

Attachment 4

Sherbeck Field Improvements Project – Draft Environmental Impact Report Summary of Draft City Comments

The following is a summary and consolidation of comments prepared by City staff, the City's independent CEQA consultant, and the City's Traffic Engineer upon review of the Sherbeck Field Improvements Project Draft Environmental Impact Report (DEIR):

Project Description (Section 3):

1. This section of the DEIR describes the proposed improvements and use of the field, including the extended hours that would be available for use in the evening with the addition of field lighting. It is important that a detailed description of the type of activities and events that will be allowed to take place on the field, and the frequency in which they will occur, be included in the Final EIR. In addition, the baseline conditions are not fully identified in this section, and to do so requires a description of existing seating capacity for spectators, lighting and sound systems that are currently or recently used. (Section 3.2)
2. Confirm that the programming from the 2016/2017 academic year schedule, as identified in Table 3-1, has not changed substantially and is still an accurate basis on which to identify an increase and/or change in programming. Additionally, Table 3-2, Proposed Programming does not clearly distinguish between existing and proposed programming or identify which programs will utilize field lighting or the sound system. This information should be provided to allow for a full understanding of the intended use of the proposed lighting and sound system.
3. The graphic representation of the proposed project is limited to a conceptual site plan that is difficult to read. Graphics that clearly depict the key project features included in the project description, including elevations of the proposed structural elements (bleachers, press box, and storage facility) to support the project-level analysis presented in the DEIR would be beneficial in order to more accurately understand the project.
4. There are inconsistencies in this section pertaining to whether the sound system will be used exclusively for athletic competition event and/or for rentals. A definition of "athletic competition" is needed, as this section discusses in some detail Fullerton College football and soccer, commencement and a few other annual events, but provides no detail with respect to field rentals. Time, duration and frequency of rentals should be provided in order to fully disclose the potential impacts and to effectively formulate, implement, enforce and monitor mitigation.
5. The description of the lighting system in this chapter focuses on the location of the lighting stanchions and height of the light fixtures. There are also references to house lights, field lights, football lights, and track lights; however greater distinction between the various types of lighting, and the type of light fixtures required/proposed to meet these needs would be beneficial for the reader to understand the scope of the project.
6. With respect to field lighting, the number of light fixtures proposed for each lighting stanchion, the type of light fixtures to be installed, and the lighting levels required for the proposed activities at the field should be identified. The number and type of lighting fixtures will determine the levels of light

and glare emitted. The California Community College Athletic Association Constitution and Bylaws refer to the National Collegiate Athletic Association (NCAA) Rulebook for football, and to the Fédération Internationale de Football Association (FIFA) which include lighting requirements for competition play. These requirements would likely differ from the lighting levels required for practice activities, physical education classes, and other activities that may occur on the Sherbeck Field.

Aesthetics (Section 4.1):

1. This Section of the DEIR identifies several assumptions regarding lighting that are used in the analysis of light and glare impacts. The DEIR states lighting will be directed downward and fixtures will be hooded to limit light spillage and reduce potential sky glow. It also analyzes light fixtures mounted at specific heights on stanchions so as to provide adequate field coverage while limiting light spillage to surrounding neighborhoods. These lighting characteristics should be included in the project description as specific Project Design Features or identified as feasible and enforceable mitigation measures.
2. This section further notes that existing trees will obscure glare from proposed lighting fixtures so as not to distract motorists on Berkeley. However, this section should also address the facts that homes to the north are at a higher elevation where trees are not likely to have a screening effect on the lighting, and that there are no trees to the east of the Sherbeck Field to obscure lighting from residential properties to the east.
3. Under cumulative lighting impacts, the DEIR acknowledges that the Fullerton Union High School has a lighted athletic field located 0.2 miles from Sherbeck Field. The DEIR should also analyze the potential cumulative effect of glare, as viewed from residences to the north, from the two lighted fields.
4. The DEIR does not address the City of Fullerton comments sent in response to the Notice of Preparation, requesting that the DEIR address the following issues:
 - a. Relative elevation of light fixtures on the field to neighborhoods north of the campus, where homes are on higher ground than Sherbeck Field.
 - b. Type of lighting fixtures to be used.
 - c. Effectiveness of proposed mitigation.
 - d. Enforcement of lighting curfews.
5. The Final EIR should include effective and enforceable mitigation relative to lighting, including the following:
 - a. Clearly identify anticipated need for lighting for field rentals, frequency and duration, with a lighting curfew of 8:00 p.m. for all rentals.
 - b. Lighting curfews for Fullerton College football and soccer competition events on days and times identified in the DEIR.

- c. Lighting should be on an automated timing system, to be designed to turn off athletic field lights no later than the identified curfew, with all events scheduled to conclude before the curfew. If scheduled events are concluded before the established curfew, the lights shall be turned off at the earliest time possible.
- d. The lighting system and associated operation of the lighting system shall include the following features which serve to reduce potential impacts:
 - i. Installation of light emitting diode (LED) light fixtures or other industry approved best available technology, and not metal halide.
 - ii. The number of light fixtures on each stanchion shall not exceed the number assumed in the lighting analysis presented in the Final EIR. The number of light fixtures shall be specifically identified in the Final EIR.
 - iii. Field lighting shall not exceed average light levels (footcandles) required by each event/activity (e.g., lighting levels for football games would be an average of 50 footcandles as required to comply with NCAA requirements). The established required average light levels for each event/activity shall be specifically identified in the Final EIR.
 - iv. Reflectors for the light fixtures that direct the light onto the field, reducing sky glow and spill light onto neighboring properties, and a visor assembly that works in conjunction with the reflector to provide more light control and reduce glare on and off the field, shall be installed.
 - v. A remote scheduling, monitoring and data management system shall be installed that allows Fullerton College to schedule, report, and track usage of athletic field lighting, including by renters, to ensure that established use restrictions are met.
 - vi. A multi-watt dimming control system shall be installed that operates by adjusting the total electrical consumption of the driver allowing for different light levels for play (i.e., high mode – 100 percent power), practices (i.e., medium mode – 50 percent power), and clean-up activities (i.e., low mode – 15 percent power), that can be operated through on-site and remote control links.
 - vii. Following installation of the athletic field lighting and prior to the use of the athletic field lighting, a third-party lighting consultant approved by the City of Fullerton, shall be retained to confirm that the established lighting results outlined in the Final EIR with respect to measured light and glare levels are met. If the established lighting measurements are not met, the lighting system shall be adjusted accordingly. The results of the study shall be submitted to the City of Fullerton.

Noise (Section 4.5):

- 1. The Final EIR should explain how and why the noise measurements taken on December 15-18, 2017, after the end of the fall session, are appropriate for the baseline in the analysis of potential noise impacts.

2. The DEIR states that construction activities would be limited to those hours set by the City's Noise Ordinance. A mitigation measure should be included to memorialize this limitation, including how this measure would be enforced and monitored
3. The PA system is described in the DEIR as designed by PlanNet using speaker arrays designed by L-Acoustics, with these characteristics serving as the basis for the analysis in the noise analysis. These features should be identified in the project description as project design features or added as feasible and enforceable mitigation.
4. CEQA requires that an EIR describe feasible measures which could minimize significant adverse impacts. It is not appropriate to disregard feasible mitigation for operational noise impacts due to the inability to reduce an impact to a less than significant level. The Final EIR should include all feasible mitigation that can reduce the stated noise impact to a less than significant level.
5. The Final EIR should clarify whether the sound system will be used only for athletic competition events or also for other activities.
6. The Final EIR should include effective and enforceable mitigation relative to noise levels, including the following:
 - a. Restrict use of the sound system to only athletic competition events and not practices, PE classes, or other non-competition or entertainment events.
 - b. Prohibit amplified music after 7:00 PM.
 - c. Curfews for use of the PA system for Fullerton College football and soccer competition events on days and times identified in the DEIR.
 - d. Clearly identify the anticipated use of the PA system for field rentals, frequency and duration, with a PA system curfew of 8:00 p.m. for all rentals.
 - e. Proposed Mitigation Measure-NOI-1. This MM requires preparation of a construction noise mitigation program but there is no language in the MM that requires that it be implemented by the contractor, or how compliance will be enforced. This mitigation measure should be expanded in the Final EIR to address specific means of implementation and enforcement.
 - f. Proposed Mitigation Measure-NOI-2. As written, this mitigation measure places restrictions on the timing of field events, but makes no mention of the use of the speaker system, with the exception of the directive that the College's PA system will be used. This mitigation measure should be revised to specifically address the type of events that may include use of the speaker system, including the time of day of field use to be incorporated into a separate, new mitigation measure.
7. The analysis concludes that traffic-related noise impacts would be significant and unavoidable; however, there is no discussion of the feasibility of mitigation. The Final EIR should identify and impose feasible mitigation, or explain why mitigation is not feasible.

Transportation (Section 4.8):

Based on review by the City Traffic Engineer, the following items need to be addressed in the Final EIR.

1. As identified with respect to other topic areas, the traffic analysis should be based on a full description of all events and activities to take place on the field, and the time they will occur.
2. The two driveways adjacent to Sherbeck Field should be modified. Driveway No. 1 (north side of the field) should be widened to better accommodate inbound and outbound traffic. In addition, prior to hosting competition events on the field, Driveway No. 2 (south side of the field) should be modified to prohibit northbound vehicles on Berkeley from turning in to this driveway. This will prevent a conflict at the offset intersection of Brookdale and Driveway No. 2 at Berkeley Avenue.
3. Table 3-3 in the traffic analysis should be modified to accurately reflect existing conditions.
4. The Traffic Analysis should address the available parking for athletic competitions, the internal vehicular circulation patterns, and directing more vehicles toward use of Lemon St. for ingress and egress from the campus. Use of Lemon St. will help reduce the traffic impacts on Berkeley Ave.
5. The Traffic Management Plan states that the Fullerton Police Department will provide for traffic control at events. The City will arrange for off-duty officers to direct traffic at the expense of the University when possible, but they cannot guarantee officers will be available for all events. The College will need to coordinate with the Fullerton Police Department in preparing the Traffic Management Plan. In addition, College Driveway No. 1 will not likely be able to accommodate the volume of outbound left turns; with traffic control stopping southbound traffic on Berkeley Ave. to accommodate left turns out.
6. The Traffic Management Plan should include measures to minimize “cut through traffic” and parking on neighborhood streets.