

## MEMORANDUM

DATE April 3, 2026

TO Irvine Unified School District

ADDRESS 2015 Roosevelt, Irvine, CA 92620

CONTACT Kelvin Okino, Executive Director, Facilities and Construction  
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FROM Malia Durand, Principal  
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SUBJECT Northwood High School Field Lighting Project Final EIR –  
Supplemental Responses to Comments

PROJECT NUMBER ISD-39

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This memorandum is provided to correct the administrative record for the Final Environmental Impact Report (EIR). The Irvine Unified School District (IUSD or District) confirms that one comment letter was received from the City of Irvine (City) for the Northwood High School Field Lighting Improvement Project (proposed project) on November 12, 2026. This comment letter was submitted in time but was inadvertently omitted from the Final EIR response-to-comments section, which was certified by the IUSD School Board on February 17, 2026. This memorandum includes the comment letter and responses to comments and identifies minor clarifications to the Draft EIR text where appropriate. These clarifications do not result in new significant environmental impacts or a substantial increase in the severity of previously identified impacts. The letter does not raise significant new information under the California Environmental Quality Act (CEQA) Guidelines Section 15088.5 and would not require recirculation of the Draft EIR.

- **Section 1, *Response to Comments***, groups similar public concerns into "topical responses" to provide comprehensive, streamlined answers to the most frequent issues raised during the Draft EIR review period. Additionally, this section also includes individual responses to the City's comment letter.
- **Section 2, *Revisions to the Draft EIR***, includes revisions to the Draft EIR in response to comments from the City, as well as staff-directed changes. These text revisions include typographical corrections, insignificant modifications, and amplifications and clarifications of the Draft EIR.

All written responses to the City's comment letter and revisions to the Draft EIR are consistent with CEQA Guidelines Section 15088.

## 1. Response to Comments

### TOPICAL RESPONSES

This section provides responses to recurring themes raised during the public review period for the Draft EIR. To minimize duplication and provide a more comprehensive discussion, "topical responses" have been prepared. Each topical response begins with a summary of the relevant comments received. Responses to individual comments reference these topical responses as appropriate. Topical responses in this Final EIR address the following issues:

1. Light and Glare
2. Noise
3. Non-school Events

#### **Topical Response 1: Light and Glare**

The District received multiple comment letters expressing concern regarding potential lighting and glare impacts from the installation of the proposed light poles at the Northwood High School football field. In response to public comments received during the Draft EIR circulation period, the District has selected Alternative 2 for implementation. This alternative modifies the project's operational profile by requiring all proposed lighting to be shut off by 9:00 p.m., rather than the originally proposed 10:00 p.m. As this change represents a reduction in the duration of light exposure compared to the project analyzed in the Draft EIR, the existing environmental analysis remains valid and sufficiently covers the reduced impact profile of Alternative 2. Additionally, the project description is revised to clarify that each proposed light pole would include nine fixtures, rather than twelve.

The potential for light spill was fully analyzed in Chapter 3.1, *Aesthetics*, of the Draft EIR. Lighting measurements were taken in the shape of an ellipse at 150 feet from the boundary of the track and field. Measurements were determined to be at or below 0.1 foot-candle (fc), which is significantly lower than both the 0.9 fc threshold of significance and the DarkSky International's 0.2 fc post-curfew measurement, described in Section 3.1.3, *Standards of Analysis*, of this Draft EIR. Figure 3.1-8, *Musco Lighting Analysis*, of this Draft EIR shows the lighting levels measured and their approximate location.

As shown in Figure 1, *Proposed Lighting Fixtures*, and Figure 2, *Proposed Lighting Examples*, the proposed lights utilize shielding and increased mounting heights, allowing lamps to be directed downward onto the playing surface rather than outward. The use of shielding on the selected (Musco) LED modern stadium light fixtures is a fixture housing design feature that effectively controls and harnesses the light beam, ensuring light is directed downward precisely onto the track and field and significantly minimizes and blocks light spill and glare onto neighboring properties. This control is achieved through Musco's extended full-cut-off visor and directional optics and internal reflectors and baffles within the housing to block light emitted above the

horizontal plane, thereby eliminating sky glow and preventing light trespass. By concealing the light source from the horizontal line of sight, the shielding minimizes direct glare for residents, allowing lighting measurements at the property boundary to remain at or below regulatory thresholds, ensuring the project's lighting impact is less than significant.

Additionally, because the nearest residential property line is beyond the 150-foot field boundary, no residential properties near the Northwood High School campus will experience light spill on their properties, as shown in Figure 3.1-8, *Musco Lighting Analysis*, of the Draft EIR. Therefore, impacts related to light spill were concluded to be less than significant; thus, no mitigation measures are required for reducing impacts related to light spill. CEQA does not require mitigation measures beyond what is necessary to reduce significant impacts to less-than-significant levels. In addition, the Draft EIR confirmed that the High School is not located within a biologically sensitive area or a migratory corridor (see Chapter 5, *Other CEQA Considerations* of the DEIR), ensuring the proposed lighting will not impact wildlife or sensitive species. The information provided meets all CEQA requirements, and no further analysis or changes to the Draft EIR are necessary.

### **Topical Response 2: Noise**

The District received multiple comment letters expressing concern regarding potential noise impacts from the installation of a future public address (PA) system at the Northwood High School campus.

In response to community concerns, the District has removed the PA system from the proposed project, and the Draft EIR project description has been updated to reflect this change. With the elimination of the future PA system on the Northwood HS track and field, the primary source of operational noise would be limited to athlete and audience activity during on-campus events.

The Draft EIR details noise impacts attributable to the proposed project on pages 3.7-24 through 3.7-26. The analysis confirms that sports and other campus events are temporary, periodic (not daily), and occur only during athletic field use hours (Monday through Saturday, 2:30 p.m. to 9:00 p.m.). The noise modeling estimated levels at locations representing the nearest residential receptors. To ensure accuracy, the modeling inputs were based on observations of typical event activities and were determined to be representative of realistic conditions, including the following:

- Rowdy crowd cheering (Bleachers) was assumed for a cumulative 10 minutes per hour and each cheer interval was assumed to be approximately 10 seconds long.<sup>1</sup>
- On-field player activity was assumed to occur for a cumulative of 25 minutes per hour.
- On-field referee whistle activity was assumed to occur for a cumulative of 25 minutes per hour.

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<sup>1</sup> To ensure a conservative analysis of high-level noise impacts, crowd noise was analyzed in the Draft EIR; however, bleachers are not proposed as part of the proposed project.

The nearest residential uses, located along Portola Parkway, are shielded by an existing 6-foot sound wall. To assess potential impacts, detailed 3D noise modeling (SoundPLAN) was conducted using ambient noise levels measured at three key locations: two near the football field (the closest being approximately 350 feet from the endzone) and one in the Orchard Hills neighborhood (approximately 1,350 feet to the northeast). As detailed in Draft EIR Table 3.7-9, *SoundPLAN Modeled Noise Levels, dBA Leq*, future sports events at the track and field—excluding the PA system—would generate noise levels more than 10 dBA below existing ambient conditions at these receptors. Consequently, the project would cause a negligible increase of less than 1 dBA over current background noise levels. Therefore, existing ambient noise will remain the dominant noise source at all locations, including Orchard Hills.

Under City of Irvine Municipal Code (Title 6, Division 8, Chapter 2), school activities such as bands, athletics, and entertainment events conducted on school property are exempt from City noise standards. Despite this exemption, the project was analyzed against the City's Exterior Noise Performance Standards to demonstrate compatibility. The relevant residential standards are 60 dBA Leq during the day and 55 dBA Leq at night (10:00 p.m. to 7:00 a.m.). As shown in Table 3.7-9 of the Draft EIR, evening football games would remain well within these limits, generating between 26.7 and 40.5 dBA Leq at the nearest receptors. Specifically, noise levels at the nearest Orchard Hills residence were modeled at 26.7 dBA Leq—more than 30 dBA below the 60 dBA threshold. Model assumptions substantiating this analysis are provided in Appendix E.

As described in the previous paragraph, Section 6-8-205(E)(1) of the City of Irvine Municipal Code exempts school bands, athletic, and entertainment events conducted on school property from noise standards. Importantly, the noise associated with band practices and performances at Northwood High School will not change under the proposed project, as these are existing campus operations that will continue in their current form. Furthermore, this is not a stadium project and does not add any bleachers or increase student, staff, or visitor capacity. Sporting events and practices are anticipated to consist of Freshman and Junior Varsity (JV) tackle football, flag football, girls and boys soccer, girls and boys lacrosse, track and field, and band. The field will also be used for football practices; however, Varsity tackle football games will continue to be held at Irvine HS. The track and field may also be used for other school events, such as graduation and non-school events.

Events at the site will be limited to practices for flag and tackle football, soccer, lacrosse, track, and band; games for soccer, lacrosse, track, flag football, and Freshman and Junior Varsity (JV) tackle football; and community events. Varsity tackle football games will continue to be hosted at Irvine High School.

Based on the noise analysis of event activity and the removal of the PA system, operational noise impacts from the proposed project are determined to be less than significant; thus, no mitigation measures are required for reducing impacts related to noise. CEQA does not require mitigation measures beyond what is necessary to reduce significant impacts to less-than-significant levels. Consequently, the project will not result in a significant effect on nearby residents, and no further revisions to the Draft EIR are required beyond documenting the exclusion of the PA system.

### **Topical Response 3: Non-school Events**

The District received multiple comment letters inquiring about the nature of non-school events that may take place on the Northwood HS campus as a result of the proposed project.

As described in Chapter 2, *Project Description*, of the Draft EIR, the facilities at Northwood High School would be available to outside user groups to utilize the athletic field lights, as required by the California Civic Center Act (Education Code sec. 38130), which mandates that school sites be made available to community groups for educational, recreational, or civic uses, subject to reasonable terms and conditions. The District's Board Policy 1330 encourages maximum community utilization of school facilities as authorized by the Civic Center Act. Administrative Regulation 1330 sets forth the procedure for outside groups to apply for the use of District facilities. The District permits use of high school athletic fields by youth and adult community groups for practices, games, meets, and tournaments for sports, including but not limited to track, lacrosse, soccer, flag football, football, futsal, and cricket. Additionally, high school athletic fields may be utilized for large community events.

Community use is only permitted outside of normal school hours, after 4:00 p.m. on regular school days and on non-school days. Outside user groups may utilize the athletic field lights from dusk to 9:00 p.m., which aligns with the City of Irvine hours of operation. The hours of operation can be extended by approval by the District Use of Facilities Department. The proposed schedule offers flexibility and may be subject to change. Detailed event information is not available at this time, as the District has not received any community event requests for the Northwood HS campus.

All community-use requests are subject to the District's established application and approval process, and any future requests would undergo that review at the time they are submitted to ensure appropriate use of school property as defined in Education Code § 38131, which limits access to activities that are consistent with educational, civic, and recreational purposes and prohibits uses that may conflict with school operations or the safety of students and staff. User groups must adhere to the District's "Regulations and Policies Regarding Community Use of School Buildings and Grounds." The District would have the authority to use lights for practices and events based on specific needs, and the event schedule may be adjusted for different school and community events. In addition, compliance with the Civic Center Act is an existing condition; the Northwood HS campus is already subject to its requirements, although no community events have been requested to date.

The District's Use of Facilities Department monitors all outside events to ensure compliance with approved hours of operation, noise regulations, and safety requirements. This oversight reduces potential conflicts between school and community activities. Further, any requests for extended hours or atypical use would undergo a formal review process, including consideration of environmental and community impacts, ensuring that all activities remain consistent with applicable local regulations.

## **INDIVIDUAL COMMENT RESPONSES**

### **A1. City of Irvine, 11/12/2025**

#### **COMMENT A1-1**

Good morning Ms. Gil,

Please find attached the City of Irvine comments on Draft Environmental Impact (DEIR) for the Northwood High School Field Lighting Improvement Project located 4515 Portola Parkway in the City of Irvine.

#### **Response A1-1**

This is an introductory comment and does not raise an environmental issue regarding the adequacy of the Draft EIR. Therefore, no further response is required.

#### **COMMENT A1-2**

Dear Ms. Gil:

Thank you for the opportunity to review the DEIR for the Northwood High School Field Lighting Improvement Project located 4515 Portola Parkway in the City of Irvine.

The proposed project includes the installation of new permanent field lights around the existing football field and infrastructure to allow for a future public address (PA) system. The football field is expected to be used until 10 p.m. and would include new events/uses of the field during light operating hours that would include band practice, football, lacrosse, and soccer games; and track & field events that are currently held off-campus.

The City reviewed the DEIR and has the following comments:

#### **Response A1-2**

This is an introductory comment and summarizes the proposed project. This comment does not raise an environmental issue regarding the adequacy of the Draft EIR. Therefore, no further response is required.

#### **COMMENT A1-3**

- Page 41 – This map needs to be updated. It does not show any of the surrounding, existing streets in Orchard Hills (making it appear undeveloped), while the streets south of Portola Parkway are included.

### **Response A1-3**

The commenter is referring to Figure 2-2, *Local Vicinity*. This figure has been revised to show the surrounding streets in Orchard Hills. Revisions have been made in Section 2, *Revisions to the Draft EIR*. This revision does not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

### **COMMENT A1-4**

- Section 2.4
  - 2.4.1 – This paragraph needs to be updated to reflect correct information pertaining to the City’s General Plan and Zoning Ordinance.
    - The correct General Plan designation is “Institutional-Educational.”
    - The correct zoning designation is “6.1 Institutional.”
    - Replace "Orchard Hills Planning Area" with "Planning Area 1 - Orchard Hills."

### **Response A1-4**

The General Plan and zoning designations have been updated to reflect the correct information. Revisions have been made in Section 2, *Revisions to the Draft EIR*. This revision does not change the accuracy of analysis concluded in the Draft EIR. No changes to impact conclusions are necessary.

### **COMMENT A1-5**

- 2.4.3
  - This paragraph should also mention the existing tennis courts, baseball and softball fields, and swimming pool, as the header says "existing athletic facilities." This new text should discuss the lighting existing at the other on-site facilities.
  - Athletic/Events Schedule - Clarify here whether any non-school events take place at Northwood HS currently as this would provide context as to whether non-school events would be a new function or they would just be increased as a result of this project.

### **Response A1-5**

The existing athletic facilities discussed herein are limited to those within the project site. Although Northwood High School includes additional facilities—such as tennis courts, baseball and softball fields, and a swimming pool—these facilities are not addressed because they are outside the proposed disturbance area. Additionally, Chapter 3.1, *Aesthetics*, Section 3.1.2,

*Existing Conditions*, has been revised to include a discussion of the existing lighting at the tennis courts. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of analysis in the Draft EIR. No changes to impact conclusions are necessary.

Please see Topical Response 3, *Non-school Events*, which describes the nature and purpose of proposed non-school events, including the District's compliance with the California Civic Center Act (Education Code sec. 38130). No revisions to the Draft EIR are necessary.

#### **COMMENT A1-6**

- Section 2.5 – The alternatives discussion in the Exec Summary states that shutting down lights one hour earlier (at 9 p.m. instead of 10 p.m.) does not allow project objectives to be accomplished. It is not clear how a 9 p.m. shut off would impact any stated project objective in this section. Please provide evidence to support this contention.

#### **Response A1-6**

As described in Section 4.6, *Alternative 2: Restricted Hours Alternatives*, the Draft EIR determined that the proposed project would not meet Objective 2, to provide lighting to allow night use of the track and field to accommodate school-related events and activities, or Objective 4, to enhance sense of community by allowing home games on campus. However, Topical Response 1, *Light and Glare*, and Topical Response 2, *Noise*, explain that in response to public comments received during the Draft EIR circulation period, the District has selected Alternative 2 for implementation. Northwood HS field would be used for practices and existing soccer, lacrosse, track, flag football, and freshman and JV tackle football games. All varsity football games would continue to be played at Irvine High School. This alternative modifies the project's operational profile by requiring all proposed lighting to be shut off by 9:00 pm rather than the originally proposed 10:00 pm. As shown in Table 2-2, *Northwood High School Proposed Athletics/Events Schedule*, of the Draft EIR, all games on campus would be expected to end before 9:00 pm. This change would still allow most student athletes to participate in games and practices on their home field instead of being transported to other sites for games and practice. Thus, Alternative 2 would meet Project Objectives 2 and 4. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

#### **COMMENT A1-7**

- The next page (Page 2-13) mentions that the lights will be used for non-school events. That is not noted in the Project Objectives section. Which is correct? Both discussions of field use should be consistent.

#### **Response A1-7**

The District is not making the project site newly available for non-school use because the existing athletic facilities already may be used for non-school events in accordance with the California

Civic Center Act (Education Code sec. 38130). Therefore, the proposed lighting improvements would incidentally benefit those community uses. Please see Topical Response 3, *Non-school Events*, which describes the nature and purpose of proposed non-school events, including the District's compliance with the California Civic Center Act. No revisions to the Draft EIR are necessary.

#### **COMMENT A1-8**

- Page 2-13 - There is no discussion of what could constitute a non-school event. Provide examples of what these events could be. As they would be allowed use of the future PA system, it would be helpful to know the nature of the amplified sound.

#### **Response A1-8**

Please see Topical Response 3, *Non-school Events*, which describes the nature and purpose of proposed non-school events, including the District's compliance with the California Civic Center Act (Education Code sec. 38130). In addition, please see Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project. No revisions to the Draft EIR are necessary.

#### **COMMENT A1-9**

- Page 2-18, Paragraph 3 - Please cite the source of "City of Irvine hours of operation." The City does not have limitations on hours of operation for uses, unless specified in a conditional use permit approval. Also, it is not clear what variance is being mentioned in this paragraph. Cite the appropriate Irvine Municipal Code or Zoning Ordinance section.

#### **Response A1-9**

This paragraph has been revised to add a citation for the City of Irvine Municipal Code Section 3-4-127. Language referencing a variance has been removed. Revisions have been made in Section 2, *Revisions to the Draft EIR*. This revision does not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

#### **COMMENT A1-10**

- Table 2-2 - This table does not include the non-school events that are discussed in this DEIR. What is the anticipated number of events per year? When could they occur? What would be the end time (10 p.m.)? What would be the maximum number of attendees?
  - It is unable to be confirmed whether a track & field event would be the largest attendance-wise, without details on the limitations that would be imposed on non-school events.

### **Response A1-10**

Please see Topical Response 3, *Non-school Events*, which describes the nature and purpose of proposed non-school events, including the District's compliance with the California Civic Center Act (Education Code sec. 38130). Detailed event information is not available at this time because the District has not received any community event requests for the Northwood HS campus. No revisions to the Draft EIR are necessary.

### **COMMENT A1-11**

- Page 3.1-2 - It is unclear why Chapter 7.1 (Signs) of the Irvine Zoning Ordinance is called out as applicable local regulatory framework. No signs are proposed as part of this project. I suggest removing this paragraph.
- Design Guidelines - This section should specifically reference Division 9, Planning Areas, of the Irvine Zoning Ordinance under this section header, as that division contains the planning area-specific standards.
  - Additionally the text in this paragraph is outdated. The City adopted the Objective Design Standards in November 2024. Refer to <https://cityofirvine.org/community-development/objective-designstandards> for details.

### **Response A1-11**

The suggested revisions have been incorporated. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

### **COMMENT A1-12**

- Page 3.1-3
  - Goal 8 of the Conservation and Open Space Element states "Enhance open space in the Irvine Business Complex." The goal and policy language referenced on this page is not correct and needs to be fixed.

### **Response A1-12**

The Goal 8 referenced in the Draft EIR is from the Land Use Element of the Irvine General Plan. The inaccurate text has been corrected. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-13**

- Section 3.1.2 - Replace “Placentia” with “Irvine” and correct the nearest scenic vista (the start of the Santiago Hills foothills (where the views begin) are just over one mile north of the project site).

**Response A1-13**

The inaccurate text has been corrected. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-14**

- Page 3.1-4 – Under Light and Glare, correct as follows: The track and field does not currently contain any permanent lighting ~~or a Public Address (PA) system~~. The PA system has no bearing on light and glare caused by the project and doesn’t need to be referenced.

**Response A1-14**

Reference to a PA system has been removed from this section. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-15**

- Page 3.1-6 – Under Threshold Guidance, this paragraph should define what precurfew and post-curfew hours are.

**Response A1-15**

The Draft EIR has been revised to add the suggested definitions. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-16**

- Page 3.1-9, Municipal Code
  - How is light spill defined? It does not appear in the list of defined terms on the prior page.
  - Additionally, Chapter 3-16 of the Irvine Zoning Ordinance states "Outdoor lighting shall be designed and installed so that all direct rays are confined to the site and adjacent properties are protected from glare. The level of lighting on the site shall comply with the requirements of the City's Security Code."

- The language in the last sentence on this page is vague and general in nature. How would the typical light control practices be achieved specifically for this project? What restrictions will be put in place so that adjacent/nearby properties are not impacted?

### **Response A1-16**

In the Draft EIR, light trespass and light spill are used interchangeably, and light trespass has been defined in the list of defined terms. Clarifying language has been added. Reference to Chapter 3-16 of the Irvine Zoning Ordinance has been added. The language in the last sentence is meant to serve as a general descriptor of light control practices; specific light control practices for the proposed project are discussed on page 3.1-29 of the Draft EIR. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

### **COMMENT A1-17**

- Page 3.1-9
  - Industry Standards - Provide more detail here as to why Lighting Zone 3 was selected. The immediately adjoining development (north of Portola Pkwy) is active agriculture and Low Density Residential-zoned property.
  - Establishing an Appropriate Threshold - The correlation between curfew hours, during which a minor may be out of their home, and light impacts to residents near the project site is not understood. It is more appropriate to use the Irvine Municipal Code hours related to noise impacts which prohibit noise impacts to residents and other sensitive uses and differentiate between daytime (7 a.m. - 10 p.m.) and overnight (10 p.m. – 7 a.m.).

### **Response A1-17**

The Draft EIR has been revised to provide more detail about why Lighting Zone 3 was selected. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

The comment recommends using the City of Irvine Municipal Code noise standards to establish lighting thresholds (daytime: 7:00 am to 10:00 pm and nighttime: 10:00 pm to 7:00 am). However, noise standards are not directly applicable to the evaluation of obtrusive light. Noise regulations are based on different scientific principles and human response criteria than those used to evaluate lighting effects. Therefore, the time distinctions in the noise ordinance are not correlated with lighting performance standards or accepted lighting industry practices.

Because the City of Irvine does not establish quantitative light spill thresholds in its Municipal Code, industry-recognized lighting standards were used to develop an appropriate and technically supported significance threshold. Specifically, the International Commission on

Illumination (CIE) Guide on the Limitation of the Effects of Obtrusive Light (2017) provides established pre-curfew and post-curfew illumination limits tailored to environmental lighting zones and nighttime sensitivity. These standards are specifically designed to evaluate potential light trespass and sleep disturbance, and therefore provide a more appropriate framework for assessing lighting impacts than the City's noise ordinance time periods.

Accordingly, the analysis relies on the CIE's Environmental Lighting Zone E3 thresholds (0.9 foot-candle pre-curfew and 0.2 foot-candle post-curfew), which are directly related to lighting impacts and are consistent with established professional lighting practice. No revisions to the Draft EIR are necessary.

#### **COMMENT A1-18**

- Page 3.1-10 – Impact Item (c) - Aren't there also light standards near the tennis courts? They should be identified here as a source of light that already exists.

#### **Response A1-18**

Impact item (c) addresses the proposed project's potential conflict with applicable zoning and other regulations governing scenic quality. Lighting sources are not addressed here but under impact item (d). Additionally, Chapter 3.1, *Aesthetics*, Section 3.1.2, *Existing Conditions*, has been revised to include a discussion of the existing lighting at the tennis courts. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

#### **COMMENT A1-19**

- Page 3.1-11 – in the last paragraph on the page, correct “Yale Lane” to “Yale Avenue.”

#### **Response A1-19**

The inaccurate text has been corrected. Revisions have been made in Section 2, *Revisions to the Draft EIR*. This revision does not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

#### **COMMENT A1-20**

- Figure 3.1-7, Existing View - This photo is the first the reader can understand that there is existing tennis court lighting on-site. How many light standards are already in place? How tall are they? What are the hours during which they are allowed to operate?

#### **Response A1-20**

Chapter 3.1, *Aesthetics*, Section 3.1.2, *Existing Conditions*, has been revised to include a discussion of the existing lighting at the tennis courts. Revisions have been made in Section 2,

*Revisions to the Draft EIR.* These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

#### **COMMENT A1-21**

- Figure 3.1-8 - This figure should be updated to also show lighting levels at the property boundaries (purple line) as evidence that there is no overspill of light offsite.

#### **Response A1-21**

Figure 3.1-8 depicts lighting levels from the proposed project at the nearest sensitive receptors. The purpose of the figure is to evaluate potential lighting impacts at off-site sensitive uses, which include residents to the west of the campus along Portola Parkway. Showing lighting levels at the school's property line (purple line) would not demonstrate the potential impact of the proposed lighting because no sensitive receptors are adjacent to the Northwood HS field. Therefore, no revisions are necessary.

#### **COMMENT A1-22**

- Page 3.1-29, Cumulative Impact Analysis
  - What related projects are being referred to here? There is no indication of other projects analyzed.
  - Why does this sentence only call out impacts to properties to the immediate north and west? If it is accurate that no impacts would occur, this sentence should read that there are no impacts to any immediately adjacent property.

#### **Response A1-22**

The cumulative impact analysis determined that the proposed project's impact on aesthetics would not be cumulatively considerable; therefore, the identification and detailed evaluation of specific related projects were not required to support the conclusion. As explained in the section, the analysis considers the project in the context of surrounding urban development. Because the project would not result in a significant impact to scenic vistas, visual character, or light and glare, it would not combine with other past, present, or reasonably foreseeable projects to result in a cumulatively considerable effect.

#### **COMMENT A1-23**

- Section 3.1.5 - Please cite correct data for Irvine. The Final EIR for the 2045 General Plan is dated August 2024. This is the first citation, others that follow should also be updated.

#### **Response A1-23**

The citation has been revised to reflect the correct date. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

### **COMMENT A1-24**

- Page 3.2-30, Operation
  - This is the first mention that there may be up to 85 additional attendees as a result of the proposed project. The project description at the beginning of the DEIR discusses a maximum increase in attendance of 50 people. However, there is no discussion on planned non-school events and what the attendance capacity could be. There is no way to analyze trip generation for non-school events without that information.
  - Earlier in the DEIR, it is stated that lights may remain on until 10 p.m. This reference needs to be made consistent.

### **Response A1-24**

As described in Section 2.6.2, *Event Scheduling*, of the Draft EIR, an additional 50 attendees are anticipated for tackle football games. However, an average day assumes a tackle football game *and* a soccer game because of the extended hours of field use, so the additional attendees totals 85. The analysis in Chapter 3.2, *Air Quality*, uses 85 as the number of additional attendees because it represents the potential maximum increase in number of attendees. However, in response to public comments during the Draft EIR public review period, as described in Topical Response 1, *Light and Glare*, varsity tackle football games will continue to be held at Irvine High School. The freshman and junior varsity schedules would be the same as the existing athletics schedule, and the maximum number of attendees is not expected to increase under the proposed schedule. The project description has been updated to reflect this. Therefore, though 85 additional attendees on average days and 50 additional attendees for tackle football games were used in the Draft EIR's analysis for air quality and transportation impacts to ensure a conservative analysis of high-level impacts, an increase in attendees is no longer expected as part of the proposed project. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

Please see Topical Response 3, *Non-school Events*, which describes the nature and purpose of proposed non-school events, including the District's compliance with the California Civic Center Act (Education Code sec. 38130). Detailed event information is not available at this time because the District has not received any community event requests for the Northwood HS campus.

The commenter is correct that at the preparation of the Draft EIR, the lighting was proposed to remain in operation until 10 pm. However, in response to public comments received during the Draft EIR circulation period, the District selected Alternative 2 for implementation, which would require all proposed lighting to be shut off by 9:00 pm, rather than the originally proposed 10:00 pm (see Topical Response 1, *Light and Glare*). Revisions to the proposed shut-off time have been made in Section 2, *Revisions to the Draft EIR*, and all references to the proposed shut-off time have been made consistent. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-25**

- Page 3.2-33, Operation
  - The called out increase in average daily vehicle trips is not consistent with the increased attendance of 50 people for school events and the unspecified number of attendees for non-school events.
  - How would the maximum 400 attendee limit be imposed? There is no prior discussion of an attendance limit for non-school events in the DEIR.

**Response A1-25**

Please see Response A1-24. The maximum number of 450 for attendees of track and field events was determined by the District and is similar to the event scheduling at the District's other high schools, as stated in the Project Description. Please see Topical Response 3, *Non-school Events*, which describes the nature and purpose of proposed non-school events, including the District's compliance with the California Civic Center Act (Education Code sec. 38130). Detailed event information is not available at this time because the District has not received any community event requests for the Northwood HS campus. No revisions to the Draft EIR are necessary.

**COMMENT A1-26**

- Page 3.3-8, City of Irvine Municipal Code, Title 3...
  - Update Director of "Community Services" to "Community and Library Services."

**Response A1-26**

This change has been implemented. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-27**

- Page 3.5-11, John Wayne Airport Land Use Plan – the statement "John Wayne Airport is in unincorporated Orange County along the western border of the city, adjacent to the Irvine Business Complex" is not correct. The airport is located in the City of Santa Ana.

**Response A1-27**

This statement has been revised to reflect the correct location of the airport. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-28**

- Section 3.5.2, update the General Plan and zoning designations per an earlier comment so they are correct.

**Response A1-28**

This section has been revised to reflect the correct General Plan and zoning designations. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-29**

- Page 3.6-8, at the top of the page - Add missing “Goal 5: Protect the community from the threat of drought and extreme heat” between Policy S3(h) and S5(f).

**Response A1-29**

This section has been revised to incorporate the suggested goal. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-30**

- Page 3.6-9, paragraph 2 – Replace “Public Works and Transportation Department” with “Public Works and Sustainability Department” to reflect the department’s correct name. This correction should also be made on Page 3.10-8, under Stormwater Infrastructure.

**Response A1-30**

Both of the mentioned sections have been revised to reflect the correct department name. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-31**

- Page 3.6-14, second to last paragraph - The Municipal Code reference is not an existing code section. Please double check that you are referencing the correct section.

**Response A1-31**

This municipal code reference has been corrected. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-32**

- Page 3.7-12, second to last paragraph - The paragraph related to deliveries is not relevant to the project. It should be deleted.

**Response A1-32**

The reference to deliveries has been removed. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**COMMENT A1-33**

- Page 3.7-13, bulleted list – Clarify what type of special permit from the City would be required.

**Response A1-33**

Special permit refers to “Special Event Permits” for special events that are outside the normal operations of an area and may temporarily affect that area with road closures, structures, amplified noise, animal expos, food and alcohol service, and other services that are not normally offered. Some examples of special events include carnivals, parades, festivals, car races, marathons, bike rides, and 5K/10K races. The Irvine Municipal Code defines a "special event" as any temporary event not exceeding 30 days (except Christmas tree sales, which may endure for a period not to exceed 45 days), whether indoors or outdoors, or on improved or unimproved property, which is inconsistent with either the zone in which the subject property is located, the uses to which the property may legally be put, or the occupancy levels permitted thereon. "Special events" shall also refer to any activity that may result in the closure of any public streets, or any activities, which may temporarily require the installation of materials or devices using building, electrical, mechanical, plumbing, flammable or similar materials.

Section 6-8-205 of the City of Irvine Noise Ordinance is quoted verbatim in the Draft EIR; therefore, no revisions are warranted because any modification would change the original language of the ordinance.

**COMMENT A1-34**

- Page 3.7-24, Athletic Field Noise
  - Same question as earlier in the document. What variance from the City of Irvine is being mentioned here?
  - What would be the maximum attendance capacity for a non-school event? The discussion is unclear as to whether non-school events would be able to use the PA system, as those events are omitted from this discussion.

### **Response A1-34**

The paragraph has been revised to remove reference to a variance. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

Please see Topical Response 3, *Non-school Events*, which describes the nature and purpose of proposed non-school events, including the District's compliance with the California Civic Center Act (Education Code sec. 38130). Detailed event information is not available at this time because the District has not received any community event requests for the Northwood HS campus. In addition, please see Topical Response 2, *Noise*, which explains that the District has decided to remove the PA system from the proposed project based on community comments and concerns. No revisions to the Draft EIR are necessary.

### **COMMENT A1-35**

- Page 3.8-7, Existing Traffic Volumes
  - This date chosen for manual traffic counts does not occur during football season (which is in the fall). Why was the date chosen?
  - The DEIR also states that track meets generated the highest number of attendees out of the events considered (not counting non-school events, for which no information has been provided). Why is a football game crowd being used for analysis purposes?

### **Response A1-35**

Manual traffic counts were conducted on this date due to scheduling constraints associated with preparation of the Draft EIR. The Draft EIR has been revised to remove the justification that the traffic count period occurs prior to the beginning of a varsity football game. Revisions have been made in Section 2, *Revisions to the Draft EIR*. This revision does not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

In the Draft EIR, football games were utilized in the transportation analysis because it was expected that they would generate the greatest increase in attendees compared to existing conditions. The maximum number of attendees for track and field meets under the proposed project would remain the same as existing conditions. However, because the District decided to move forward with Alternative 2 (see Topical Response 1, *Light and Glare*), varsity tackle football games will continue to be held at Irvine High School, and the maximum number of attendees at Northwood HS is not expected to increase under the proposed schedule. The Project Description has been updated to reflect this. Therefore, though additional attendees for tackle football games were used in the Draft EIR's analysis for transportation impacts to ensure a conservative analysis of high-level impacts, an increase in attendees is no longer assumed as part of the proposed project. Revisions have been made in Section 2, *Revisions to the Draft EIR*. These

revisions do not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

#### **COMMENT A1-36**

- Page 3.10-12, Energy Infrastructure - Page 3.10-9 says that electricity for the school is provided by the Orange County Power Authority (OCPA). This page calls out So Cal Edison as the provider. Correct the incorrect reference.

#### **Response A1-36**

The Draft EIR has been revised to state the correct electricity provider. Revisions have been made in Section 2, *Revisions to the Draft EIR*. This revision does not change in the Draft EIR. No changes to impact conclusions are necessary.

#### **COMMENT A1-37**

- Section 4.6.1, the statements in this section are not consistent with earlier statements in this DEIR. The use of the lights past 9 p.m. was only identified for non-school events. Additionally, the use of the school for non-school events was not listed under the Project Objectives section earlier in this chapter.

#### **Response A1-37**

Section 4.6.1, *Relationship to Project Objectives*, has been revised to state that Alternative 2 would meet all objectives of the project, consistent with Section ES.5.2, *Restricted Hours Alternative*, of the Executive Summary. Under this alternative, use of the proposed lights would end at 9:00 pm for all events. In addition, please see Topical Response 1, *Light and Glare*, which describes how the District selected Alternative 2 for implementation in response to public comments received during the Draft EIR circulation period. Revisions have been made in Section 2, *Revisions to the Draft EIR*. This revision does not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

The District is not making the project site newly available for non-school use because the existing athletic facilities already may be used for non-school related events in accordance with the California Civic Center Act (Education Code sec. 38130). Therefore, the proposed lighting improvements would incidentally benefit those community uses. Please see Topical Response 3, *Non-school Events*, which describes the nature and purpose of proposed non-school events, including the District's compliance with the California Civic Center Act. No revisions to the Draft EIR are necessary.

**COMMENT A1-38**

- Table 4.2, all boxes under the Alternative 2 column should read yes as the objectives specially identify school activities. It would only be the non-school activities that would go past 9 p.m.

**Response A1-38**

Table 4.2 has been revised to state that Alternative 2 would meet all project alternatives. Revisions have been made in Section 2, *Revisions to the Draft EIR*. This revision does not change the accuracy of the analysis in the Draft EIR. No changes to impact conclusions are necessary.

**Comment Letter A1**
**Comment Letter A1**

**From:** [Taya Espinosa](#)  
**To:** [Stephanie Frady](#)  
**Subject:** FW: City of Irvine Comments on Draft Environmental Impact (DEIR) for the Northwood High School Field Lighting Improvement Project located 4515 Portola Parkway in the City of Irvine  
**Date:** Thursday, February 26, 2026 5:21:47 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Northwood HS Field Lights DEIR Comment Letter 251112.pdf](#)



**Taya Espinosa** | Executive Assistant  
 Community Development  
 949-724-6401 | 1 Civic Center Plaza, Irvine, CA 92606  
[tespinosa@cityofirvine.org](mailto:tespinosa@cityofirvine.org) | [cityofirvine.org](http://cityofirvine.org)



**From:** Taya Espinosa  
**Sent:** Wednesday, November 12, 2025 10:38 AM  
**To:** Kathleen Gil <kathleengil@iusd.org>  
**Cc:** Sean Crumby <SCrumby@cityofirvine.org>; Stephanie Frady <SFrady@cityofirvine.org>; Marika Poynter <mpoynter@cityofirvine.org>; Alyssa Matheus <AMatheus@cityofirvine.org>  
**Subject:** City of Irvine Comments on Draft Environmental Impact (DEIR) for the Northwood High School Field Lighting Improvement Project located 4515 Portola Parkway in the City of Irvine

Good morning Ms. Gil,

Please find attached the City of Irvine comments on Draft Environmental Impact (DEIR) for the Northwood High School Field Lighting Improvement Project located 4515 Portola Parkway in the City of Irvine.

A1-1

If you have any questions, please contact Director Stephanie Frady at [sfrady@cityofirvine.org](mailto:sfrady@cityofirvine.org) or 949-724-6375.

Kind regards,



**Taya Espinosa** | Executive Assistant  
 Community Development  
 949-724-6401 | 1 Civic Center Plaza, Irvine, CA 92606  
[tespinosa@cityofirvine.org](mailto:tespinosa@cityofirvine.org) | [cityofirvine.org](http://cityofirvine.org)




[cityofirvine.org](http://cityofirvine.org)

City of Irvine, 1 Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575 949-724-6000

November 12, 2025

Kathleen Gil  
 Facilities Planner, Facilities Planning  
 Irvine Unified School District  
 Facilities Planning and Construction Services Department  
 2015 Roosevelt  
 Irvine, CA 92620

**Sent via email:**  
[kathleengil@iusd.org](mailto:kathleengil@iusd.org)

**Re: City of Irvine Comments on Draft Environmental Impact (DEIR) for the Northwood High School Field Lighting Improvement Project located 4515 Portola Parkway in the City of Irvine**

Dear Ms. Gil:

Thank you for the opportunity to review the DEIR for the Northwood High School Field Lighting Improvement Project located 4515 Portola Parkway in the City of Irvine.

The proposed project includes the installation of new permanent field lights around the existing football field and infrastructure to allow for a future public address (PA) system. The football field is expected to be used until 10 p.m. and would include new events/uses of the field during light operating hours that would include band practice, football, lacrosse, and soccer games; and track & field events that are currently held off-campus.

A1-2

The City reviewed the DEIR and has the following comments:

- Page 41 – This map needs to be updated. It does not show any of the surrounding, existing streets in Orchard Hills (making it appear undeveloped), while the streets south of Portola Parkway are included. A1-3
- Section 2.4
  - 2.4.1 – This paragraph needs to be updated to reflect correct information pertaining to the City’s General Plan and Zoning Ordinance. A1-4
    - The correct General Plan designation is “Institutional-Educational.”
    - The correct zoning designation is “6.1 Institutional.”
    - Replace “Orchard Hills Planning Area” with “Planning Area 1 - Orchard Hills.”
  - 2.4.3
    - Existing Athletic Facilities - This paragraph should also mention the existing tennis courts, baseball and softball fields, and swimming A1-5

Ms. Kathleen Gil  
 November 12, 2025  
 Page 2

- pool, as the header says "existing athletic facilities." This new text should discuss the lighting existing at the other on-site facilities.
  - Athletic/Events Schedule - Clarify here whether any non-school events take place at Northwood HS currently as this would provide context as to whether non-school events would be a new function or they would just be increased as a result of this project. A1-5 Cont
- Section 2.5 – The alternatives discussion in the Exec Summary states that shutting down lights one hour earlier (at 9 p.m. instead of 10 p.m.) does not allow project objectives to be accomplished. It is not clear how a 9 p.m. shut off would impact any stated project objective in this section. Please provide evidence to support this contention. A1-6
  - The next page (Page 2-13) mentions that the lights will be used for non-school events. That is not noted in the Project Objectives section. Which is correct? Both discussions of field use should be consistent. A1-7
- Page 2-13 - There is no discussion of what could constitute a non-school event. Provide examples of what these events could be. As they would be allowed use of the future PA system, it would be helpful to know the nature of the amplified sound. A1-8
- Page 2-18, Paragraph 3 - Please cite the source of "City of Irvine hours of operation." The City does not have limitations on hours of operation for uses, unless specified in a conditional use permit approval. Also, it is not clear what variance is being mentioned in this paragraph. Cite the appropriate Irvine Municipal Code or Zoning Ordinance section. A1-9
- Table 2-2 - This table does not include the non-school events that are discussed in this DEIR. What is the anticipated number of events per year? When could they occur? What would be the end time (10 p.m.)? What would be the maximum number of attendees? A1-10
  - It is unable to be confirmed whether a track & field event would be the largest attendance-wise, without details on the limitations that would be imposed on non-school events.
- Page 3.1-2
  - It is unclear why Chapter 7.1 (Signs) of the Irvine Zoning Ordinance is called out as applicable local regulatory framework. No signs are proposed as part of this project. I suggest removing this paragraph.
  - Design Guidelines - This section should specifically reference Division 9, *Planning Areas*, of the Irvine Zoning Ordinance under this section header, as that division contains the planning area-specific standards. A1-11
    - Additionally, the text in this paragraph is outdated. The City adopted the Objective Design Standards in November 2024. Refer to <https://cityofirvine.org/community-development/objective-design-standards> for details.
- Page 3.1-3
  - Goal 8 of the Conservation and Open Space Element states "Enhance open space in the Irvine Business Complex." The goal and policy language referenced on this page is not correct and needs to be fixed. A1-12

Ms. Kathleen Gil  
 November 12, 2025  
 Page 3

- Section 3.1.2 - Replace "Placentia" with "Irvine" and correct the nearest scenic vista (the start of the Santiago Hills foothills (where the views begin) are just over one mile north of the project site). A1-13
- Page 3.1-4 – Under Light and Glare, correct as follows: The track and field does not currently contain any permanent lighting ~~or a Public Address (PA) system~~. The PA system has no bearing on light and glare caused by the project and doesn't need to be referenced. A1-14
- Page 3.1-5 – Under Threshold Guidance, this paragraph should define what pre-curfew and post-curfew hours are. A1-15
- Page 3.1-8, Municipal Code
  - How is light spill defined? It does not appear in the list of defined terms on the prior page.
  - Additionally, Chapter 3-16 of the Irvine Zoning Ordinance states "Outdoor lighting shall be designed and installed so that all direct rays are confined to the site and adjacent properties are protected from glare. The level of lighting on the site shall comply with the requirements of the City's Security Code." A1-16
  - The language in the last sentence on this page is vague and general in nature. How would the typical light control practices be achieved specifically for this project? What restrictions will be put in place so that adjacent/nearby properties are not impacted?
- Page 3.1-9
  - Industry Standards - Provide more detail here as to why Lighting Zone 3 was selected. The immediately adjoining development (north of Portola Pkwy) is active agriculture and Low Density Residential-zoned property.
  - Establishing an Appropriate Threshold - The correlation between curfew hours, during which a minor may be out of their home, and light impacts to residents near the project site is not understood. It is more appropriate to use the Irvine Municipal Code hours related to noise impacts which prohibit noise impacts to residents and other sensitive uses and differentiate between daytime (7 a.m. - 10 p.m.) and overnight (10 p.m. – 7 a.m.). A1-17
- Page 3.1-10 – Impact Item (c) - Aren't there also light standards near the tennis courts? They should be identified here as a source of light that already exists. A1-18
- Page 3.1-11 – in the last paragraph on the page, correct "Yale Lane" to "Yale Avenue." A1-19
- Figure 3.1-7, Existing View - This photo is the first the reader can understand that there is existing tennis court lighting on-site. How many light standards are already in place? How tall are they? What are the hours during which they are allowed to operate? A1-20
- Figure 3.1-8 - This figure should be updated to also show lighting levels at the property boundaries (purple line) as evidence that there is no overspill of light off-site. A1-21
- Page 3.1-29, Cumulative Impact Analysis A1-22

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 November 12, 2025  
 Page 4

- What related projects are being referred to here? There is no indication of other projects analyzed.
  - Why does this sentence only call out impacts to properties to the immediate north and west? If it is accurate that no impacts would occur, this sentence should read that there are no impacts to any immediately adjacent property.A1-22 Cont
- Section 3.1.5 - Please cite correct data for Irvine. The Final EIR for the 2045 General Plan is dated August 2024. This is the first citation, others that follow should also be updated. A1-23
- Page 3.2-30, Operation
  - This is the first mention that there may be up to 85 additional attendees as a result of the proposed project. The project description at the beginning of the DEIR discusses a maximum increase in attendance of 50 people. However, there is no discussion on planned non-school events and what the attendance capacity could be. There is no way to analyze trip generation for non-school events without that information.
  - Earlier in the DEIR, it is stated that lights may remain on until 10 p.m. This reference needs to be made consistent.A1-24
- Page 3.2-33, Operation
  - The called out increase in average daily vehicle trips is not consistent with the increased attendance of 50 people for school events and the unspecified number of attendees for non-school events.
  - How would the maximum 400 attendee limit be imposed? There is no prior discussion of an attendance limit for non-school events in the DEIR.A1-25
- Page 3.3-8, City of Irvine Municipal Code, Title 3...
  - Update Director of “Community Services” to “Community and Library Services.”A1-26
- Page 3.5-11, John Wayne Airport Land Use Plan – the statement “John Wayne Airport is in unincorporated Orange County along the western border of the city, adjacent to the Irvine Business Complex” is not correct. The airport is located in the City of Santa Ana. A1-27
- Section 3.5.2, update the General Plan and zoning designations per an earlier comment so they are correct. A1-28
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- Page 3.6-9, paragraph 2 – Replace “Public Works and Transportation Department” with “Public Works and Sustainability Department” to reflect the department’s correct name. This correction should also be made on Page 3.10-8, under Stormwater Infrastructure. A1-30
- Page 3.6-14, last sentence on the page – The Municipal Code reference is not an existing code section. Please double check that you are referencing the correct section. A1-31
- Page 3.7-12, second to last paragraph - The paragraph related to deliveries is not relevant to the project. It should be deleted. A1-32

Ms. Kathleen Gil  
 November 12, 2025  
 Page 5

- Page 3.7-13, bulleted list – Clarify what type of special permit from the City would be required. | A1-33
- Page 3.7-24, Athletic Field Noise
  - Same question as earlier in the document. What variance from the City of Irvine is being mentioned here? | A1-34
  - What would be the maximum attendance capacity for a non-school event? The discussion is unclear as to whether non-school events would be able to use the PA system, as those events are omitted from this discussion.
- Page 3.8-7, Existing Traffic Volumes
  - This date chosen for manual traffic counts does not occur during football season (which is in the fall). Why was the date chosen? | A1-35
  - The DEIR also states that track meets generated the highest number of attendees out of the events considered (not counting non-school events, for which no information has been provided). Why is a football game crowd being used for analysis purposes?
- Page 3.10-12, Energy Infrastructure - Page 3.10-9 says that electricity for the school is provided by the Orange County Power Authority (OCPA). This page calls out So Cal Edison as the provider. Correct the incorrect reference. | A1-36
- Section 4.6.1, the statements in this section are not consistent with earlier statements in this DEIR. The use of the lights past 9 p.m. was only identified for non-school events. Additionally, the use of the school for non-school events was not listed under the Project Objectives section earlier in this chapter. | A1-37
- Table 4.2, all boxes under the Alternative 2 column should read yes as the objectives specially identify school activities. It would only be the non-school activities that would go past 9 p.m. | A1-38

If you have any questions, please contact me at [sfrady@cityofirvine.org](mailto:sfrady@cityofirvine.org) or 949-724-6375.

Sincerely,



Stephanie Frady, AICP  
 Director of Community Development

ec: Sean Crumby, City Manager  
 Marika Poynter, Chief of Planning and Policy  
 Alyssa Matheus, Planning Manager

## 2. Revisions to the Draft EIR

### INTRODUCTION

This section contains revisions to the Draft Environmental Impact Report (EIR) in response to comments from agencies, organizations, and the public, as well as staff-directed changes. These text revisions include typographical corrections, insignificant modifications, and amplifications and clarifications of the Draft EIR. For each revision, the Draft EIR page and location on the page are identified, followed by the textual, tabular, or graphical revision.

Double underlined text represents language that has been added to the EIR; text with ~~strikethrough~~ represents language that has been deleted from the Draft EIR. None of the revisions to the Draft EIR constitute significant new information, as defined in California Environmental Quality Act (CEQA) Guidelines Section 15088.5; therefore, the Draft EIR does not need to be recirculated.

### DRAFT EIR REVISIONS

#### Revisions to Significant Impacts and Mitigation Measures

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#### **Section ES.5, *Summary of Project Alternatives*, Section ES.5.2, *Restricted Hours Alternative*, page ES-4:**

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Under the Restricted Hours Alternative, the proposed Northwood High School Field Lighting Improvement Project would be implemented and would include the installation of four new athletic field lights around the existing football field ~~and infrastructure to allow for a future public address (PA) system~~. Under this Alternative, the difference from the proposed project would be that field use would be required to stop at 9:00 p.m. and lights would turn off at 9:00 p.m. instead of 10:00 p.m. This alternative would result in similar impacts as the proposed project related to aesthetics, air quality, greenhouse gas emissions, noise, and transportation. However, this alternative would meet all of the objectives of the project ~~not meet two of the five objectives of the project~~ (see Chapter 4).

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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#### **Section 2.4, *Environmental Setting*, page 2-9:**

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#### **General Plan Land Use and Zoning**

The Northwood HS campus has a General Plan designation of Institutional-Educational Facility and a zoning designation of 6.1 Institutional. According to the City's zoning code, the Northwood

HS campus is located within the Planning Area 1 - Orchard Hills Planning Area. The Northwood HS campus is not located in any Focus Areas as designated by the 2045 Irvine General Plan.

The proposed project would be developed on the project site within the boundaries of the existing Northwood HS campus, and development of the proposed project would not require modification to the current General Plan designation or zoning.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.1, Aesthetics, Section 3.1.1, Regulatory Framework, page 3.1-2:**

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**Chapter 7.1 (Signs)**

~~The intent of this division of the Zoning Ordinance, also known as the Sign Ordinance, is to promote and protect the public health, safety and welfare by regulating existing and proposed signs of all types within the City. This division outlines the standards and regulations that apply to the design and installation of signage, including quantity, location, dimensions, and lighting.~~

**DESIGN GUIDELINES**

~~Development within specific areas of the city is also regulated by adopted design guidelines, which regulate the architectural theme, character, and overall design of new development. These design guidelines are unique to the Planning Area for which they apply and are applied on an individual project basis. It should also be noted that the city is in the process of developing Objective Design Standards that would further regulate the development of residential projects throughout the city. On November 26, 2024, the Irvine City Council voted to approve an ordinance to establish objective design standards that apply to residential and residential mixed-use projects citywide. This ordinance introduces a new chapter within the Irvine Zoning Ordinance that outlines the purpose, applicability, and key provisions of the Objective Design Standards and incorporates an Objective Design Standards Manual by reference. Division 9, Planning Areas of the City of Irvine Zoning Ordinance contains planning area-specific standards for Planning Area 1 - Orchard Hills.~~

**City of Irvine General Plan**

The 2045 Irvine General Plan provides the basis for the City's policies and represents the community's basic values, ideals, and aspirations. The General Plan establishes policies to guide development and conservation through 2045. Key policies of the General Plan relevant to this chapter's analysis of the proposed project's potential aesthetic impacts are included below. The set of policies listed is not an exhaustive list of all of the General Plan policies applicable to the

proposed project; rather, it is a selection of policies relevant to the impact discussion in this chapter.

### *Land Use Element*

#### **Goal 1: Preserve and strengthen Irvine’s Identity as a diverse and innovative community.**

- **Policy (a).** Develop identifiable City edges, pathways, entry points, and landmarks, and conserve visual resources.
- **Policy (b).** Use building masses and landscaping to create a sense of unity throughout the City.
- **Policy (d).** Maintain and enhance the physical appearance of the City as the infrastructure ages.

#### **Goal 8: Create visually attractive and efficient organized City.**

- **Policy (f).** Provide visually rock and engaging street scenes along designated local and collector roads, encouraging pedestrian use, and adding aesthetic value to neighborhoods.

### *Conservation and Open Space Element*

#### **Goal 3: Use and Preserve geophysical resources, including, but not limited to, ridgeline, hillsides, and waterways, as part of the City’s land use pattern.**

- **Policy (a).** Implement development strategies that prioritize the preservation and minimal disturbance of the City’s hillsides through clustering, landscaping, and grading techniques.

#### **~~Goal 8: Create visually attractive and efficient organized City.~~**

- **~~Policy (f).~~** ~~Provide visually rock and engaging street scenes along designated local and collector roads, encouraging pedestrian use, and adding aesthetic value to neighborhoods.~~

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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#### **Section 3.1, Aesthetics, Section 3.1.2, Existing Conditions, page 3.1-3:**

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## **VIEWSHEDS AND SCENIC VISTAS**

Scenic vistas are panoramic views of features such as mountains, forests, the ocean, or urban skylines. The city of Irvine ~~Placentia~~ is primarily developed with urban uses and also includes several prominent landforms, such as the Santiago Hills, northern flatlands, central flatlands, and

San Joaquin Hills. The project site is not located within a scenic vista or scenic corridor. The nearest scenic areas are the Santiago Hills, which are approximately 3.7 miles northeast of the project site.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.1, Aesthetics, Section 3.1.2, Existing Conditions, page 3.1-4:**

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### LIGHT AND GLARE

The two major causes of light pollution on the campus are spill light and glare from existing sources of light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface. Existing sources of light on the campus include light emanating from building interiors, building and security lights, and parking lot lights. The tennis courts, located just north of the track and field, are currently equipped with athletic lighting. The track and field does not currently contain any permanent lighting ~~or a PA system~~. Off-site sources of light include street lighting, vehicular lighting, and exterior lighting on existing residential uses.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.1, Aesthetics, Section 3.1.3, Standards for Analysis, page 3.1-5:**

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### THRESHOLD GUIDANCE

To determine the impact significance of spill light (threshold d), an industry standard of 0.9 foot-candle (fc) during pre-curfew hours and a 0.2 fc during post-curfew hours were used for a significance determination. Pre-curfew hours generally refer to evening hours before a locally established nighttime lighting curfew (typically before 10:00 p.m.), when higher ambient light levels are expected. Post-curfew hours refer to late-night hours after the applicable curfew, when stricter illumination limits apply to protect residential areas from sleep disturbance and light trespass. The 0.9 fc standard was selected because it is below the level of typical street lights (1.0 to 5.0 fc) and below the light level at twilight (1.0 fc), which ensures that bedrooms are not subjected to sleep-depriving light intrusion.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.1, Aesthetics, Section 3.1.3, Standards for Analysis, page 3.1-8:**

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### **Municipal Code**

The City of Irvine does not establish a significant threshold for light spill/trespass for outdoor lighting near residential areas or for recreational areas. The Irvine Municipal Code (IMC) does identify minimum light thresholds for buildings as adopted by the California Building Code (CBC) (IMC CH5. Uniform Security Code).

A “Night Sky Ordinance” is a common policy set by local municipalities that regulates outdoor lighting to reduce light pollution and other adverse effects. A Night Sky Ordinance was also not found within the City’s General Plan, Municipal Code, and website.

Chapter 3-16 of the Irvine Zoning Ordinance states "Outdoor lighting shall be designed and installed so that all direct rays are confined to the site and adjacent properties are protected from glare." The proposed project would include typical light and glare control practices, such as lights needing to be directed, controlled, screened or shaded so as not to shine directly on surrounding properties; lighting needing to be controlled to prevent glare; and prohibiting the use of unshaded clear bulbs in exterior lighting. These are typical light control practices, and it is assumed that the proposed project’s lighting would be directed, controlled, screened or shaded so as not to shine directly on surrounding properties.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.1, Aesthetics, Section 3.1.3, Standards for Analysis, page 3.1-9:**

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### **Industry Standards**

The International Commission on Illumination (CIE) *Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations* (2nd Edition) provides quantitative metrics to analyze the impact of light and glare (CIE 2017). The Guide identifies lighting thresholds based on five environmental lighting zones (E0, intrinsically dark, to E4, high district brightness). Environmental Lighting Zone E3, medium district brightness, (such as well inhabited rural and urban settlements) would be most applicable to the proposed project’s urban context. While agricultural land and Low Density Residential–zoned properties occur north of Portola Parkway, the project site is located within an established suburban area that includes an existing high school campus, athletic facilities with lighting, and surrounding residential neighborhoods and roadways that contribute to moderate ambient nighttime illumination. As such, the lighting environment is consistent with a suburban setting. Therefore, Lighting Zone E3 is used to evaluate potential light spill and glare associated with the proposed project. Environmental Lighting Zone E3 establishes the following lighting thresholds:

- Pre-Curfew Mixed-Use/Suburban = 0.9 foot-candle
- Post-Curfew Mixed-Use/Suburban = 0.2 foot-candle

The Illuminating Engineering Society (IES) and the International Dark-Sky Association (IDA)'s *Model Lighting Ordinance* (MLO) provides guidance for communities to develop effective lighting control ordinances (IES 2011). The MLO provides the following light spill thresholds:

- Rural/Low Density = 0.1 foot-candle
- Mixed-use/Suburban Density = 0.3 foot-candle
- City/Urban = 0.8 foot-candle

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.1, Aesthetics, Section 3.1.4, Project Impact Analysis, page 3.1-10:**

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The project site is in an urbanized area. According to the US Census Bureau, the City of Irvine has a population of approximately 318,683 (US Census 2025), which meets the definition of an urbanized area (at least 100,000) as defined in the PRC section 21071, Urbanized Area. The existing vertical elements of the campus that are visible from the residential areas to the south, include permanent sidewalk light poles near the tennis courts, score board, trees, fencing, basketball hoops, and school buildings. The proposed project includes the installation of four 70-foot light poles with ~~12~~ 9 light fixtures. The project is consistent with the existing campus zoning and land use designation. Implementation of the proposed project would not violate any regulations governing scenic quality. As the project site is already developed with school uses, the proposed light poles would not interfere with public views, including background views of Santiago Hills, and would not conflict with regulations governing scenic quality. Therefore, impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.1, Aesthetics, Section 3.1.4, Project Impact Analysis, page 3.1-11:**

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On June 3, 2025, existing conditions of the project site were documented (see Figure 3.1-1, *Visual Simulation Locations*). Location 1 is located at the intersection of Yale Avenue Lane and Portola Parkway facing northwest (see Figure 3.1-2, *Location 1 – Existing and Proposed Daytime Views* and Figure 3.1-3, *Location 1 – Existing and Proposed Nighttime Views*); Location 2 located along

Portola Parkway facing northeast towards the football field (see Figure 3.1-4, *Location 2 – Existing and Proposed Daytime Views* and Figure 3.1-5, *Location 2 – Existing and Proposed Nighttime Views*), and Location 3 is located in the residential neighborhood north of the project site near the intersection of Stallion and Twisted Oak, facing southwest towards the campus (see Figure 3.1-6, *Location 3 – Existing and Proposed Daytime Views* and Figure 3.1-7, *Location 3 – Existing and Proposed Nighttime Views*).

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.1, Aesthetics, Section 3.1.5, References, page 3.1-29:**

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Caltrans (California Department of Transportation). 2025. California State Scenic Highway System.  
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

International Dark-Sky Association (IDA). 2020. Outdoor Lighting Basics.  
<https://www.darksky.org/our-work/lighting/lighting-for-citizens/lighting-basics/>.

Institution of Lighting Engineers (ILE). 2003, May. Guidance Notes for the Reduction of Light Pollution.  
<https://www.gov.je/SiteCollectionDocuments/Planning%20and%20building/SPG%20Lightpollution%202002.pdf>.

Irvine, City of. ~~2024, August~~ ~~2025, March~~. Irvine 2045 General Plan Draft Program Environmental Impact Report. <https://cityofirvine.org/community-development/current-general-plan>.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.2, Air Quality, Section 3.2.5, Project Impact Analysis, page 3.2-31:**

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The proposed project would entail the renovation of the existing track and field with the addition of field lighting ~~and infrastructure to allow for a future PA system~~ to accommodate Northwood HS sports activities, other school activities, and non-school events. Implementation of the proposed project would not involve any residential development and would not have a direct impact on local resident growth assumptions for the City. In addition, the proposed project would involve improvements to an existing campus without increasing student or employment capacity and would not substantially influence the employment growth forecasts for the City. Thus, the proposed project is not anticipated to substantially affect demographic projections beyond what

is accounted for in the current 2022 AQMP. Therefore, the proposed project would be consistent with the AQMP under the first criterion.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.2, Air Quality, Section 3.2.5, Project Impact Analysis, page 3.2-36:**

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Operation of the proposed project would not generate substantial emissions from onsite stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur onsite and would require a permit from South Coast AQMD. The proposed project would entail the renovation of the existing track and field with addition of field lighting ~~and infrastructure to allow for a future PA system~~, which does not fall within these categories of uses. Localized air quality impacts related to operation-related emissions would be **less than significant**.

### *Carbon Monoxide Hotspots*

Since South Coast AQMD currently does not have adopted CO hotspot screening criteria, Bay Area Air District's recommended threshold was used in this analysis. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—to generate a significant CO impact (Bay Area Air District 2023).

The proposed project would result in a maximum of 150 new peak hour trips ~~during football games~~ and a maximum of 2,460 intersection turning counts at the intersection of Portola Parkway and Yale Avenue (refer to Appendix F). As such, the proposed project would not add vehicle trips to the regional roadway network to cause an exceedance of 44,000 vehicles per hour or 24,000 vehicle per hour where vertical and/or horizontal mixing is substantially limited at an intersection.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.3, Cultural Resources, Section 3.3.1, Regulatory Framework, page 3.3-8:**

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### **City of Irvine Municipal Code**

The Irvine Municipal Code outlines the local laws and regulations governing land use, development, and environmental protection within the City. Among its provisions, the municipal

code includes specific measures to identify, evaluate, and preserve cultural resources, such as archaeological sites, and historic structures.

**Title 3, Division 4, Chapter 1, Section 3-4-132:** prohibits any person from possessing, destroying, injuring, defacing, removing, digging or disturbing from its natural state any of the following: plants, wildlife, artifacts, minerals, landscape structures, improvements, wood, and natural products. Except for those persons engaged in sanctioned trail development, other construction or interpretative activities at the discretion of the Director of Community and Library Services, or for emergency personnel in the performance of their duties.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.5, Hazards and Hazardous Materials, Section 3.5.1, Regulatory Framework, page 3.5-11:**

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### **John Wayne Airport Land Use Plan**

The Airport Environ Land Use Plan (AELUP) for John Wayne Airport contains land use restrictions that are meant to reduce the hazards associated with airport land use plans.

John Wayne Airport is in the City of Santa Ana ~~unincorporated Orange County~~ along the western border of the city, adjacent to the Irvine Business Complex. Structures within the Airport Environs Land Use Plan Airport Planning Areas are required to abide by land use regulations within the Airport Land Use Plan such as safety and noise compatibility zones, and height restrictions.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.5, Hazards and Hazardous Materials, Section 3.5.2, Existing Conditions, page 3.5-14:**

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### **Existing Conditions**

#### **ON-CAMPUS AND ADJACENT USES**

The project site is developed with the Northwood HS campus, which is surrounded by residential uses to the north; residential and agricultural uses to the east; residential uses to the south; and agricultural uses to the west. The proposed project would be developed within the existing track and field located in the southern portion of the Northwood HS campus. The Northwood HS campus has a General Plan designation of Institutional-Educational ~~Facility~~ and a zoning designation of 6.1 Institutional, that would not change.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.6, Hydrology and Water Quality, Section 3.6.1, Regulatory Framework, page 3.6-8:**

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**Policy S-3(h).** Encourage the use of climate-smart landscaped surfaces (e.g., permeable pavement, stormwater parks, green streets) in new and existing development to reduce runoff, minimize flood hazards, and maintain existing drainageways.

**Goal 5: Protect the community from the threat of drought and extreme heat.**

**Policy S-5(f).** Protect groundwater supply against contamination, degradation, or loss due to flooding.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.6, Hydrology and Water Quality, Section 3.6.2, Existing Conditions, page 3.6-9:**

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The local storm drain system is owned by the City and maintained by the City's Public Works and ~~Sustainability~~ ~~Transportation~~ Department. The regional flood control system is owned and maintained by the Orange County Public Works Department (OCPW). Lines typically range in size from 18 to 60 inches (with some up to 96 inches), with the local drainage system consisting of the smaller diameter pipes and the larger flood control facilities consisting of trapezoidal channels or riverine systems. Drainage facilities are typically either RCP pipe or box culverts to convey stormwater. Local storm drain facilities are designed to accommodate 25-year flow requirements, and the regional County facilities are designed to accommodate 100-year storm events. The City conveys stormwater to OCPW regional conveyance facilities and has an ongoing monitoring and maintenance procedure to ensure the overall system functions effectively. To prevent significant flooding during storm events, OCPW and the City monitors and maintains its respective channels and storm drain systems to ensure they are conveying storm flows as designed. The project site is located entirely within the Santa Ana RWQCB jurisdictional area (City of Irvine 2024a).

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.6, Hydrology and Water Quality, Section 3.6.4, Project Impact Analysis, page 3.6-14 to 3.6-15:**

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Furthermore, as part of the Statewide Trash Amendments, the District would adhere to the requirements of the City of Irvine Municipal Code Section 6-8-303, which includes BMPs such as pollution treatment practices or devices, prohibitions of practices, general good housekeeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices or devices to prevent or reduce the discharge of pollutants directly or indirectly to stormwater, receiving waters, or the stormwater drainage system ~~the installation and maintenance of full capture trash screening devices at curb inlets, grate inlets, and catch basin inlets.~~ With compliance with federal, state, county, and local regulations and code requirements, the proposed project would have a less than significant impact on surface or groundwater quality during the operational phase. Therefore, this impact is **less than significant**.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.7, Noise, Section 3.7.4, Project Impact Analysis, page 3.7-12:**

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It should be noted that the City's Noise Ordinance identifies special provisions (Section 6-8-205). The special provisions include but are not limited to:

Construction activities and agricultural operations may occur Monday through Friday from 7:00 a.m. to 7:00 p.m. and Saturday from 9:00 a.m. to 6:00 p.m. No construction activities shall be permitted outside of these hours or on Sundays and federal holidays, except Columbus Day, unless a temporary waiver is granted by the Chief Building Official or his or her authorized representative. Trucks, vehicles, and equipment that are making or are involved with material deliveries, loading, or transfer of materials, equipment service, maintenance of any devices or appurtenances for or within any construction project in the City shall not be operated or driven on City streets outside of these hours or on Sundays and federal holidays unless a temporary waiver is granted by the City. Any waiver granted shall take impact upon the community into consideration. No construction activity and agricultural operations will be permitted outside of these hours except in emergencies including maintenance work on the City rights-of-way that might be required.

~~Deliveries to or pickups from any commercial property sharing a property line with any residential property may occur daily from 7:00 a.m. to 10:00 p.m. No deliveries or pickups from any such properties shall occur outside of these hours.~~

Maintenance of real property operations may exceed the noise standards Monday through Saturday from 7:00 a.m. to 7:00 p.m. and Sundays or federal holidays from 9:00 a.m. to 6:00 p.m.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

**Section 3.8, Transportation, Section 3.8.2, Existing Conditions, page 3.8-7:**

**EXISTING TRAFFIC VOLUMES**

Manual traffic counts were taken at the three study area intersections during the Friday evening peak period on April 18, 2025. The peak hour for this analysis (6:00 p.m. to 7:00 p.m.) refers to the one-hour time period prior to the beginning of a ~~varsity football~~ game at the field, which would ~~typically occur from 7:00 p.m. to 9:00 p.m. on a Friday and would~~ generate the highest number of attendees as compared to all other activities at the facility. The existing peak hour traffic volumes and turning movements are shown in Appendix F.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

**Section 3.8, Transportation, Section 3.8.3, Standards for Analysis, page 3.8-9:**

Table 3.8-2 Project-Generated Traffic

| Facility   | Pre-Event Peak Hour |          |       | Daily Traffic |
|--|---------------------|----------|-------|---------------|
|  | Inbound             | Outbound | Total |               |
| <b>Trip Generation Rates</b>   |                     |          |       |               |
| Athletic (vehicle trips per attendee)  | 0.55                | 0.05     | 0.60  | 1.20          |
| <b>Generated Traffic Volumes</b>   |                     |          |       |               |
| Average Day (85 additional attendees)  | 47                  | 4        | 51    | 102           |
| <del>Football</del> Sports Game (250 attendees, 50 additional daily attendees) | 138                 | 12       | 150   | 60            |

Source: Garland Associated 2025 (Appendix F).

NOTE: The varsity football games currently take place at the field, but during daylight hours. The peak hour traffic volumes represent the shift to the evening starting times. The daily traffic volume represents an increase of 50 additional attendees per day.

Table 3.8-2 indicates that the facility would generate an estimated 51 vehicle trips during the peak hour (47 inbound and 4 outbound) and 102 daily trips on an average day with 85 additional attendees. The peak hour for this analysis represents the one-hour time period at the beginning of an event when patrons are traveling to the athletics field. Approximately the same level of

traffic would be generated at the end of an event when patrons are exiting (with the inbound and outbound traffic volumes reversed).

### INTERSECTION IMPACT ANALYSIS

The impact analysis for the three study area intersections was conducted by comparing the ICU values and LOS for the “without project” and “with project” scenarios. For the existing conditions scenario, the analysis compared the existing conditions to the conditions with the proposed project.

The comparative levels of service at the study area intersections for the existing conditions scenario are summarized in Table 3.8-3, *Project Impact on Intersection Levels of Service, Existing Conditions as Baseline*, for the Friday evening peak hour. The table shows the before and after ICU values and the LOS that would occur at each study area intersection. Also shown are the increases in the ICU values that would occur as a result of the proposed project. The last column in Table 3.8-3 indicates if the intersections would be significantly impacted by the project-generated traffic.

Table 3.8-3 Project Impact on Intersection Levels of Service, Existing Conditions as Baseline

| Intersection                        | ICU Value and Level of Service |                       | Increase in ICU Value | Significant Impact |
|-------------------------------------|--------------------------------|-----------------------|-----------------------|--------------------|
|                                     | Existing Conditions            | Existing Plus Project |                       |                    |
| <b>Signalized Intersections</b>     |                                |                       |                       |                    |
| Portola Parkway/Yale Avenue         | 0.393 – A                      | 0.429 – A             | 0.036                 | No                 |
| Portola Parkway/Orchard Hills Drive | 0.408 – A                      | 0.420 – A             | 0.012                 | No                 |
| Orchard Hills Drive/Wolf Trail      | 0.316 – A                      | 0.316 – A             | 0.000                 | No                 |

Source: Garland Associated 2025 (Appendix F).

Table 3.8-3 indicates that none of the study area intersections would be significantly impacted by the traffic that would be generated by the proposed project for a peak day event (varsity football game) for the existing conditions baseline scenario.

As the proposed project is expected to be fully completed in the fall of 2026, the first full year of operation for the facility would be the year 2027. The existing (2025) traffic volumes were expanded by a growth factor of 4.04 percent to account for general regional growth and the cumulative impacts of traffic associated with other development projects in the area. This growth factor represents a two percent annual growth rate for two years, compounded annually.

The comparative levels of service for the year 2027 analysis scenario are shown in Table 3.8-4, *Project Impact on Intersection Levels of Service, Year 2027 as Baseline*. Table 3.8-4 indicates that none of the study area intersections would be significantly impacted by the traffic that would be generated by the proposed project for a peak day event (~~varsity football game~~) for the year 2027 baseline scenario.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 3.10, *Utilities and Service Systems*, Section 3.10.4, *Project Impact Analysis*, page 3.10-11:**

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Electricity is provided by the OCPA and is accessed via SCE's infrastructure. The proposed project would connect to existing electric power infrastructure for operation. Underground system electrical conduit lines would be installed to connect the proposed stadium light poles to power distribution equipment and lighting control equipment that would be located north of the track and field. ~~Additionally, the proposed project would also include the installation of infrastructure to allow for a future Public Address (PA) system.~~

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 4, *Alternatives to the Proposed Project*, Section 4.6, *Restricted Hours Alternative*, page 4-8:**

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Under the Restricted Hours Alternative, the proposed Northwood High School Field Lighting Improvement Project would be implemented and would include the installation of four new athletic field lights around the existing football field ~~infrastructure to allow for a future public address (PA) system~~. Under this Alternative, the difference from the proposed project is that field use would be required to stop at 9:00 p.m. and lights would turn off at 9:00 p.m., instead of 10:00 p.m.

**Relationship to Project Objectives**

Alternative 2, Restricted Hours Alternative, would meet all project objectives, ~~except for Objective 2, provide lighting to allow night use of the track and field to accommodate school-related events and activities, and Objective 4, enhance sense of community by allowing home games on campus~~. Under this alternative, the field's use would be reduced by one hour, requiring the lights to be turned off at 9:00 p.m. This would limit some on-campus games and events, ultimately requiring them to continue to be held off-campus.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

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**Section 4, Alternatives to the Proposed Project, Section 4.7, Summary of Alternatives Evaluation, page 4-12:**

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**Table 4-2 Ability to Meet Proposed Project Objectives**

| <b>Objective</b>   | <b>Proposed Project</b> | <b>Alternative 1: No Project Alternative</b> | <b>Alternative 2: Restricted Hours Alternative</b> |
|--|-------------------------|--|--|
| 1. Provide adequate athletic facilities at Northwood HS to accommodate school sport games and school events at the campus. | Yes                     | No   | Yes  |
| 2. Provide lighting to allow night use of the track and field to accommodate school-related events and activities.         | Yes                     | No   | <u>Yes</u> <del>No</del>                           |
| 3. Utilize existing space to enhance opportunities for after-school athletic and extracurricular activities.               | Yes                     | No   | Yes  |
| 4. Enhance sense of community by allowing home games on campus.  | Yes                     | No   | <u>Yes</u> <del>No</del>                           |
| 5. Upgrade the athletic fields to increase school pride.   | Yes                     | No   | Yes  |

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

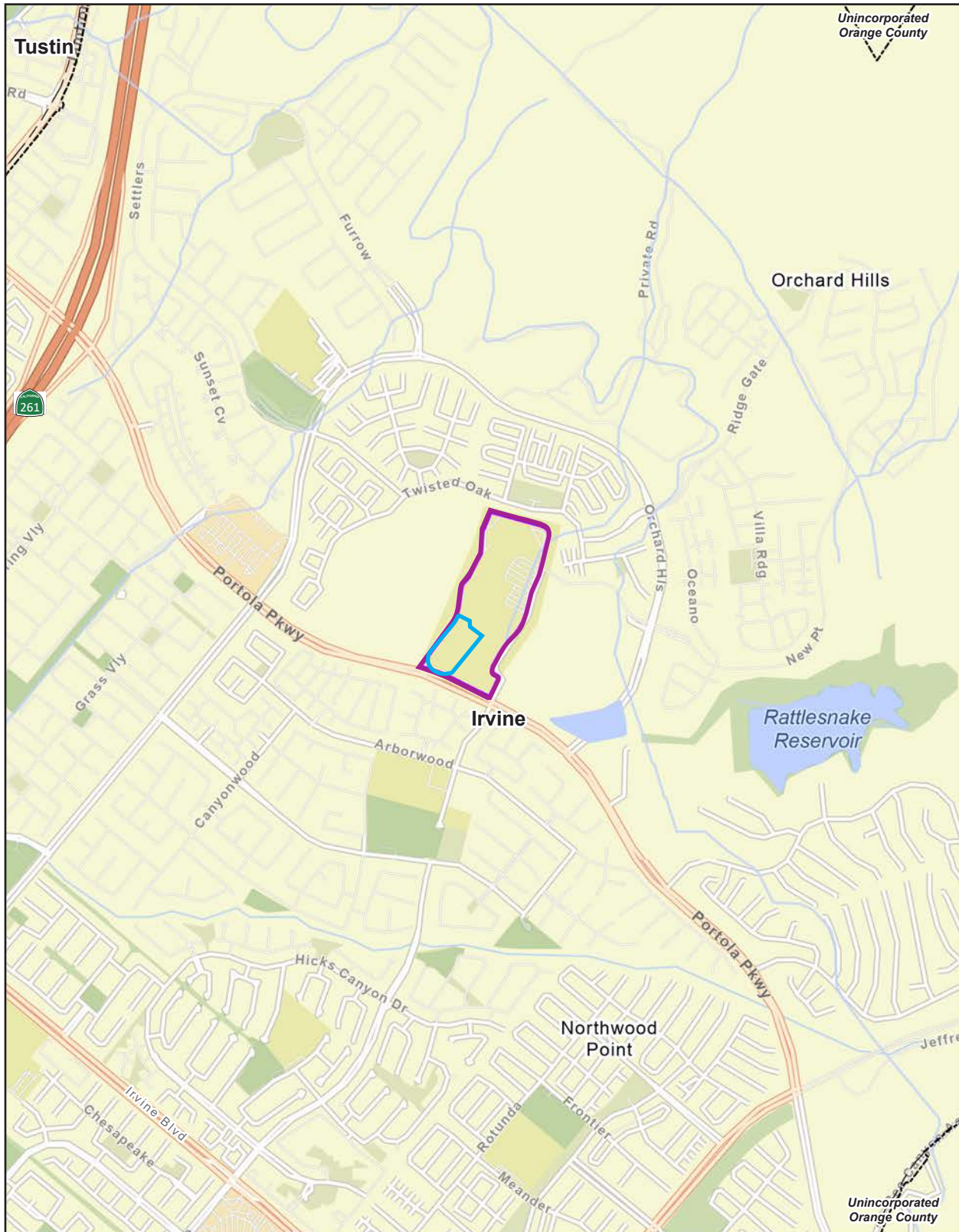
**1.1.1 Revisions to Figures in the Draft EIR**

The following Draft EIR figure has been revised in response to comments received during the public review period of the Draft EIR to show the surrounding, existing streets in Orchard Hills:

**Figure 2-2 – Local Vicinity [Revised]**

The proposed revision to the figure does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed, that would clearly lessen the environmental impacts of the proposed project.

Figure 2-2 - Local Vicinity



- Irvine City Boundary
- Project Site
- Northwood High School Campus

0 2,000  
Scale (Feet)



Source: Generated using ArcMap 2026.