015 KPAB meeting regarding this proposal. These areas of concern are unaddressed by the application. The following summarizes my comments regarding the lighting and sound studies submitted by MC.

#### **Lights Study and Photographic Simulations**

The submitted study is not adequate to assess visual impacts of increased nighttime use of the fields and parking lot.

The pictures and calculations only simulate turning on lights for the proposed new 80-foot poles. The project plans contemplate 30 additional light standards used throughout the project. These lights are not necessarily directed downward or using the same technology. The studies calculations and pictures do not include increased use of parking lot lights, increased use of lights for paths and other new light sources included in the project proposal. Analysis is therefore not capturing the total effect of the proposed project.

The submitted simulation pictures are flawed. Examining the photo renderings shows that the "comparison" photos do not reflect the same time of day. This is obvious from looking at the sky portions of each photo, which do not match.



## PRESERVE ROSS VALLEY

---

The pictures are not from all appropriate locations. The addition of poles will impact the public's view from many locations. The County's incomplete notice from the 2012 application indicated that renderings of the visual impact of the poles should be done from Hal Brown Park, for instance. They should also be done from other locations around the proposed stadium lighting. This is not only a Greenbrae hillside issue.

Mt Tamalpais is a designated visual resource under CEQA. Projects under CEQA need to be considered for visual impacts of visual resources from public viewpoints. The addition of poles will directly impact the view of Mt Tam along Sir Frances Drake. Sir Frances Drake is a major thoroughfare in Marin County. Marin County has a long tradition of respecting views along roadways. Stretches of Coastal Route 1 also enjoy this protection. Marin County does not allow billboards along highways for similar reasons. The proposed stadium lights would significantly impact the public's enjoyment of views.

The light study states that "[o]ur primary directive from Marin Catholic High School was to analyze a football field lighting design to determine the light impact with regard to the neighboring residences." The light study provides no information about the impact of light on wildlife in the neighboring Corte Madera Creek wildlife areas. The creek area is much closer to MC than neighboring residences. Without this information, there is no objective way to assess the project under CEQA and other necessary California and Federal statutes and guidelines.

### **Band and Crowd Noise**

The Noise Study contains no baseline measurements of noise from MC's band at football games. As neighbors are well aware, the band is a much more substantial source of noise for neighbors of the campus than the PA system. This issue was raised at the June 2015 KPAB meeting and is reflected in the meeting minutes. MC's band is not a "voice" source of sound but rather a percussive source of noise, which has a different impact as compared to "voice" sources of noise. MC has been well aware of this issue since it received comments on its 2012 application for stadium lights. MC should be required to pay for sound testing by Alan Rosen (The CDA's selected acoustics engineer during the compliance phase of its stadium renovation project) for band noise to establish meaningful baseline noise levels during actual football games. Without these baseline measurements, there is no way to assess the potential significant impacts of the proposed project. The 2016 football season would provide the basis for such testing, just as MC could have used the 2015 season to gather this data.





## PRESERVE ROSS VALLEY

---

Percussive sound is also different from “voice” sound. The noise from percussive sound is often not dampened by structures. While closing a window may reduce the sound from voice sources, it does not mitigate sound from percussive sources to the same extent. Assessing percussive sound will require more testing than the sound system or crowd noise as it has a different effect on the environment. Again, this is an issue that could be addressed by sound testing by Alan Rosen during the 2016 football season.

The Noise Study provides no baseline measurements of noise from MC’s crowd at football games. As neighbors know, the crowd is a much more substantial source of noise for neighbors of the campus than the PA system. MC has been well aware of this issue since it received comments on its 2012 application for stadium lights. This issue was also raised in the June 2015 KPAB meeting. MC should be required to pay for sound testing by Alan Rosen for crowd noise to establish meaningful baseline noise levels during actual football games. Without these baseline measurements, there is no objective way to assess the impacts of the proposed project.

The noise study also does not assess noise in neighboring Corte Madera Creek and therefore there is not objective information about potential significant impacts on wildlife.

Thank you for considering the ways in which MC’s application is incomplete and should trigger an Initial Study under CEQA.

Sincerely,

John Holzwarth  
100 Corte Elena  
Greenbrae, CA 94904