

March 15, 2022

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*Anne K. Secker*

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*Christine G. Kemp*

*Timothy J. Baldwin*

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*Anne Frassetto Olsen*

*Sharilyn Payne*

*Heidi A. Quinn*

*Daniel J. Little*

*Jacob Weeks*

*Harry L. Noland  
(1904-1991)*

*Paul M. Hamerly  
(1920-2000)*

*Myron E. Etienne, Jr.  
(1924-2016)*

*Peter T. Hoss  
(1934-2018)*

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**VIA – E-MAIL**  
**tknight@carmelunified.org**

Mr. Ted Knight  
Superintendent  
Carmel Unified School District  
4380 Carmel Valley Road  
Carmel, CA 93923

Re: Proposed Carmel High School Football Lights

Dear Mr. Knight:

I am writing on behalf of Robert Kahn, owner of property in Carmel Views, in opposition to the District's proposal to install football stadium lights at Carmel High School.

This matter should not become a "kids vs landowners" issue. The lighting is a community wide issue that affects many people. Our area residents want resources for the kids, while also being considerate to all stakeholders.

The proposed stadium lights are out of character for the Carmel area, and out of step with the current times where the focus is on a gentler, friendlier, and reduced impact on the environment. Just as the proposed Hatton Canyon Freeway, running behind the High School, was defeated as being far too urban and massive for the area, and just as car pollution, greenhouse gases, and a large carbon foot print are no longer acceptable, the proposed stadium lights face these same unacceptable environmental impacts. Our societal efforts are to heal and support the environment, not destroy it.

Carmel-by-the -Sea, the Santa Lucia Preserve, and Pebble Beach, limit night lighting, in good conscious, to protect the environment. Carmel High School is located

in the middle of a residential area, as well as, along a State Scenic Highway<sup>1</sup>. Just as the nearby residential areas protect their night light, bright stadium lights at Carmel High School have no place in the middle of an established residential area, which values its night sky and scenic natural setting.

The Draft Environmental Impact Report (DEIR) for the proposed project concludes the stadium lights will create a “*Significant and Unavoidable*” aesthetic impact to the community. The clear environmental damage that will occur to the surrounding community, as a result of these lights, cannot be mitigated. Reduced hours do not lessen the lights’ negative destruction of the night light, nor the negative visual impact of the tall light stands whether the lights are on or off.

The draft EIR states, “*The four new lighting poles will result in a total of 44 luminaires with an average kilowatt of 68.82 (74.8 maximum)*”. This means 44 lights with a massive amount of illumination. Erecting 80 foot tall lights is comparable to a developer creating an eight (8) story high-rise building<sup>2</sup> on the property. No one would accept a developer doing this.

The draft EIR states the proposed stadium lights are the only Project under review: “*The Carmel Unified School District (school district) is proposing to install field lighting at the existing Carmel High School stadium. No additional improvements are proposed*”.

Yet, contrary to this statement in the DEIR, the District just passed Resolution 20-22 to provide funding for, not only the High School stadium lighting, but additional High School parking; a High School stadium storage building, replacing the existing pool lights, and adding playing fields to Carmel Middle School to replace sports facilities lost at Carmel High School by converting sports facilities to parking.

Funding projects for which CEQA review has not yet been completed, nor been approved, is premature and a potential waste of taxpayer funds. Moreover, taxpayers, like Mr. Kahn, do not want their tax dollars going to fund environmentally destructive and unsupportable projects.

Are these proposed projects on the list of projects in an adopted Facilities Needs List and Facilities Plan? What are the funding sources for these projects? Are bond funds being used for these projects? Are these projects on the list of projects to be funded by approved bonds? What is the authority for using taxpayer money to fund these projects?

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<sup>1</sup> Highway 1 in this area is a State Scenic Corridor, and within an area of “Visual Sensitivity” under the Greater Monterey Peninsula Area plan of the County’s 2010 General Plan (See GMP Open Space Policy 3.3; Figure 14)

<sup>2</sup> Eight stories calculated based on 12’ ground floor, +9 feet per story, +2.5 roof extension = 75.5 feet tall.

Where is the EIR and CEQA review for these additional projects? What CEQA review was done when the School installed the existing pool lights, (which also create a substantial impact to the night light)? What CEQA review as done for the library demolition and the new Performing Arts Theater? Please forward this information.

The District appears to be piecemealing a host of projects without full CEQA review: additional High School parking, replacing existing pool lights, adding storage buildings, adding new facilities to Carmel Middle School to accommodate facilities lost at Carmel High School by adding new parking, in addition to the new Performing Arts Center, etc.

There are several options that need to be seriously considered, including use of the Middle School where there is much more land and parking available, or covering the field at the High School to contain the light.

The fact that use of the Middle School property, or other options, have not been mentioned or studied (as all options should be on the table) is a unilateral decision to rule out options without study, and divert attention away from viable options, particularly when the Middle School has substantial land resources available.

As you know, there are many stakeholders who have indicated they will pursue any and all legal options to make sure that all stakeholders, the environment, and common courtesy to the surrounding neighbors prevails.

The Kahns have owned their house in Carmel Views for over 45 years. Mr. Kahn attended both Carmel Middle School and Carmel High School and spent many hours on the field playing sports. He has real life “onsite” experience on the Carmel High School field and never felt at loss without lights.

Mr. Kahn loves the area and the High School. He opposes the proposed High School football field lighting as it is out of character for the area, out of step with the times where the focus is on protecting, not destroying, the environmental, as the lights will clearly have a substantial negative impact on the community<sup>3</sup>.

Please forward the CEQA documents prepared for the Performing Arts Center and existing pool lights.

I look forward to timely receiving information regarding the CEQA review for the existing and proposed improvements beyond the stadium lights.

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<sup>3</sup> Figure 5-6 in the draft EIR does not accurately represent the night pollution that will impact the homes in Carmel Views from these lights

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Lastly, please add my name to the list of persons to receive all notices of meetings related to this matter, as well as, the CEQA review and draft Environmental Impact Report which we understand is being redrafted.

Sincerely,

NOLAND, HAMERLY, ETIENNE & HOSS  
A Professional Corporation

*Christine Kemp*

Christine G. Kemp

CGK:kp

cc: District Trustees

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