
5. Environmental Analysis

5.4 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates the potential impacts of the proposed High School No. 5 project, as incorporated into the 2011 Approved Project, and the proposed 2012 Modified Project, with respect to potential environmental hazards and exposure to hazardous materials/substances. The evaluation analyzes conditions associated with the Proposed Project, project construction, and project operations. Potential project impacts and standard conditions are discussed, and appropriate mitigation measures are included, as necessary. The analysis in this section is based, in part, upon the following sources:

- *Orange County Great Park EIR*, City of Irvine, May 2003.
- *Orange County Great Park EIR, Addenda 1 through 8*, City of Irvine, May 2006 through October 2011.
- *2011 SEIR to the 2003 Orange County Great Park EIR*, City of Irvine, September 2011.
- *2012 Heritage Fields Project GPA/ZC Second SEIR*, City of Irvine, July 2012.
- *Geologic and Environmental Hazard Assessment Report, Proposed Irvine Unified School District High School – Great Park*, The Planning Center | DC&E, March 2013
- *Pipeline Safety Hazard Assessment, Irvine Unified School District High School #5*, The Planning Center | DC&E, July 2013.

In addition, as described previously, the Site is located on the former Marine Corp Air Station El Toro base, and numerous reports relating to hazards and hazardous materials have been prepared concerning the base, including:

MCAS El Toro Community Reuse Plan FEIR, Volume 2B, County of Orange, August 2001.

Draft Final Environmental Baseline Survey, Former Marine Corps Air Station, El Toro, California, Earth Tech Inc., April 2003.

Final Environmental Baseline Survey, Former Marine Corps Air Station, El Toro, California, Earth Tech Inc., September 2003.

Phase I Environmental Site Assessment. TCA Property, Heritage Fields, Irvine, California, ENGEO Incorporated, October 2011.

Residual Organochlorine Pesticide Soil Sampling Report, Transportation Oriented District, Proposed Heritage Fields Development at the Former Marine Corps Air Station El Toro, City of Irvine, California, Leighton and Associates, Inc., December 2006.

Aerially Deposited Lead Investigation, Transportation Oriented District, Proposed Heritage Fields Development at the Former Marine Corps Air Station El Toro, City of Irvine, California, Leighton and Associates, Inc., December 2006.

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Draft Radiological Release Report, IRP Sites 3 and 5 (including APHO 46), Anomaly Area 3, and Building 244, Former Marine Corps Air Station, El Toro, California, Weston Solutions, Inc., 2004.

Final Record of Decision, Operable Units 2A and 3A, No Action Sites, Marine Corps Air Station El Toro, California, Southwest Division, Naval Facilities Engineering Command, San Diego, California, U.S. Department of the Navy, September 1997b.

Final Record of Decision, Operable Unit 3B, No Action Sites 7 and 14, Marine Corps Air Station, El Toro, California. Southwest Division, Naval Facilities Engineering Command, San Diego, California, U.S. Department of the Navy, June 2001.

Base Realignment and Closure Business Plan for Marine Corps Air Station, El Toro, California. Southwest Division, Naval Facilities Engineering Command, San Diego, California, U.S. Department of the Navy, May 2002a.

Record of Decision for Operable Unit 1, Site 18 – Regional Volatile Organic Compound Groundwater Plume, Operable Unit 2A – VOC Source Area, Former Marine Corps Air Station, El Toro, California U.S. Department of the Navy, June 2002b.

Final Finding of Suitability to Lease for Carve-outs Within Parcels I, II, and III, Former Marine Corps Air Station, El Toro, California, U.S. Department of the Navy, 2004.

Final Finding of Suitability to Transfer (Parcel IV and Portions of Parcels I, II, and III), Former Marine Corps Air Station, El Toro, California, U.S. Department of the Navy, 2004.

Final Finding of Suitability to Transfer #2 (Portions of Parcels II and III), Former Marine Corps Air Station, El Toro, California, U.S. Department of the Navy, 2005.

Final Record of Decision, Operable Units 2A – Site 24, VOC Source Area Vadose Zone, Former Marine Corps Air Station El Toro, California. Southwest Division, Naval Facilities Engineering Command, San Diego, California, U.S. Department of the Navy, April 2006.

Final Record of Decision, Operable Unit 3A, Sites 8, 11, and 12, Marine Corps Air Station, El Toro, California, U.S. Department of the Navy, 2007a.

Final Finding of Suitability to Transfer#3 (Carve-outs I-C and II-U), Former Marine Corps Air Station, El Toro, California, U.S. Department of the Navy, 2008.

Final Finding of Suitability to Transfer #4 for Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D, Former Marine Corps Air Station, El Toro, California, U.S. Department of the Navy, 2009.

Final Finding of Suitability to Transfer #5 for Carve-Outs I-F, I-K, I-N, I-O, I-S, II-E, II-L, II-M, II-R, and Building 746, Former Marine Corps Air Station, El Toro, California, U.S. Department of the Navy, 2010.

Final Finding of Suitability to Transfer #6 for Carve-Outs I-D, I-Q, I-R, II-B, II-K, II-N, II-O, III-B-1, III-B-2, III-E, and III-F, Former Marine Corps Air Station, El Toro, California, U.S. Department of the Navy, 2011.

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Draft Phase I Environmental Site Assessment, Proposed Irvine Unified School District High School – Great Park, The Planning Center | DC&E, December 2012.

Heritage Fields Project GPA/ZC Second SEIR, City of Irvine, July 2012.

1st Year Long-Term Monitoring Report August 2010-July 2100 Operation and Maintenance Operable Unit 2C, Installation Program Sites 3 and 5 Former Maine Corps Air Station El Toro California, Shaw, 2012.

Closure Report – Location of Concern MSC JP-5, JP-5 Pipeline Units MSCJP5-1 and MSCJP5-3, Marine Corps Air Station, El Toro, CA. Dated June 2001, OHM Remedial Services Corporation, 2001.

2011 Annual Long-term Monitoring Report Former JP5 Truck Fueling Area Groundwater Plume Former Marine Corps Air Station El Toro, March, Enviro Compliance Solutions Inc., 2012.

The data used for the analysis in this Section is based on the data used in the Hazards and Hazardous Materials discussions in the 2011 Approved Project as updated and expanded upon by the above references.

5.4.1 Environmental Setting

The Project Site currently consists of agricultural land that that ceased operation with a drainage culvert bisecting the proposed school site in a northeast to southwest direction. Two roads, Marine Way and Perimeter Road, traverse the southwestern portion of the proposed school site. The southern portion of the site is currently being used for agriculture. Two decommissioned jet fuel pipelines traverse the northern portion of the proposed school site that was part of the base jet fuel distribution system. The nearest structure is located off the proposed school site on Desert Storm Road and was a guard shack for the eastern base entrance off of Irvine Boulevard. The current site conditions figure shows existing features of the proposed school site and the immediate vicinity (Figure 5.4-1, *Current Site Conditions*).

Hazardous Materials and Wastes

An Environmental Baseline Survey (“EBS”) for MCAS was prepared in support of the base closure in 1995 in compliance with the provisions of the Community Environmental Response Facilitation Act (“CEFRA”). CERFA amends Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (“CERCLA”), and was enacted to facilitate the rapid return of uncontaminated properties to local communities during the BRAC process. The majority of the Project Site is located in Navy Sale Parcel I and was found suitable to transfer as part of the Finding of Suitability to Transfer (“FOST”) #1 in July 2004 with the former jet fuel line included in FOST#2 in 2005. Figure 5.4-2, *Former Building Identification*, shows the area that was transferred as part of FOST#2 on the school site and in the vicinity of the school site. The remainder of the school site and surrounding areas that are unshaded in Figure 5.4-2 were transferred as part of FOST#1. The FOSTs document that environmental impacts have been investigated and that remedial actions have been taken to protect the public health, welfare, and the environment. No RCRA Facility Assessment Sites, Potential Release Locations, Temporary Accumulation Areas, Aboveground Storage Tanks, Aerial Photograph Anomaly Areas, Installation Restoration Program (“IRP”) Sites, wash racks, silver recovery units, oil/water separators, underground storage tanks (“USTs”), polychlorinated biphenyls (PCB) equipment, and Radiological Materials Investigation sites were not identified as being located within the proposed school

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site boundaries (Earth Tech 2003a). Figure 5.4-3, *Areas of Concern*, shows former USTs, IRP sites, and groundwater plume in the vicinity of the Project Site, but these sites are not within Project Site boundaries. The outline of IRP 3 shown on Figure 5.4-3 is the former operational boundary of the old landfill. The footprint of capped and consolidated waste is smaller in area and is located in the northwest portion of IRP 3 as depicted in Figure 5.4-4, *Location of the Existing IRP 3 Landfill*. The EBS identified the following items within the proposed school site: fuel pipelines and aboveground storm drain channel.

Fuel Pipeline System

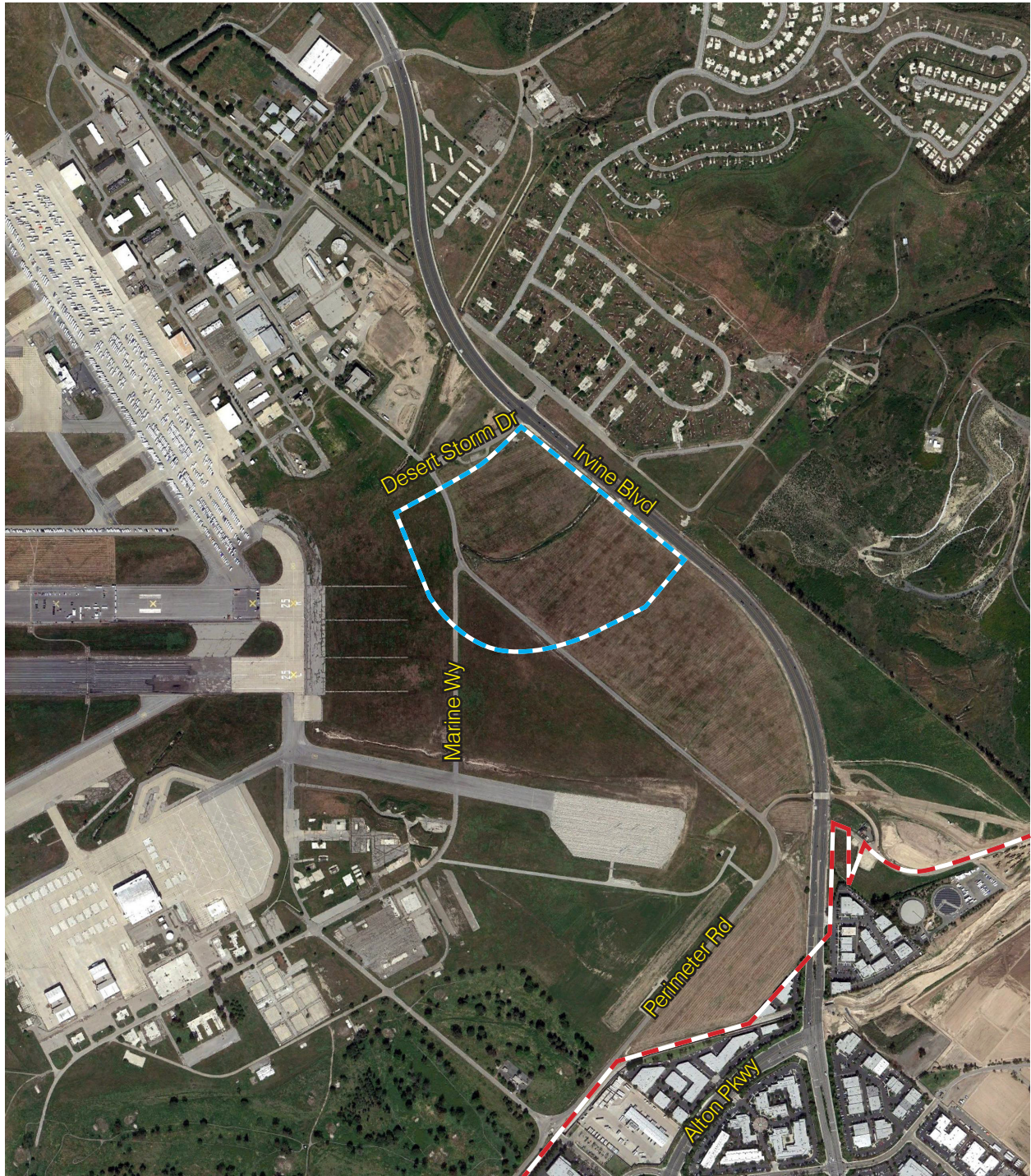
Two jet fuel pipelines associated with MSC JP5 fuel pipeline system traversed the Project Site. The components of MSC JP5 fuel system included pipelines, pipeline segments, sumps, fueling stations, the pump station, valve boxes and vaults, and dry wells. The two jet fuel pipelines were closed in 2001. The Regional Water Quality Control Board (“RWQCB”) provided oversight for the investigations of the JP5 pipeline segments and features, and the RWQCB provided letters of concurrence with no further action status for the individual JP5 pipeline segments and all associated features (DON 2011).

One pipeline on the site was 12 inches in diameter and the other was 8 inches in diameter. Both pipelines extended from Tank Farm 555 located on the northeast side of Irvine Boulevard to Tank Farm 5 located to the west of the proposed school site. Valve Box 3 was located on the site. The pipeline and valve box were considered part of the eastern section of the pipeline system. The JP5 pipelines were taken out of service in 1998.

The JP5 pipelines overlie three petroleum-impacted groundwater plumes: the Tank 398 Plume, the Former JP5 Truck Fueling Area (“TFA”) Plume, and the Former Tank Farm 555 Plume. Monitored Natural Attenuation (“MNA”) is the remedial strategy for the three plumes, and long-term groundwater monitoring activities with RWQCB oversight are in progress as of April 2011.

During January and February 2000, hydrostatic testing activities were conducted, and the primary JP5 pipelines extending from Former Tank Farm 555 to UST 902A and UST 902B and UST 891A and UST 891B (approximately 11,130 feet of pipelines), were closed in place and filled with approximately 221 cubic yards of cement grout. The testing and closure activities were documented in the Closure Report, *Location of Concern MSC JP-5, JP-5 Pipeline Units MSCJP5-1 and MSCJP5-3, MCAS, El Toro, California* (OHM Remediation Services Corp. 26 June 2001). The RWQCB submitted comments to the Navy in a letter dated 11 October 2001. The RWQCB concurred that the pipelines were closed according to State requirements, and the RWQCB requested that the Navy evaluate historical records pertaining to pipeline operations and investigate any releases from the pipelines. The Navy reviewed historical records, reviewed results of investigations of nearby locations of concern, field investigation including excavation of exploratory trenches and collection of soil samples, and identification and evaluation of petroleum releases at several JP5 pipeline features. Observations from many exploratory trenches showed that the JP5 pipeline sections were welded together, and no releases of petroleum were observed along the welded sections of the pipeline. As a result of exploratory trenching and field sampling activities, petroleum-impacted soils were identified at several locations. Petroleum-impacted soils were excavated from different areas along the JP5 system. No petroleum-impacted soils along the pipeline within the school site boundaries were identified. The primary pipeline segment known as JP5-2, Segment 3, was an 8-inch pipeline that had been taken out of service when the 12-inch pipeline (MSC JP5-1, Segment 1) was installed, and the 8-inch pipeline was parallel to and located near the 12-inch pipeline. The 8-inch pipeline did not pass a hydrostatic test in 2000.

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Current Site Conditions



--- Existing PA 30 and PA 51 Boundary

--- High School No. 5 Boundary

0 1,500
Scale (Feet)



Source: Google Earth Pro 2011

High School No. 5 Draft Supplemental EIR

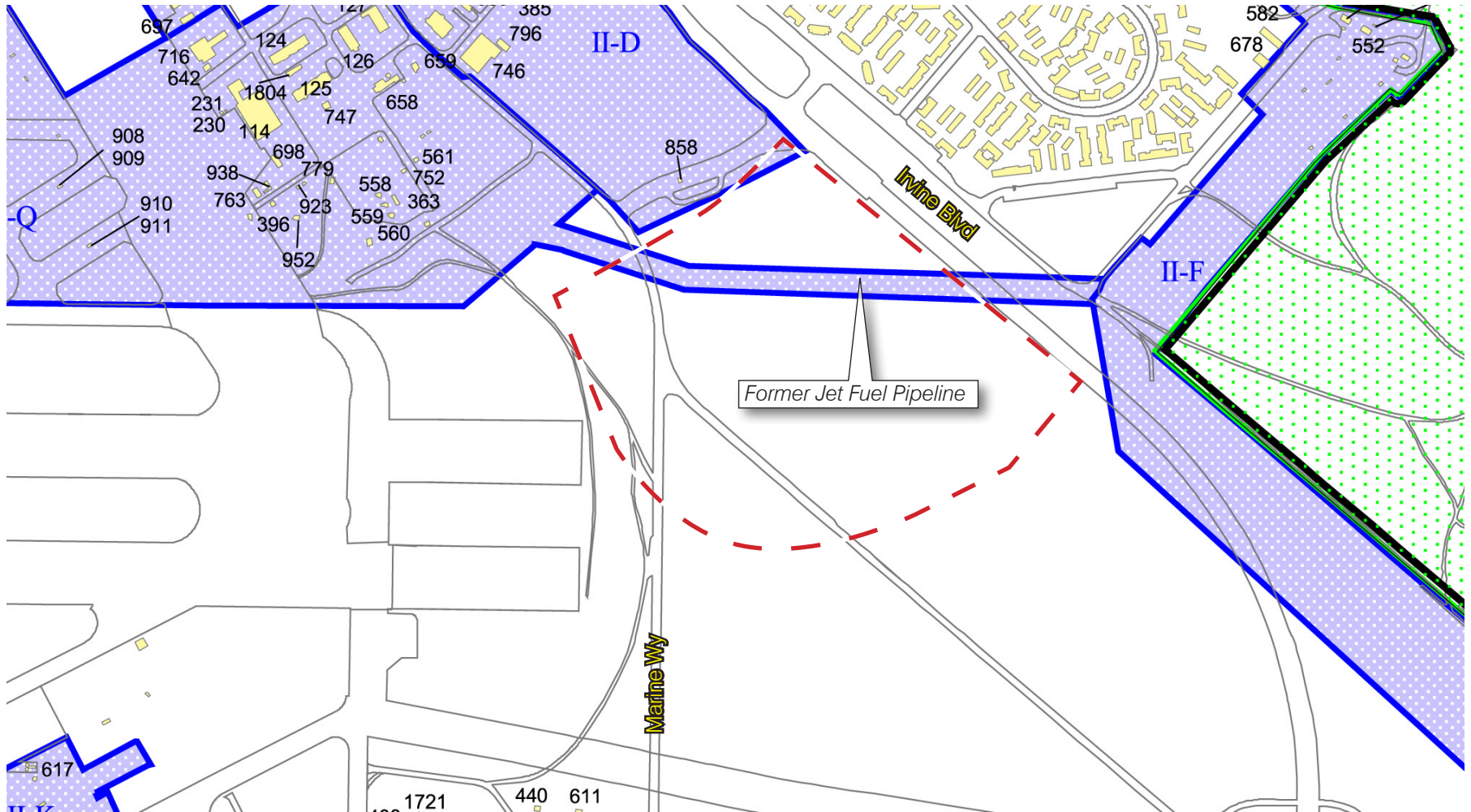
The Planning Center | DC&E • Figure 5.4-1

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Former Building Identification



— High School 5 Boundary

296 Building/Facility Number

■ Building/Facility

0 600
Scale (Feet)



Source: Final Environmental Baseline Survey, Former Marine Corps Air Station, El Toro, California. Earth Tech 2003

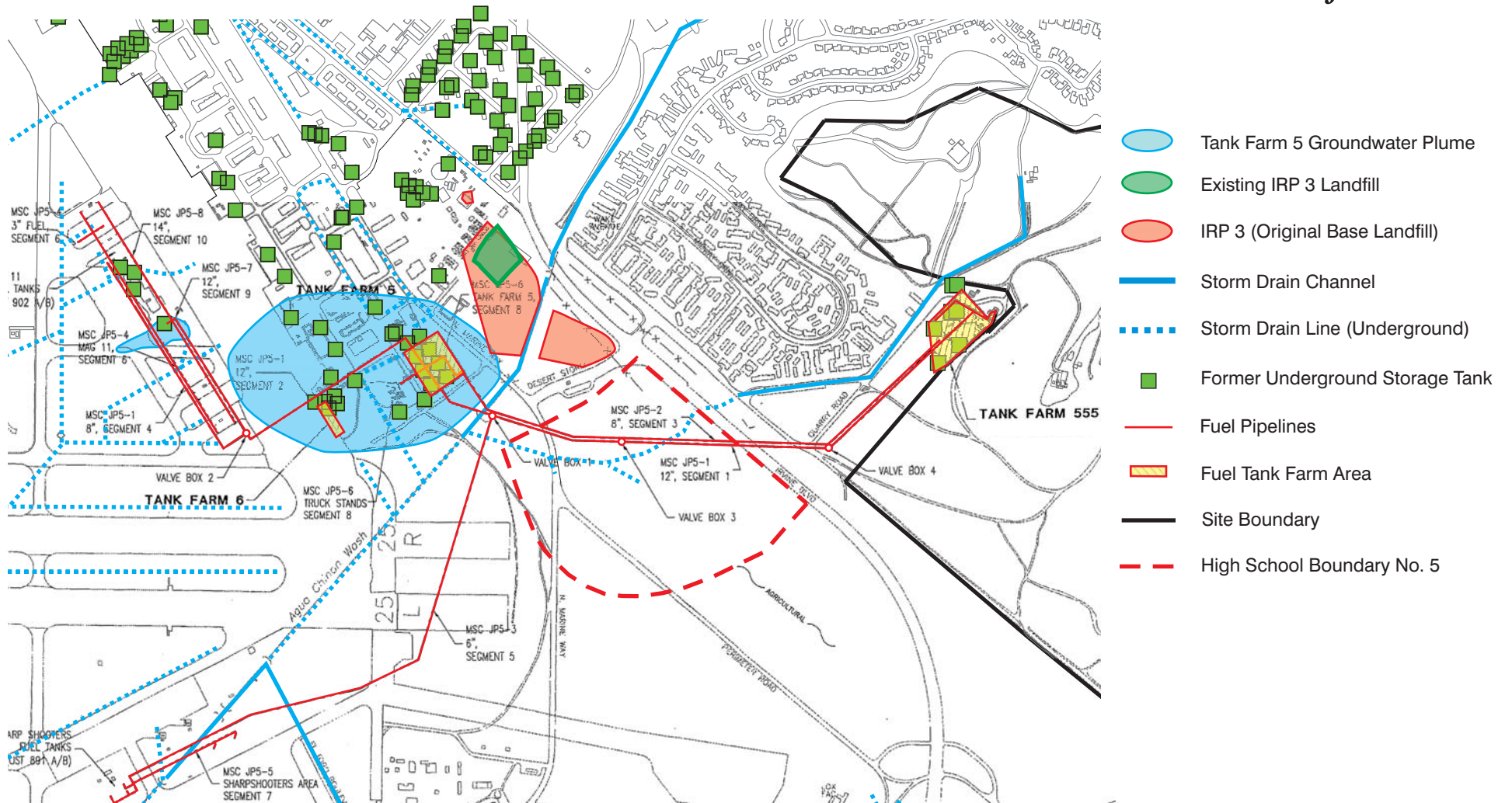
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Areas of Concern



Note: Groundwater plume reflects conditions in 2003.

Source: Earth Tech 2003; U.S. Department of the Navy 2004.

High School No. 5 Draft Supplemental EIR

0 1,010
Approx. Scale (Feet)

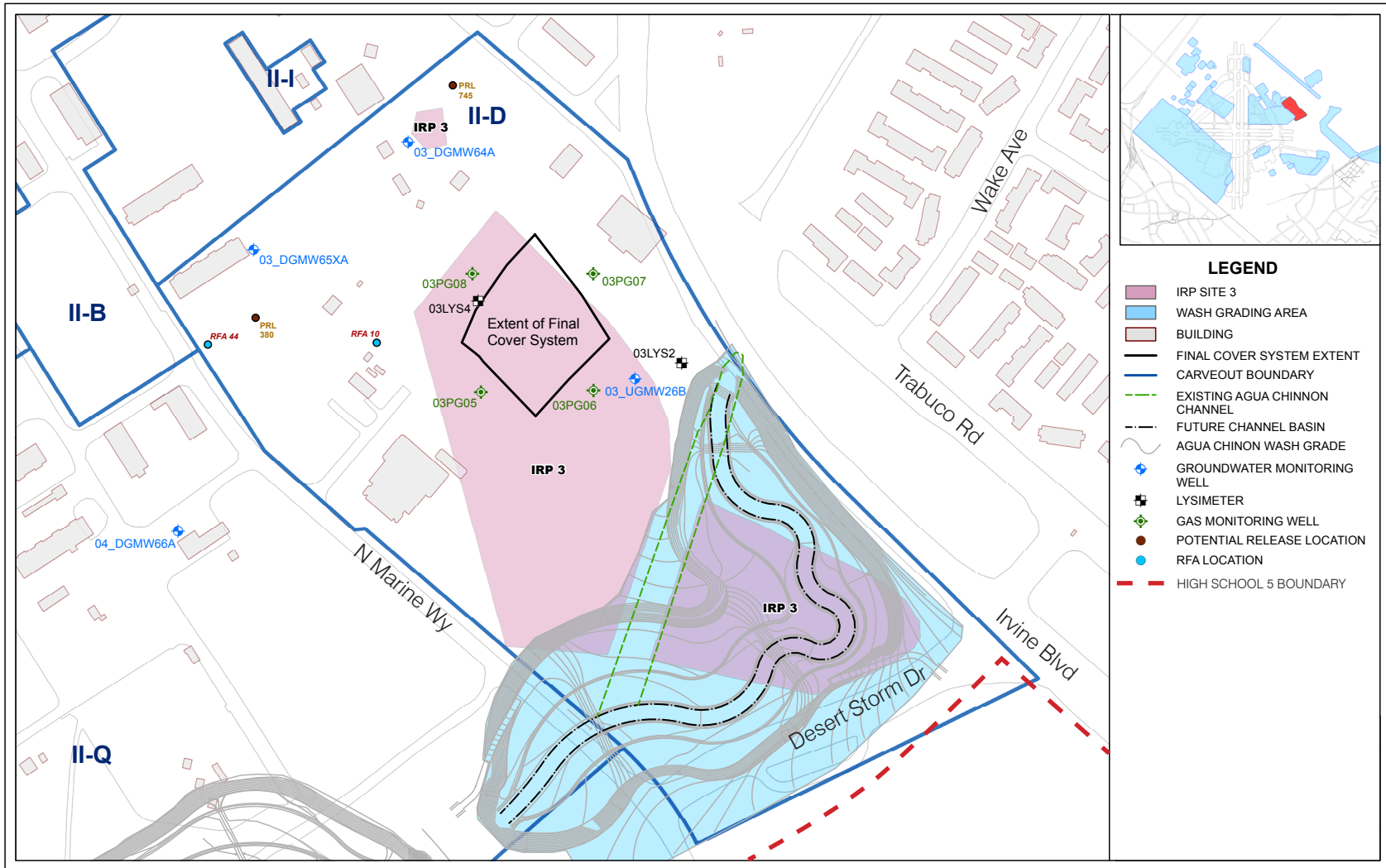


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Location of the Existing IRP 3 Landfill



LEGEND

- IRP SITE 3
- WASH GRADING AREA
- BUILDING
- FINAL COVER SYSTEM EXTENT
- CARVEOUT BOUNDARY
- EXISTING AGUA CHINNON CHANNEL
- FUTURE CHANNEL BASIN
- AGUA CHINON WASH GRADE
- GROUNDWATER MONITORING WELL
- LYSIMETER
- GAS MONITORING WELL
- POTENTIAL RELEASE LOCATION
- RFA LOCATION
- HIGH SCHOOL 5 BOUNDARY



Source: Weston Solutions

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The Valve Box 3 Vicinity includes the 8-inch pipeline (JP5-2, Segment 3 (2,200 feet)) and the 12-inch pipeline (JP5-1, Segment 1, (2,200 feet)) extending from Valve Box 4 near Quarry Road through Valve Box 3 (in a former agricultural field) to Valve Box 1 (near Former Tank Farm 5 and Agua Chinon Wash). The 12-inch pipeline was considered the primary pipeline, MSC JP5-1 (DON 2004). The 8-inch pipeline had been used until the 12-inch pipeline was constructed in the late 1990s. The 8-inch pipeline was constructed in the 1950s. Exploratory trenches were excavated, field observations were recorded, and soil samples were collected at various locations. Historical information pertaining to nearby locations of concern was evaluated. Field activities and historical documentation were described in a Summary Report (DON 2004). On the Project Site, one trench and three soil samples were collected in 2004 to assess the pipeline. Soil gas samples were collected from four locations to the west of Marine Way. Two of the soil gas locations were located within the proposed school site boundaries. Table 5.4-1 describes the soil and soil gas data collected on the Project Site, and Figure 5.4-5, *Historic Pipeline Sampling*, shows the sampling locations within the Project Site.

*Table 5.4-1
Soil and Soil Gas Data Collected on the Project Site*

<i>Sampling Identification</i>	<i>Sampling Depths</i>	<i>Sampling Date</i>	<i>Results</i>	<i>Comments</i>
JP5SB22	5' and 10', 9/9/2004	9/9/2004	ND for gasoline, JP5, all VOCs except acetone 25 and 43 µg/kg (5 and 10' bgs)	Near valve box 3
JP5SB28	5', 11/10/2004	11/10/2004	ND for gasoline, JP5, all VOCs	
Trench 121	No samples, 11/4/2004	11/4/2004	No staining or discolored soils observed	Trenched to 18 inches
SG-01	5' and 10'	6/26/2000	7 ppmV C1-C3, 3 ppmV TPHV at 5'; 5 ppmV C1-C3, 3 ppmV TPHV, ND for BTEX, MTBE at 5 and 10'	Collected just west of Marine Way along pipeline.
SG-02	5' and 10'	6/26/2000	4 ppmV C1-C3, 2 ppmV TPHV at 5'; 4 ppmV C1-C3, 2 ppmV TPHV at 10', ND for BTEX, MTBE at 5 and 10'	Collected to the west of SG-01 along pipeline.

The EBS report identified the following areas of concern in the vicinity of the proposed school site:

- IRP 3 Original Base Landfill:* IRP 3, the original base landfill footprint, borders the Proposed Project site to the north (Figure 5.4-3, *Areas of Concern*). The southern edge of the landfill footprint is depicted as being on the north side of Desert Storm Road. A Record of Decision for the remedy for the landfill was finalized in 2008. The remedy has been implemented and first year of monitoring has been completed. IRP 3 landfill was the original base landfill, which was active from 1943 until 1955. As mentioned above, as a result of the remedy that was implemented, the landfill waste was consolidated and capped in a smaller area located in the northwest portion of IRP 3 as depicted in Figure 5.4-4. The landfill was operated as a cut-and-fill disposal facility. IRP 3 potentially contained a variety of materials disposed at assorted locations within the landfill, including metals, incinerator ash, solvents, paint residues, hydraulic fluids, engine coolants, construction debris, oily wastes, municipal solid waste, and various inert solid wastes. The selected remedy for the landfill is documented in the 1st Year Long-Term Monitoring Report (Shaw 2012). A single-barrier cap with a flexible membrane liner to prevent contact with landfill materials and reduce infiltration into landfill contents was installed. Prior to capping,

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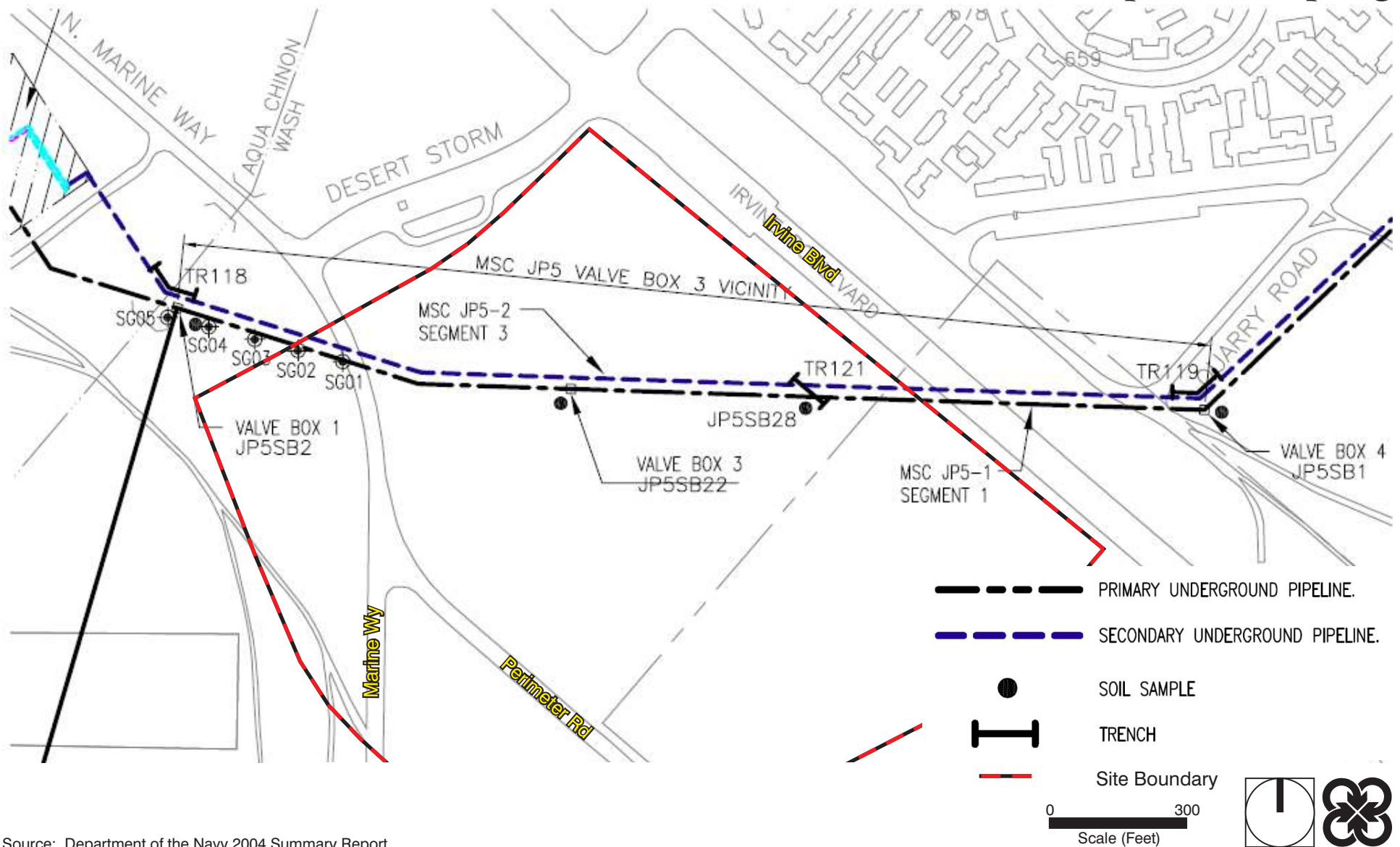
wastes from IRP 3 Unit 4 and Unit 1 were consolidated in IRP 3, Unit 1 Waste Area A. All waste consolidated were radiologically screened for Radium 226.

Land-use restrictions apply to the landfill areas and extend approximately 100 feet off the waste boundaries to protect the landfill covers, to help ensure the containment remedy and contents of the landfill are not disturbed. Monitoring to detect migration of contaminants from the landfills is being implemented. A landfill gas collection (“LFG”) and/or venting system to actively collect and vent LFG as necessary and passively vent or monitor gas during inactive periods has been installed. Passive gas-control gravel trenches within the compliance monitoring zone were added for an additional measure of safety. A California Integrated Waste Management Board monitoring protocol with compliance LFG monitoring probes within 50 feet of the landfill waste boundary to facilitate perimeter monitoring and assess migration of LFG has been implemented. Remedial construction activities at IRP 3 started in August 2009 and were completed in August 2010.

Four quarters of groundwater monitoring from September 2010 to June 2011 found low concentrations of chloroform, and benzene was reported at 1.9 micrograms per liter ($\mu\text{g/l}$) and at a later monitoring event at 0.76 $\mu\text{g/l}$ in a down-gradient well of the landfill. VOCs were nondetectable in the up-gradient wells. Groundwater samples were analyzed once for SVOCs, pesticides, and PCBs, none of which were detected. Results from the interior LFG extraction wells, perimeter gas probes, and lysimeters over the first year of VOC monitoring were either not reported above the laboratory reporting limits, showed a decreasing trend, or the concentrations had stabilized. It was recommended that laboratory analyses for VOCs be terminated, and field instrument monitoring for VOCs be performed for subsequent semiannual monitoring events (Shaw 2012). Methane concentrations were not above the laboratory reporting limit in any of the perimeter gas probes, interior extraction wells, or lysimeter probes during the four sampling events. The 2012 Shaw report concluded that LFG is not migrating beyond the landfill boundaries.

- *Truck Fueling Area Plume:* Former JP5 Truck Fueling area groundwater plume eastern historic plume boundary is located approximately 0.14 mile to the west of the proposed school site (Earth Tech 2003a). Figure 5.4-3, *Areas of Concern*, shows the plume boundaries as depicted in 2003 (Earth Tech 2003a). The truck fueling area was located to the west of the intersection of Desert Storm Road and Marine Way. The fueling area included former Tank Farm 5 and Tank Farm 6. The plume is believed to originate from several source locations, including former fuel pipelines, USTs, and distribution stands. The contaminant of concern in the plume is jet fuel. The depth to groundwater is approximately 210 feet below ground surface (“bgs”), and the groundwater flow is to the northwest, away from the proposed school site. Several fuel-impacted soil cleanups have occurred in the area that overlies the facilities associated with the plume. All USTs were removed from these tank farms. Petroleum-impacted soil was excavated from Former UST Site 206 within Former Tank Farm 6 during February 2008, and the RWQCB closed UST 206 in 2008. All other former tank sites within Former Tank Farms 5 and 6 were closed by the RWQCB or the Orange County Health Care Agency (“OCHCA”). The remedial method for the plume is monitored natural attenuation. In 2007 a long-term monitoring plan for monitored natural attenuation was developed for the truck fueling area (Wiedemeier 2007). The area of the plume was calculated to be 983,000 square feet in 1996 and reduced by 70 percent to 312,000 square feet by 2006. A groundwater monitoring report was submitted in March 2012 that concluded that the plume is not expanding and that biodegradation of petroleum hydrocarbons is occurring within the plume (ECS 2012).

Historic Pipeline Sampling



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Emergency Plans

The former MCAS El Toro (PA 51 and 30) is a potential emergency response staging area in the event of a large regional catastrophe (e.g., a severe earthquake) because of its capacity for processing and storing large quantities of cargo. The County of Orange, in coordination with all other local jurisdictions and emergency service providers in the County, is responsible for the preparation, maintenance, and implementation of emergency response plans and emergency evacuation plans for the County. The “Orange County Emergency Plan” is the official emergency plan for the County. That Plan is a basic reference and training document for emergency preparedness, response, recovery, mitigation, and provides the authority and basis for the development of more detailed departmental and functional standard operating procedures. It also incorporates the standardized emergency management system and national incident management system (“SEMS/NIMS”) established by the California Emergency Management Agency (“Cal EMA”). The SEMS/NIMS standardizes the response to emergencies involving multiple jurisdictions or agencies.

Wildland Fires

Areas adjacent to the Natural Communities Conservation Plan (NCCP) Reserve would be exposed to the highest level of fire risk from wildfires. The Project Site is separated from the NCCP Reserve by Irvine Boulevard, a six-lane roadway divided by a landscaped median.

5.4.2 Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, the District has determined that a project would normally have a significant effect on the environment if the project would:

- H-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- H-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- H-3 Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?
- H-4 Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site?
- H-5 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- H-6 Create an air quality hazard due to the placement of a school within one-quarter mile of:
(a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large

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- agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?
- H-7 Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site?
- H-8 Is the property line of the proposed school less than the following distances from the edge of respective power line easements: (1) 100 feet of a 50–133 kV line; (2) 150 feet of a 220–230 kV line; or (3) 350 feet of a 500–550 kV line?
- H-9 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 [inclusive of Section 25356 of the Health & Safety Code] and, as a result, would it create a significant hazard to the public or the environment?
- H-10 Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?
- H-11 Is the proposed school site located on a site containing or underlain by naturally occurring hazardous materials?
- H-12 Is the proposed school site situated within 2,000 feet of a significant disposal of hazardous waste?
- H-13 Is the proposed school site within two miles, measured by air line, of that point on an airport runway or potential runway included in an airport master plan that is nearest to the site? (Ed. Code §17215(a)&(b); Does not apply to school sites acquired prior to January 1, 1966.)
- H-14 For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- H-15 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- H-16 Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Chapter 8, *Impacts Found Not to Be Significant*, substantiates the District's determination in the Initial Study for the High School No. 5 project (Appendix A to this DSEIR) that the following impacts would be less than significant: H-1, H-2, H-8, H-, H-11, H-13 and H-14. Therefore, these impacts are not addressed in the following analysis. All other impact areas are discussed in detail below.

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5.4.3 *2011 Approved Project*

Hazardous Materials and Wastes

The 2011 Approved Project analyzed the impacts of hazardous materials and wastes associated with the Approved Project Site, and identified no significant impacts associated with the No Further Action IRP sites. The 2011 Approved Project disclosed the following significant impacts of developing the Approved Project:

- Construction activities involving demolition and possible substantial remodeling of existing structures in the Approved Project Site as the Approved Project Site develops could result in the disturbance of structures and soils containing asbestos-containing building materials (“ACM”) and lead-based paint.
- IRP Site 24 is located in the 6.1 Institutional, 1.9 Great Park, and 8.1 TTOD zoning districts. The site may be conveyed with temporary restrictions on use.
- Future uses of IRP Sites 3 and 5 may be potentially constrained by the implementation of institutional controls.
- IRP Site 16 (Crash Crew Pit No. 2) is located in the 1.9 Orange County Great Park zoning district. The site may be conveyed with temporary restrictions on use that are not appropriate for recreational land uses.

Emergency Plans

The 2011 Approved Project determined that the Approved Project would not be expected to interfere with emergency response and evacuation plans on the basis that other sites within Orange County are already designated as emergency staging areas, and portions of the Approved Project Site would remain available for use by non-aviation emergency response equipment. Accordingly, the 2011 Approved Project concluded that while major portions of the Approved Project site would be developed, sufficient acreage is expected to remain within preservation areas and the Great Park to allow for emergency staging operations. Therefore, residential and non-residential uses were found to not result in a significant impact related to emergency response and evacuation plans.

Wildland Fires

The 2011 Approved Project concluded that the NCCP Reserve, Approved Wildlife Corridor Feature, and Recreational areas in the northeastern portion of Existing PA 51 would be exposed to the highest level of fire risk from wildland fires under the Approved Project, and that reuse of existing buildings require inspection for conformance to fire life safety code requirements. However, due to project design features included as part of the Approved Project, the 2011 Approved Project concluded that the wildland fire hazard impacts would be less than significant.

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5.4.4 2012 Modified Project

Hazardous Materials and Wastes

The 2012 Modified Project analyzed the impacts of hazardous materials and wastes associated with the 2011 Approved Project, identified no significant impacts associated with IRP sites that were granted regulatory closure, and did not require any further investigation or remedial action. As is the case for the 2011 Approved Project, the 2012 Modified Project is located on a site that is included on the “Cortese List” of hazardous materials sites compiled pursuant to Government Code Section 65962.5; however, that fact does not in and of itself indicate that it would create a significant hazard to the public or the environment.

Although the 2012 Modified Project is located on the “Cortese List,” as is the 2011 Approved Project, the active sites would not create a significant impact. The Navy has established institutional controls for many of the sites, and the 2012 Modified Project specifies compliance with those institutional controls as mitigation measures, as did the MMRP for the 2011 Approved Project, even though such compliance would otherwise be legally required (see Mitigation Measure HH-2). As with the 2011 Approved Project, the potential impacts of the 2012 Modified Project were determined to be less than significant.

IRP Sites 18 and 24 (VOC Contamination)

Remediation of contaminated soils at IRP Site 24 began in spring of 1999 and was completed in 2001. IRP Site 24 is located in zoning districts categorized as 6.1 Institutional, 1.9 Great Park, and 8.1 TTOD. The Department of Navy’s (DON) human health risk assessment for Site 24 indicates that neither a recreational or institutional land use of the Proposed Project site would result in a higher than acceptable risk. The Final Record of Decision (ROD) addressing Site 24 was issued by the DON in June 2002. The ROD selected a groundwater extraction and VOC treatment remedy addressing the trichloroethylene (TCE) plume in the shallow groundwater unit. The groundwater remedy of extracting and treating VOC-impacted groundwater was implemented in 2006. A Final Operating Properly and Successfully (OPS) Report for Site 24 was submitted on July 13, 2010. The EPA concurred with the OPS Report on September 9, 2010. The DON intends to remediate the existing contamination of the shallow groundwater at Site 24 to an unrestricted standard. This remediation process will likely take a period of years to complete, and during this time the DON has implemented institutional controls to limit access to groundwater and related activities to portions of Site 24. The Draft Final FOST #6 (DON, 2010) identifies institutional controls that the DON must implement and enforce in the form of land use or activity restrictions to be implemented for a portion of Site 24. These institutional controls are as follows:

- The DON will provide Orange County Water District/Irvine Ranch Water District (OCWD/IRWD) access to the property for implementation of the Irvine Desalter Project. Lease of the property to the Applicant will contain provisions for continuing access, rights-of-way licenses, and easements as necessary for such remediation activities.
- The DON has informed the Applicant that a groundwater treatment system will be operating as prescribed and that the operator has the right to collect soil samples to confirm that the Applicant’s operations have not released hazardous substances that could impact the treatment system.

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- OCWD/IRWD will provide reasonable access to the DON, EPA, and the DTSC to sample pretreated and treated groundwater as necessary.
- Land-use restrictions will be implemented through two legal instruments: 1) Environmental Restriction Covenant and Agreements addressing on-Station real property containing the IRP Site 24 groundwater plume and associated buffer zone and 2) quitclaim deeds between the transferee and the DON conveying on-station real property containing the IRP Site 24 groundwater plume and associated buffer zone.
- OCHCA and IRWD will assure that permits are applied for and obtained for any new water wells in the on-station VOC groundwater plume and will take necessary enforcement action to assure permits are obtained and complied with.
- The DON shall provide annually copies of permit applications and permits that it has received from OCHCA and IRWD during the previous year, beginning one year from the issuance of the OU1 and OU2A ROD, and ending when remediation has been completed.
- The DON shall monitor and inspect the status of compliance with the land-use restrictions in the Environmental Restriction Covenant and Agreements and quitclaim deeds protecting on-station extraction, injection, and monitoring wells, and associated piping and equipment concurrently with inspections of such engineering controls and equipment.
- If a violation of land-use restrictions is identified and/or documented by either the DON or the Department of Toxic Substances Control (DTSC), the identifying entity will provide notification to all appropriate regulatory agencies within 10 working days.

IRP Site 18 is a plume of TCE that extends below the ground surface into the aquifer system located off-site of the former MCAS El Toro and outside of the Project Site. The institutional controls that the DON must implement and enforce for IRP Site 18 are as follows:

- Any person planning to construct a water well within the off-station VOC plume must apply for and obtain a permit for construction.
- The DON will be provided with copies of any well permit applications received or permits issued within the geographic scope of the off-station groundwater plume until remediation of the plume has been completed.
- The DON shall provide annually updated maps delineating the VOC groundwater plume until remediation has been completed.
- The DON shall annually provide copies of permit applications and permits that it has received during the previous year, beginning one year from the issuance of the OU1 and OU2A ROD, and ending when remediation has been completed. Implementation of the institutional controls described above will reduce any potential exposures from VOC Sites 18 and 24 such that implementation of the 2012 Modified Project would have a less than significant impact. In recognition of the importance of the above-described institutional controls to the environmental remediation program and to human health and safety, the 2012 Modified Project specifies compliance with them as mitigation measures, as did the MMRP for the 2011 Approved Project

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even though such compliance would otherwise be legally required (see Mitigation Measure HH-2 below).

IRP Sites 3 and 5 (Landfills)

Issues relating to IRP Sites 3 and 5 (landfills), including settling, were determined not to constrain proposed land uses within the Proposed Project site. Possible exposure issues due to the potential presence of radioactive materials in the former landfills resulting from the disposal of radium paint residues were identified in the HRA report. As a result, the DON conducted site-specific radiological investigations for the presence of radioactive materials and proceeded with the remedies described in the discussion that follows.

IRP Site 3 (Original Landfill) is located in the proposed zoning districts designated as 1.9 OCGP and 8.1 TTOD. The remediation for this site, consisting of the installation of a synthetic liner and implementation of institutional controls, has been completed. Due to the use of institutional controls in the form of land use controls, Site 3 and the associated buffer zone surrounding it would not be available for immediate reuse activity.

IRP Site 5 (Perimeter Road Landfill) is located in the proposed zoning district designated as 1.4 Preservation. The remediation for this site, consisting of the installation of a synthetic liner and implementation of institutional controls, has been completed. Due to the use of institutional controls in the form of land use controls, Site 5 and the associated buffer zone surrounding it would not be available for immediate reuse activity. The former landfill area has been capped and can accommodate shallow-rooted plants. The proposed native grasses for the Relocated Wildlife Corridor Feature meet the "shallow-rooted" restriction. The Navy has published an Operations and Monitoring/Long Term Monitoring Plan which defines land use restrictions. Per this plan, the Relocated Wildlife Corridor Feature is an acceptable use of the capped landfill, and all land use restrictions associated with this area can, and will be followed in developing the Relocated Wildlife Corridor Feature. The planting restrictions apply only to the footprint of the capped landfill (less than 10 acres), and would not affect the overall flora and fauna of the Relocated Wildlife Corridor Feature.

Implementation of the institutional controls described above would reduce any potential exposures from the landfill Sites 3 and 5 such that the 2012 Modified Project would have a less than significant impact. In recognition of the importance of these institutional controls to the environmental remediation program, the 2012 Modified Project specifies compliance with them as mitigation measures, as did the MMRP for the 2011 Approved Project, even though such compliance would otherwise be legally required (see Mitigation Measure HH-2 below).

IRP Site 8

IRP Site 8 is located in zoning district designations 6.1 Institutional and 8.1 TTOD. As mentioned previously, information in the HRA Report indicates that IRP Site 8 may have received empty radium paint containers and debris from the demolition of the radium paint shop at Building 296 for temporary storage awaiting disposal. The remediation of this site, consisting of excavation and proper disposal of shallow soil contamination, confirmation sampling, and site restoration, has been completed. The site is awaiting official closure documentation. Once that documentation is received, the DON intends to convey the site as suitable for unrestricted use. Therefore, no significant impacts are anticipated to be associated with this site.

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IRP Site 12

IRP Site 12 (sludge drying beds) is located in a zoning district designation 6.1 Institutional. Site 12 may have received sludge contaminated with Radium 226 from the sanitary sewage treatment plant due to the disposal of radium paint into the sanitary sewer system. Remediation at Site 12, consisting of excavation and proper disposal of shallow soil contamination, confirmation sampling, and site restoration, has been completed. The site is awaiting official closure documentation. No significant impacts are anticipated to be associated with this site.

IRP Site 16

IRP Site 16 (Crash Crew Pit No. 2) is located in zoning district designation 1.9 Great Park. Because of the potential risks associated with the existing groundwater contamination, the DON may restrict use of the site until the groundwater is remediated to an appropriate risk level, at which time the site would be released for unrestricted use. This remediation process will likely take multiple years to complete, and during this time various institutional controls could be implemented to limit certain activities and unauthorized access to the site. Those institutional controls are likely to be similar to those specified for IRP Sites 18 and 24, described above. Implementation of those institutional controls will reduce any potential exposures from IRP Site 16 such that the 2012 Modified Project would have a less than significant impact. In recognition of the importance of these institutional controls to the environmental remediation program, the 2012 Modified Project specifies compliance with them as mitigation measures, as did the MMRP for the 2011 Approved Project, even though such compliance would otherwise be legally required (see Mitigation Measure HH-2 below).

Anomaly Area 3

Anomaly Area 3 is an approximately 13-acre site located in the northwest section of the 2012 Modified Project Site near Pusan Way and adjacent to the Agua Chinon Wash in zoning district designation 8.1 TTOD. This site is considered a former refuse disposal area for construction debris. To date, the DON has conducted a geophysical investigation, exploratory trenching, radiological screening, installed monitoring wells and vadose zone wells and has started implementing its Proposed Plan. Preliminary results indicate the presence of buried metallic and construction debris, along with plastics, asbestos, pipes, wood and concrete. Radiological readings in the soil were at or below background levels. Some groundwater samples exceeded the maximum contaminant levels and are subject to further investigation. Soil levels for arsenic, total petroleum hydrocarbons, lead, and benzopyrene exceed industrial and residential PRG standards. Remedial actions under implementation at the site include limited site grading, minor waste consolidation, construction of a finger dyke, placement of riprap, implementation of institutional controls, and long-term monitoring. The proposed institutional controls put in place by the DON prohibit the following without prior approval from Navy regulators:

- Residential use of the sites and construction of hospitals for humans, schools for persons under 21 years of age, day care centers for children or any permanently occupied human habitation on the sites;
- Construction of facilities, structures, or appurtenances; excavation; or any other land-disturbing activity into or on the surface of the landfills that may involve adverse impacts upon the performance of the cap or affect the drainage and/or erosion controls;

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- Construction of structures within 100 feet of the edge of the landfill until such time as monitoring demonstrates that contamination is not migrating;
- Planting deep-rooted plants that have the potential to interfere with the performance of the landfill cap in minimizing infiltration;
- Irrigating the surface of the landfill except when it is used for establishment, repair, and maintenance of vegetative cover required for effective performance of the cap;
- Alteration, disturbance, or removal of any component of a response action, including but not limited to a landfill cap (if constructed), monitoring wells, or survey monuments;
- Removal of or damage to security features or to monitoring equipment and associated pipelines and appurtenances.

Due to the use of institutional controls, Anomaly Area 3 and a possible buffer site surrounding it would not be available for immediate reuse activity. Implementation of the institutional controls described above would reduce any potential exposures from Anomaly Area 3 such that the 2012 Modified Project would have a less than significant impact. In recognition of the importance of these institutional controls to the environmental remediation program, this 2012 SSEIR specifies compliance with them as mitigation measures, as did the MMRP for the 2011 Approved Project, even though such compliance would otherwise be legally required (see Mitigation Measure HH-2 below).

Jet Fuel Distribution System

The Norwalk Pipeline was used as a jet fuel distribution system in support of the military mission at the former MCAS El Toro. The entire pipeline was flushed and filled with an inert gas, and the majority of it was removed in 2006, with the exception of approximately 100 feet that was closed off and left in place under the Agua Chinon Wash. The presence of the pipeline that remains is considered a less than significant impact because it contains inert material.

Wildland Fires

The 2012 Modified Project analyzed the potential impacts resulting from exposure of people and structures to wildland fires. The proposed Relocated Wildlife Corridor Feature and residential areas in the northeastern portion of Combined PA 51 would be exposed to the highest level of risk from wildfires because these areas are adjacent to the NCCP Reserve, which is currently defined as having high risk for wildland fires under the updated Fire Hazard Map. Though not considered a high wildland fire hazard area, the Relocated Wildlife Corridor Feature would be subject to fuel modification requirements within its boundary. Therefore, similar to the conclusions of the 2011 Approved Project, the 2012 Modified Project concluded that wildland fire hazard impacts would remain less than significant.

5.4.5 Environmental Impacts of High School No. 5

Existing Plans, Programs, and Policies

The following measures are existing plans, programs, or policies (“PPPs”) that were developed as a result of the 2011 Approved Project and the 2012 Modified Project, which will help to reduce and avoid

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potential impacts related to hazards and hazardous materials. Note that the Mitigation Agreement between the District and Heritage Fields provides for the site to be delivered to the District in a master pad condition, mass-graded and compacted, with backbone infrastructure installed (roadway, storm drains, sanitary sewer, water, etc.) and stubbed wet and dry utilities.

- PPP 5-1 If any underground storage tanks (“USTs”) are encountered during site grading and excavation activities, they shall be removed in accordance with the existing standards and regulations of, and oversight by, the Orange County Health Care Agency (“OCHCA”), based on compliance authority granted through the California Code of Regulations, Title 23, Division 3, Chapter 16, Underground Tank Regulations. The process for UST removal is detailed in the OCHCA’s “Underground Storage Tanks: The Basics.” Soil samples from areas where storage tanks have been removed or where soil contamination is suspected shall be analyzed for hydrocarbons including gasoline and diesel in accordance with procedures set forth by OCHCA. If hydrocarbons are identified in the soil, the appropriate response/remedial measures will be implemented as directed by OCHCA with support review from the Regional Water Quality Control Board until all specified requirements are satisfied and a Tank Closure Letter is issued. Any aboveground storage tank (“AST”) in existence at the commencement of site development shall be removed in accordance with all applicable regulations under the oversight of Orange County Fire Authority. Compliance requirements relative to the removal/closure of storage tanks are set forth through the California Health and Safety Code, Sections 25280 through 25299.
- PPP 5-2 During demolition, grading, and excavation, workers shall comply with the requirements of Title 8 of the California Code of Regulations, Section 1532.1, which provides for exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead. Lead-contaminated debris and other wastes shall be managed and disposed of in accordance with the applicable provision(s) of the California Health and Safety Code.
- PPP 5-3 Prior to approval of a conditional use permit, project applicants shall prepare a Fire Master Plan for submittal to the Orange County Fire Authority (“OCFA”) consistent with OCFA Guideline B-09 (Fire Master Plans for Commercial and Residential Development).
- PPP 5-4 Federal law requires compliance with Rule 29 of the Code of Federal Regulations (“CFR”) Part 1926. Prior to site demolition activities, building materials shall be carefully assessed for the presence of lead-based paint, and its removal, where necessary, must comply with state and federal regulations, including Occupational Safety and Health Administration (“OSHA”) 29 CFR Part 1926. The OSHA rule establishes standards for occupational health and environmental controls for lead exposure. The standard also includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation of monitoring. Furthermore, the requirements of California Code of Regulations, Title 17, Division 1, Chapter 8, identify procedures that must be followed for accreditation, certification, and work practices for lead-based paint and lead hazards. Section 36100 thereof specifically sets forth requirements for lead-based paint abatement in public and residential buildings.
- PPP 5-5 Prior to site demolition activities, building materials must be carefully assessed for the presence of asbestos-containing materials (“ACM”), and removal of this material, where necessary, must comply with state and federal regulations, including SCAQMD Rule 1403,

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which specifies work practices with the goal of minimizing asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of ACMs. The requirements for demolition and renovation activities include asbestos surveying; notification; ACM removal procedures and time schedules; ACM handling and cleanup procedures; and storage, disposal, and landfill disposal requirements for asbestos-containing waste materials.

- PPP 5-6 During site decommissioning and demolition activities, hazardous wastes must be managed in accordance with the requirements of Title 22, Division 4.5 of the California Code of Regulations. Title 22 sets forth the requirements with which hazardous-waste generators, transporters, and owners or operators of treatment, storage, or disposal facilities must comply. These regulations include the requirements for packaging, storage, labeling, reporting, and general management of hazardous waste prior to shipment. In addition, the regulations identify standards applicable to transporters of hazardous waste such as the requirements for transporting shipments of hazardous waste, manifesting, vehicle registration, and emergency accidental discharges during transportation.
- PPP 5-7 During demolition, grading, and excavation, workers shall comply with the requirements of Title 8 of the California Code of Regulations, Section 1529, which provides for exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to asbestos. Asbestos-contaminated debris and other wastes shall be managed and disposed of in accordance with the applicable provision(s) of the California Health and Safety Code.
- PPP 5-8 Evidence of soil and/or groundwater contamination (e.g., chemical odors, staining) unrelated to above/underground storage tank releases may be encountered during site development. The appropriate agency (e.g., OCHCA, DTSC, or the RWQCB) shall be notified if these conditions are encountered during construction or grading activities. With their oversight, an environmental site assessment shall be completed and a determination shall be made as to whether cleanup is required. Cleanup activities are required to be consistent with all applicable federal, State and local rules, regulations, and laws. A cleanup would not be considered complete until confirmatory samples of soil and/or groundwater reveal levels of contamination below the standards established by the oversight agency. Alternatively, a risk assessment may be prepared for the site to determine that there are no human or environmental risks associated with leaving contamination below specific levels in place. Construction in the impacted area shall not proceed until a “no further action” clearance letter or similar determination is issued by the oversight agency, or until a land use covenant is implemented.

Additional Plans, Programs, and Policies

The following measures are additional PPPs developed for the High School No.5 project that will help to reduce and avoid potential impacts related to hazards and hazardous materials:

- IUSD 4-1 California Education Code Section 17213.1 requires that the District follow a prescribed environmental review process with oversight by the Department of Toxic Substances Control (DTSC). As a requirement of eligibility for state funding, school districts must contract with a qualified environmental consultant to prepare a Phase I Environmental Site Assessment (Ed.

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Code, § 17210, subsec. (b) and § 17213.1, subsec. (a)). The school district submits this assessment for DTSC review, comment and approval. When a Phase I Environmental Site Assessment reveals recognized environmental conditions, a Preliminary Environmental Assessment (PEA) is required to evaluate potential threats to human health or the environment. The PEA includes collection of environmental samples and evaluation of potential health risks. The assessment includes preparation of a work plan, collection and analysis of environmental samples, and preparation of a PEA report (Ed. Code, § 17210, subsec. (b) and § 17213.1, subsec. (a)(4)(B)). The PEA report includes results of environmental sampling and a health risk assessment conducted according to DTSC guidelines (Ed. Code, § 17213.1, subsec. (a)(4)(B)). As required by the Education Code (Ed. Code, § 17213.1, subsec. (a)(6)), school districts must make the report available for public review and comment before DTSC's final determination. DTSC is required to approve or disapprove the Preliminary Environmental Assessment Report within 30 days of close of public review period (Ed. Code, § 17213.1, subsec. (a)(6)(A)) or within 30 days of the school district's approval of the Environmental Impact Report for the school (Ed. Code, § 17213.1, subsec. (a)(6)(B)). If the assessment identifies no significant health or environmental risks, the school district will receive a "No Further Action" determination letter from DTSC (Ed. Code, § 17213.1, subsec. (a)(9)) and the process is complete. If the assessment identifies potential contamination, further action will be required. Prior to acquiring the Site, and as a condition of receiving State funding, the District is required to obtain site approval from DTSC, indicating that the Site does not pose a risk to human health or the environment, and that "no further action" is required with respect to the investigation or remediation of any hazardous substances.

Impact Threshold Analysis

The following analysis focuses on the potential environmental hazards and exposure to hazardous materials impacts associated with implementation of proposed High School No. 5, as compared to the 2011 Approved Project (the baseline), and the proposed 2012 Modified Project. As indicated below, High School No. 5 does not increase the potential impacts associated with hazards or hazardous materials.

IMPACT 5.4-1: THE PROJECT SITE DOES NOT CONTAIN ONE OR MORE PIPELINES, SITUATED UNDERGROUND OR ABOVEGROUND, WHICH CARRY HAZARDOUS SUBSTANCES, ACUTELY HAZARDOUS MATERIALS, OR HAZARDOUS WASTES. [IMPACT H-3]

Impact Analysis:

2011 Approved Project

A pipeline safety hazard assessment ("PSHA") was prepared for the Proposed Project (TPC|DC&E 2013) to evaluate potential exposure and fatality risk to staff and visitors from underground or at-grade natural gas or hazardous liquid pipeline releases on or within 1,500 feet of the project site.

The PSHA identified two natural gas transmission pipelines within 1,500 feet of the school site. No hazardous liquid or chemical pipelines were reported within the 1,500-foot radius. In addition, there were two former jet fuel pipelines that were located beneath the proposed school site (Earth Tech, 2003). The pipelines were 12 inches and 8 inches in diameter and were part of the base's fuel pipeline system. The

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pipelines transported jet fuel from Tank Farm 555, which was located across Irvine Boulevard at the end of El Toro MCAS Road, to Tank Farm 5, which was located northwest of the school site. The pipelines were decommissioned in 2001 by flushing the lines with water, removing residual fuel, cleaning the interior with a cleaning pig, hydrostatic testing, filling the lines with cement slurry, and capping the lines with blind flanges (OHM Remedial Services Corp, 2001). Because these pipelines are no longer active and cannot be reactivated in the future, they are not listed in the State Fire Marshal's database of hazardous liquid pipelines and were not considered for further evaluation.

Natural Gas Pipelines: Natural gas pipeline data was obtained from the Southern California Gas Company (SCGC). There is a 6-inch natural gas distribution pipeline located beneath Irvine Boulevard, approximately 94 feet northeast from the proposed school's property boundary. Approximately 1,150 feet north from the school site, the 6-inch pipeline expands to an 8-inch natural gas distribution pipeline and continues to the northwest beneath Trabuco Road.

Both pipelines have a maximum allowable operating pressure ("MAOP") of 375 pounds per square inch ("psig"). The pipelines are constructed of steel and are wrapped and equipped with an induced current cathodic protection system to minimize corrosion. They are inspected annually in accordance with Federal (49 CFR 192) and State (CPUC General Order 112-E) regulations. The approximate depth of cover is 36 inches.

Water Pipelines: There are two existing large volume (>12 inches) water pipelines within 1,500 feet of the school site and there are plans for two future large volume water pipelines within that distance, according to the Irvine Ranch Water District. There is one existing 36-inch potable water transmission pipeline and one existing 16-inch recycled water pipeline beneath Irvine Boulevard. There are future plans to install a 12-inch potable water pipeline and a 16-inch recycled water pipeline in a road that would be constructed immediately west of the school site as part of the Great Park Neighborhood development.

Conclusions

The results of the PSHA indicate a total individual risk of 1.2×10^{-10} from the presence of natural gas pipelines. This is much less than the California Department of Education ("CDE") significance threshold of one in a million (1.0×10^{-6}). Therefore, the risk to staff or students at the school site is not considered to be significant and no mitigation measures are required.

With respect to water pipelines, the water released from a full-flow rupture of the water pipelines would not exceed the confines of the street curbing, with the exception of a 36-inch water pipeline beneath Irvine Boulevard. Based on the conservative assumptions in the CDE guidance document, which assumes that all water released from the pipeline would reach the surface, the depth of water that could possibly flow onto the school site would be one inch, which is much less than the one-foot depth that warrants further evaluation by CDE. In addition, the area of the school site that would be impacted from an overflow of water above the street curbing would be the athletic fields and hard courts, which would result in a minimal impact. Given the low probability of a water pipeline failure and the low probability that all of the released water would reach the surface, the impact from a catastrophic rupture of the 36-inch pipeline beneath Irvine Boulevard on flooding at the school site would be less than significant. For all other water pipelines, the predicted releases would be confined within street curbing and would not impact the school site. Therefore, impacts from nearby pipelines would be less than significant.

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Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR because net impacts from on- or offsite pipelines would be less than significant.

2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change. No additional impacts are associated with the Proposed Project under the 2012 Modified Project other than those identified above.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR because net impacts from on- or offsite pipelines would be less than significant.

IMPACT 5.4-2: THE PROJECT SITE IS NOT LOCATED NEAR AN ABOVEGROUND WATER OR FUEL STORAGE TANK OR WITHIN 1,500 FEET OF AN EASEMENT OF AN ABOVEGROUND OR UNDERGROUND PIPELINE THAT CAN POSE A SAFETY HAZARD TO THE SITE. [THRESHOLD H-4]

Impact Analysis:

2011 Approved Project

No aboveground storage tanks were identified within 1,500-feet of the site based on topographic maps, aerial photographs, and a site reconnaissance (TPC|DC&E 2012). No impacts from aboveground water or fuel storage tanks are anticipated, and no mitigation measures are required.

With respect to aboveground and underground pipelines, as described above, the results of the PSHA indicate that risk from the presence of natural gas pipelines is much less than the CDE significance threshold of one in a million (1.0×10^{-6}). In addition, the impact from a catastrophic rupture of the 36-inch pipeline beneath Irvine Boulevard on flooding at the school site would be less than significant, and the predicted releases from all other water pipelines would be confined within street curbing and would not impact the school site. Therefore, impacts from nearby pipelines would be less than significant, and no mitigation measures are required.

Mitigation Program and Net Impact

No mitigation measures are introduced in this DSEIR because net impacts from aboveground water or fuel storage tank or pipelines would be less than significant.

2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change. No additional impacts are associated with the Proposed Project under the 2012 Modified Project scenario other than those identified above.

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Mitigation Program and Net Impact

No mitigation measures are introduced in this DSEIR because net impacts from aboveground water or fuel storage tank or pipelines would be less than significant.

IMPACT 5.4-3: THE PROPOSED PROJECT WOULD NOT EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL. [IMPACT H-3]

Impact Analysis:

2011 Approved Project

The project involves the construction and operation of a high school. The operation of the proposed school would not release a substantial amount of hazardous emissions into the environment or require significant amounts of hazardous materials, substances, or wastes that could impact another school. Long-term operation of the new buildings at the site would not involve the transport, storage, use, or disposal of hazardous materials. The types of hazardous materials generally associated with the operation of a school are restricted to common substances such as commercial cleansers, paints, aerosol cans, fertilizers, etc., used by the janitorial and/or maintenance staff, or small quantities of laboratory chemicals. These materials would be used in small quantities and would be stored in compliance with federal, state, and local health and safety requirements. No impact is anticipated, and no mitigation measures are required.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR because net impacts from hazardous emissions from the construction and operation of a high school would be less than significant.

2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change. No additional impacts are associated with the Proposed Project under the 2012 Modified Project Scenario.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR because net impacts from hazardous emissions from the construction and operation of a high school would be less than significant.

IMPACT 5.4-4: THE PROPOSED PROJECT WOULD NOT CREATE AN AIR QUALITY HAZARD DUE TO THE PLACEMENT OF A SCHOOL WITHIN ONE-QUARTER MILE OF: (A) PERMITTED AND NONPERMITTED FACILITIES IDENTIFIED BY THE JURISDICTIONAL AIR QUALITY CONTROL BOARD OR AIR POLLUTION CONTROL DISTRICT; (B) FREEWAYS AND OTHER BUSY TRAFFIC CORRIDORS; (C) LARGE AGRICULTURAL OPERATIONS; AND/OR (D) A RAIL YARD, WHICH MIGHT REASONABLY BE ANTICIPATED TO EMIT HAZARDOUS AIR

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EMISSIONS, OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIAL, SUBSTANCES, OR WASTE. [IMPACT H-6]

Impact Analysis:

2011 Approved Project

Public Resources Code Section 21151.8 and Education Code Section 17213 prohibit the approval of an EIR or negative declaration for a project involving the purchase of a school site or the construction of a new elementary or secondary school unless the governing board of the school district makes one of the following written findings:

1. Consultation identified no permitted or nonpermitted facilities, or other pollution sources as specified in PRC §21151.8(a)(2) ; or
2. The facilities or other pollution sources specified in PRC §21151.8(a)(2) exist, but one of the following conditions applies:
 - A. The health risks from the facilities or other pollution sources do not and will not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school.
 - B. Corrective measures required under an existing order by another government entity that has jurisdiction over the facilities or other pollution sources will, before the school is occupied, result in the mitigation of all chronic or accidental hazardous air emissions to levels that do not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school. If the governing board makes this finding, the governing board shall also make a subsequent finding, prior to the occupancy of the school, that the emissions have been mitigated to these levels.
 - C. For a school site with a boundary that is within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor, the governing board of the school district determines, through analysis pursuant to paragraph (2) of subdivision (b) of Section 44360 of the Health and Safety Code, based on appropriate air dispersion modeling, and after considering any potential mitigation measures, that the air quality at the proposed site is such that neither short-term nor long-term exposure poses significant health risks to pupils.
3. Neither of the conditions set forth in above (1) or (2) can be met, and the school district is unable to locate an alternative site that is suitable due to a severe shortage of sites that meet the requirements in subdivision (a) of Section 17213 of the Education Code. If the governing board makes this finding, the governing board shall adopt a statement of Overriding Considerations pursuant to Section 15093 of Title 14 of the California Code of Regulations.

To determine the potential for significant air pollution levels from stationary sources of emissions in the Site's vicinity, the South Coast Air Quality Management District ("SCAQMD") Facility Information Detail ("FIND") website was accessed on April 20, 2012 to perform a "grid search" for facilities within a quarter mile radius of the proposed school site with the potential to emit hazardous or acutely hazardous air emissions. Based on the online database search, no facilities were identified within ¼ mile of the site.

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In addition, a reconnaissance of the area indicated that manufacturing facilities were not located in the vicinity of the site.

To identify non-permitted emitters, maps and aerial photographs of the area within a quarter-mile radius of the site were reviewed and a field survey was conducted. The review identified no large-scale agricultural operations, railroads, freeways, or busy traffic corridors within a quarter mile of the site. Although there have been agricultural operations on the project site itself, these operations were small in scale and would be replaced with urban uses including the proposed high school facilities. Therefore, no impact is anticipated to the project site.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR since net impacts from large-scale agricultural operations, railroads, freeways, or busy traffic corridors within a quarter mile of the Project Site would not be significant.

2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change. No additional impacts are associated with the Proposed Project under the 2012 Modified Project scenario.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR since net impacts from large-scale agricultural operations, railroads, freeways, or busy traffic corridors within a quarter mile of the Project Site would not be significant.

IMPACT 5.4-5: THE PROPOSED PROJECT IS NOT IN AN AREA DESIGNATED IN A CITY, COUNTY, OR CITY AND COUNTY GENERAL PLAN FOR AGRICULTURAL USE AND ZONED FOR AGRICULTURAL PRODUCTION. [IMPACT H-7]

Impact Analysis:

2011 Approved Project

The Project Site is zoned TTOD and is approved for development under the 2011 Approved Project. The District would receive a mass-graded site and no impacts concerning past agricultural uses are anticipated.

Mitigation Program and Net Impact

No mitigation measures are introduced in this DSEIR since net impacts related to agricultural production would be less than significant.

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2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change. No additional impacts are associated with the Proposed Project under the 2012 Modified Project Scenario.

Mitigation Program and Net Impact

No mitigation measures are introduced in this DSEIR since net impacts related to agricultural production would be less than significant.

IMPACT 5.4-6: THE PROPOSED PROJECT IS LOCATED ON A SITE THAT IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 (INCLUSIVE OF SECTION 25356 OF THE HEALTH & SAFETY CODE), BUT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT. [IMPACT H-9]

Impact Analysis;

2011 Approved Project

The Planning Center|DC&E utilized the electronic database service Environmental Database Resources (EDR) to complete the environmental records review. The database search was used to identify properties that may be listed in the referenced agency records, located within the ASTM-specified search radii indicated below:

- NPL sites: 1 mile
- CERCLIS sites: 0.5 mile
- CERCLIS NFRAP sites Site and Adjoining
- Federal ERNS: Site only
- RCRA non-CORRACTS TSD facilities: 0.5 mile
- RCRA CORRACTS TSD facilities: 1 mile
- RCRA Generators: Site and Adjoining
- State Hazardous Waste Sites: 1 mile
- Registered Underground Storage Tanks: Site and Adjoining
- State Landfills and Solid Waste Disposal Sites: 0.5 mile
- State Leaking Underground Storage Tanks: 0.5 mile

According to the database report obtained from EDR, dated August 9, 2012, the subject property and adjoining properties were identified in the environmental databases searched by EDR. MCAS El Toro is identified as a Department of Defense (DOD) site, DOD sites are federally owned or administered lands that have any area equal to or greater than 640 acres. The original base landfill is located approximately 750 feet to the northwest of the proposed school site. The original base landfill was active from 1943 until 1955. It was the original former MCAS El Toro landfill, which was operated as a cut-and-fill disposal facility. Based on site inspections and information reviewed, the school site is not located on an area of the base that was identified as a current or former disposal site.

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As previously mentioned, an EBS for MCAS was prepared in support of the base closure in 1995 in compliance with the provisions of the CERCLA, to facilitate the rapid return of uncontaminated properties to the local community during the BRAC process. The majority of the Proposed Project site is located in Navy Sale Parcel I and was found suitable to transfer as part of the Finding of Suitability to Transfer (FOST) #1 in July 2004, and the former jet fuel line was included in FOST #2 in 2005. The FOST did not place any restrictions on land use for the Proposed Project site, and no significant impacts from the construction and operation of the Proposed Project are anticipated. In addition, California Education Code Section 17213.1 requires that the District follow a prescribed environmental review process with oversight by the DTSC. Prior to school construction, the District is required to obtain site approval from DTSC, indicating that the site does not pose a risk to human health or the environment, and that “no further action” is required with respect to the investigation or remediation of any hazardous substances. Therefore, based on prior regulatory approvals, and the requirement for further environmental regulatory review for school sites, a less than significant impact is anticipated.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR since net impacts from hazardous materials would be less than significant.

2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change. No additional impacts are associated with the Proposed Project under the 2012 Modified Project scenario.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR since net impacts from hazardous materials would be less than significant.

IMPACT 5.4-7: THE PROJECT SITE DOES NOT CONTAIN A CURRENT OR FORMER HAZARDOUS WASTE DISPOSAL SITE OR SOLID WASTE DISPOSAL SITE. [IMPACT H-10]

Impact Analysis:

2011 Approved Project

As mentioned above, according to the database report obtained from EDR, dated August 9, 2012, the subject property and adjoining properties were identified in the environmental databases searched by EDR. Based on site inspections and information reviewed, the school site is not located on an area of the base that was identified as a current or former disposal site. The Project Site was found suitable to transfer as part of the FOST #1 in July 2004, and FOST #2 in 2005. The FOST did not place any restrictions on land use for the Project Site, and no significant impacts from the construction and operation of the Proposed Project are anticipated.

In addition, California Education Code Section 17213.1 requires that the District follow a prescribed environmental review process with oversight by the DTSC. Prior to school construction, the District is

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required to obtain site approval from DTSC, indicating that the site does not pose a risk to human health or the environment, and that “no further action” is required with respect to the investigation or remediation of any hazardous substances. Therefore, based on prior regulatory approvals, and the requirement for further environmental regulatory review for school sites, a less than significant impact is anticipated.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR because net impacts related to a current or former hazardous waste disposal site or solid waste disposal site would be less than significant.

2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR because net impacts related to a current or former hazardous waste disposal site or solid waste disposal site would be less than significant.

IMPACT 5.4-8: THE PROPOSED SCHOOL SITE IS SITUATED WITHIN 2,000 FEET OF A SIGNIFICANT DISPOSAL OF HAZARDOUS WASTE. [IMPACT H-12]

Impact Analysis:

2011 Approved Project

As described above, according to the database report obtained from EDR, dated August 9, 2012, the subject property and adjoining properties were identified in the environmental databases searched by EDR. RCRA Facility Assessment Sites, Potential Release Locations, Temporary Accumulation Areas, Aboveground Storage Tanks, Aerial Photograph Anomaly Areas, IRP Sites, wash racks, silver recovery units, oil/water separators, underground storage tanks, PCB equipment and Radiological Materials Investigation sites were not identified as being located within the proposed school site boundaries (Earth Tech 2003a). In addition, sites within 2,000 feet of the Project Site were not determined to have a significant impact, and it was found suitable to transfer as part of the FOST #1 in July 2004, and FOST #2 in 2005. The FOST did not place any restrictions on land use for the Proposed Project site, and no significant impacts from the construction and operation of the project are anticipated.

Mitigation Program and Net Impact

No mitigation measures are introduced in this DSEIR because net impacts related to proximity of a significant disposal of hazardous waste would be less than significant.

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2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change. No additional impacts are associated with the Proposed Project under the 2012 Modified Project scenario.

2012 Mitigation Program and Net Impact

No mitigation measures are introduced in this DSEIR because net impacts related to proximity of a significant disposal of hazardous waste would be less than significant.

IMPACT 5.4-9: THE PROPOSED PROJECT WOULD NOT IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN. [IMPACT H-15]

Impact Analysis:

2011 Approved Project

The Proposed Project would not conflict with any adopted emergency response or evacuation plans. The site's surrounding roadways would provide emergency access through the project area and to surrounding properties during the Project's construction. In the event that a temporary closure of any street is required, the project's contractor would be required to provide the City of Irvine with a construction schedule and plans for the closure of the street and to ensure that the placement of construction materials and equipment does not obstruct a detour route. The Project's contractor would be required to comply with all county and/or fire department recommendations, as applicable, for reducing impacts to emergency response or evacuation plans.

Onsite emergency response would be facilitated through the use of the school's driveways, parking lot, and paved areas, which would provide emergency vehicle access. The District would be required to obtain local fire authority approval of the site plan, including emergency access routes, prior to initialization of any construction activities. Mandatory compliance with existing rules and regulations would ensure that no significant impacts would occur. Emergency access at the school is addressed in more detail in section 5.11.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR since net impacts related to impairment of emergency response plans would be less than significant.

2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change. No additional impacts are associated with the Proposed Project under the 2012 Modified Project scenario.

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Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR since net impacts related to impairment of emergency response plans would be less than significant.

IMPACT 5.4-10: THE PROPOSED PROJECT WOULD NOT EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS. [THRESHOLD H-16]

Impact Analysis:

2011 Approved Project

The Project Site would be surrounded by developed property, and would not be located in or adjacent to an area prone to wildland fires. The approved Wildlife Corridor Feature is located greater than ½ mile south, and would not impact the project site.

Mitigation Program and Net Impact

No mitigation measures are introduced here in this DSEIR because net impacts related to exposure to wildland fires would be less than significant.

2012 Modified Project

When considering the 2012 Modified Project, impacts associated with the Proposed Project would not change. No additional impacts are associated with the Proposed Project under the 2012 Modified Project scenario.

Mitigation Program and Net Impact

No mitigation measures are introduced in this DSEIR because net impacts related to exposure to wildland fires would be less than significant.

5.4.6 *Cumulative Impacts*

The assessment of potential cumulative impacts with regard to hazards and hazardous materials refers to the potential for on-site and off-site hazardous materials to have a cumulative effect on the health and well-being of project occupants. The hazardous materials study area considered for cumulative impacts consists of (1) the 2011 Approved Project and 2012 Modified Project activities, and (2) the areas affected by other off-site projects where activities could directly or indirectly affect the presence or dispersion of hazardous materials onto the Proposed Project site. The cumulative impact of hazardous and hazardous materials as a result of these projects will be less than significant.

A number of the areas adjacent to the Proposed Project site have been developed since the 2011 Approved Project. In addition, substantial portions of the base which may have posed cumulative impacts have been remediated and released for unrestricted use. The DON process has addressed and remediated the potential instances between the site and adjacent areas where possible impacts were identified. Finally, the

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cumulative impacts of Sites 18 and 24 have been reduced by the remediation processes initiated in 2006. The Proposed Project is consistent with school facility development and would involve the use of limited amounts of hazardous materials. In addition, the contribution of hazardous materials use and hazardous waste disposal with implementation of the project is minimal. With implementation the institutional restrictions imposed by the DON that are described above, the other PPPs described previously, and the mitigation measures imposed on the 2011 Approved Project and 2012 Modified Project, the cumulative impact of hazards and hazardous materials would be less than significant.

5.4.7 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, standard conditions of approval, and PPPs, Impacts 5.4-1 through 5.4-10 would be less than significant.

5.4.8 Applicable Mitigation Measures from the 2011 Approved Project and 2012 Modified Project

Mitigation measures specified for implementation in the 2011 Approved Project and associated MMRP are set forth below. All hazards and hazardous materials Mitigation Measures remained the same for the 2012 Modified Project, as for the 2011 Approved Project, with two minor modifications to Mitigation Measures HH-2 and HH-3 adopted by the City for the 2011 Approved Project. The modification to HH-2 was made to update the reference to the 2012 Modified Project. The modification was made to HH-3 to note that the high fire hazard maps are occasionally updated and does not affect the substance of the mitigation measure. Modifications to the original mitigation measure are identified in ~~strikeout~~ text to indicate deletions and underlined to signify additions.

Note that the Mitigation Agreement between the District and Heritage Fields provides for the site to be delivered to the District in a master pad condition, mass graded and compacted, with backbone infrastructure installed (roadway, storm drains, sanitary sewer, water, etc.) and stubbed wet and dry utilities. No additional mitigation measures were required based on the analysis of the High School No. 5 project.

2011 Approved Project

HH-3 The Community Development Department, in coordination with the Orange County Fire Authority (“OCFA”), will be responsible for review of all development plans, which would include evaluation of very high fire severity zones, special fire protection plans, and any requirements for fuel modification zones. Projects potentially impacted by wildland fire hazards will be subject to OCFA Guidelines for “Development Within and Exclusion from Very High Fire Severity Zones” and “Fuel Modification Plans and Maintenance.” Additionally, all demolition, renovation, and construction activities in the project area will be subject to review by OCFA to ensure adequate fire protection, water flow, emergency access, design features, etc., according to the standards of the Uniform Fire Code and the California Fire Code. Due to the implementation of these standard fire protection procedures and based on the revised Fire Hazard Maps, the 2012 Modified Project is not anticipated to result in significant short- or long-term adverse impacts related to fire hazards.

HH-4 Prior to issuance of occupancy permits of any existing structure at the former MCAS El Toro, a fire life-safety evaluation of the structure including recommendations for improvements

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required for compliance with current Building Codes for use of existing structures adopted by the City and plans for any required improvements shall be submitted to the Chief Building Official for review and approval.

HH-5 Prior to the issuance of a grading permit, the applicant shall prepare and the Director of Community Development shall approve a protocol plan (including but not limited to worker training, health and safety precautions, additional testing requirements, and emergency notification procedures) in the event that unknown hazardous materials are discovered during grading, construction, and/or related development activities. Additionally, said protocol plan will be revised should the discovery of previously unknown hazardous materials be made during any of the above mentioned development activities. The applicant and/or property owner that discovers contamination due to past military operations not previously identified by the DON shall be responsible for notifying the DON, appropriate regulatory agencies, and the Director of Community Development of the City in a timely manner. Additionally, said Protocol Plan shall be revised should the discovery of previously unknown hazardous materials be made during any of the above mentioned development activities.

HH-6 The City shall develop and maintain the location and status, as well as other pertinent information, of all monitoring wells on the former MCAS El Toro in a geographic information systems database (“GIS”). The City will review all permit applications on the former air station for monitoring well locations that may be affected by a permit, and require applicants to maintain appropriate access. Access to monitoring wells will be limited to authorized personnel.

2012 Modified Project

Same as the 2011 Approved Project.

5.4.9 Additional Mitigation Measures for the Proposed Project

No additional mitigation is required because California Education Code Section 17213.1 requires that the District follow a prescribed environmental review process with oversight by the Department of Toxic Substances Control. The District is required to obtain site approval from DTSC, indicating that the site does not pose a risk to human health or the environment, and that “no further action” is required with respect to the investigation or remediation of any hazardous substances (see IUSD 4-1 in Section 5.4.5).

5.4.10 Level of Significance After Additional Mitigation

Implementation of PPPs by the community developed prior to the delivery of the mass-graded site and the existing requirement of Mitigation Measure HAZ-1 by the District would ensure that impacts related to hazards and hazardous materials are less than significant.

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