



May 23, 2013

Ms. Lorrie Lujan-Ruiz, Assistant Director
Facilities Planning
Irvine Unified School District
Facilities Planning Department
14600 Sand Canyon Avenue
Irvine, California 92618

SUBJECT: Notice of Preparation of Supplement to Orange County Great Park Environmental Impact Report (SCH 2002101020) and Initial Study for High School No. 5

Dear Ms. Lujan-Ruiz:

The City of Irvine has reviewed the notice of preparation and initial study pertaining to the above referenced project and has the following comments:

Section 1: Introduction

1. Page 1, Paragraph 1: Correct Project Location as follows: "... in the City of Irvine, Orange County. The project site is on a portion of the former Marine Corps Air Station El Toro (MCAS El Toro), in Planning Area 51, (Orange County Great Park), ~~of the City of Irvine General Plan.~~"
2. Page 1, Paragraph 1: Correct second to last sentence as follows: "Locally, the project site is in Development District 5 of the Great Park Neighborhoods development...."
3. Page 1 and throughout document: To avoid confusion among the various EIR's referenced, the 2011 SEIR for the OC Great Park should be referenced as "2011 OCGP SEIR," rather than simply "2011 SEIR." Remove reference to "2003/2011 EIR", since the 2011 OCGP SEIR incorporated the original 2003 OCGP EIR. In addition, please change the reference to the "Heritage Fields EIR" to "2012 OCGP DSSEIR."
4. Page 3, Paragraph 4: Environmental Setting: Correct final paragraph of this section as follows: "On the east end of the project site, north of Irvine Blvd., the project site is adjacent to an area designated "habitat reserve" which is part of the Orange County Central-Coastal Sub-region Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP)."

5. Page 3, Last Paragraph: Existing Zoning and General Plan: Correct first sentence as follows: "The project site is designated as Planning 51 Orange County Great Park by the City of Irvine General Plan and 8.1 Trails and Transit Oriented Development (TTOD) by the zoning map ordinance."
6. Figure 3: Add Label for Orange County Great Park, as was done for the development districts.

Section 2: Environmental Checklist

7. Page 17: Correct General Plan Designation as follows: "~~Planning 51~~ Orange County Great Park."
8. Page 17, Surrounding Land Uses and Setting: Identify locations south of the Agua Chinon drainage culvert where active agricultural uses are occurring.

Air Quality

9. Page 37: Final Paragraph under Item (f): This section refers generally to composting facilities and landfills. The EIR should note that there is a composting facility (R&S Soils Production) on Irvine Blvd. near the project site and a closed landfill at the future Agua Chinon.

Biological Resources

10. Page 37: This section should reference and discuss the biological mitigation measures included in the OCGP EIR.

Cultural Resources

11. Page 39, Sentence 1 of Item (b): Correct to read as follows: "The 2003/2011 EIR states that the majority of previously documented archaeological resources in the project area are in the portions of Planning Area 51 designated as 1.4 Habitat Preserve in the zoning ordinance, within the FAA site."

Hazards and Hazardous Materials

12. Page 45, Item (P): Correct to read as follows: "The area adjacent to north of the project site is defined as having high risk for wildland fires by the City of Irvine General Plan. The proposed project would increase population and structures adjacent to this high fire risk area. Therefore, this issue will be addressed in the EIR."

Hydrology and Water Quality

13. Page 46, Item (c): Identify further improvements proposed for the Agua Chinon channel in addition to those currently in place.

Land Use and Planning

14. Page 48, Item (b): This section refers to a site designation of golf course in the approved OCGP Plan. This designation was part of the prior Base and Overlay Plans approved for the for the OCGP site in 2003. The 2009 General Plan Amendment and Zone Change for the Amended and Restated Development Agreement removed the Base and Overlay Plan designations, and the 2011 General Plan Amendment and Zone Change for Heritage Fields rezoned the subject property to 8.1 Trails and Transit-Oriented Development, in which a golf course is a conditionally permitted use. References to the Base and Overlay Plans should, therefore, not be included in the EIR analysis, except for historical purposes.

Noise

15. Page 49, Item (a): All short term noise generation shall be subject to the City of Irvine Noise Ordinance for construction.

Transportation/Traffic (Pages 52-53)

16. In order to ensure that traffic impacts are properly considered in a manner consistent with City standards, please submit a traffic analysis scope of work, including an exhibit of the study area to be analyzed, for City staff to review. City staff strongly recommends that the scope of work be consistent with applicable sections of the City's Traffic Impact Analysis Guidelines (adopted August 24, 2004) in order to ensure a consistent analytical approach with other projects in Irvine.
17. Identify whether the recreational facilities such as the aquatics complex, tennis courts, softball/baseball fields, as well as the 2,940-seat stadium and 720-seat performing arts center, will be available for public or non-enrollment population use. If so, include an analysis of these "additional" uses beyond typical school activity. As part of the traffic analysis, itemize and tabulate the trip generation of the 2,600-student high school as well as the trip generation associated with all of the other recreational facilities that may be available for non-enrollment population use.
18. The traffic analysis should analyze interim conditions (2017), long term (2035) and build-out conditions (Post-2035) assuming a baseline condition that includes the 2011 approval of the Great Park Neighborhoods General Plan Amendment and Zone Change and any other recent approvals to date. Also, include an analysis of the potential cumulative impacts that may result from all 'pending' projects including the 2012 Great Park Neighborhoods General Plan Amendment and Zone Change and

any other projects concurrently being reviewed by the City. Please contact City Transportation Planning staff, at 949-724-7360, to obtain the latest 'baseline' and 'pending' versions of the Irvine Transportation Analysis Model (ITAM) to be used for the traffic analysis.

19. The traffic analysis needs to identify any additional traffic controls and roadway geometrics required as a result of the proposed high school and any modified or otherwise altered timing of previously identified traffic controls and roadway geometrics in the vicinity of the proposed school and surrounding Great Park Neighborhoods.
20. As part of the traffic analysis, include an evaluation of the City's Transportation Design Procedures (TDPs) when evaluating site access and circulation. This evaluation shall include the following:
 - a) An analysis of access points to determine if these access points meet current City Standards (i.e., street geometry, turn lane storage, signalization warrants, driveway throat lengths, spacing between intersections) and City Transportation Design Procedures.
 - b) Access points shown for the school site shall align with the adjacent "LQ" and "B" streets. Revise access points to not be offset from these streets as currently depicted on Figure 6, Conceptual Site Plan.
 - c) An analysis of pedestrian and bicycle circulation within the traffic study area.
 - d) The EIR shall stipulate City of Irvine review and approval of transportation-related improvements.
21. As part of the traffic analysis, include a special event analysis inclusive of a parking and traffic management plan for the proposed stadium and any other special event facilities on the high school campus.
22. Page 52, Item (d), The EIR should identify potentially significant impacts due to hazards from the curve of "LQ" Street and intersections on Irvine Blvd., rather than stating "No Impact" in the Initial Study.
23. Page 53: Item (g): Correct first sentence to: "The project site is not within 1,500 feet of a railroad track easement."

Ms. Lorrie Ruiz
May 23, 2013
Page 5

Thank you for the opportunity to review and comment on the proposed document. We would appreciate the opportunity to review any further information regarding this project as the planning process proceeds. If you have any questions, please Barry Curtis, Manager of Planning Services at 949-724-6541 or by email at bcurtis@cityofirvine.org

Sincerely,



Eric M. Tolles
Director of Community Development

cc:

Irvine City Council
Sean Joyce, City Manager
Sharon Landers, Assistant City Manager
Tim Gehrich, Deputy Director of Community Development
Barry Curtis, Manager of Planning Services
Bill Jacobs, Principal Planner
Kerwin Lau, Project Development Administrator
Sun Sun Murillo, Supervising Transportation Analyst
Tom Perez, Senior Civil Engineer



May 30, 2013

Irvine Unified School District
5050 Barranca Parkway
Irvine, CA 92604
Attention: Lorrie Ruiz
lorrieruiz@IUSD.org

RE: Notice of Preparation for IUSD High School #5

Dear Ms. Ruiz,

Laguna Greenbelt, Inc., is a long time grassroots community organization, dedicated to advocating for the preservation of natural lands in Orange County, especially in the coastal canyons near Laguna Beach. The coastal Laguna Greenbelt is now 22,000 acres of wilderness parks and preserves.

Since 2000 we have been advocating for a wildlife corridor across central Orange County to connect the Laguna Greenbelt with the larger protected open spaces of the Cleveland National Forest. This vital connection will facilitate wildlife movement between these two important wildlife reserve areas. For the last three years we have been actively advocating for the Orange County Great Park wildlife corridor. Our comments focus on the proposed site of High School #5, and the potential implications for the completion of the wildlife corridor.

Our specific questions and suggestions regarding the proposed SEIR are set forth below:

1. In the NOP dated April 30, 2013, the document illustrates and discusses a relocated Wildlife Corridor Feature. To our knowledge, this relocated Wildlife Corridor Feature has not been approved by the City of Irvine. This would appear to be inconsistent with approved city land use plans over and above the discussion in Section 3.10(b) of the NOP. The proposed SEIR should address this.
2. The current city of Irvine Wildlife Corridor Plan designates the wildlife corridor and adjacent golf course as 'corridor influence' area. These areas were designed to serve wildlife and allow for unimpeded movement throughout the 'influence area'. Potential impacts on this area should be addressed in the proposed SEIR. The analysis in NOP section 3.4(d) is not correct.

Given that the proposed high school site forecloses certain solutions for wildlife movement, prior to the high school project's approval, the City should have a final wildlife movement plan, including Wildlife Corridor Plan, approved and implementation measures identified.

Wildlife are generally attracted to large grassy areas, such as those located in the proposed athletic field areas of the new high school. Given the future school site's proximity to both the Agua Chinon wildlife area and to the proposed relocated Wildlife Corridor, the proposed EIR

should describe how wildlife might move between these two open space wilderness areas and if any special measures are needed to protect this movement.

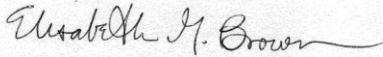
3. The location of the proposed high school is adjacent to Agua Chinon, a federal and state mitigation site for wildlife. How will the proposed high school site affect wildlife in Agua Chinon? For example, how will lighting and noise impacts from the adjacent sport fields impact wildlife in the adjacent Agua Chinon mitigation area? Will these impacts interfere with wildlife in the Agua Chinon area?

Given that the Aqua Chinon is a mitigation site, it will attract wildlife. These wildlife are likely to move between the Great Park and Agua Chinon, and without connection to upper Agua Chinon (northeast side of Irvine Blvd.) will likely wander through neighborhoods searching for habitat and food. The EIR should identify specific strategies to ensure wildlife have movement corridors that route them between habitat areas and not through neighborhoods.

4. Project timing. When will daylighting/excavation of Agua Chinon occur? This will be a major excavation, with the potential for much wind-borne soil entering the high school site. Excavating a stream channel is exactly where one might expect to find spores of coccidioides fungus (Valley Fever). Apparently there was an increase in cases after the Northridge Earthquake (1994). NOP Section 3.3- Air Quality should discuss this issue.

Thank you for the opportunity to provide these comments for this important project. If there are questions, please do not hesitate to contact me.

Sincerely,



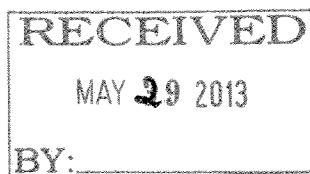
Elisabeth M. Brown, Ph.D., President
Laguna Greenbelt, Inc.
lagunagreenbelt@gmail.com



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov



May 22, 2013

Lorrie Ruiz, Assistant Director of Facilities
Irvine Unified School District
5050 Barranca Parkway
Irvine, CA 92604

Notice of Preparation of a CEQA Document for the Orange County Great Park Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as the recently released CalEEMod. This model is available on the SCAQMD Website at: <http://www.aqmd.gov/ceqa/models.html>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the

recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis”) can be found on the SCAQMD’s CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD’s CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD’s Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board’s Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD’s World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM
ORC130507-01
Control Number



**COUNTY OF ORANGE
HEALTH CARE AGENCY**

**REGULATORY HEALTH SERVICES
ENVIRONMENTAL HEALTH**

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May 16, 2013

Lorrie Ruiz
Assistant Director of Facilities
Irvine Unified School District
5050 Barranca Parkway
Irvine, CA 92604

Subject: Notice of Preparation of Supplement to Orange County Great Park Environmental Impact Report and Initial Study for High School No. 5 (SCH 2002101020), Irvine, CA

Dear Ms. Ruiz,

The Orange County Health Care Agency Environmental Health Division is the Solid Waste Local Enforcement Agency (LEA) for all cities and unincorporated areas of Orange County. Pursuant to Public Resources Code (PRC) Sections 43020, 43021, and 44002, and the California Code of Regulations (CCR), Title 14 and Title 27. It is the intent of the LEA to protect public health, safety, and the environment through the enforcement of State regulations applicable to open and closed solid waste facilities.

The LEA has a concern that the report does not document or evaluate the potential impacts associated with the location of a former landfill (El Toro Site 3) located directly adjacent to the Agua Chinon Arroyo (north of the proposed school). This former landfill is located closer than 1,000 ft. from the proposed school. The Environmental checklist and analysis in the report identify other potential hazardous material sites within 2,000 feet of the proposed school, but fail to discuss the former landfill.

The LEA recommends that the report, EIR and other environmental documents be updated to include the former landfill in the environmental setting and subsequent analysis to mitigate any potential risks associated with the project in regards to the former disposal site. In addition, the LEA is available to participate in future meetings to discuss any issues regarding the former landfill.

Finally, please include me on all future notices regarding this proposed high school.

Lorrie Ruiz
May 9, 2013
Page 2 of 2

If you have any questions, or if we can be of assistance, please do not hesitate to contact me at (714) 433-6270, or James Strozier at (714) 433-6273.

Sincerely,

A handwritten signature in black ink that reads "Kathryn Cross". The signature is written in a cursive, flowing style.

Kathryn Cross
Supervising Hazardous Waste Specialist
Solid Waste Local Enforcement Agency
Environmental Health

cc: Dianne Ohiosumua, CalRecycle (Riverside)