

Irvine Unified School District

WOODBIDGE HIGH SCHOOL FIELD LIGHTING IMPROVEMENT PROJECT

March 2026 | Revised Final Environmental Impact Report

State Clearinghouse No. 2025051366



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WOODBRIIDGE HIGH SCHOOL FIELD LIGHTING IMPROVEMENT PROJECT

for Irvine Unified School District

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1. INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA), as amended (Public Resources Code Sections 21000 et seq.), and the CEQA Guidelines (California Code of Regulations Sections 15000 et seq.).

According to the CEQA Guidelines Section 15132, the Final EIR shall consist of:

- (a) The draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies comments on the draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft EIR for the Woodbridge High School Field Lighting Improvement Project during the public review period, which began September 29, 2025, and closed November 12, 2025. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated Draft EIR make up the Final EIR, in accordance with CEQA Guidelines Section 15132.

Revised Final Environmental Impact Report

This Revised Final Environmental Impact Report (RFEIR) supersedes the Final EIR dated January 2026 and distributed on February 6, 2026, and includes revisions to the text of the FEIR as well as a fully updated Responses to Comments section.

Following release of the Final EIR, the Lead Agency identified additional clarifications, updates, and omitted comment letters that needed to be incorporated. The Draft EIR analysis and impact conclusions remain largely unchanged, except where noted in the text revisions below.

The prior Final EIR was withdrawn and removed from circulation. This Revised FEIR has been reposted and all commenters from the Draft EIR and original FEIR review periods have been notified.

1. INTRODUCTION

This Revised FEIR includes:

- Revisions to FEIR text (clarifications, minor corrections, and updates where necessary)
- Full inclusion of previously omitted comment letters
- Fully updated written responses to all comments pursuant to CEQA Guidelines §15088

Except as explicitly revised herein, all other components of the Draft and Final EIR are incorporated by reference. The Lead Agency has determined that the revisions do not constitute significant new information requiring recirculation under CEQA Guidelines §15088.5.

1.1 FINAL EIR ORGANIZATION

Chapter 1, Introduction. This chapter describes CEQA requirements and the content of this Final EIR.

Chapter 2, Response to Comments. This chapter provides a list of individuals commenting on the Draft EIR; comments received during the public review period; and responses to comments.

Chapter 3, Revisions to the Draft EIR. This chapter contains revisions to the Draft EIR as a result of the comments received by agencies and interested persons, as described in Chapter 2, and/or errors and omissions discovered subsequent to release of the Draft EIR for public review.

The responses to comments contain material and revisions that will be added to the text of the Final EIR. District staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in CEQA Guidelines Section 15088.5.

1.2 ENVIRONMENTAL REVIEW PROCESS

1.2.1 Notice of Preparation

Pursuant to CEQA Guidelines Sections 15084, the Irvine Unified School District (IUSD or District) determined that an EIR would be appropriate for the project and circulated a Notice of Preparation (NOP). The public review period for the NOP was from May 28, 2025, to June 26, 2025, pursuant to CEQA Guidelines Section 15082. Additionally, a public scoping meeting was held at the Woodbridge High School Teacher's Lounge on June 10, 2025, to present the

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proposed project, describe the EIR process, and receive public comments. Public notification of the Draft EIR was satisfied by sending the NOP to the following recipients:

- Addresses within 500 feet of the Woodbridge HS campus
- State and local agencies

Additionally, copies of the NOP were made available for review at the following locations:

- Irvine Unified School District, Facilities Planning and Construction Services Department, 2015 Roosevelt, Irvine, CA 92620
- Irvine Unified School District website: <https://iusd.org/business-services/facilities-planning-construction-services/bidder-information-public-notices>

1.2.2 Draft Environmental Impact Report

Following the NOP, a Draft EIR was prepared in accordance with CEQA Guidelines Section 15084 and the California Code of Regulations, Title 14, Division 6, Chapter 3, Article 9. As the Lead Agency under CEQA Guidelines Section 21067, the District is required to evaluate and consider environmental consequences of a proposed project before approving projects within its discretionary authority. In compliance with CEQA Guidelines Sections 15126.2 and 15126.4, the Draft EIR identified potentially significant adverse impacts to cultural resources, geology and soils, and tribal cultural resources and proposed mitigation measures to reduce those impacts to less-than-significant levels. No impacts were found to be significant and unavoidable, and all other topics analyzed in the Draft EIR would result in impacts that are considered less than significant under CEQA, or would result in no environmental impact. Furthermore, consistent with CEQA Guidelines Section 15126.6(a), the District analyzed a range of reasonable project alternatives and locations that could feasibly achieve the project's basic objectives while avoiding or substantially lessening significant environmental effects, and evaluated the comparative merits of those alternatives.

1.2.3 Notice of Availability

Following the completion of the Draft EIR, the District issued a Notice of Availability (NOA) on September 29, 2025, in compliance with PRC Section 21165 and CEQA Guidelines Section 15087, to notify the public and federal, State, and local agencies that the Draft EIR was available for public comment for 45 days, between September 29, 2025, and November 12, 2025. Additionally, a community meeting was held at the Woodbridge High School Teacher's Lounge on October 27, 2025 to present the findings of the Draft EIR and to provide an opportunity for the public to comment on the content of the Draft EIR. Public notification of the Draft EIR was satisfied by sending the NOA to the following recipients:

1. INTRODUCTION

- Addresses within 500 feet of the campus
- State and local agencies

The Draft EIR and NOA for the proposed project were available for public review at:

- Irvine Unified School District, Facilities Planning and Construction Services Department, 2015 Roosevelt, Irvine, CA 92620
- Woodbridge High School, 2 Meadowbrook, Irvine, CA 92604
- On the IUSD website: <https://iusd.org/business-services/facilities-planning-construction-services/bidder-information-public-notice>

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be

... on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

CEQA Guidelines Section 15204(c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204(d) states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204(e) states, “This section shall not be used to restrict the ability of reviewers to comment

1. INTRODUCTION

on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies have been forwarded to those agencies at least 10 days prior to certifying the EIR. The responses have been forwarded with copies of this Final EIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft EIRs.

1. INTRODUCTION

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2. RESPONSE TO COMMENTS

Section 15088 of the California Environmental Quality Act (CEQA) Guidelines requires the lead agency to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft Environmental Impact Report (EIR) and to prepare written responses.

This chapter provides all comments received on the Draft EIR and the lead agency’s responses to each comment. Comment letters and specific comments are given letters and numbers for reference purposes.

2.1 LIST OF COMMENTERS

Table 2-1, *List of Commenters*, lists the individuals that provided comments on the Draft EIR during the public review period.

Table 2-1 List of Commenters

Number Reference	Commenter	Date of Comment
Agencies		
A1	City of Irvine	11/12/2025
Individuals		
I1	Margie Jesswein	11/4/2025
I2	Robert Coyle	11/6/2025
I3	Mei Ying Kee	11/8/2025
I4	Stephanie Rutledge	11/9/2025
I5	Mojtaba Torkjazi	11/9/2025
I6	Christine Shih	11/9/2025
I7	Karen Davis	11/10/2025
I8	Emmanuel Ventura	11/11/2025
I9	Kevin Chudy	11/12/2025
I10	Tina Sun	11/12/2025
Verbal Comments		
V1	Robert Coyle	10/27/2025

2. RESPONSE TO COMMENTS

2.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review of and comment on Draft EIRs should be

. . . on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. . . . CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

The CEQA Guidelines further advises,

Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence. (sec. 15204[c])

Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility. (sec. 15204[d])

This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section. (sec. 15204[e])

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be provided to those agencies at least 10 days prior to certifying the EIR.

2.3 TOPICAL RESPONSES

This section provides responses to reoccurring 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. Transportation
4. Community Outreach
5. Non-school Events
6. Non-CEQA Topics

2.3.1 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 Woodbridge 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 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*, of the Final EIR, 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

2. RESPONSE TO COMMENTS

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 below regulatory thresholds, ensuring the project's lighting impact is less than significant.

Additionally, the nearest residential property lines within the 150-foot field boundary would experience light spill on their properties at 0.1 fc or lower, 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.

2.3.2 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 Woodbridge 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 Woodbridge 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 3.7-20 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:

2. RESPONSE TO COMMENTS

- 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.¹
- 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.

Modeled operational noise levels at future sports events at the track and field (not including the PA system) would result in noise levels below ambient noise conditions at the nearest noise-sensitive receptors. Significance conclusions were identified based on detailed 3D noise-modeling analyses conducted in SoundPLAN, modeled ambient noise levels, and operational noise levels at three receptor locations. The closest receptor location, which is the nearest residence, is approximately 150 feet southwest of the existing track and field, across Alton Parkway. As shown in Table 3.7-9, *SoundPLAN Modeled Noise Level, dBA Leq*, on page 3.7-24 of the DEIR, SoundPLAN modeled operational noise levels associated with the proposed project at noise receptor locations. Future sports events noise levels range from 35.4 dBA to 42.4 dBA L_{eq} at the nearest noise sensitive receptors to the track and field, which is below ambient noise conditions. Proposed project noise levels attributable to proposed project sports events would be similar to existing noise levels but would extend into the evening hours, typically not past 9:00 pm. Future sports events at the track and field would result in a negligible, less than 1 dBA increase over ambient noise levels. As shown in Table 3.7-9, future sports events at the track and field would not generate noise levels at the nearest noise sensitive receptors that would be more than 10 dBA above ambient noise conditions. Furthermore, Section 6-8-205 of the Municipal Code exempts school bands, school athletic, and school entertainment events, provided said events are conducted on school property or authorized by special City permit to allow exceedance of the noise level standards within Section 6-8-204 of the City of Irvine Noise Ordinance. Therefore, this impact would be less than significant.

The noise associated with band practices and performances at Woodbridge 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 University HS. The track and field may also be used for other school events, such as graduation and non-school events.

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

¹ 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.

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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.

2.3.3 Topical Response 3: Transportation

The District received multiple comment letters expressing concern regarding traffic congestion and a lack of parking safety with implementation of the proposed project.

Impacts related to transportation were addressed in Chapter 3.8, *Transportation*, of the Draft EIR. The proposed project does not add bleachers or any increase in student, staff, or visitor capacity. Varsity tackle football games would continue to be hosted at University High School. The Traffic/Transportation Impact Analysis (TIA) prepared for this project (Appendix F to the Draft EIR) determined that streets, intersections, and driveways near Woodbridge High School are designed to accommodate the anticipated levels of vehicular and pedestrian activity from the proposed project. The TIA compared existing conditions to the conditions with the proposed project at Alton Parkway/West Yale Loop, Alton Parkway/Lake Road, Lake Road/Greg Cops Place, and Alton Parkway/Meadowbrook. The TIA determined 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 for the existing conditions baseline scenario. Additionally, § 15064.3(b)(1) of the CEQA Guidelines states that projects that decrease vehicle miles traveled (VMT) in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact. The proposed project would allow for student athletes to attend practices and games, including soccer, lacrosse, track, flag football, and Freshman and JV tackle football, at their school, which would eliminate the need to travel to another field, resulting in shorter travel distances and a reduction in VMT. Further, busing would be provided from the opposing schools during athletics events, resulting in fewer vehicles. Therefore, impacts related to transportation and traffic were determined to be less than significant; thus, no mitigation measures are required for reducing impacts related to transportation. CEQA does not require mitigation measures beyond what is necessary to reduce significant impacts to less-than-significant levels.

Additionally, as detailed in pages 3.7-25 through 3.7-26 and Table 3.7-10, *Summary of Traffic Noise Increases* of the Draft EIR, the increase in vehicle trips from the proposed project would result in a minimal increase in average daily traffic (ADT) volumes on most study roadway segments, thus resulting in a minimal increase in traffic noise levels that would not exceed the 1 dBA or 3 dBA in ambient noise environments of greater than 70 dBA CNEL and less than 60 dBA CNEL thresholds, respectively. Thus, traffic noise impacts would be less than significant. No revisions to the Draft EIR are necessary.

2.3.4 Topical Response 4: Community Outreach

The District received multiple comment letters expressing concern regarding a lack of community outreach and inadequacy in the noticing process of the Notice of Preparation (NOP) and Notice of Availability (NOA).

In accordance with CEQA Guidelines § 15082, an NOP was prepared for the proposed project to allow the public and federal, State, and local agencies the opportunity to provide input on the proposed project and the topics that would be analyzed in the Draft EIR. CEQA Guidelines § 15082 requires the lead agency to send an NOP stating that an EIR will be prepared, to the Governor’s Office of Land Use and Climate Innovation (formerly known as the Office of Planning and Research), responsible agencies, and trustee agencies; and file the NOP with the county clerk of each county in which the project will be located. Therefore, the notices were sent via certified mail to state and local agencies and Native American Tribes that are historically affiliated with the area.

The CEQA Guidelines do not require the NOP to be sent to residents or property owners near the project site. However, it is common practice to provide notice of a proposed project to property owners within a 300-foot radius of the project site. For this project, the District provided noticing to all property owners within a 500-foot radius of the entire Woodbridge HS campus, which exceeds common practice and the requirements of CEQA Guidelines § 15082.

The NOP was made publicly available between May 28, 2025, and June 26, 2025, via the District’s website, the LCI’s CEQAnet Web Portal, and the Orange County Clerk-Recorder Department. The NOP advertised the date, time, and location of the scoping meeting for the proposed project, to be held by the District at 6:00 pm on June 10, 2025, in the Woodbridge High School Teacher’s Lounge. Although a public scoping meeting is only required for projects of regional significance, the District opted to hold a public scoping meeting for transparency and to provide an additional opportunity for the public to comment on the proposed project. One member of the public attended this meeting; no representatives from federal, State, or local agencies attended the meeting. Only one Native American Tribe provided comments on the NOP, the Gabrieleño Band of Mission Indians–Kizh Nation.

Following the completion of the Draft EIR, the District issued a Notice of Availability (NOA) on September 29, 2025, in compliance with PRC Section 21165 and CEQA Guidelines Section 15087, to notify the public and federal, State, and local agencies that the Draft EIR was available for public comment for 45 days, between September 29, 2025, and November 12, 2025. CEQA Guidelines Section 15807(a) requires that the NOA be published in at least one of the following ways: in a local newspaper, posting on- and off-site in the area where the project is located, or direct mailing to the owners and occupants of properties contiguous to the project site. Similar to the NOP, it is common practice to distribute the NOA to residents and/or property owners within a 300-foot radius of the project site. However, for this project, the District provided

2. RESPONSE TO COMMENTS

notice to all residents and property owners within a 500-foot radius of the campus, which exceeds common practice and the requirements of CEQA Guidelines Section 15087(a)(3). The NOAs were also sent via certified mail to state and local agencies and Native American Tribes that are historically affiliated with the area.

The Draft EIR and NOA were also posted for public review on the District's website, LCI's CEQAnet Web Portal, and the Orange County Clerk-Recorder Department. Additionally, two hard copies of the Draft EIR and the NOA were made available for public review at the District's Facilities Planning and Construction Services Department office at 2015 Roosevelt and at the Woodbridge High School main office.

The NOA advertised a community meeting, which was held on October 27, 2025, from 5:00 pm to 6:00 pm at Woodbridge High School, to solicit comments from the public about the contents of the Draft EIR. Similar to the NOP scoping meeting, CEQA Guidelines do not require a community meeting; however, the District elected to hold a public meeting during the public review period for transparency and to provide an additional opportunity for the public to comment on the proposed project.

CEQA does not require direct notification to individual homeowners associations (HOAs) unless they have specifically requested to be placed on the lead agency's notification list. Nonetheless, the NOA was sent to the Woodbridge Village Association during the NOA public review period. The District provided multiple avenues for public participation and disclosure consistent with CEQA's public review and noticing requirements. Therefore, the CEQA process for this project has been appropriately implemented, and no procedural violations occurred.

2.3.5 Topical Response 5: Non-school Events

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

As described in Chapter 2, *Project Description*, of the Draft EIR, the facilities at Woodbridge 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.

2. RESPONSE TO COMMENTS

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 Woodbridge 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 Woodbridge 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.

2.3.6 Topical Response 6: Non-CEQA Issues

TRESPASSING, SECURITY, AND PROPERTY DAMAGE

The District received multiple comment letters expressing concern regarding neighborhood safety, trespassing, and property damage from increased student activity at the Woodbridge High School campus as a result of the proposed project.

Concerns regarding trespassing and property damage are not environmental topics addressed under CEQA. However, it should be noted that the proposed project would primarily be implemented to allow existing students and sports teams to utilize their home field during evening hours for typical high school uses. 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 University HS. The

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track and field may also be used for other school events, such as graduation and non-school events. The proposed project would not include new bleachers.

Issues such as student conduct, campus supervision, and property security are outside the scope of CEQA and are instead addressed through District policies and operational procedures. The Draft EIR is intended to disclose potential physical environmental impacts that could result from the project. Social or economic considerations are not evaluated unless they would indirectly lead to a physical change in the environment. As directed by § 15131(a) of the CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment. Therefore, a response is not required pursuant to CEQA. No revisions to the Draft EIR are necessary.

PARKING

The District received multiple comment letters expressing concern regarding a lack of parking with implementation of the proposed project. The proposed project does not include an increase in student enrollment or visitors on campus, and therefore would not generate new parking demand during school hours. The proposed project would primarily be used to accommodate evening practices and existing games, and community events, which are not anticipated to require additional parking on the campus. The proposed project would include track and field events that are currently held off campus. The campus currently provides adequate on-site parking to serve students, staff, and authorized outside user groups, consistent with City of Irvine standards. During sports games and other events held on campus, Woodbridge HS and the District's Use of Facilities Department would manage parking to ensure safe ingress and egress, including clearly marked parking areas, pedestrian pathways, and event monitoring. No revisions to the Draft EIR are necessary.

PRIOR DISCRETIONARY AND DESIGN DECISIONS

The District received multiple comment letters expressing discontent with the proposed project compared to the District's decision at Woodbridge High School's inception to not include field lighting.

The District's decision to forego stadium field lighting during the initial construction of Woodbridge High School is not a topic subject to analysis under CEQA. CEQA requires the evaluation of potential physical environmental impacts of the proposed project as it exists in the present day, not an assessment of past discretionary decisions or design choices. In accordance with CEQA, the Draft EIR analyzes significant effects on the physical environment; non-physical factors are excluded from the analysis unless they serve as a primary driver of physical deterioration. The Draft EIR has already appropriately evaluated the potential environmental effects associated with the proposed installation of stadium field lighting based on current environmental and regulatory conditions. Comments regarding the District's prior design

decision do not raise new or substantive environmental issues requiring additional analysis, and therefore a further response is not required pursuant to CEQA.

2.4 COMMENTS AND RESPONSES

This section includes a reproduction of and response to each comment received during the public review period for the Draft EIR. Comments are presented in their original form in Appendix A, *Public Review Period Comments*, and annotated to identify each comment number.

Responses to individual comments are provided in this chapter following the text of each corresponding comment. Comments are arranged by category, date received, and name. Categories and their corresponding abbreviations are:

- Agencies (A)
- Individuals (I)
- Verbal comments (V)

2.4.1 Comments from Agencies

A1. City of Irvine, 11/12/2025

Comment A1-1

Good afternoon Ms. Gil.

Please find attached the City of Irvine comments on Draft Environmental Impact (DEIR) for the Woodbridge High School Field Lighting Improvement Project located 2 Meadowbrook 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 Woodbridge High School Field Lighting Improvement Project located 2 Meadowbrook in the City of Irvine.

2. RESPONSE TO COMMENTS

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

- Section 1.4, Incorporation by Reference – add City of Irvine Zoning Ordinance to the list of reference documents.

Response A1-3

The Draft EIR has been revised to incorporate the City of Irvine Zoning Ordinance to the list of reference documents. Revisions have been made in Section 3, *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 A1-4

- Section 2.4
 - 2.4.1 – This section 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 “3.1 Multi-Use.”
 - Replace "Planning Area 15" with "Planning Area 15 - Woodbridge."

Response A1-4

The General Plan and zoning designations have been updated to reflect the correct information. Revisions have been made in Section 3, *Revisions to the Draft EIR*. This revision does not change

2. RESPONSE TO COMMENTS

the accuracy of analysis concluded in the Draft EIR. No changes to impact conclusions are necessary.

Comment A1-5

- 2.4.3, Athletic/Events Schedule - Clarify here whether any non-school events take place at Woodbridge 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

Please see Topical Response 5, *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, 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. However, as described in Topical Response 1, *Light and Glare*, and Topical Response 2, *Noise*, in response to public comments received during the Draft EIR circulation period, the District has selected Alternative 2 for implementation. Woodbridge 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 University High School. 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 shown in Table 2-2, *Woodbridge 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, rather than 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 3, *Revisions to the Draft EIR*. These revisions

2. RESPONSE TO COMMENTS

do not change the accuracy of analysis concluded 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 may already 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 A1-8

- 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 5, *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.

2. RESPONSE TO COMMENTS

Response A1-9

This paragraph has been revised to add a citation to City of Irvine Municipal Code Section 3-4-127. Language referencing a variance has been removed. Revisions have been made in Section 3, *Revisions to the Draft EIR*. This revision does not change the accuracy of 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 5, *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). 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. Detailed event information is not available at this time because the District has not received any community event requests for the Woodbridge 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.

2. RESPONSE TO COMMENTS

Response A1-11

The suggested revisions have been incorporated. Revisions have been made in Section 3, *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.

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 3, *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.

Comment 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.

Response A1-13

Reference to a PA system has been removed from this section. Revisions have been made in Section 3, *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.

Comment A1-14

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

2. RESPONSE TO COMMENTS

Response A1-14

The Draft EIR has been revised to add the suggested definitions. Revisions have been made in Section 3, *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.

Comment A1-15

- 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 A1-15

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 were discussed on page 3.1-29 of the Draft EIR. Revisions have been made in Section 3, *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.

Comment A1-16

- Page 3.1-10, 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.).

2. RESPONSE TO COMMENTS

Response A1-16

The comment recommends using the City of Irvine Municipal Code noise standards (7:00 a.m. to 10:00 p.m. daytime and 10:00 p.m. to 7:00 a.m. nighttime) to establish lighting thresholds. 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 are 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 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 time periods in the City's noise ordinance.

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 A1-17

- 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 A1-17

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 Alton Parkway. Showing lighting levels at the school's property line (purple line) would not demonstrate the potential impact of the proposed lighting since there are no sensitive receptors located directly adjacent to the Woodbridge HS field. Therefore, no revisions are necessary.

Comment A1-18

- Page 3.1-30, Cumulative Impact Analysis
 - What related projects are being referred to here? There is no indication of other projects analyzed.

2. RESPONSE TO COMMENTS

- Why does this sentence only call out impacts to properties to the immediate north and west? The closest residential development is to the immediate south. If it is accurate that no impacts would occur, this sentence should read that there are no impacts to any adjacent properties.

Response A1-18

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 was 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.

The commenter is correct—the nearest residential development to the project site is to the northwest and southwest. The Draft EIR has been revised to state that there would be less than significant impacts to all adjacent residences. Revisions have been made in Section 3, *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.

Comment A1-19

- Page 3.2-30, Operation
 - 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 A1-19

Please see Topical Response 5, *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 Woodbridge HS campus. No revisions to the Draft EIR are necessary.

The commenter is correct. At the preparation of the Draft EIR, the lighting was proposed to remain in operation until 10 p.m. However, in response to public comments received during the Draft EIR circulation period, the District has selected Alternative 2 for implementation, which

2. RESPONSE TO COMMENTS

would require all proposed lighting to be shut off by 9:00 p.m. rather than the originally proposed 10:00 p.m. (see Topical Response 1, *Light and Glare*). Revisions to the proposed shut-off time have been made in Section 3, *Revisions to the Draft EIR*. Thus, all references to the proposed shut-off time have been made consistent.

Comment A1-20

- Page 3.2-33, Operation
 - How would the maximum 450 attendee limit be imposed? There is no prior discussion of an attendance limit for non-school events in the DEIR.

Response A1-20

The maximum number of attendees of 450 is based on prior track and field events that have been held at Woodbridge HS and the District's other high schools, as stated in the Project Description. Please see Topical Response 5, *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 Woodbridge HS campus. No revisions to the Draft EIR are necessary.

Comment A1-21

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

Response A1-21

This change has been implemented. Revisions have been made in Section 3, *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.

Comment A1-22

- Page 3.5-12, 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.

2. RESPONSE TO COMMENTS

Response A1-22

This statement has been revised to reflect the correct location of the airport. Revisions have been made in Section 3, *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.

Comment A1-23

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

Response A1-23

This section has been revised to reflect the correct General Plan and zoning designations. Revisions have been made in Section 3, *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.

Comment A1-24

- 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 S-3(h) and S-5(f).

Response A1-24

This section has been revised to incorporate the suggested goal. Revisions have been made in Section 3, *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.

Comment A1-25

- 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 A1-25

Both of the mentioned sections have been revised to reflect the correct department name. Revisions have been made in Section 3, *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.

2. RESPONSE TO COMMENTS

Comment A1-26

- Page 3.6-15, Project Operation – The Municipal Code reference (section 6-8-3) is not an existing code section. Please double check that you are referencing the correct section.

Response A1-26

This Municipal Code reference has been corrected. Revisions have been made in Section 3, *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.

Comment A1-27

- Page 3.7-11, second bullet - The bulleted item related to deliveries is not relevant to the project. It should be deleted.

Response A1-27

This bulleted item has been removed. Revisions have been made in Section 3, *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.

Comment A1-28

- Page 3.7-12, bulleted list – Clarify what type of special permit from the City would be required.

Response A1-28

Special permits refer to Special Event Permits for special events that are outside the normal operations of an area and may temporarily affect that general area with road closures, structures, amplified noise, animal expos, food and alcohol service, and other services that would not normally be there. 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.

2. RESPONSE TO COMMENTS

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

Comment A1-29

- Figure 3.7-1 – discuss why the two short-term noise monitoring locations were chosen. The closest residential unit, which would likely experience the highest noise levels, was not used.

Response A1-29

The long-term noise monitoring location (LT-1) was in the landscaped portion of the Alton Parkway right-of-way (ROW) near the northern property line for the residence at 27 Thunder Trail. This was a continuous 24-hour measurement that best represents the shielded side yards of the nearest residential uses to the south to the site. During the time of the noise measurements, Alton Parkway traffic noise was the dominant noise source, and although LT-1 was not completely shielded from traffic noise, it does represent Alton Parkway traffic noise for all residential receptors adjacent to Alton Parkway.

Short-Term Location 1 (ST-1) was at the western corner of the intersection of Alton Parkway and West Yale Loop, and represents an unshielded traffic noise level for Alton Parkway and West Yale Loop. Short-Term Location 2 (ST-2) was at a grassy lawn in a residential neighborhood that was completely shielded from Alton Parkway traffic noise.

Access issues preclude field staff from entering private property. The commenter does not provide a location for adjacent residential uses closer to the project site than the locations shown in Figure 3.7-1.

Comment A1-30

- Page 3.7-23, 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.

2. RESPONSE TO COMMENTS

Response A1-30

The paragraph has been revised to remove reference to a variance. Revisions have been made in Section 3, *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 5, *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 Woodbridge 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; thus, no PA system will be installed. No revisions to the Draft EIR are necessary.

Comment A1-31

- 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 A1-31

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*, in the Executive Summary. Under this alternative, use of the proposed lights would end at 9 p.m. for all events. In addition, please see Topical Response 1, *Light and Glare*, which describes how in response to public comments received during the Draft EIR circulation period, the District has selected Alternative 2 for implementation. Revisions have been made in Section 3, *Revisions to the Draft EIR*. This revision does not change the accuracy of 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.

2. RESPONSE TO COMMENTS

Comment A1-32

- 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 A1-32

Table 4.2 has been revised to state that Alternative 2 would meet all project alternatives. Revisions have been made in Section 3, *Revisions to the Draft EIR*. This revision does not change the accuracy of analysis in the Draft EIR. No changes to impact conclusions are necessary.

2.4.2 Comments from Individuals

I1. Margie Jesswin, 11/4/2025

Comment I1-1

Hello Ms. Gil:

I have attached my written comments and responses to the above named Project and Draft Environmental Report. I attended the meeting on October 27, 2025 regarding the same and have the additional comments that I stated I would send to the District.

Response I1-1

This is an introductory comment and does not raise an environmental issue regarding the adequacy of the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

Comment I1-2

Dear Ms. Gil:

I am addressing and commenting on some rather glaring omissions and/or incorrect statements of fact contained in the Draft Environmental Impact Report (DEIR) for the proposed Woodbridge High School Field Lighting Improvement Project (Project). They undermine the validity of the findings of the DEIR.

- I. STATEMENT OF CIRCUMSTANCES AND REQUEST FOR EXTENSION OF PUBLIC REVIEW PERIOD FOR COMMENTS TO DEIR

2. RESPONSE TO COMMENTS

I have followed this process since I was first sent Notice of it on or about October 17, 2024. It was addressed to “CURRENT RESIDENT.” (Exhibit A) That Notice said nothing about the installation of a permanent Public Address System (PA) with a speaker on each of the 4 70-foot lighting posts. It only said that “IUSD is considering the installation of field lights at Woodbridge High to extend the usability of our sports fields, allowing for evening practices and events.” As I was concerned about the lighting issue, I provided written comments and objections related to that on November 1, 2024 (Exhibit B).

The Notice also did not say anything about “non-school events” (DEIR, 2-13), taking place at night.

The first time I heard about the permanent PA system was at the scoping meeting I attended on June 10, 2025. Although I had not specifically addressed the issue in my written comments of November 1, 2025, I did so in an email following the scoping meeting on June 11, 2025. It was clear from both my letter of November 1, 2024, (Exhibit B) and my email following the scoping meeting that I had an issue with the additional noise that the outside lighting would create, as well as the additional noise of a permanent PA system. See email of June 11, 2025, Exhibit C.

Despite this, the DEIR states that there were “no comments related to noise received.” (DEIR 3,7-1). Not only did I provide two separate written responses/comments prior to and after the scoping meeting, another resident wrote comments after the scoping meeting, who is also the president of the Alders Maintenance Association, Karen Davis. See Exhibit D, part of Exhibit A to the DEIR Appendix. It was not until on or about May 28, 2025, that the District provided written notice that a permanent PA system was to be installed with speakers on each of the lighting poles. That Notice for the Preparation of the DEIR was not sent to all “current residents” within the affected areas as my neighbor asked me how I knew about the scoping meeting and the PA System. My Notice of the scoping meeting had been addressed by hand with my name on it. That may be why I was the only resident at the scoping meeting. This is a lack of effort to provide notice to the interested parties. Even if it was provided to all the affected residents the Project Title doesn’t describe the loudspeakers. The description of them is on the back of the first page and it was not even mentioned in the original Public Notice dated October 17, 2024, or even the subsequent Public Notice for the meeting occurring on September 18, 2025. (Exhibits A and E).

It is my belief that the PA System installation is an even greater problem than the lighting installation, as the PA System will reach a greater number of residents than the field lights will. It is likely that the entire Alders Community of 248 residences will be able to hear the play-by-play of the night football games and other events held on the field. Certainly, at least an additional 300 or more residents that reside to the south of the field will also hear the loudspeakers.

2. RESPONSE TO COMMENTS

Response I1-2

The District received two comment letters regarding potential noise impacts from the installation of a public address (PA) system at the Woodbridge High School campus during the NOP review period. The introduction of the Section 3.7, *Noise*, has been revised in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR.

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; thus, no PA system will be installed. The Draft EIR has been revised accordingly to remove the inclusion of a PA system from the project description (see Section 3, *Revisions to Draft EIR*). With the removal of the PA system, the primary source of operational noise associated with the proposed project would be limited to athlete and audience activity during on-campus events (see Topical Response 5, *Non-school Events*).

Comment I1-3

On or about September 30, 2025, I received by regular mail the Notice of Availability of Environmental Impact Report. On the back of the one-page Notice was Notice of a Community Meeting for October 27, 2025. The purpose of the meeting was to “discuss the findings of the DEIR and to provide an opportunity for the public to comment on environmental issues.” Emphasis added. (Exhibit F) The Notice also provided an internet link to the draft of the DEIR and set a deadline for public responses and comments for November 12, 2025.

After spending some time reviewing the DEIR prior to the meeting of October 27, 2025, I contacted the Master Homeowners Association for all of the Woodbridge communities, Woodbridge Village Association (WVA), to let them know of the meeting and the opportunity to make comments to the DEIR.

The executive director of WVA, Kevin Chudy, told me that they were never notified of the subject Project until I sent him Notice of it on the weekend before the scheduled meeting. He was surprised. He told me they are normally notified of government Projects within and related to Woodbridge Village. He did not know at the time of our phone call whether he could get someone to go to the meeting and said that the WVA could not respond to the DEIR by November 12, 2025, as the Board did not even meet until November 19, 2025. I told him I would ask for an extension of time for comments and responses to the DEIR at the meeting due to WVAs lack of notice of the Project. Mr. Chudy did end up attending the meeting and confirmed that WVA had not been sent any notice of the high school lighting Project. I made the request for an extension based upon WVAs and other neighbors’ lack of notice of the Project. The representative stated they couldn’t move the deadline and that they notified everyone within 500 feet of the Project.

2. RESPONSE TO COMMENTS

The WVA is certainly an interested organization entitled to notice and an opportunity to comment on this Project as it affects the residential communities it is charged with maintaining and regulating. The Architectural Guidelines of the WVA Code state at 3-000:

“(a) One of the responsibilities of the Woodbridge Village Association is the control of the physical character of the village to enhance the desirability and attractiveness of the community.

(b) The Woodbridge Village Association is charged with the administration and enforcement of architectural control within the community by the authority given to it in the Covenants, Conditions and Restrictions (CC&Rs).”

The recorded CC&Rs of Woodbridge Village state in pertinent part on the first page thereof:

“B. Declarant has deemed it desirable to establish [CC&Rs] upon the Covered Property and each and every portion thereof, which will constitute a general scheme for the management of the Village, and for the use, occupancy and enjoyment thereof, all for the purpose of enhancing and protecting the value, desirability and attractiveness of the Covered Property and enhancing the quality of life within the Village. Emphasis added.

C. It is desirable for the efficient management of the Village and the preservation of the value, desirability and attractiveness of the Covered Property to create a corporation to which, [is] assigned the powers of managing the Village, maintaining and administering the Community Facilities and administering and enforcing these [CC&Rs]... and to perform such other acts as shall generally benefit the Village. Emphasis added.

D. [WVA] ... has been incorporated ... for the purpose of exercising the powers and functions aforesaid.”

Article III, Section 2 on page 16 of the CC&Rs states:

“Purpose of Assessments. The Assessments levied by the Association shall be used exclusively for the purposes of promoting the recreation, health, safety and welfare of the Members and the management of the Village, enhancing the quality of life in the Village and the value of the Covered Properties ...” Emphasis added.

It is difficult to preserve, enhance and protect the health, safety, welfare and quality of life of the homeowners of the community if the organization charged with doing that has no notice of the Project.

2. RESPONSE TO COMMENTS

Response I1-3

Please see Topical Response 4, *Community Outreach*, for a detailed description of the District’s notification process and a demonstration of its full compliance with CEQA requirements. No revisions to the Draft EIR are necessary.

Comment I1-4

The statement of the representative at the meeting of October 27, 2025 that notice was provided to everyone within 500 feet of the Project is not even accurate as the WVA owns all common areas within the Village which includes, but is not limited to, all landscaped areas bordering the exterior walls, including those facing the streets which border the school, Alton Parkway and West Yale Loop. The “Community Facilities” is defined in the CC&Rs at Article I, Section 12, page 8. The High School football field at some points are a minimum of 150 feet by reference to the DEIR, 3.7-15; 3.1.8; 3.1-29.

Regardless of the arbitrary 500 feet notice, California’s Environmental Quality Act, (CEQA) in its Codes and Regulations, require notice to the public without any distance requirement.

Public Resources Code Section 21061 states in pertinent part: “The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project.” Emphasis added.

The California Code of Regulations (CCR) at 14 CCR § 15201 states: “Public participation is an essential part of the CEQA process. Each public agency should include provisions in its procedures for wide public involvement, formal and informal, ... in order to receive and evaluate public reactions to environmental issues related to the agency’s activities ...”

14 CCR § 15203 states: “The lead agency shall provide adequate time for other public agencies and members of the public to review and comment on a draft EIR or negative declaration that it has prepared. ...”

14 CCR § 15087 states in pertinent part: “Public Review of Draft EIR.

(a) The lead agency shall provide public notice of the availability of a draft EIR at the same time that it sends a notice of completion to the Office of Planning and Research. ... Notice shall be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and shall also be given by at least one of the following procedures:

(1) Publication ... in a newspaper ... in the area affected by the proposed project. ...

2. RESPONSE TO COMMENTS

(2) Posting on and off site where the project is to be located.

(3) Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located. Owners of such property shall be identified as shown on the latest equalized assessment roll. ...”

The most likely to provide notice in this matter would have been (a)(3).

The WVA has stated that it did not get any such notice. As owners of the landscaped areas in front of the closest residences adjacent to the Project and charged with the responsibility and duty to protect the health, safety, welfare and quality of life of its members/owners, the WVA has a right to be notified and to comment on the Project/DEIR.

Response I1-4

Refer to response I1-3 regarding noticing for the Draft EIR. This comment does not raise an environmental issue regarding the adequacy of the Draft EIR. This comment has been provided to the District for its consideration as part of the project review and approval process. No changes to the Draft EIR are necessary.

Comment I1-5

Pursuant to 14 CCR § 15105, the review period shall not be less than 45 days. It also states that it should not be more than 60 days “except in unusual circumstances.”

My first comment/objection, therefore, is that there has been insufficient Notice to the Public and to WVA to proceed with this Project. An extension of the deadline to December 5, 2025, due to the WVA Board meeting scheduled November 19, 2025 and the closeness of the Thanksgiving holiday, thereafter, is therefore requested.

My residence is located within Alders HOA and Woodbridge Village Master Association. It is kitty-corner from the track and field at Woodbridge High School and directly across Alton Parkway from Mark Daily Athletic Park, owned by the City of Irvine. I am on the corner of Alton and West Yale Loop. I have lived here since 1997.

Response I1-5

The lead agency holds the authority to determine whether to extend the public review period, as neither statute nor case law defines the "unusual circumstances" that would necessitate a longer duration. While the District has the discretion to grant an extension of the public review period (for instance, if numerous requests were received), multiple requests were not submitted during the public review period. The Draft EIR complied with CEQA Guideline 21091 by providing the 45-day minimum review period. This comment addresses administrative

2. RESPONSE TO COMMENTS

process rather than the environmental adequacy of the Draft EIR; this comment has been provided to the District for its consideration as part of the project review and approval process, and requires no changes to the Draft EIR.

Comment I1-6

In dealing with the impact of noise that the Project will have on the surrounding community, the DEIR has several inaccuracies, inconsistencies and omissions.

1. The DEIR Misstates the Name of the Project School and the Number of Comments Received Making the Findings Suspect.

The initial paragraph under the title Noise, (DEIR, 3.7-1) states the following pertinent language and inaccuracies.

“This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for Implementation of the Woodbridge High School field and Lighting Improvements Project (proposed project) to result in noise impacts in the noise environment in the local vicinity.” Emphasis added “No comments related to noise were received during the Notice of Preparation public comment period and/or public scoping meeting held for the proposed project.” Emphasis added.

The subject Project relates to Woodbridge High School, not Northwood High School. Northwood High School is in a completely different area of the city and has different demographic, geographic, topographic and land use features.

Response I1-6

The comment is accurate regarding the incorrect title for the proposed project. Revisions have been made in Section 3, *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.

Additionally, comments received during the NOP public review period (May 28, 2025, to June 26, 2025) are discussed and acknowledge in Section 3, *Environmental Analysis*, of the DEIR. The District received one verbal comment and two comment letters expressing concern regarding potential noise impacts from the installation of a public address (PA) system at the Woodbridge High School campus. After careful consideration of community comments and concerns, the District decided to remove the PA system from the proposed project; thus, no PA system will be installed (see Topical Response 2, *Noise*, regarding removal of the PA system).

2. RESPONSE TO COMMENTS

Comment I1-7

As set forth in my initial comments I provided written and oral concerns about the impact of additional noise in the local vicinity, both based on additional noise from the additional traffic as well as that from the noise of a permanent PA system with loudspeakers mounted on each of four 70-foot-tall field lighting poles. (Exhibit B and C).

The incorrect identification of the Project as Northwood High throws into dispute the underlying assumptions made in the report related to noise impact. It also contributes to the failure to test for and assess all the noise concerns. For example, it does not appear that the noise levels were at all tested or considered for the proposed extended period of time for the sporting events and other “non-school activities” while the PA system would be blasting play by play announcements during and after game nights up to 10:00 PM and possibly 11:00 PM and for the proposed 6 hours of game times. See DEIR 2-14 through 2-19; chart 2-18-2-19.

An additional place in the DEIR of the incorrect identification of the subject Project is within the explanation of the actual testing of noise volume at the short-term testing location (ST-1), identified as a “236 ft west of the Northwood HS campus marquee” Emphasis added. (DEIR 3.7-15).

Response I1-7

Please see Topical Response 1, *Light and Glare*, and Topical Response 2, *Noise*, regarding the less than significant impact of the proposed lighting, removal of the PA system, and changes to the proposed sports and events schedule on the Woodbridge HS campus. Additionally, as stated in response I1-6, corrections of the project title do not change the impact conclusions made in the Draft EIR. See Section 3, *Revision to the Draft EIR*.

Comment I1-8

A still further relevant factual inaccuracy with the DEIR is the timing of the band practice. One of the listed existing schedule of school events on the chart at 2-10, Table 2-1 is band practice, which is stated as starting at 4:30 PM and ending at 7:30 PM on Wednesdays, August through November, is inaccurate. The band has practiced in the mornings at about 7:00 AM every Fall since I have lived here and continues to this day. It is well known in the community as it wakes up those that are still sleeping and is another noise that emanates from the High School that can be heard by the residents in the Alders and the other communities of Woodbridge, south of the HS track and field. (DEIR 2-14). Further, the band does not only practice once a week. During the relevant months, I have heard it practice from inside my home at all times of the day and many times a week. When it is practicing it is directed by a portable microphone/speaker that I can also hear from inside my home. See Exhibit L that shows pictures I took of the band

2. RESPONSE TO COMMENTS

practicing at 7:40 AM on a Monday morning, November 3, 2025 and again on October 23, 2025, Thursday, at 8:06 AM.

The scheduling error continues into the proposed changes to the sports scheduling after the proposed lighting Project is completed at DEIR 2-14 and 2-18, Table 2-2, as it states that the band practice will stay the same from 4:30-7:30 PM on Wednesdays. This further error supports the above analysis that due to the many factual errors in the Report it cannot and should not be relied upon.

Response I1-8

Refer to Topical Response 2, *Noise*, that addresses concerns regarding noise. No revisions to the Draft EIR are necessary.

Comment I1-9

2. The Noise Data Measured at the Short-Term and Long-Term Sites Seems Inconsistent with the Findings that the Noise Level during Sports and Other Activities will be “Less than Significant” After the Proposed Project is Completed.

The DEIR states that physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. High noise levels affect our entire system, with prolonged noise exposure more than 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart, and the nervous system. Extended periods of noise exposure above 90 dBA could result in permanent hearing damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the ear. As the sound reaches 140 dBA, the tinkling sensation is replaced with pain. A sound above 190 dBA will rupture the eardrum and permanently damage the inner ear. (DEIR 3.7-4).

The DEIR also states that the City of Irvine identifies the maximum interior and exterior noise levels for each land use category. The City of Irvine says the maximum exterior noise level required for residential use is CNEL 65 (or 65 dBA), the average sound level during a 24 hour period. (DEIR 3.7-8)

The City of Irvine’s Municipal Code makes it unlawful for a single source of sound to cause the sound level on residential property for more than 15 minutes to be greater than 60 dBAs on average, from 7:00AM to 10:00 AM and greater than 55 dBAs for a 15 minute average, from 10:00 PM to 7:00 AM. (DEIR 3.7-10 to 3.7-12; Table 3.7-5).

One of the two locations for Short Term sound testing (taken for 15 minutes), was labeled ST-1 and located on the southwest corner of West Yale Loop, approximately 755 feet from the campus scoreboard taken on 2/20/25 at 5:29 PM, where I live. The average dBA for the 15-minute period of measurement was 63.8 dBA and the maximum for that period of time was

2. RESPONSE TO COMMENTS

77.6 dBA. (DEIR 3.7-15) The printout for the tests and the field notes are contained in Appendix E-2-E-8 of the DEIR, Exhibit G hereto). Although the maximum dBA recorded is 77.6 there is a peak recordation for that site at 105.1 dBA. The peak level identified in the test results (“Measurement Report”) as “LAS peak” and “LPeak(max)” is not defined in the DEIR like the other terminology was at DEIR 3.7-1 to 3.7-4.

Response I1-9

LPeak(max) represents the highest instantaneous sound pressure level measured during a noise event, capturing short, sharp peaks. Ls(max) is the maximum noise level measured using a slow time-weighting (about 1 second), reflecting the loudest level as perceived over a brief period rather than momentary spikes. For example, an LPeak(max) measurement may be a clap or a hammer strike. In CEQA, Ls(max) measurements are used because they better represent human perception of noise and are appropriate for evaluating community noise impacts.

Additionally, refer to Topical Response 2, *Noise*, which addresses concerns regarding noise. No revisions to the Draft EIR are necessary.

Comment I1-10

As noted from the field note on DEIR Appendix E-6 the location of ST-1 is South of Mark Daly Athletic Park and the “Primary Noise Sources were, noise along Alton and W Yale Loop; Recreational soccer games at Mark Daily Field; lacrosse practice on campus track & field.” Distances were noted as “47.6 m from Mark Daily Marquee; 72 m from Northwood HS(sic) marquee; 23 m from campus scoreboard”

There is something wrong with these measures. 23 meters is 75.46 feet. The Woodbridge HS marquee is much closer than the scoreboard to the identified location but is represented in the field note to be 72 meters which is 236.22 feet. Directly across the street at the Mark Daily marquee is represented to be 47.6 meters in the Report. That is 156.7 feet. The DEIR, itself says the distances from the ST-1 test location is 157 feet from the Mark Daily Marquee, 236 feet from the “Northwood” (sic) HS campus marquee and 755 feet from the High School scoreboard which is 229 meters, not 23m. (DEIR 3.7-15).

DEIR says: 157 ft from MD Park Marquee, 236 ft “Northwood” HS Marquee, 755 ft from HS track scoreboard

Appendix says: 41.6m, 72m, 23m (respectively)

Meters to Feet are: 156.7 ft, 236.22 ft, 75.46 ft (respectively)

As stated above, the Woodbridge High School scoreboard is much further away than either of the two marquees from where the meter measuring the level of noise was set up. This is

2. RESPONSE TO COMMENTS

another discrepancy that undermines the validity of the findings in the DEIR. Only one site was selected for a day long or Long-Term measurement. It was near 27 Thunder Trail on 2/20-2/21/2025, approximately 150 feet southwest of the track and field, across Alton Parkway. The maximum averages for the day, evening and night hours were 83.2, (7 a.m.-7 p.m.); 85.5, (7 p.m.-9 p.m.); and 75.6 (9 p.m.-7 a.m.) dBAs, respectively. The maximum average for the hours of 3:00 PM to 11:00 PM was 83.3 dBA. (DEIR 3.7-16).

All of the maximum readings for each hour of the 24-hour measurements was over the City of Irvine's maximum dBA policy and Code requirements of 60-65 dBAs for exterior noise at residences ranging from 94.5 at 3:00 PM to 73.0 at 0:00 PM/AM. (DEIR Appendix E-2).

There doesn't seem to be a question that any further noise, let alone, four blaring loudspeakers mounted around the field at a height of 20 feet would increase the ambient noise level at the residences surrounding the field to well in excess of dangerous levels for prolonged periods of time and is substantially greater than the required Irvine City maximum exterior noise level of 65 dBA. Also noted at 3.7-10 the DEIR quotes Irvine's Municipal Code for Noise at Section 6-8-204 that it is unlawful to cause a receiving property to have greater than 60 dBAs for a period of 15 minutes during the hours of 7:00 AM and 10:00 PM. (See Table 3.7-5 at DEIR 3.7-11)

The disruptive play-by-plays of sports teams are particularly offensive at the end of the day when people are coming home from a long day and attempting to relax in their homes. It is believed the noise of the permanent PA system will drown out TVs and make entertaining in one's own home an impossibility due to the noise from football and other sporting events. It is noted that the football games are proposed to start at 3:00 PM and end at 9:00 PM with the field lights staying on until at least 10:00 PM. (DEIR 2-18).

Response I1-10

The comment is accurate regarding the incorrect title for the proposed project. Additionally, as accurately stated in Appendix E-6 and by the commenter, the location of ST-1 is 23 meters from the scoreboard, which equates to 75.46 feet. The Draft EIR has been revised to state "75 feet" instead of "755 feet," and these revisions are shown in Section 3, *Revisions to the Draft EIR*. These revisions do not change the accuracy of the analysis and conclusions in the Draft EIR. No changes to impact conclusions are necessary.

The purpose of CEQA is to ensure that public agencies identify, evaluate, and disclose the potential environmental effects of a proposed project on the existing conditions of the project site and its surrounding environment. CEQA requires a thorough examination of baseline environmental conditions—such as air quality, biological resources, cultural and historical assets, hydrology, transportation, noise, and other physical environmental factors—before any approval or implementation of a project. By assessing how a project may alter these existing conditions, CEQA provides decision-makers and the public with a clear understanding of the

2. RESPONSE TO COMMENTS

project's potential impacts, encourages informed choices, and promotes feasible mitigation measures or alternatives that reduce or avoid significant adverse effects. Ultimately, CEQA is designed to protect environmental quality, foster transparency, and ensure that environmental considerations are integrated into the planning and decision-making process. Refer to Topical Response 2, *Noise*, which addresses concerns regarding noise. Typographical errors were corrected in the Draft EIR; however, no further analysis is necessary.

Comment I1-11

3. The Analysis Fails to Explain the Finding That the Project Would Have Less than Significant Impact on Noise to the Surrounding Residential Community.

The DEIR states without explanation that the additional lighting and sporting events will increase spectators and traffic at the sports field from a review of the existing and proposed maximum number of attendees by number of scheduled and proposed scheduled games. DEIR 2-9 to 2-12 (existing) 2-14 to 2-19 (proposed), and Appendix C-26. The basis of the proposed increased number of attendees is not supported but if it is the maximum number of seats available at the field that can't possibly be estimated as the field is a completely open space and anyone can walk up to the fence surrounding it after parking in the neighborhoods and watch any activity going on at the field. Further the bleacher within and around the field could be modified to increase seating capacity extensively.

There is also no analysis of the actual noise that would be generated during a sporting event of this type of an open track and field without walls, structures or very much vegetation around it to mute any of it. Similarly, as set forth in a previous written concern, there is no way to determine the number of increased traffic and effect on the surrounding community parking and roadway situations that the Project may generate. As an example, the Alders condominium development has 248 residential units with parking and internal streets and walkways that could easily be accessed by possible proposed attendees and result in overcrowding, lack of available space for the members of the community and increased noise.

There has been no analysis of the noise, light and traffic that is already generated by the City owned Mark Daily Athletic Field. The lighting at the Athletic Field directly across Alton from the Alders community and directly across West Yale Loop from Woodbridge High School has increased traffic, noise and night lighting pollution at the Alders since those lights were installed on that field. See DEIR Figure 3.1-1 Visual Simulation Locations, showing the Mark Daily Field, its location across from the Alders community and the baseball field lights which number 10 and are similar to the lights proposed at the High School. The lights were installed there a few years ago and have created additional traffic and lighting issues for the community. See my letter date November 1, 2024, and also the written comments of Karen Davis, the president of the Alders HOA. Exhibits B and D hereto. I can see the evening lights of the Daily Field and hear the noise of the game and spectators as I drive up Greenfield when turning off of Blue Lake North.

2. RESPONSE TO COMMENTS

Probably about .25 miles from Daily Field. See pictures of the field lighting at Daily Field which I took outside my residence on October 29, 2025, at 6:23 PM. and again November 3, 2025 between 5:30 and 6:30 PM, Exhibit H.

Response I1-11

Please refer to Topical Response 1, *Light and Glare*, and Topical Response 2, *Noise*, for responses regarding lighting and noise. The proposed project would not increase traffic at the campus because the Woodbridge 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 University High School. No revisions to the Draft EIR are necessary.

Comment I1-12

The cumulative effects of these two projects now should be considered as adding to the detrimental environmental impact by the increased noise and light pollution to the existing communities and a finding of considerable and significant impact. It supports the No Project alternative.

Further the Project in and of itself supports a No Project alternative as even if there was less than significant impact to the environment any increased noise is not tolerable as the levels of noise are already too high as they currently exceed Municipal Code requirements and policies. Further noise and traffic is sure to impact the health and safety of the local population, as well as decreasing the real estate values.

Response I1-12

CEQA Guidelines Section 15130 requires an EIR to evaluate cumulative impacts where the project's incremental effects, combined with other past, present, and reasonably foreseeable future projects, may be significant. The Draft EIR includes a thorough cumulative impact analysis for all environmental topics relevant to the project, including traffic, noise, and lighting in their respective chapters, based on existing conditions and reasonably foreseeable development in the vicinity. The analysis appropriately considers the combined effects of the project with surrounding development and other planned improvements, in accordance with Section 15130. Therefore, the Draft EIR adequately addresses cumulative impacts, and no additional analysis is required. Refer to Topical Response 2, *Noise*, which addresses concerns regarding noise, and to response I1-11, which addresses concerns regarding traffic. No revisions to the Draft EIR are necessary.

2. RESPONSE TO COMMENTS

Comment I1-13

In assessing all the on-campus sources of light that are visible to the south and west of the field (DEIR 3.1-5; 3.1-12), the DEIR fails to mention the brightly lit marquee that is lit up and displays colorful messages all day and most of the night. It displays announcements and has several screens that change and move every few seconds during the day and night. It faces directly out from the southwest corner of the school track facing diagonally at the homes at the corner of Alton and West Yale Loop. I can see it from my living room window, and it is very bright, especially at night. It is not measured by foot candles anywhere in the DEIR. See Exhibit I.

While taking further nighttime pictures of the lighting after dark, I discovered that there are at least four 70-foot lighting poles already apparently on the school grounds that are lit up at night. They are either within the school or behind it in the parking lot area. They also provide quite a bit of neighborhood light that is not mentioned in any of the discussions in the DEIR. See Exhibit J. I find it unusual that there are at least two on campus lighting sources that are not mentioned in the DEIR which would increase the foot-candle measurements within the neighborhoods when added to the new proposed 70- foot lighting poles.

In explaining the methodology to analyze glare and lighting the DEIR states at 3.1-6:

“Nighttime illumination and glare impacts are the effects of a project’s exterior lighting upon adjoining uses and areas. Light and glare impacts are determined through a comparison of the existing light sources with the proposed lighting plans or policies. The Irvine Municipal Code and industry standards were reviewed to identify the appropriate threshold based on footcandles. Using the District’s Sports Field Lighting Plans (Musco plans and Appendix A), the District compared the foot candles measurements at 150 feet from the edge of the field in all directions against the identified threshold to determine if the proposed lighting would exceed the threshold. The nearest sensitive receptors are just beyond the 150 foot boundary of the measured foot candles area. In some cases, excessive light and glare can be annoying to residents or other sensitive land uses; be disorienting or dangerous to drivers; ... If the project has the potential to generate spill light on adjacent sensitive receptors or generate glare ... mitigation measures can be provided.”

The DEIR does not take all of the existing sources of light into consideration as is outlined above, so it is unknown how they can say that based upon those additional lighting sources the foot candle measurements would not go beyond 150 feet. I dispute that the illumination cannot be seen beyond 150 feet. My view of the track and field is beyond 150 feet, and I clearly see light coming into my home from the track and from the lit-up Marquee.

Response I1-13

The purpose of CEQA is to ensure that public agencies identify, evaluate, and disclose the potential environmental effects of a proposed project on the existing conditions of the project site and its surrounding environment. CEQA requires a thorough examination of baseline environmental conditions—such as air quality, biological resources, cultural and historical assets, hydrology, transportation, noise, and other physical environmental factors—before any approval or implementation of a project. By assessing how a project may alter these existing conditions, CEQA provides decision-makers and the public with a clear understanding of the project’s potential impacts, encourages informed choices, and promotes feasible mitigation measures or alternatives that reduce or avoid significant adverse effects. Ultimately, CEQA is designed to protect environmental quality, foster transparency, and ensure that environmental considerations are integrated into the planning and decision-making process.

Please refer to Topical Response 1, *Light and Glare*, which addresses concerns regarding lighting. Additionally, the marquee referenced by the commenter is an existing part of the campus and not part of the proposed project. CEQA Guidelines Section 15130 requires an EIR to evaluate cumulative impacts where the project’s incremental effects, combined with other past, present, and reasonably foreseeable future projects, may be significant. The Draft EIR includes a thorough cumulative impact analysis for all environmental topics relevant to the project, including traffic, noise, and lighting, in their respective chapters, based on existing conditions and reasonably foreseeable development in the vicinity. The analysis appropriately considers the combined effects of the project with surrounding development and other planned improvements, in accordance with Section 15130. Therefore, the Draft EIR adequately addresses cumulative impacts, and no additional analysis is required.

Comment I1-14

At DEIR 3.1-12, in responding to the issue that the project would not expose people on and off site to substantial light or glare which would adversely affect day or nighttime view of the area, the District relied on on-site sources of artificial light which included light emanating from building interiors, building and security lights, sidewalks and parking lots. Existing off-site lighting sources include street lighting, vehicular lighting and exterior lighting on existing residential uses.

The District did not measure the existing light sources as the threshold but only took a picture of those lighting situations. So, it is unknown how they determined that the light from the field would not spread beyond 150 feet beyond the track.

Surprisingly, the pictures of Location 2, Figure 3.1-4 and 5 do not show the marquee turned on for either the existing or proposed day and nighttime views of that location to show the threshold. Exhibit K.

2. RESPONSE TO COMMENTS

I have taken daytime and nighttime pictures of the marquee from my window and outside my condo which I have attached as Exhibit I. Included are nighttime pictures of three portable lighting poles that are clearly shining brightly into my home that are being used on the track for nighttime games which are left on the field well after the game and/or practice is over. See also portable lighting pictures I took on November 3, 2025 at approximately 5:30 pm showing additional portable lighting at the end of the field near the scoreboard and it appears to be of a blinding nature as cars drive through it. There are also no pictures of the four other 70-foot lighting poles within the interior of the school and/or parking lots. Those pictures are included in Exhibit I.

The DEIR states that the maximum illumination on the field would be 59 fc. Along the track there would be an average of 31.36 fc and 50.93 on the field. DEIR, 3.1-12. The measure of the foot candles at the track are therefore not accurate as they do not include the illumination from the marquee, the four already installed 70-foot lighting poles or the portable lighting poles at the track and field. Based upon my actual visual of the glare, spill light and the light trespass I can see from my window every day and night, that light is well above twilight illumination and does come into my home and through my windows and is annoying and distracting. If it comes into my bedroom window, I will not be able to sleep regardless of the foot-candle measurement. The accuracy of how far light will be seen given its illumination qualities and how far from the lighting source a residential receptor is, has not been proven. I can clearly see the light from the Woodbridge High School track and field from my home, which distance the DEIR says is 236 feet. Further the cumulative effect of the lighting at the Daily Field, the lighting already on campus, that is, the 4 70-foot, already installed, lighting poles in the High School interior and parking lot (which looks to illuminate the bleachers and finds its way to Alton and West Yale Loop), and the new track and field lighting would be cumulatively too bright for residential communities just across the street.

Response I1-14

Please refer to Topical Response 1, *Light and Glare*, and comment response I1-13, regarding the anticipated lighting impacts for the proposed project, and the reduced use of the proposed lights until 9 pm rather than the originally proposed 10 pm. No revisions to the Draft EIR are necessary.

Comment I1-15

1. No Project Alternative

I attended the meeting on October 27, 2025, that was to discuss and comment on the DEIR. In response to a question about what the Project for new lighting and a permanent PA system for the field and track at Woodbridge High would be used for, Kelvin Okino, Executive Director of Facilities Planning and Construction for IUSD said Soccer, Lacrosse and some football for games

2. RESPONSE TO COMMENTS

and practice. I told him the DEIR stated in the proposed scheduling of events that the Varsity football games are listed to be played until 3:00 PM to 9:00 PM on Friday nights at Woodbridge High. He responded that they would have those games at University High School because Woodbridge was too small for the football games. They are using it now after dark with portable lighting on the field. See Exhibit I.

So, why is the project necessary when Woodbridge High School has been without field lights and a permanent PA System since its inception in the 1980s and they don't seem to have suffered for it. The School is fully built out, as you say, so its capacity for more and longer sporting activities is also beyond its capacity and will only harm the already crowded neighboring community. The School is fortunate to have other schools in close proximity to use other schools' facilities for practice and games as it always has and will continue to do so, even if the Project was built, as it has been acknowledged.

This Project would make the noise, traffic and lighting problems in the surrounding community unbearable, unhealthy and reduce property values. The downside of this Project far outweighs any small benefit the high school would receive from being able to use the field and track a few more hours a day.

Response I1-15

Senate Bill 328, School Start Time, became effective in 2022 and pushed high school start times to no earlier than 8:30 am. This, in turn, pushed high school end times later in the day. Currently, Woodbridge High School's last period ends at 4:00 pm, and in the winter months, the sun sets as early as 4:45 pm. The proposed lighting is not meant to replicate a stadium, but to provide students with equal practice time as their peers at other schools.

Under the No Project Alternative, school objectives would not be met. These objectives include providing adequate athletic facilities to accommodate school sport games and events, providing lighting to allow night use of the track and field to accommodate school events, enhancing opportunities for after-school activities, allowing home games on campus, and upgrading athletic fields to increase school pride. A No Project Alternative would have no impacts when compared to the proposed project. Refer to Topical Response 1, *Light and Glare*, regarding the reduced use of the proposed lights until 9 pm rather than the originally proposed 10 pm, and Topical Response 2, *Noise*, regarding removal of the PA system. This comment does not raise an environmental issue regarding the adequacy of the Draft EIR. This comment has been provided to the District for its consideration as part of the project review and approval process. No changes to the Draft EIR are necessary.

2. RESPONSE TO COMMENTS

Comment I1-16

No PA System Alternative

The second alternative, although not as attractive to the residential communities, would be to build only the lighting and not the PA System. The permanent PA system is wrought with excessiveness and possible unhealthful conditions for residents that spend more time at home than anywhere else. The longer a person is exposed to noise at higher levels the more likely it is unhealthful, including hearing loss, high blood pressure and heart and nervous system breakdowns, speech and sleep interference, physiological responses and annoyance. All of this is acknowledged in the DEIR. 3.7-2, 3.7-3, 3.7-4.

The presenter at the meeting acknowledged that the PA System was not going to be immediately installed but wanted flexibility to proceed with it anyway. But that is an unacceptable reason for allowing the authorization of the PA System.

With this alternative, the lighting would have to be shut down earlier than 10 PM as there is already too much light emanating from the High School and other venues too late at night which again is not a healthy situation for the residential community.

Response I1-16

Refer to Topical Response 2, *Noise*, regarding removal of the PA system. No revisions to the Draft EIR are necessary.

Comment I1-17

Conclusion

In conclusion, it is requested that an extension be given so that the WVA could consider the DEIR and provide comment if it so desires as they are charged with the responsibility and duty to make sure the properties within Woodbridge Village are safe, healthy and preserved, enhancing the quality of life in the Village and the value of its properties. They were not given that opportunity because they were not notified of the Project which they should have been.

Further, there are many inaccuracies, inconsistencies and omissions with the Report that make its conclusions suspect. I have lived here for 28 years and dispute many of the facts that are stated in the Report. If the additional lighting and permanent PA system are installed, the quality of life will decrease and so will the property values. The community will become too noisy, crowded and unhealthy.

I hope you will consider my concerns.

2. RESPONSE TO COMMENTS

Response I1-17

All concerns raised in the letter have been addressed in the responses above. This comment has been provided to the District for its consideration as part of the project review and approval process. No changes to the Draft EIR are necessary.

I2. Robert Coyle, 11/6/2025

Comment I2-1

Kathleen,

I am writing to express my opposition to the proposed four, 70 foot high light poles with loudspeakers to be installed at the high school's athletic field. I live in the Cottages that borders Alton Parkway, across from Woodbridge High School. My home is the 2nd home from the greenbelt adjacent to Alton Parkway. Our neighborhood, for as long as I can remember one can hear the school band practicing early in the morning, and often times in the late afternoon/evening. In September, the band is just learning to play, as the months go by they get better and better and I enjoy listening to them. I cannot say I would enjoy listening to loudspeakers giving a play-by-play account of a sporting event. We also have a problem with high school students climbing over the perimeter fence as a short cut, passing by my and three of the adjacent neighbor's front yards; this is an invasion of privacy that I could do without.

Response I2-1

Please see Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project based on comments received during the public review period of the Draft EIR. The proposed project is not a stadium project, as it does not include bleachers or any increase in student, staff, or visitor capacity. Events held at the project site would consist of athletic practices and activities, such as soccer and lacrosse. Football practices will be held at Woodbridge HS, but Varsity tackle football games would continue to be hosted at University High School. Thus, operational noise impacts from the proposed project would be less than significant.

Additionally, please see Topical Response 6, *Non-CEQA Issues*, which describes how trespassing and property damage are not environmental topics to be addressed under CEQA. The commenter's statements has been provided to the District for its consideration as part of its decision-making for this project. No revisions to the Draft EIR are necessary.

2. RESPONSE TO COMMENTS

Comment I2-2

I attended the presentation on October 27, 2025, to hear the first draft of Environmental Impact Report to learn more about the details of the proposed field lighting improvement project. At first, I was very surprised to be one of only two homeowners to be present but then realized that for people who have a job and a family it would be very difficult to be present for a meeting scheduled between 5:00 - 6:00 PM.

Kevin Chudy and Matt Sills from the Woodbridge Village Association were in attendance, I found it very noteworthy to discover that neither one of them had any idea about the proposal to install 70 foot high lighting poles with loudspeakers at Woodbridge High; furthermore, they had not been invited to this, or any previous meetings by the Irvine Unified School District. Mr. Chudy only became aware of the October 27 meeting because Margie Jesswein Paul, a homeowner in the Alders, informed him.

Response I2-2

Please see Topical Response 4, *Community Outreach*, which describes the noticing process and distribution of the NOP and NOA. The District provided multiple avenues for public participation and disclosure consistent with CEQA's public review and noticing requirements. Therefore, the CEQA process for this project has been appropriately implemented, and no procedural violations occurred. No revisions to the Draft EIR are necessary.

Comment I2-3

The gentleman giving the DEIR presentation indicated the field with the new lights and loudspeakers would also be used for other school events, such as graduation and non-school events. When asked what these non-school activities would be and how frequent, Kelvin Okino the Executive Director of Facilities Planning and Construction for IUSD did not have a precise, enlightening answer, only that the IUSD has an agreement with the City of Irvine to make the field available for non-school related events. I assume other homeowners would be highly interested in what type of noise these non-school related events would generate and the duration.

Response I2-3

Please see Topical Response 5, *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 further response is warranted and no revisions to the Draft EIR are necessary.

2. RESPONSE TO COMMENTS

Comment I2-4

I strongly believe the addition of the four, 70 foot tall poles with bright lights and the noise amplified by the attached loudspeakers is something that will not benefit the surrounding communities whatsoever. It possibly will also have a profound effect on property resale values in the future. I, like many other homeowners in Woodbridge, have invested hundreds of thousands of dollars in renovating our homes.

Response I2-4

Please see Topical Response 1, *Light and Glare*, and Topical Response 2, *Noise*, which address lighting and noise impacts of the proposed project. Additionally, please see Topical Response 6, *Non-CEQA Issues*, which describes topics that are not addressed under CEQA. The Draft EIR is intended to disclose potential physical environmental effects, not to address social or economic considerations unless they would result in a physical change to the environment. No further response is warranted and no revisions to the Draft EIR are necessary.

Comment I2-5

It is my belief this project is being ramrodded through, to be accepted quickly, without a reasonable amount of planning, or consideration outside the school's perceived benefit. The Woodbridge High School has been since its inception in 1981, functioning successfully without lights and a permanent public address system for all these years. The school is ranked in top 5% of California public schools. I seriously doubt having four, 70 foot high, bright lights with loudspeakers will advance the school's national or state ranking.

Response I2-5

The primary purpose of the proposed project is to provide existing students and athletic programs the opportunity to utilize their home facilities during evening hours for standard high school activities. 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 University HS. Please see Topical Response 6, *Non-CEQA Issues*, which describes why prior discretionary and design decisions are not environmental topics to be addressed under CEQA. This comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

2. RESPONSE TO COMMENTS

Comment I2-6

The negative aspects of this project for the adjacent homeowners will overshadow the marginal benefit Woodbridge High School would achieve from being able to use the sports field later in the evening. During the DEIR presentation, I had to suppress a chuckle when one of the bullet points of the new lights and speakers was “to give the students a sense of pride in their school.” Upon hearing this I thought to myself, who really believes this line of self-serving hype.

The proposed project most certainly counters Woodbridge Village Association’s mission to preserve, enhance and protect the health, safety, welfare, and quality of life in the Village and the value of the properties.

Response I2-6

This comment has been provided to the District for its consideration as part of the project review and approval process. However, this comment is not a direct comment on the content or adequacy of the Draft EIR and does not raise a specific environmental issue; therefore, no further response is required.

13. Mei Ying Kee, 11/8/2025

Comment I3-1

Dear Kathleen ,

I am a homeowner residing directly across from the Woodbridge High School athletic field, along the fence line on Alton Parkway. I am writing to formally express my strong opposition to the proposed WHS Field Lighting Improvement Project.

Response I3-1

This comment opposes the proposed project but does not raise an environmental issue regarding the adequacy of the Draft EIR. This comment has been provided to the District for its consideration as part of the project review and approval process. However, this is not a direct comment on the content or adequacy of the Draft EIR and does not raise a specific environmental issue; therefore, no further response is required.

Comment I3-2

As residents, we already experience significant and unavoidable noise from Alton Parkway, including constant vehicle traffic, speeding cars, loud motorcycles, and emergency sirens. The addition of amplified sound systems and lighting will further increase noise and light pollution in

2. RESPONSE TO COMMENTS

an already impacted area, directly affecting our quality of life, sleep, and peaceful enjoyment of our homes.

Response I3-2

Please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare, and Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project, including transportation noise, would be less than significant. No changes to the Draft EIR are necessary.

Comment I3-3

I am deeply concerned about the following issues:

1. Noise Impact – Permanent loudspeakers will project sound directly toward homes. Sports games, practices, announcements, and events will create disruptive noise not just occasionally, but repeatedly — potentially multiple days per week, including evenings and weekends.

Response I3-3

Please see Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would be less than significant. No changes to the Draft EIR are necessary.

Comment I3-4

2. Light Pollution – The 70 feet high lights are intrusive, especially at night. Even with shielding, the brightness will spill into homes, backyards, and bedrooms, affecting sleep, privacy, and overall comfort

Response I3-4

Please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare. No changes to the Draft EIR are necessary.

Comment I3-5

3. Extended Activity Hours – With the addition of lighting, the field may be used later into the night, increasing noise, traffic, and foot activity beyond typical school hours. This could lead to late-night events, cheering crowds, and more disturbances.

2. RESPONSE TO COMMENTS

Response I3-5

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. Installation of a PA system has also been removed from Alternative 2. Please see Topical Response 1, *Light and Glare*, and Topical Response 2, *Noise*, regarding the less than significant impacts to lighting and noise that would result from the proposed project. 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. No changes to the Draft EIR are necessary.

Comment I3-6

4. Property Value Impact – Homes facing large sports fields with lighting and speakers often experience decreased desirability, which could negatively affect property values in our community.

Response I3-6

Please see Topical Response 6, *Non-CEQA Issues*, which describes topics that are not addressed under CEQA. The Draft EIR is intended to disclose potential physical environmental effects, not to address social or economic considerations unless they would result in a physical change to the environment. No further response is warranted and no revisions to the Draft EIR are necessary.

Comment I3-7

5. Lack of Prior Community Consultation – Residents whose homes are directly affected should be given the opportunity to provide feedback before such decisions are approved. Many neighbors were unaware of this project until recently.

Response I3-7

Please see Topical Response 4, *Community Outreach*, which describes the noticing process and distribution of the NOP and NOA. The District provided multiple avenues for public participation and disclosure consistent with CEQA's public review and noticing requirements. Therefore, the CEQA process for this project has been appropriately implemented, and no procedural violations occurred. No revisions to the Draft EIR are necessary.

Comment I3-8

6. Alternative Solutions – If the school needs sound or lighting, there may be alternatives, such as limited-use portable equipment.

Response I3-8

Feasible alternatives to the proposed project were analyzed in Chapter 4, *Alternatives* of the Draft EIR. 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. Installation of a PA system has also been removed from Alternative 2. 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. No changes to the Draft EIR are necessary.

Comment I3-9

We are not opposed to student activities, but we expect IUSD to balance school needs with the rights of neighboring residents to maintain peace, safety, and quality of life. I respectfully request that the IUSD reconsider and properly review this project with full residential input.

Thank you for taking the time reading my concern. I hope our community’s peace and well-being will be prioritized.

Response I3-9

This comment opposes the proposed project but does not raise an environmental issue regarding the adequacy of the Draft EIR. This comment has been provided to the District for its consideration as part of the project review and approval process. However, this comment is not a direct comment on the content or adequacy of the Draft EIR and does not raise a specific environmental issue; therefore, no further response is required.

I4. Stephanie Rutledge, 11/9/2025

Comment I4-1

Sixteen-year Alders resident urges reconsideration of proposed light poles and sound system due to health, noise, and livability impacts.

2. RESPONSE TO COMMENTS

Response I4-1

Please see Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would not be significant for nearby residents. 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. Installation of a PA system has also been removed from Alternative 2. No changes to the Draft EIR are necessary.

Comment I4-2

Dear Ms. Gill,

I am writing to express my strong opposition to the proposed Woodbridge High School Field Lighting Improvement Project. I have lived directly across from Woodbridge High for sixteen years, and while I value the school's role in our community, I have experienced firsthand how much the surrounding environment has changed — and how significantly the existing school activity already affects nearby homes.

Response I4-2

This comment opposes the proposed project but does not raise an environmental issue regarding the adequacy of the Draft EIR. This comment has been provided to the District for its consideration as part of the project review and approval process. However, this comment is not a direct comment on the content or adequacy of the Draft EIR and does not raise a specific environmental issue; therefore, no further response is required.

Comment I4-3

When I moved to this neighborhood in 2009, traffic was light and the school environment was manageable. Over the years, the volume of vehicles, emergency responders, and general street noise has increased dramatically. The soundscape has become constant and intrusive — a far cry from the peaceful community that once existed here.

Response I4-3

This comment discusses the existing conditions surrounding Woodbridge High School. This comment has been provided to the District for its consideration as part of the project review and approval process. However, this comment is not a direct comment on the content or adequacy of the Draft EIR and does not raise a specific environmental issue; therefore, no further response is required.

2. RESPONSE TO COMMENTS

Comment I4-4

The school's daily operations already generate substantial noise. The passing bells, frequent fire alarm tests, and early morning marching band rehearsals — which now begin around 7:30 a.m. — are clearly audible inside my home, even with windows closed. The band director uses a megaphone or portable PA system that carries across the street, and these activities now occur nearly year-round, including summer sessions.

Adding four 70-foot light poles and a permanent loudspeaker system would significantly worsen this environment. Residents facing the school, including myself, would experience bright light intrusion late into the evening and amplified sound that would carry through the neighborhood. The school sign already produces a noticeable nighttime glow; it's difficult to imagine the impact of stadium-level lighting and pole-mounted speakers on visibility, sleep, and overall health.

Scientific studies consistently link chronic noise and nighttime light exposure to anxiety, sleep disruption, cardiovascular stress, and other health risks. These effects are especially severe for residents with sensory sensitivities, children with special needs, or those managing conditions such as PTSD or anxiety.

Response I4-4

Please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare, and Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would not be significant for nearby residents. No revisions to the Draft EIR are necessary.

Comment I4-5

I am copying the IUSD Board of Education on this message to ensure that the voices of residents living directly across from the school are heard and included in the record before any decisions are finalized. This project would fundamentally alter the livability of our neighborhood and diminish the quality of life for hundreds of families.

Response I4-5

This comment does not raise an environmental issue regarding the adequacy of the Draft EIR. This comment has been provided to the District for its consideration as part of the project review and approval process. All public comments received during the review period are part of the administrative record and has been considered by the District's decision-makers prior to taking action on the project. However, this comment is not a direct comment on the content or

2. RESPONSE TO COMMENTS

adequacy of the Draft EIR and does not raise a specific environmental issue; therefore, no further response is required.

Comment I4-6

I respectfully urge the District and the Board to reconsider this proposal and explore less intrusive alternatives that preserve both student opportunity and residential well-being.

Thank you for your time and for taking these community concerns seriously.

Sincerely,

Stephanie Rutledge

Resident of the Alders Community

Irvine, CA 92614

P.S. Please confirm that this message will be included in the official public record of comments for the Woodbridge High School Lighting Improvement Project prior to the November 12 deadline.

Response I4-6

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. Installation of a PA system has also been removed from Alternative 2.

All public comments received during the review period are part of the administrative record and have been considered by the District's decision-makers prior to taking action on the project. No further response is required, and no revisions to the Draft EIR are necessary.

15. Mojtaba Torkjazi, 11/9/2025

Comment I5-1

I am writing to object to the proposed installation of field lights and PA systems at Woodbridge High School, as outlined in your Draft Environmental Impact Report (DEIR). As an Alders community resident, I believe this project will negatively impact Woodbridge Village residents' quality of life. The DEIR's assessment of impacts on Land Use, Aesthetics, Noise, and Population and Housing is understated and inaccurate.

2. RESPONSE TO COMMENTS

The proposal will introduce significant and unacceptable pollution into our quiet residential neighborhood:

Response I5-1

Please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare, and Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would not be significant for nearby residents. Impacts to Land Use and Population and Housing were discussed in Chapter 5, *Other CEQA Considerations* of the Draft EIR. The project site is within an established and operating high school campus, and the proposed project would not alter or conflict with the existing uses of the campus. Thus, impacts to Land Use were determined to be less than significant. No impacts related to population growth would occur; all proposed improvements would occur within the campus boundaries and therefore would not displace any housing. Thus, impacts to Population and Housing were determined to be less than significant. No revisions to the Draft EIR are necessary.

Comment I5-2

* **Noise Pollution:** Installing loud speakers for continuous announcements of practices, games, band events, and other events will disrupt the neighborhood's peace. The DEIR's classification of this impact as "less than significant" is inaccurate; this noise will be audible throughout the Alders community and other parts of Woodbridge Village.

Response I5-2

Please see Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would be less than significant. No revisions to the Draft EIR are necessary.

Comment I5-3

* **Light Pollution:** Powerful floodlights at night are excessive and constitute a significant negative aesthetic impact. This constant illumination will degrade the night sky, interfere with residents' quality of life, and negatively affect the sleep cycles of humans and local wildlife.

Response I5-3

Please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare. No revisions to the Draft EIR are necessary.

2. RESPONSE TO COMMENTS

Comment I5-4

* **Biological Impact:** The increased light and noise pollution will detrimentally affect the local ecology, disturbing birds, nocturnal animals, and domestic pets.

Response I5-4

The Draft EIR confirmed that Woodbridge High School is not located within a biologically sensitive area or a migratory corridor (see Chapter 5), ensuring the proposed project will not impact wildlife or sensitive species. Additionally, the California Department of Fish and Game Region 5 and the California Department of Conservation received copies of the NOP and NOA and were invited to provide comments. Neither agency elected to provide any comments. The information provided meets all CEQA requirements, and no further analysis or changes to the Draft EIR are necessary.

Comment I5-5

Introducing institutional-level lighting and amplification systems represents a negative change in land use character, shifting it from a neighborhood amenity to a high-impact athletic venue. This will adversely affect the surrounding population and housing.

I ask you to reconsider and reject the installation of the field lights and loudspeakers.

Response I5-5

The proposed project is not a stadium project, as it does not include bleachers or any increase in student, staff, or visitor capacity. Events held at the project site would consist of athletic practices and activities, such as soccer and lacrosse. Football practices will be held at Woodbridge HS, but Varsity tackle football games would continue to be hosted at University High School.

See Topical Response 1, *Light and Glare*, and Topical Response 2, *Noise*. 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. Installation of a PA system has also been removed from Alternative 2. 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. No revisions to the Draft EIR are necessary.

16. Christine Shih, 11/9/2025

Comment I6-1

Hi Kathleen

I am a resident of Alders community in Woodbridge for ten years. I am concerned on the effects putting four 70 ft lighting pole and PA systems. We can already hear the sport games along with band practice every fall season and I'm afraid by putting these new systems it'll affect the comfort of our homes even more. More sporting events will cause dramatic parking concerns in our neighborhood and the having these bright lights with loud speakers late into the hours will impact our typical quiet neighborhood. We can already hear events into dinner hours without the speakers. Please find alternative solutions and reconsider the proposal.

Response I6-1

Please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare; Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would be less than significant; and Topical Response 6, *Non-CEQA Issues*, which describes how and parking is not an environmental topic to be addressed under CEQA.

In response to public comments received during the Draft EIR review 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. Installation of a PA system has also been removed from Alternative 2. 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. This comment has been provided to the District for its consideration as part of the project review and approval process.

17. Karen Davis, 11/10/2025

Comment I7-1

Please see the attached Letter of Opposition to the Woodbridge High School Field Lighting Improvement Project.

Thank you for your consideration.

2. RESPONSE TO COMMENTS

Response I7-1

This is an introductory comment and does not raise an environmental issue regarding the adequacy of the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

Comment I7-2

Dear Ms. Gil:

I am an owner and resident of a condominium in the Alders HOA, which is located within the Woodbridge Village Master Association. I am also the Alders HOA Board President, having served on this Board of Directors for the past 19 years. My family has lived in the Alders since 1992, and I have been a resident of Woodbridge Village Association since its inception in 1976.

I join with my other Alders Board Members in expressing our opposition to the proposed field lighting project at Woodbridge High School. As our HOA Board represents the community at large and the residents and off-site owners, we feel it is our responsibility to formally notify you and the members of the IUSD of our opposition to this project.

Response I7-2

This comment introduces the commenter and states opposition to the proposed project. This comment does not raise an environmental issue regarding the adequacy of the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

Comment I7-3

Not only do we feel that required notices were not forthcoming in a timely manner, but also that the proposed project was not brought to the full attention of the neighborhood and the community. As an example, it is my understanding that notification was not made to the Executive Director of Woodbridge Village Association (WVA), until it was brought to his attention by a member of the Alders community. Normally, the WVA Board of Directors and Executive Director would be notified of government projects within and related to Woodbridge Village, which is home to 9,500 residential units. This lack of notification hardly allows time to disseminate information to the community, to discuss it at a WVA Board of Directors meeting and for the Board of Directors to potentially take a stand on this proposed project.

2. RESPONSE TO COMMENTS

Response I7-3

Please see Topical Response 4, *Community Outreach*, which describes the noticing process and distribution of the NOP and NOA. The District provided multiple avenues for public participation and disclosure consistent with CEQA's public review and noticing requirements. As such, the CEQA process for this project has been appropriately implemented, and no procedural violations occurred.

Comment I7-4

Along with my fellow Alders Board Members, I am requesting that this proposed lighting and loudspeaker project at Woodbridge High School be withdrawn from consideration, but at the very least, I believe that there are ample reasons to extend the time period for public review and comments to DEIR, and I am requesting that the IUSD Board of Directors, and I am requesting that you, as Facilities Planner, provide a recommendation to the IUSD Board of Directors to vote on such an extension. This will allow more members of the community to voice their opinions and concerns, due to the fact that this proposed project will undoubtedly affect them, either personally through excessive noise, lights, and traffic as they try to pursue the "quiet enjoyment" of their homes (as stated in the CC&R documents of our community, or through the impact that such a project may have on the values of neighboring homes.

Thank you for your consideration.

Response I7-4

The comment requests an extension of the public review period for the Draft EIR. The Draft EIR was circulated for public review in compliance with CEQA and the State CEQA Guidelines. CEQA requires a minimum public review period of 45 days for a Draft EIR, which was provided for this project. CEQA does not require the Lead Agency to extend the Draft EIR public review period beyond the minimum required timeframe. Where the Lead Agency has determined that the Draft EIR provides sufficient information to allow for meaningful public review and comment, an extension of the public review period is not required under CEQA.

In addition, please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare; Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would be less than significant; and Topical Response 3, *Transportation*, which describes how the Draft EIR accurately assesses impacts related to transportation consistent with the CEQA Guidelines. Additionally, please see Topical Response 6, *Non-CEQA Issues*, which describes topics that are not addressed under CEQA. The Draft EIR is intended to disclose potential physical environmental effects, not to address social or economic considerations unless they would

2. RESPONSE TO COMMENTS

result in a physical change to the environment. No further response is warranted and no revisions to the Draft EIR are necessary.

I8. Emmanuel Ventura, 11/11/2025

Comment I8-1

Dear Kathleen,

My name is Emmanuel Ventura, and I am a homeowner in Woodbridge Village very close to Woodbridge High School.

Response I8-1

This is an introductory comment and does not raise an environmental issue regarding the adequacy of the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

Comment I8-2

I would like to express my opposition to the installation of field lights and loudspeakers near my home. I am concerned that this project could significantly impact the peaceful character of our neighborhood and potentially reduce the value of nearby properties.

Response I8-2

Please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare; Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would be less than significant; and Topical Response 3, *Transportation*, which describes how the Draft EIR accurately assesses impacts related to transportation consistent with the CEQA Guidelines. Additionally, please see Topical Response 6, *Non-CEQA Issues*, which describes topics that are not addressed under CEQA. The Draft EIR is intended to disclose potential physical environmental effects, not to address social or economic considerations unless they would result in a physical change to the environment. No further response is warranted and no revisions to the Draft EIR are necessary.

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Comment I8-3

I truly understand the importance of supporting our students and their activities, but I hope the district and community can work together to find an alternative solution that meets the school's needs while preserving the quiet enjoyment of our homes.

Thank you for your time and consideration.

Response I8-3

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. Installation of a PA system has also been removed from Alternative 2. 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. This comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

I9. Kevin Chudy, 11/12/2025

Comment I9-1

Ms. Gil-

Woodbridge Village Association (WVA) recently became aware of a proposal to install field lighting and a future public address system at Woodbridge High School, with the purpose of extending on-campus athletic and other activities into the evening hours. Please be aware that WVA did not receive any formal or informal notification from Irvine Unified School District regarding this proposal. We only learned about it on October 25, 2025 when we were contacted by an affected homeowner, who notified us about the Community Meeting for the presentation of the Draft Environmental Impact Report (DEIR) scheduled for October 27, 2025. I do believe that WVA is entitled to notice, as it owns property nearby the high school and within the apparent 500 foot notice range. Given this lack of notice to WVA, we request that the timeline for comments related to the DEIR be extended to November 30, 2025 to allow WVA an appropriate amount of time to respond to the proposal.

Response I9-1

Please see Topical Response 4, *Community Outreach*, which describes the noticing process and distribution of the NOP and NOA. The District provided multiple avenues for public participation

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and disclosure consistent with CEQA's public review and noticing requirements. As such, the CEQA process for this project has been appropriately implemented, and no procedural violations occurred.

The Draft EIR was circulated for public review in compliance with CEQA and the State CEQA Guidelines. CEQA requires a minimum public review period of 45 days for a Draft EIR, which was provided for this project. CEQA does not require the Lead Agency to extend the Draft EIR public review period beyond the minimum required timeframe. Where the Lead Agency has determined that the Draft EIR provides sufficient information to allow for meaningful public review and comment, an extension of the public review period is not required under CEQA.

Comment I9-2

Another WVA employee and I attended the October 27, 2025 Community Meeting to learn more about the project. At that time we were informed that the deadline to submit comments on this project is November 12, 2025. Our Board of Directors does not meet again until November 19, 2025, and thus has not had an opportunity to review this proposal. We have this matter scheduled for review by our Board of Directors on November 19th. Due to the apparent hard deadline for the submittal of comments, the following comments are being submitted by the WVA staff at this time, and do not necessarily reflect the position of the Board of Directors. We will follow up after November 19th with any comments or clarifications our Board of Directors may have.

Response I9-2

This comment opposes the proposed project but does not raise any specific environmental issues regarding the adequacy of the Draft EIR. This comment has been provided to the District for its consideration as part of the project review and approval process; therefore, no further response is required.

Comment I9-3

WVA staff is concerned about the proposed introduction of field lighting with a potential future public address system. The introduction of lighting and the use of the athletic field into the evening hours, as well as the introduction of a public address system will certainly increase noise during the evening hours for those homeowners whose properties are closely situated to the high school.

Response I9-3

Please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare, and Topical Response 2,

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Noise, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would be less than significant. This comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

Comment I9-4

There also appears to be a lack of information as to how often the field lighting and future public address system will be used, and to what extent the public address system will be used. For example, our understanding is that the athletic field and public address system would be used for non-school activities, but the types and extent of such non-school activities are not defined.

Response I9-4

Please see Topical Response 1, *Light and Glare*, which describes the proposed hours of operation for the proposed project, and Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project. In addition, please see Topical Response 5, *Non-school Events*, which describes the nature and purpose of proposed non-school events. This comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

Comment I9-5

Staff is also concerned about the title included with information distributed to local residents. It appears that at least some of the information that has been distributed by IUSD lacked clear information on the proposed future public address system, and identified the proposed field lighting only in the title. We are concerned that some local residents may not be aware that a public address system is included in this proposal, and thus have not had an opportunity to be aware of and comment on that aspect of the project.

Response I9-5

Please see Topical Response 2, *Noise*, which describes how in response to the comments and concerns of the community, the District has decided to remove the PA system from the proposed project. No revisions to the Draft EIR are necessary.

Comment I9-6

The Draft Environmental Impact Report also states that no comments related to noise were received. However, WVA is aware of at least two Woodbridge residents who previously submitted comments related to potential noise impacts, and we are aware of at least three

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additional Woodbridge residents who have submitted comments related to noise in November 2025. Such comments should be carefully evaluated as part of the review process. There is no doubt that these residents will be impacted.

Thank you in advance for considering our request for an extension to submit formal comments, and for reviewing the staff comments described above.

Response I9-6

The statement in the Draft EIR refers specifically to comments received during the formal NOP scoping period. During this period, which was May 28, 2025 to June 26, 2025, the District received two comment letters from the public in regards to potential noise impacts.

Please see Topical Response 2, *Noise*, which describes how in response to the comments and concerns of the community, the District has decided to remove the PA system from the proposed project. The additional comments referenced by the commenter were received prior to the November 12, 2025 deadline, and have been included in this Final EIR. All comments received during the Draft EIR public review period are being considered as part of the CEQA process and are addressed in the Final EIR, as required by CEQA. No revisions to the Draft EIR are necessary.

I10. Tina Sun, 11/12/2025

Comment I10-1

Hi Kathleengil,

I hope this message finds you well.

I recently learned about the plan to install loudspeakers and field lights near Woodbridge high school, and I want to express my concern as a nearby resident.

Response I10-1

This is an introductory comment and states opposition to the proposed project. This comment does not raise an environmental issue regarding the adequacy of the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

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Comment I10-2

While I understand the intent to enhance student activities, I 'am worried that the increased noise and lighting could significantly disrupt the peace and quiet of our neighborhood, especially during evenings. I kindly ask the district consider alternative solutions that balance the needs of students with the well-being of surrounding residences.

Thank you so much for your time and consideration.

Response I10-1

This comment raises concerns about noise and lighting as a result of the proposed project. Please see Topical Response 1, *Light and Glare*, which describes how the proposed project would result in less than significant impacts regarding light and glare, and Topical Response 2, *Noise*, which describes how the District has decided to remove the PA system from the proposed project, and how operational noise impacts from the proposed project would be less than significant.

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. Installation of a PA system has also been removed from Alternative 2. 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. No further analysis or changes to the Draft EIR are necessary.

2.4.3 Verbal Comments

V1. Robert Coyle, 10/20/2025

Comment V1-1

This comment objects to the proposed project because of the proposed PA system. The comment raises concerns regarding lights and how often they would be turned on as well as the type of non-school events that would occur on the school campus.

Response V1-1

Refer to response I1-2 regarding the removal of the proposed PA system. Table 2-2, *Woodbridge High School Proposed Athletics/Events Schedule*, on page 2-18 of the DEIR, outlines the proposed start and end times for events. The athletics schedule in Table 2-2 has been revised in

2. RESPONSE TO COMMENTS

Chapter 3, *Revisions to the Draft EIR*, of this Final EIR to remove all varsity football home games, which would continue to be held at University High School.

As discusses in the Topical Response 1, *Light and Glare*, the District has selected Alternative 2 for implementation, which requires lights to be turned off past 9:00 pm, rather than the originally proposed 10:00 p.m. Additionally, as required by the Civic Center Act, the facilities would be available to outside user groups to utilize the athletic field lights from dusk to 9:00 pm. This comment does not raise an environmental issue regarding the adequacy of the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment has been provided to the District for its consideration as part of the project review and approval process. No revisions to the Draft EIR are necessary.

3. REVISIONS TO THE DRAFT EIR

3.1 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.

3.2 DRAFT EIR REVISIONS

3.2.1 Revisions to Text in the Draft EIR

Section ES.4, *Summary of the Proposed Project*, page ES-3 to ES-4:

The proposed project would include 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 9:00 p.m. and include new events/uses of the fields during light-operating hours that would include band practice; flag football, Freshman and JV tackle football, lacrosse, and soccer games; and track and field events that are currently 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 ES.5, Summary of Project Alternatives, Section ES.5.2, Restricted Hours Alternative, page ES-4:

Under the Restricted Hours Alternative, the proposed Woodbridge 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 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. This alternative would result in similar impacts as the proposed project related to aesthetics, air quality, greenhouse gas emissions, noise, and transportation. This alternative would meet all of the objectives of the project.

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 1.4, Incorporation by Reference, page 1-4:

Some documents are incorporated by reference into this DEIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the District Office.

- City of Irvine Municipal Code
- City of Irvine General Plan
- City of Irvine Zoning Ordinance

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 2.4.1, General Plan Land Use and Zoning, page 2-9:

The Woodbridge HS campus has a General Plan designation of Institutional-Educational Educational Facility and a zoning designation of 3.1 Multi-Use Multi-Use. According to the City's zoning code, the Woodbridge HS campus is located within Planning Area No. 15 - Woodbridge. The Woodbridge HS campus is not located in any Focus Areas as designated by the 2045 Irvine 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

3. REVISIONS TO THE DRAFT EIR

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 2.4.3, Existing Conditions, page 2-9:

Existing Athletic Facilities

The project site consists of an existing track and field located in the northwest portion of the Woodbridge HS campus that is surrounded by a black chain link fence. The existing field consists of a synthetic turf field that currently used for flag football, Freshman and Junior Varsity (JV) tackle football, soccer, and lacrosse games. The field also includes black netting along the northeastern and southwestern sides of the field and aluminum benches for the athletes on the northwestern and southeastern sides of the field.

The track consists of an all-weather track that surrounds the synthetic turf field, along with track and field equipment. The track and field also includes a scoreboard located in the northern portion of the track and field.

Athletic/Events Schedule

Woodbridge HS hosts various sports events and other school events. The existing sports events include Freshman and JV tackle football, flag football, girls and boys soccer, girls and boys lacrosse, and track and field. The track and field also hosts band events. Table 2-1, *Woodbridge High School Existing Athletics/Events Schedule*, shows the existing schedule for sports events and other school events.

Table 2-1 Woodbridge High School Existing Athletics/Events Schedule

Activity/Use	Anticipated Number of Home Events	Days of Week	Times		Maximum Number of Attendees
			Start	End	
Tackle Football (August to November)					
Freshman Football	5 per year	Tuesday or Wednesday	3:30 pm	6:00 pm	125
Junior Varsity Football	7 per year	Thursday, Friday, or Saturday ¹	3:30 pm	6:30 pm	125
Varsity Football	7 per year	Wednesday or Thursday	2:30 pm	6:00 pm	125

3. REVISIONS TO THE DRAFT EIR

Table 2-1 Woodbridge High School Existing Athletics/Events Schedule

Activity/Use	Anticipated Number of Home Events	Days of Week	Times		Maximum Number of Attendees
			Start	End	
Flag Football (August to November)					
Junior Varsity Flag Football	7 per year	Monday, Tuesday, or Wednesday	4:45 pm	7:45 pm	100
Varsity Flag Football	11 per year	Monday, Tuesday, or Wednesday	2:30 pm	5:00 pm	100
Band (August to November)					
Band	30 per year	Wednesday or Thursday	7:00 am	8:30 am	210
Soccer (November to February)					
Girls Fresh/Soph Soccer	10 per year	Monday, Tuesday, Wednesday, Thursday, or Friday	3:00 pm	5:15 pm	125
Girls Junior Varsity Soccer	10 per year	Monday, Tuesday, Wednesday, Thursday, or Friday	3:00 pm	5:30 pm	125
Girls Varsity Soccer	11 per year	Monday, Tuesday, Wednesday, Thursday, or Friday	2:30 pm	6:00 pm	125
Boys Fresh/Soph Soccer	4 per year	Tuesday or Friday	3:15 pm	5:30 pm	125
Boys Junior Varsity Soccer	7 per year	Tuesday or Friday	3:15 pm	7:00 pm	125
Lacrosse (February to May)					
Girls Junior Varsity Lacrosse	9 per year	Monday, Tuesday, Wednesday, or Thursday	4:30 pm	7:15 pm	100

3. REVISIONS TO THE DRAFT EIR

Table 2-1 Woodbridge High School Existing Athletics/Events Schedule

Activity/Use	Anticipated Number of Home Events	Days of Week	Times		Maximum Number of Attendees
			Start	End	
Girls Varsity Lacrosse	9 per year	Monday, Tuesday, Wednesday, or Thursday	2:30 pm	6:00 pm	100
Boys Junior Varsity Lacrosse	6 per year	Monday, Tuesday, Wednesday, or Thursday	4:45 pm	7:15 pm	100
Boys Varsity Lacrosse	7 per year	Monday, Tuesday, Wednesday, or Thursday	2:30 pm	6:00 pm	100
Track and Field (February to May)					
Track and Field	0 per year	N/A	N/A	N/A	N/A

Source: Irvine Unified School District, 2025.

¹ Saturday Events start at 8:00 a.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 2.6.1, Description of the Project, page 2-12:

The proposed project would consist of the installation of four new athletic field lights around the existing football field ~~and infrastructure to allow for a future Public Address (PA) system~~. The proposed project would also consist of trenching for the installation of an electrical line to provide electricity for the four athletic field lights, and is anticipated to disturb approximately 1,500 square feet. The proposed project would allow for events occurring off-campus to be held on the Woodbridge HS campus. Events would consist of sports games and practices, other school events, and non-school events. The proposed project would not require the demolition of any existing structures, and no new buildings are anticipated to be constructed on the campus. Additionally, the proposed project would not increase the student capacity or enrollment at Woodbridge HS.

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Athletic Field Lights

The proposed project includes the installation of four new athletic field lights located adjacent to the existing track and field. Two light poles with athletic field lights would be located on the northwest border of the track and field and two light poles with athletic field lights would be located on the southeast border of the track and field (see Figure 2-4, Conceptual Site Plan). Each light pole would be approximately 70 feet in height, include ~~9~~¹²-light fixtures, and have a load capacity of 57.52 kilowatts (kW). The athletic field lighting would be directed toward the field and would be used to add lighting for nighttime sporting events, other school events, and non-school events

PA System

~~The proposed project is anticipated to include the infrastructure to allow for a future permanent PA system. The future PA system would consist of four speakers with one speaker attached to each lighting pole. To accommodate the potential system, electrical conduit lines would be installed underneath the track and field to connect to light poles and power the PA system speakers located on each pole. The speakers may be oriented towards the audience in the spectator areas. The speakers would be used during sporting events, other school events, and non-school events.~~

Hardscaping

The proposed project is anticipated to include expansion of hardscaping, which would be limited to the installation of the athletic field light poles and installation of the power distribution equipment and lighting control equipment. The light poles would be installed by setting the athletic field light poles in concrete. A concrete pad would be installed for the area that would include the power distribution equipment and lighting control equipment. Additionally, installation of the conduit lines would result in demolition and then the reinstallation of existing hardscaping. Installation of the conduit lines would not result in an expansion of hardscaping. No other areas would be hardscaped.

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 2.6.2, *Event Scheduling*, page 2-14:

The proposed improvements at Woodbridge HS may be used for sporting events and practices, other school events, and non-school events. The proposed event scheduling is contingent upon District operational needs and may be modified at the District's discretion. Sporting events and practices are anticipated to consist of Freshman and JV tackle football, flag football, girls and

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boys soccer, girl's and boy's lacrosse, track and field, and band. The track and field may also be used for other school events, such as graduation and non-school events. Table 2-2, *Woodbridge High School Proposed Athletics/Events Schedule*, shows the proposed sports activities, days, and times.

Similar to the existing athletics schedule, the tackle football season would begin in August and conclude in November. Varsity tackle football games would continue to be held at University High School. The Freshman tackle football team is projected to include four home games that would be played on Thursdays from 3:30 pm to 6:00 pm and the Junior Varsity tackle football would include seven home games during the season on Thursdays, Fridays, or Saturday nights which would occur from 3:30 pm to 6:30 pm. The proposed Freshman and Junior Varsity tackle football schedules would remain the same as the existing schedule. ~~The Varsity tackle football would include five home games per year on Fridays and game times would range from 3:00 pm to 9:00 pm. The proposed days of the week and number of home games would remain the same as the existing events schedule but the times of games would change from 2:30 pm to 6:00 pm to 3:00 pm to 9:00 pm.~~ Additionally, the maximum number of attendees for the Freshman, and Junior Varsity, ~~and Varsity~~ games is expected to increase from 125 to 225.

Similar to the existing athletics schedule, the flag football season is projected to begin in August and would conclude in November. The Junior Varsity flag football team would play seven home games per year on Mondays, Tuesdays, or Wednesdays, which would start at 4:45 pm and end at 7:45 pm. The proposed events schedule would remain the same as the existing events schedule. The Varsity flag football team would play 11 home games per year on Mondays, Tuesdays, or Wednesdays, which would start at 4:30 pm and end at 6:00 pm. Compared to the existing events schedule, the proposed number of games and days of the week would remain the same, but the times would change from 2:30 pm to 5:00 pm to 4:30 pm to 6:00 pm. Additionally, the maximum number of attendees for the Junior Varsity and Varsity games is expected to increase from 100 to 125~~150~~.

Band practices are anticipated to occur approximately 20 times per year and would occur from 4:30 pm to 7:30 pm on Wednesdays. Band practices utilizing the track and field would start in August and end in November. The band practice schedule would remain the same as the existing schedule and the number of maximum attendees would remain the same.

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 2.6.2, *Event Scheduling*, page 2-18:

The athletic field lights are anticipated to be utilized throughout the year for school events and non-school events from dusk to 9:00 pm similar to the District's other high schools. As required

3. REVISIONS TO THE DRAFT EIR

by the Civic Center Act, the facilities would be available to outside user groups to utilize the athletic field lights from dusk to ~~9~~10:00 pm, which aligns with the City of Irvine hours of operation for the use of public facilities (Municipal Code Section 3-4-127). The hours of operation can be extended via ~~a variance from the City of Irvine and~~ approval by the District Use of Facilities Department. The proposed schedule offers flexibility and may be subject to change. The District would have the authority the use of lights for practices and events based on specific needs; thus, the event schedule may be adjusted for different school and community events.

Table 2-2 Woodbridge High School Proposed Athletics/Events Schedule

Activity/Use	Anticipated Number of Home Events	Days of Week	Times		Maximum Number of Attendees
			Start	End	
Tackle Football (August to November)					
Freshman Football	4 per year	Thursday	3:30 pm	6:00 pm	225
Junior Varsity Football	7 per year	Thursday, Friday, or Saturday ¹	3:30 pm	6:30 pm	225
Varsity Football	5 per year	Friday	3:00 pm	9:00 pm	225
Flag Football (August to November)					
Junior Varsity Flag Football	7 per year	Monday, Tuesday, or Wednesday	4:45 pm	7:45 pm	125 150
Varsity Flag Football	11 per year	Monday, Tuesday, or Wednesday	4:30 pm	6:00 pm	125 150
Band (August to November)					
Band	20 per year	Wednesday	4:30 pm	7:30 pm	210
Soccer (November to February)					
Girls Fresh/Soph Soccer	10 per year	Monday, Tuesday, Wednesday, Thursday, or Friday	3:00 pm	5:15 pm	170
Girls Junior Varsity Soccer	10 per year	Monday, Tuesday, Wednesday, Thursday, or Friday	3:00 pm	5:30 pm	170
Girls Varsity Soccer	11 per year	Monday, Tuesday, Wednesday, Thursday, or Friday	5:00 pm	9:00 pm	170
Boys Fresh/Soph Soccer	4 per year	Tuesday or Friday	3:15 pm	5:30 pm	170
Boys Junior Varsity Soccer	7 per year	Tuesday or Friday	3:15 pm	7:00 pm	170
Boys Varsity Soccer	8 per year	Monday, Tuesday, or Wednesday	5:00 pm	9:00 pm	170

3. REVISIONS TO THE DRAFT EIR

Table 2-2 Woodbridge High School Proposed Athletics/Events Schedule

Activity/Use	Anticipated Number of Home Events	Days of Week	Times		Maximum Number of Attendees
			Start	End	
Lacrosse (February to May)					
Girls Junior Varsity Lacrosse	9 per year	Monday, Tuesday, Wednesday, or Thursday	4:15 pm	7:15 pm	150
Girls Varsity Lacrosse	9 per year	Monday, Tuesday, Wednesday, or Thursday	5:00 pm	7:00 pm	150
Boys Junior Varsity Lacrosse	6 per year	Monday, Tuesday, Wednesday, or Thursday	4:45 pm	7:15 pm	150
Boys Varsity Lacrosse	7 per year	Monday, Tuesday, Wednesday, or Thursday	7:00 pm	9:00 pm	150
Track and Field (February to May)					
Track and Field	4 per year	Thursday	3:00 pm	6:00 pm	<u>350</u> ² 450

¹ Saturday games occur from 10:00 am to 12:15 pm.

² The Event Schedule table has been revised to reflect an updated estimate of the proposed Track and Field event attendance. The air quality, noise, and transportation analyses assumed the original, higher attendance figure of 450 attendees as a conservative modeling basis. With 450 attendees, impacts were determined to be 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.

Chapter 3, Environmental Analysis, page 3-2:

3.3 SCOPING COMMENTS RECEIVED

~~One comment letter was~~ Two comment letters were submitted on June 11, 2025 and June 16, 2025, in opposition to the proposed installation of bright lights and loudspeakers at Woodbridge HS due to the negative impact on their nearby community. The commenters cited existing disturbances such as bright field lights, noise from announcements and marching band

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practices, high schoolers cutting through the neighborhood (leaving trash and occupying parking), increased traffic, sirens, and recent street widening. Additional verbal comments were provided by the same commenter at the Woodbridge HS scoping meeting on June 10, 2025.

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

City of Irvine Zoning Ordinance

Chapter 3-16 (Lighting)

Chapter 3-16 of the City's Zoning Ordinance requires that outdoor lighting 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 Uniform Security Code.

Chapter 3-15 (Landscaping Standards)

This chapter of the Zoning Ordinance outlines the minimum requirements for site landscaping and maintenance. This chapter also outlines the screening and landscaping requirements for parking areas and parking structures.

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 15- Woodbridge.

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 rich 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.~~

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- ~~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.

Section 3.1, *Aesthetics*, Section 3.1.2, *Existing Conditions*, page 3.1-5:

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 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.

Section 3.1, *Aesthetics*, Section 3.1.3, *Standards for Analysis*, page 3.1-6:

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.

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

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.

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

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 Public Resources Code Section 21071, Urbanized Area. The existing vertical elements of the campus that are visible from the residential areas to the south, permanent sidewalk light poles near the tennis courts, scoreboard, trees, fencing, basketball hoops, and school buildings. The proposed project includes the installation of four 70-foot light poles with 912 light fixtures.

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 3.1-29:

Generation of Glare

The design elements for glare control include mounting height, visors and shielding, aim, and reflective housing around the lamp. The project would also use 900W fixtures, resulting in maximum spill control. As part of the proposed project, the lighting engineer would ensure that the lights are properly adjusted and maintained so that glare would not impact the surrounding community (see Figures 3-1.2 through 3.1-7). Additionally, the highest measured light level at 150 feet from the field remains at or below 0.1 fc, and the nearest residential property line to the south of the project site is located beyond the 150-foot boundary line. The proposed project would not cause any measurable increase in lighting at nearby residential properties. In general, all school activities are scheduled to end by 9:00 p.m., and community use would end by ~~9:10:00~~ 9:00 p.m. The project would not result in a substantial new source of glare that would affect nighttime views in the area. 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.

Section 3.1, *Aesthetics*, page 3.1-30:

Development of the proposed project and related projects have the potential result in aesthetic impacts and generate light spill. However, similar to the proposed project, each related project would be expected to prepare a site-specific analysis of impacts, implement mitigation measures if needed, and comply with applicable regulatory compliance measures. The proposed project would not result in significant impacts related to nighttime light spill to ~~the any adjacent~~ any adjacent properties ~~immediately to the north or to the west~~. Therefore, the project's contribution to cumulative nighttime lighting impacts would be less than cumulatively considerable, and the project's impacts would be 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.

Section 3.2, *Air Quality*, Section 3.2.4, *Standards for Analysis*, page 3.2-30:

As ~~identified~~ stated in Section 2.6.1, Description of the Project, the proposed project would entail the installation of four athletic field lights around the existing football field, and utility ~~trenching for the electrical lines, and infrastructure to allow for a future Public Address (PA)~~

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system. The proposed project would allow for events occurring off-campus to be held on the Woodbridge HS campus and would not impact student or staff capacity at Woodbridge HS.

The new field lighting would allow for evening uses for various nighttime events and increase the maximum number of attendees (refer to Table 2-2, *Woodbridge High School Proposed Athletics/Events Schedule*). The anticipated increase in attendance for games and new home track and field events would result in 120 average daily vehicle trips (100 additional attendees) and 540 peak daily vehicle trips (~~350~~¹450 additional attendees) (Appendix F). As a result, the proposed project would generate a slight increase in new vehicle trips, water demand and solid waste generation compared to existing conditions. The athletic field lights are anticipated to be utilized throughout the year for school events and non-school events from dusk to 9:00 pm similar to the District's other high schools.

¹ The Event Schedule table has been revised to reflect an updated estimate of the proposed Track and Field event attendance. The air quality analysis assumed the original, higher attendance figure of 450 attendees as a conservative modeling basis. With 450 attendees, air quality impacts were determined to be 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.

Section 3.2, Air Quality, Section 3.2.4, Project Impact Analysis, page 3.2-32:

The proposed project would entail the renovation of the existing track and field with the addition of field lighting ~~and infrastructure for a future PA system~~ to accommodate Woodbridge 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.

Section 3.2, Air Quality, Section 3.2.4, Project Impact Analysis, page 3.2-34:

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Buildout of the proposed project would generate an increase in criteria air pollutant emissions mainly from transportation (i.e., vehicle trips). As mentioned previously, the anticipated increase in attendance for games and new four home track and field events would result in 120 average daily vehicle trips (100 additional attendees) and 540 peak daily vehicle trips (~~350~~⁴⁵⁰ additional attendees) (refer to Appendix F). However, these peak day events would not occur often, and the majority of these sports team practices/games are already generating vehicle trips to the site.

¹ The Event Schedule table has been revised to reflect an updated estimate of the proposed Track and Field event attendance. The air quality analysis assumed the original, higher attendance figure of 450 attendees as a conservative modeling basis. With 450 attendees, air quality impacts were determined to be 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.

Section 3.2, Air Quality, Section 3.2.4, Project Impact Analysis, page 3.2-37:

Operation of the proposed project would not generate substantial emissions from on-site 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 on-site and would require a permit from South Coast AQMD. The proposed project would entail the renovation of the existing track and field with the addition of field lighting ~~and infrastructure for a future PA system~~, so it does not fall within these categories of uses. Localized air quality impacts related to operation-related emissions would be **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.

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

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.

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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 3.5, Hazards and Hazardous Materials, Section 3.5.1, Regulatory Framework, page 3.5-12:

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.

Each local agency having jurisdiction over any area within the planning areas is required to submit its general plans for that area to the Commission for a determination in accordance with the Government Code for the State of California, Section 65302.3 and Public Utilities Code Section 21676. The submittals should highlight those areas which address the AELUP noise impact, safety compatibility, and height restriction zones. The only requirement is that the submittals illustrate how local agencies will incorporate the performance standards outlined in the airport land use plan into their planning, zoning, and development processes. Any amendments to a General Plan must be submitted to the Commission for a determination prior to its adoption by the local agency.

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 3.5, Hazards and Hazardous Materials, Section 3.5.2, Existing Conditions, page 3.5-15:

ON-SITE AND ADJACENT USES

The project site is within the Woodbridge High School (Woodbridge HS) campus. The proposed project would be developed within approximately 4.96 acres of the northwestern portion of the existing 22.1-acre high school campus. The Woodbridge HS campus has a General Plan designation of Institutional-Educational Facility and a zoning designation of 3.1 Multi-Use (Irvine

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2023, 2014). The Woodbridge HS campus is surrounded by commercial and recreational uses to the north; commercial, residential, and recreational uses to the east; institutional, residential, and recreational uses to the south; and residential uses to the west.

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 3.5, Hazards and Hazardous Materials, Section 3.5.4, Project Impact Analysis, page 3.5-20:

The proposed project would consist of the installation of a new stadium lighting system along the perimeter of the existing track and field, ~~infrastructure to allow for a future public address (PA) system,~~ utility trenching, and hardscaping.

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 3.5, Hazards and Hazardous Materials, Section 3.5.4, Project Impact Analysis, page 3.5-21:

The project site is located on the western portion of Woodbridge HS. The proposed project would consist of the installation of a new stadium lighting system located along the perimeter of the existing track and field, ~~infrastructure to allow for a future PA system,~~ utility trenching, and hardscaping. As such, the project site is approximately 0.25 miles southwest of the LePort Montessori Irvine Mandarin located at 3935 Alton Parkway. As discussed in Section 3.5(a), construction and operation of the proposed project would handle small amounts of hazardous materials typical of school uses. The use, transportation, and storage of hazardous materials would be required to comply to all applicable federal and state regulations that would ensure the proper handling of such materials. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste that could impact an existing or proposed school site within a 0.25-mile radius of the proposed project. Therefore, impacts would be 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 3.5, Hazards and Hazardous Materials, Section 3.5.4, Project Impact Analysis, page 3.5-23:

The proposed project would consist of installing a new stadium lighting system on the perimeter of the existing track and field, ~~infrastructure to allow for a future PA system,~~ and hardscaping. The proposed project would not alter the existing circulation or access on-site. Construction-related vehicles and materials would be properly stored on-site so as not to block vehicle circulation or access onto the project site, and no vehicles or materials would be stored on public rights-of-way. The proposed project would comply with applicable CBC design and safety standards and regulations. The Division of State Architect (DSA) would review the project plans to ensure adequate emergency access and circulation during operation. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be **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.

Section 3.5, Hazards and Hazardous Materials, Section 3.5.4, Project Impact Analysis, page 3.5-24:

The proposed project would consist of installing a new stadium lighting system along the perimeter of the existing track and field, ~~infrastructure to allow for a future PA system,~~ utility trenching, and hardscaping. The proposed project would allow for existing uses at the track and field to extend into evening hours and would not expose any people or structures to significant wildfire risk. The proposed project would comply with applicable CBC and Fire Code requirements. The DSA would review the project plans to ensure compliance with safety standards and to verify adequate emergency access and circulation during operations. Therefore, the proposed project would not result in a significant risk of loss, injury, or death related to wildland fires, and impacts would be **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 3.6, Hydrology and Water Quality, Section 3.6.1, Regulatory Framework, page 3.6-7 to 3.6-8:

Safety Element

Goal 3: Anticipate the risks and mitigate the effects that flood hazards pose to the community.

- **Policy S-3(a).** Work with Orange County Flood Control District to ensure flood control facilities are adequately provided and maintained.
- **Policy S-3(g).** Ensure resilience and long-term functionality of stormwater and sewer systems.
- **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.

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

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.

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

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.

Section 3.6, Hydrology and Water Quality, Section 3.6.4, Project Impact Analysis, page 3.6-17:

As described in Section 3.6.4(c)(i), the proposed project would not substantially alter the existing drainage pattern of the project site or the surrounding area. The proposed project would result in the installation of four new stadium lights located adjacent to the existing track ~~and field and infrastructure to allow for a future Public Address (PA) system.~~ The expansion of hardscaping would be limited to the installation of the stadium light poles and installation of the power distribution equipment and lighting control equipment on a concrete pad. The proposed project would result in a minor increase of impervious surfaces onsite. Stormwater from the proposed project would flow to on-site stormwater facilities and to stormwater drainage system in the public right of way similar to existing conditions. Therefore, the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

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, page 3.7-1:

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the Woodbridge Northwood High School Field and Lighting Improvements Project (proposed project) to result in noise impacts in the noise environment in the local vicinity. Specifically, this section summarizes relevant federal, State and local noise guidelines, policies, and standards; reviews noise levels at existing receptor locations, and evaluates potential noise impacts. This evaluation uses procedures and methodologies specified by the Federal Transit Administration (FTA). The analysis in this section is based in part on the noise modeling data included in Appendix E of this DEIR.

~~No comments~~ Two comments related to noise were received during the Notice of Preparation public comment period and/or public scoping meeting held for the proposed project. The NOP and comment letters are included as Appendix A of this document.

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 3.7, Noise, page 3.7-11:

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 to or pickups from any such properties shall occur outside of these hours.~~

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- 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.
- Noise from air conditioning, refrigeration, or heating equipment for residences or other structures, and pumps, filters or heating equipment for pools or reservoirs shall not exceed the higher of the noise standards prescribed in the section above or the five decibels above the ambient noise level.

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 3.7, Noise, Section 3.7.2, Existing Conditions, page 3.7-15:

Short-Term Location 1 (ST-1) was at the western corner of the intersection of Alton Parkway and West Yale Loop, approximately 157 feet (ft) south of the Mark Daily Athletic Field marquee, 236 ft west of the ~~Woodbridge Northwood~~ Woodbridge HS campus marquee, and approximately 755 ft from the campus track and field scoreboard. A 15-minute noise measurement began at 5:29 p.m. The noise environment is characterized by heavy, frequent traffic at the Alton Parkway and W Yale Loop intersection. Additionally, recreational activities at the Mark Daily Athletic Field and sports practice activities at the campus were audible at this short-term location. Noise levels measured 63.8 dBA Leq and 77.6 dBA Lmax during the measurement period.

Table 3.7-6 Short-Term Noise Measurements Summary in A-weighted Sound Levels

Monitoring Location	Description	15-Minute Noise Level, dBA						
		Leq	Lmax	Lmin	L50	L25	L8	L2
ST-1	At the southwest corner of Alton Parkway and W Yale Loop, approximately 755 feet from the campus track and field scoreboard. 2/20/25, 5:29 PM	63.8	77.6	51.2	60.1	64.3	68.1	71.7
ST-2	Within a residential neighborhood between 31 and 33 Sweet Rain, approximately 328 feet southeast of the Woodbridge HS track and field. 2/20/25, 6:08 PM	55.7	68.6	45.0	54.4	57.0	58.7	60.7

Source: Appendix E.

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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 3.7, Noise, Section 3.7.4, Project Impact Analysis, page 3.7-23:

Athletic Field Noise

The athletic field lights are anticipated to be utilized throughout the year for school events and non-school events from dusk to 9:00 p.m. similar to other high schools within the District. As required by the Civic Center Act, the facilities would be available to outside user groups to utilize the athletic facilities from dusk to ~~9:10:00~~ 9:00 p.m., which aligns with the City's hours of operation (Municipal Code Section 3-4-127). The hours of operation can be extended via ~~a variance from the City of Irvine and~~ approval by the District Use of Facilities Department. The proposed schedule offers flexibility and may be subject to change. The District would have the authority of the use of lights for practices and events based on specific needs; thus, the event schedule would be adjusted for different school and community events. ~~The proposed project is anticipated to include infrastructure to allow the implementation of a future PA system. The speakers would be oriented toward the audience in the spectator areas. The speakers may be used during sporting events, other school events, and non school events.~~

The ~~future PA system's~~ primary on-site operational noise sources associated with flag football, Freshman and JV tackle football, soccer, lacrosse and track sports events and other school events would include ~~a PA system with speakers mounted on light poles modeled at a height of 20 feet, attendee spectator~~ cheering from southeastern home side and northwestern visitor side bleachers, on-field players, and referee whistle blasts ~~for football games~~. A track and field event would have a maximum capacity of up to ~~350~~⁴⁵⁰ ~~attendees~~ spectators. ~~A football event would have a maximum capacity of up to 225 spectators.~~ The nearest residential uses are to the south of the track and field across Alton Parkway. Sports events and other school events are temporary, periodic (not daily) events that occur throughout the school year Monday through Friday during regular campus operating hours (3:00 pm to 9:00 pm, see Table 2-2). Attendee Spectator capacity would range from 150 ~~participants~~ to up to ~~350~~⁴⁵⁰ ~~attendees~~ participants. Existing sports events and other school events at the track and field range from 100 to 210 ~~attendees~~ participants. Band activities would remain the same.

Four new field lights (light fixtures and poles) ~~with infrastructure to allow for a future PA system~~ would be installed at the existing track and field on campus as part of the proposed project. The proposed project's operational scenarios were modeled using SoundPLAN computer software. SoundPLAN uses industry-accepted propagation algorithms based on International Organization for Standardization (ISO) and ÖAL-28 standards for outdoor sound propagation. The modeling calculations account for classical sound wave divergence (spherical spreading loss with

3. REVISIONS TO THE DRAFT EIR

adjustments for source directivity from point sources) plus attenuation factors due to air absorption and ground effects. Additionally, SoundPLAN provides for other correction factors, including level increases due to reflections, source directivity, and source tonality.

The most conservative scenarios modeled included existing and future conditions for ~~both football games and track and field events~~, as these events would have the most ~~spectator attendees and PA system activity~~. Additionally, the proposed project does not include the addition of a PA system, and varsity tackle football games would continue to be held at University High School. See Appendix E for modeling results. SoundPLAN noise modeling estimated noise levels at the receptor locations, representing the nearest residential receptors to the project site.

¹ The Event Schedule table has been revised to reflect an updated estimate of the proposed Track and Field event attendance. The noise analysis assumed the original, higher attendance figure of 450 attendees as a conservative modeling basis. With 450 attendees, noise impacts were determined to be 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.

Section 3.7, Noise, Section 3.7.4, Project Impact Analysis, page 3.7-24:

The most conservative scenarios modeled included existing and future conditions for both ~~football games and track and field events~~, as these events would have the most ~~spectator attendees and PA system activity~~. See Appendix E for modeling results. SoundPLAN noise modeling estimated noise levels at the receptor locations, representing the nearest residential receptors to the project site. Based on other typical event observations the following additional modeling inputs were assumed to be reasonable:

- Rowdy crowd cheering (Bleachers)¹ was assumed for a cumulative 10 minutes per hour, and each cheer interval to be approximately 10 seconds long.
- Four proposed future speakers, with individual announcement durations of 20 seconds, for a cumulative of 12 minutes per hour.
- 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

Table 3.7-9, SoundPLAN Modeled Noise Levels, dBA Leq, shows ambient noise measurements and modeled operational noise levels associated with the proposed project at noise receptor

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locations R-1 through R-3. Residential receptors are shown in Table 3.7-9 as Receptor R-1, representative of LT-1 at 32 Thunder Trail; R-2, representative of ST-1 at 112 Greenfield; and R-3, representative of ST-2 at 33 Sweet Rain. Modeled SoundPLAN scenario inputs, results, and operational noise contours associated with project track and field and practice field noise on the project site and in the greater community for all scenarios are shown in Appendix E.

Table 3.7-9 SoundPLAN Modeled Noise Levels, dBA Leq

Receptors	Ambient Measurement, dBA Leq	Modeling Scenario, dBA Leq			Increase Over Ambient, dBA ¹	
		Existing Football	Future Football	Future Track and Field	Future Football	Future Track and Field
R-1 - 32 Thunder Trail	62.8	39.2	39.5	42.4	≤>1	≤>1
R-2 - 112 Greenfield	63.8	38.2	38.5	41.5	≤>1	≤>1
R-3 - 33 Sweet Rain	55.7	35.4	35.7	38.4	≤>1	≤>1

Source: SoundPLAN. See Appendix E.

¹ Modeling includes PA system and football game scenarios; however, the project does not include a PA system, and Varsity football games would occur off-site.

As shown in Table 3.7-9, future sports events noise levels range from 35.4 dBA to 42.4 dBA L_{eq} at the nearest noise sensitive receptors to the track and field. Proposed project noise levels attributable to proposed project sports events would be similar to existing noise levels, however, would occur during the evening hours and typically not extending past 9:00 pm. Future sports events at the track and field would result in a negligible, less than 1 dBA increase over ambient noise levels. Table 3.7-9 also shows that future sports events at the track and field would ~~not generate result in~~ noise levels more than 10 dBA ~~above~~ below ambient noise conditions at the nearest noise sensitive receptors. ~~In addition, future sports events at the track and field would also result in a negligible, less than 1 dBA increase over ambient noise levels.~~ Furthermore, Section 6-8-205 of the Municipal Code exempts school bands, school athletic, and school entertainment events, provided said events are conducted on school property or authorized by special City permit from the noise level standards within Section 6-8-204 of the City of Irvine Noise Ordinance. Therefore, this impact would be **less than significant**.

¹ 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 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

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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 3.7, Noise, Section 3.7.4, Project Impact Analysis, page 3.7-25:

As shown in Table 3.7-9, future sports events noise levels range from 35.4 dBA to 42.4 dBA Leq at the nearest noise sensitive receptors to the track and field. Proposed project noise levels attributable to proposed project sports events would be similar to existing noise levels, however, would occur during the evening hours and typically not extending past 9:00 pm. Table 3.7-9 also shows that future sports events at the track and field would result in noise levels more than 10 dBA below ambient noise conditions at the nearest noise sensitive receptors. In addition, future sports events at the track and field would also result in a negligible, less than 1 dBA increase over ambient noise levels. The SoundPLAN modeling includes varsity tackle football games and PA system activity, which are not part of the proposed project. Thus, actual operational noise levels would be lower than those modeled. Furthermore, Section 6-8-205 of the Municipal Code exempts school bands, school athletic, and school entertainment events, provided said events are conducted on school property or authorized by special City permit from the noise level standards within Section 6-8-204 of the City of Irvine Noise Ordinance. Therefore, this impact would be **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.

Section 3.8, Transportation, Section 3.8.4, Project Impact Analysis, page 3.8-9:

The number of additional attendees assumed for the athletics field activities is based on information provided by staff at Irvine Unified School District regarding the existing and anticipated number of attendees. The data indicate that ~~tackle flag~~ tackle flag football would have an increase of ~~50-100~~ attendees, ~~50 for flag football~~, no increase for band, 45 for soccer, and 50 for lacrosse; track and field, which currently does not occur at Woodbridge HS, would have an increase of ~~350-450~~ attendees.

¹ The Event Schedule table has been revised to reflect an updated estimate of the proposed Track and Field event attendance. The transportation analysis assumed the original, higher attendance figure of 450 attendees as a conservative modeling basis. With 450 attendees, transportation impacts were determined to be 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 3.8, *Transportation*, Section 3.8.4, *Project Impact Analysis*, page 3.8-13:

The proposed project would remain consistent with the 2024 SCAG RTP/SCS, Connect SoCal, as no changes to land use, or circulation are proposed. The goals of Connect SoCal are related to housing, transportation technologies, equity, and resilience. The proposed project would install stadium lighting, ~~infrastructure to allow for a future public address (PA) system,~~ and associated equipment. The proposed project would not interfere with the City's ability to continue to provide "complete streets" circulation improvements or Strategies 1,2, and 3 of the SCAG Active Transportation Technical Report. Therefore, the proposed project would not conflict with Connect SoCal. Impacts would be **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.

Section 3.10, *Utilities and Service Systems*, Section 3.10.2, *Existing Conditions*, page 3.10-8:

STORMWATER INFRASTRUCTURE

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.

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 3.10, *Utilities and Service Systems*, Section 3.10.4, *Project Impact Analysis*, page 3.10-12:

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 electrical conduit lines would be installed to power the proposed stadium light poles, ~~and infrastructure to allow for a future public address (PA) system.~~ Although the proposed project would result in a higher electricity demand compared to existing conditions, the increase would be negligible

3. REVISIONS TO THE DRAFT EIR

compared to SCE's capacity. The proposed project would use LED luminaires that are energy efficient and last longer than metal halide or high-pressure sodium lights. Increased electricity use would only occur during evening to nighttime sporting events, which are intermittent. Implementation of the proposed project would not result in major construction related to electrical power facilities that could cause significant environmental impacts. Therefore, impacts would be **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.

Section 4, Alternatives to the Proposed Project, Section 4.5, No Project Alternative, page 4-5:

Under the No Project Alternative, the District would not approve any portion of the proposed project on the Woodbridge HS campus, and none of the mitigation measures identified within this DEIR would be necessary. Under the No Project Alternative, the proposed improvements at Woodbridge HS would not be implemented. The project site on campus would not have permanent lighting ~~nor a PA system~~. The school would continue to operate under its current conditions, and no changes would take place.

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 4, Alternatives to the Proposed Project, Section 4.5, No Project Alternative, page 4-7:

Under this alternative, the campus would continue to operate as a high school campus, but no permanent lighting or PA system would be installed to be used during events. Therefore, operational impacts under the No Project Alternative would be less than the less than significant operational noise impacts of the proposed project. Overall, the No Project Alternative would result in less noise impacts than the proposed project, and construction noise and vibration impacts would be avoided.

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 4.5, No Project Alternative, page 4-7:

UTILITIES AND SERVICE SYSTEMS

No construction or expansion of utilities would occur under this alternative; therefore, no impacts to utilities and service systems would occur. Woodbridge HS would continue utilizing existing utilities serving the campus. Impacts related to the expansion of utilities would be less than the less than significant impacts of the proposed project. Operational uses under this alternative would remain the same, no lighting poles ~~or PA system~~ would be installed. Therefore, increased demand for utilities would not occur, and operational-related impacts under this alternative would be less than the less than significant impacts of the proposed project. Overall, the No Project Alternative would result in less utilities impacts than the proposed project.

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

Under the Restricted Hours Alternative, the proposed Woodbridge 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 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:

Table 4-2 Ability to Meet Proposed Project Objectives

Objective	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Restricted Hours Alternative
a) Provide adequate athletic facilities at Woodbridge HS to accommodate school sport games and school events at the campus.	Yes	No	Yes
b) Provide lighting to allow night use of the track and field to accommodate school-related events and activities.	Yes	No	<u>Yes</u> No
c) Utilize existing space to enhance opportunities for after-school athletic and extracurricular activities.	Yes	No	Yes
d) Enhance sense of community by allowing home games on campus.	Yes	No	<u>Yes</u> No
e) 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.

3.3.1 Revisions to Figures in the Draft EIR

The following Draft EIR figure has been revised after removal of the public address (PA) system from the proposed project in response to comments received during the public review period of the Draft EIR:

Figure 2-4 - Conceptual Site Plan [Revised]

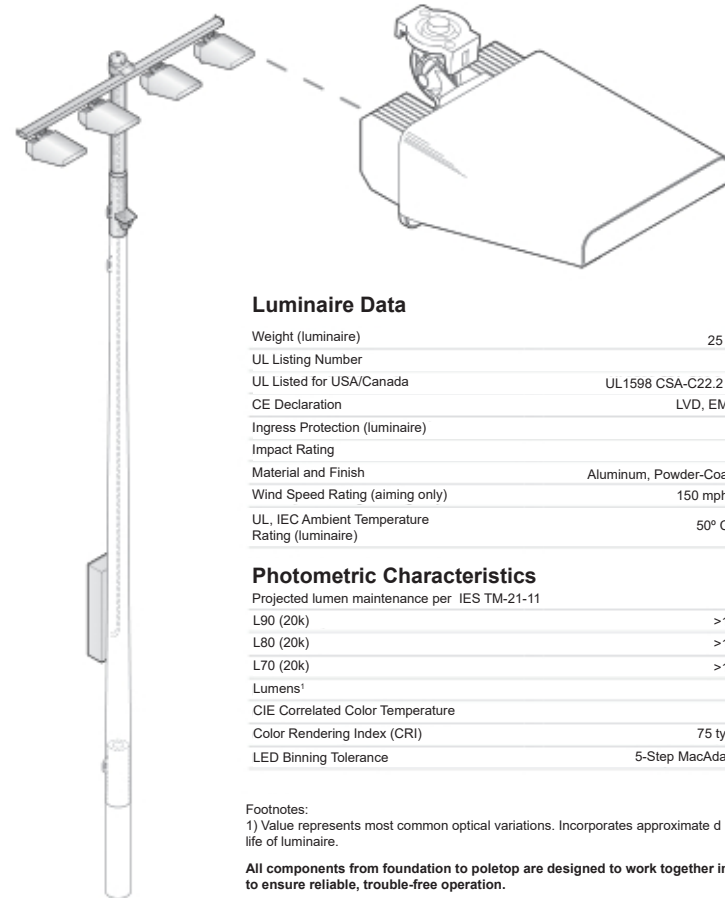
The proposed revision to the figure does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or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

Final EIR Figures and Revised Draft EIR Figures

Figure 1 - Proposed Lighting Fixtures



Datasheet: Light-Structure System™
TLC-LED-550 Luminaire and Driver



Luminaire Data

Weight (luminaire)	25 lb (11 kg)
UL Listing Number	E338094
UL Listed for USA/Canada	UL1598 CSA-C22.2 No 250.0
CE Declaration	LVD, EMC, RoHS
Ingress Protection (luminaire)	IP66
Impact Rating	IK07
Material and Finish	Aluminum, Powder-Coat Painted
Wind Speed Rating (aiming only)	150 mph/(67 m/s)
UL, IEC Ambient Temperature Rating (luminaire)	50° C (122° F)

Photometric Characteristics

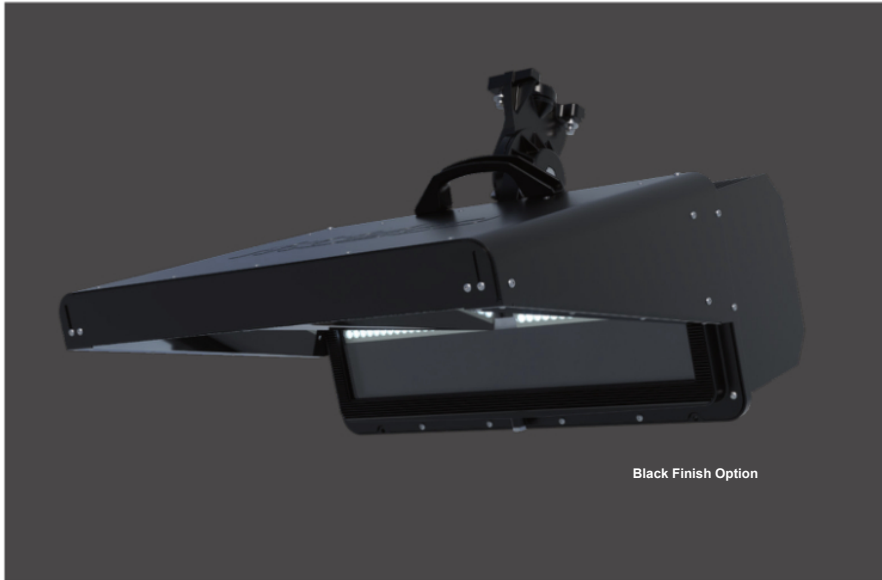
Projected lumen maintenance per IES TM-21-11	
L90 (20k)	>120,000 h
L80 (20k)	>120,000 h
L70 (20k)	>120,000 h
Lumens ¹	67,000
CIE Correlated Color Temperature	5700 K
Color Rendering Index (CRI)	75 typ, 70 min
LED Binning Tolerance	5-Step MacAdam Ellipse

Footnotes:
 1) Value represents most common optical variations. Incorporates approximate dirt depreciation factor for life of luminaire.

All components from foundation to poletop are designed to work together in Light-Structure System™ to ensure reliable, trouble-free operation.

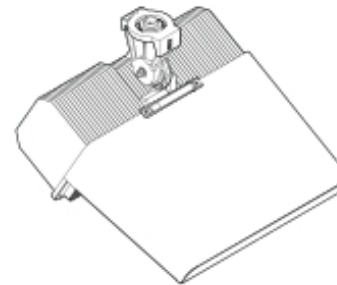
Figure 1 - Proposed Lighting Fixtures

Total Light Control™ - TLC-LED-550 Luminaire



Black Finish Option

Datasheet: TLC-LED-1500 Luminaire and Driver



Luminaire Data

Weight (luminaire)	67 lb (30 kg)
UL Listing Number	E338094
UL Listed for USA/Canada	UL1598 CSA-C22.2 No 250.0
CE Declaration	LVD, EMC, RoHS
Ingress Protection (luminaire)	IP66
Impact Rating	IK07
Material and Finish	Aluminum, Powder-Coat Painted
Wind Speed Rating (aiming only)	150 mph/(67 m/s)
UL, IEC Ambient Temperature Rating (luminaire)	50° C (122° F)

Photometric Characteristics

Projected lumen maintenance per IES TM-21-11	
L90 (20k)	>120,000 h
L80 (20k)	>120,000 h
L70 (20k)	>120,000 h
Lumens ¹	181,000
CIE Correlated Color Temperature	5700 K
Color Rendering Index (CRI)	75 typ, 70 min
LED Binning Tolerance	5-Step MacAdam Ellipse

Footnotes:
 1) Value represents most common optical variations. Incorporates approximate d int depreciation factor for life of luminaire.

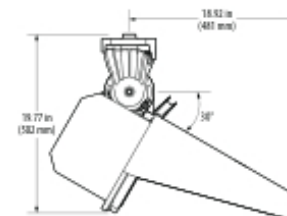
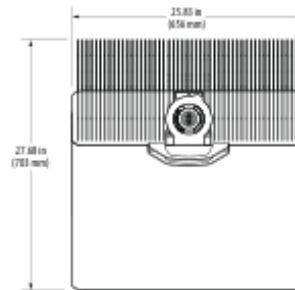


Figure 2 - Proposed Lighting Examples

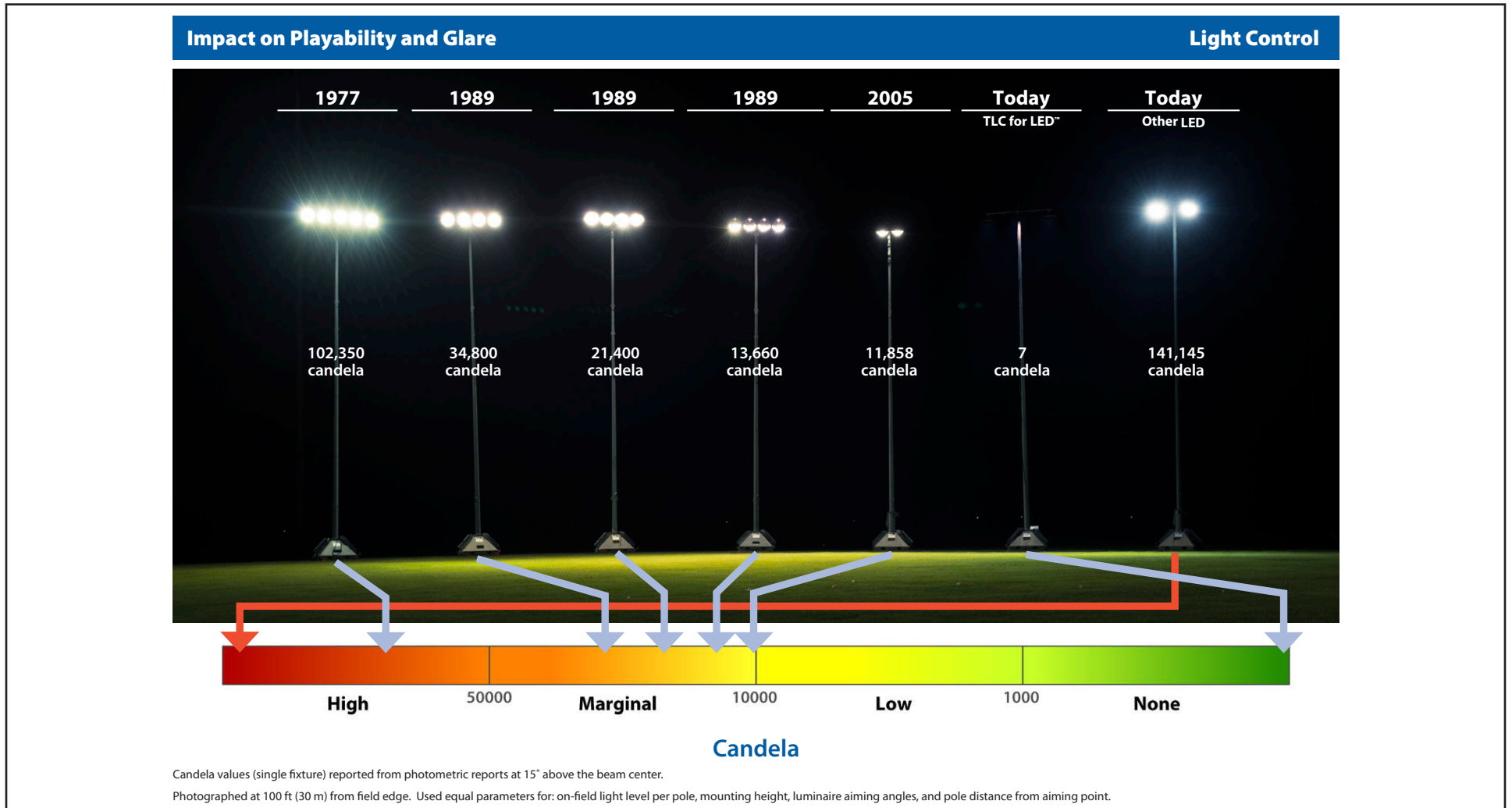


Figure 2 - Proposed Lighting Examples



Figure 2 - Proposed Lighting Examples

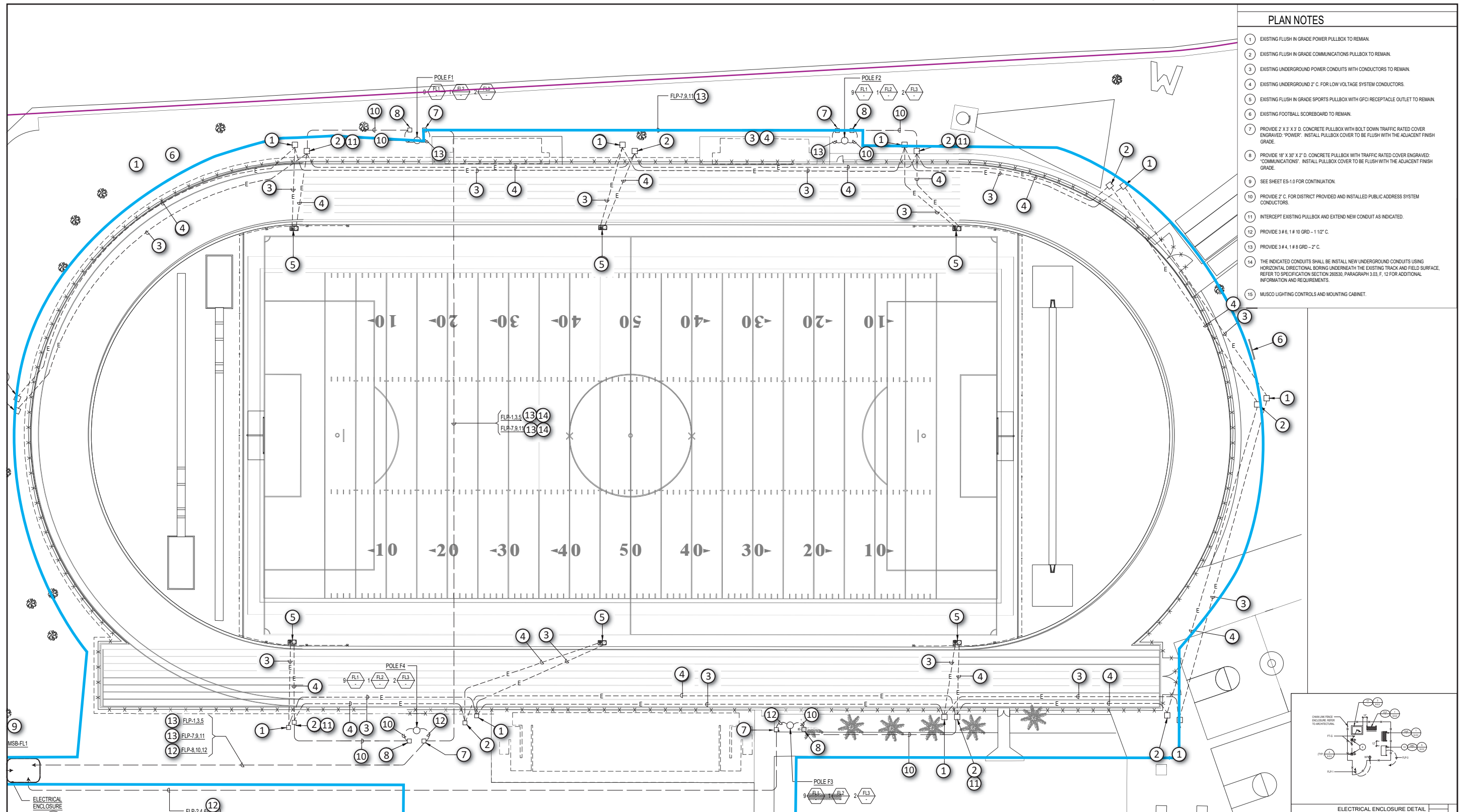


Figure 2 - Proposed Lighting Examples



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Figure 2-4 - Conceptual Site Plan [REVISED]



- PLAN NOTES**
- 1 EXISTING FLUSH IN GRADE POWER PULLBOX TO REMAIN.
 - 2 EXISTING FLUSH IN GRADE COMMUNICATIONS PULLBOX TO REMAIN.
 - 3 EXISTING UNDERGROUND POWER CONDUITS WITH CONDUCTORS TO REMAIN.
 - 4 EXISTING UNDERGROUND 2" C. FOR LOW VOLTAGE SYSTEM CONDUCTORS.
 - 5 EXISTING FLUSH IN GRADE SPORTS PULLBOX WITH GFCI RECEPTACLE OUTLET TO REMAIN.
 - 6 EXISTING FOOTBALL SCOREBOARD TO REMAIN.
 - 7 PROVIDE 2' X 3' X 3' D. CONCRETE PULLBOX WITH BOLT DOWN TRAFFIC RATED COVER ENGRAVED: "POWER". INSTALL PULLBOX COVER TO BE FLUSH WITH THE ADJACENT FINISH GRADE.
 - 8 PROVIDE 18" X 30" X 2" D. CONCRETE PULLBOX WITH TRAFFIC RATED COVER ENGRAVED: "COMMUNICATIONS". INSTALL PULLBOX COVER TO BE FLUSH WITH THE ADJACENT FINISH GRADE.
 - 9 SEE SHEET ES-1.0 FOR CONTINUATION.
 - 10 PROVIDE 2" C. FOR DISTRICT PROVIDED AND INSTALLED PUBLIC ADDRESS SYSTEM CONDUCTORS.
 - 11 INTERCEPT EXISTING PULLBOX AND EXTEND NEW CONDUIT AS INDICATED.
 - 12 PROVIDE 3 # 6, 1 # 10 GRD - 1 1/2" C.
 - 13 PROVIDE 3 # 4, 1 # 8 GRD - 2" C.
 - 14 THE INDICATED CONDUITS SHALL BE INSTALL NEW UNDERGROUND CONDUITS USING HORIZONTAL DIRECTIONAL BORING UNDERNEATH THE EXISTING TRACK AND FIELD SURFACE. REFER TO SPECIFICATION SECTION 280530, PARAGRAPH 3.03, F. 12 FOR ADDITIONAL INFORMATION AND REQUIREMENTS.
 - 15 MUSCO LIGHTING CONTROLS AND MOUNTING CABINET.

Woodbridge High School Campus
 Project Site

Source: Ruhnau Clarke 2025.

0 50
 Scale (Feet)

