

8. Impacts Found Not to Be Significant

California Public Resources Code Section 21003 (f) states: "...it is the policy of the state that...[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in CEQA Guidelines Section 15126.2(a), which states that "[a]n EIR [Environmental Impact Report] shall identify and focus on the significant environmental impacts of the proposed project," and Section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment." The CEQA Guidelines allow use of an Initial Study to document project effects that are less than significant (Guidelines Section 15063[a], [c]). Guidelines Section 15128 requires that an EIR contain a statement that briefly indicates the reasons that various possible significant effects of a project were determined not to be significant, and were therefore not discussed in detail in the Draft EIR. The discussion in this chapter is provided pursuant to those requirements.

As described in Section 1.2.2, *Type and Purpose of This DSEIR*, this DSEIR has been prepared as a supplement to the Certified EIR consistent with Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15163. Pursuant to those sections, the Proposed Project, as compared to the 2011 Approved Project, would not result in any new significant impacts or an increase in the severity of significant impacts previously identified for the 2011 Approved Project for the impacts listed below.

8.1 ASSESSMENT IN THE INITIAL STUDY

A Notice of Preparation ("NOP") of this DSEIR and an Initial Study (IS) for the Proposed Project were distributed by the District on May 1, 2013, to the State Clearinghouse, responsible agencies, and interested parties (See Appendix A of this DSEIR). The IS prepared for the Proposed Project determined that the impacts of the Proposed Project, as compared to the 2011 Approved Project, listed below would be less than significant. Consequently, they have not been further analyzed in this DSEIR.

Impact categories and questions below, as contained in the IS for the Proposed Project, summarize the CEQA Environmental Checklist and the California Education Code and California Code of Regulations that identify special requirements for a state-funded new school. The IS for the Proposed Project dated May 2013 determined that none of the impacts to Agriculture and Forestry Resources, Geology and Soils, Mineral Resources, Population and Housing, and Recreation would result in any new significant impacts based on the conditions set forth in Section 15162 of the CEQA Guidelines and the justification for the IS determination is reiterated in Table 8-1. However, subsequent to the circulation of the IS, it was also concluded that none of the impacts to Biological Resources, Cultural Resources and Hydrology and Water Quality would result in any new significant impacts compared to the 2011 Approved Project as discussed in Section 8.2, *Post Initial Study Assessment*.

8. Impacts Found Not to Be Significant

Table 8-1
Project Impacts Found Not to Be Significant

<i>Environmental Issue</i>	<i>Initial Study Determination</i>	<i>Discussion</i>
I. AESTHETICS. Would the project:		
a) Have a substantial adverse effect on a scenic vista?	No Impact	The project site is not located in the vicinity of any scenic vista. None of the surrounding roadways are designated county or state scenic highways. The city's general plan designates Interstate 5 (I-5) as an urban character highway. The Proposed Project would not result in adverse impact to any existing scenic resources. No impact is anticipated.
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	The Project Site was used for agricultural purposes on the MCAS El Toro base. There are no trees or rock outcroppings, and the site does not contain any scenic resources. The Certified EIR does not identify any scenic resources in the project area. No impact is anticipated.
II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:		
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	No Impact	The northern portion of the Project Site is designated Prime Farmland by the Farmlands Designation Map for Orange County prepared by the Farmland Mapping and Monitoring Program of the California Department of Conservation, Division of Land Resources Protection (DOC 2013). The Certified EIR designated the Project Site as Trails and Transit Oriented Development (TTOD) that allows for a mix of residential, commercial, recreational, and educational uses that support a multi-use environment and determined that conversion of the farmland to nonagricultural land would be significant and unavoidable. The Proposed Project would not require a change in the land use designation for the Project Site. Therefore, although portions of the Project Site are currently designated Prime Farmland, the Project Site was already committed to nonagricultural uses, and environmental impacts have been addressed as significant and unavoidable by the Certified EIR. No additional conversion would occur and no new impact to agricultural resources is anticipated as a result of the Proposed Project. Development of projects under the 2003 EIR would result in the permanent loss of 683 acres under the Base Plan (574 acres of Prime Farmland, 46 acres of Farmland of Statewide Importance, and 63 acres of Unique Farmland) and 802 acres under the Overlay Plan (651 acres of Prime Farmland, 88 acres of Farmland of Statewide Importance, and 63 acres of Unique Farmland). The conversion of the Project Site was included as part of this analysis in the 2003 EIR.

8. Impacts Found Not to Be Significant

*Table 8-1
Project Impacts Found Not to Be Significant*

		<p>Under the 2003 EIR, 443 acres were designated agricultural preserve under the Base Plan, which includes Planning Area Zones 1, 4, 26, 27, 28, 29, 30, and 31; 307 acres were designated agricultural preserve under the Overlay Plan, which includes Planning Area Zones 1, 4, and 26. The Project Site is not adjacent to these areas. Subsequently, the Addendum 5 approval in July 2008 removed the agriculture designation for 173 acres in Planning Area Zone 1, now identified as District 8. With that, the Certified EIRs considered environmental effects of converting 975 acres of agricultural land to nonagricultural use and preservation of 117 acres of agricultural preserve in Planning Area 51. The proposed high school would not result in additional conversion of special status agricultural land to nonagricultural use compared to the 2011 Approved Project.</p> <p>The Certified EIR found the impact to be significant and unavoidable and listed three feasible mitigation measures. However, only one of these three mitigation measures is applicable to the Proposed Project, which is to work cooperatively with adjacent farmers to minimize conflicts between agricultural operation and adjacent urban uses. The first mitigation measure required submission to and approval from the City of Irvine Director of Community Development a completed occupancy disclosure form to be included as part of the rental/lease agreement and as part of the sales literature for a project within the farmland. Because the proposed high school would not require such rental/lease agreement, this mitigation does not apply. The second mitigation measure encouraged “Heritage” and community service/educational farming operations within utility easements and other lands. Heritage farming is small-scale specialty farming operations that can be accommodated in an urban environment. The Project Site was already committed as a nonagricultural use (TTOD) and does not involve any utility easements. This mitigation measure does not apply. Therefore, the conversion of the Project Site from agricultural use to nonagricultural use has already been addressed and no additional impact would occur.</p>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<p>No Impact</p>	<p>The Project Site is zoned 8.1, Trails and Transit Oriented Development (TTOD) and is not under a Williamson Act contract. The proposed school would not conflict with the agriculture zoning because agricultural uses are not existing or planned on this property. Additionally, the Project Site has already been permitted for mixed use development; therefore, no agricultural zoning impacts would occur.</p>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned</p>	<p>No Impact</p>	<p>Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (California Public</p>

8. Impacts Found Not to Be Significant

*Table 8-1
Project Impacts Found Not to Be Significant*

Timberland Production (as defined by Government Code section 51104(g))?		Resources Code Section 12220[g]). Timberland is defined as "land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (California Public Resources Code Section 4526). The high school site is not designated forest land or timberland production. No impact would occur.
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	The area disturbed by the Proposed Project do not contain forest land; thus, the project would not convert forest land to nonforest land. No impact would occur.
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	The Proposed Project would not involve any changes in the environment that would cause conversion of farmland to nonagricultural use or forest land to nonforest use. No impact would occur.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

e) Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School? [PRC § 21151.8 (a)(1)(D); Ed. Code § 17213 (c)(1)(C)]	No Impact	The Project Site is not within 500 feet of the edge of a freeway or busy traffic corridor. The nearest freeway is SR-241, 1.7 miles to the north, and I-5 is 2.2 miles to the south. A busy traffic corridor is a roadway that, on an average day, has traffic in excess of 100,000 vehicles in an urban area (Section 50104.7 of the Health and Safety Code). Irvine Boulevard carries less than 100,000 vehicles per day. No impact is anticipated.
f) Create objectionable odors affecting a substantial number of people?	No Impact	The Project Site is undeveloped and there are no known sources of objectionable odors that would impact the high school. The project would also not emit objectionable odors that would affect a substantial number of people. The threshold for odor is if a project creates an odor nuisance pursuant to SCAQMD Rule 402, Nuisance, which states: A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals. The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing,

8. Impacts Found Not to Be Significant

*Table 8-1
Project Impacts Found Not to Be Significant*

		and food manufacturing facilities. Schools are not associated with foul odors that constitute a public nuisance; therefore, odor impacts would be less than significant. Potential odors resulting from the project would occur during the construction phase and would be associated with the application of asphalt and paint and the emission of construction vehicle exhaust at the campus and along the access routes. Nuisance odors would be confined to the immediate vicinity of the construction equipment and would not affect substantial numbers of people. Odor impacts would be less than significant.
--	--	---

IV. BIOLOGICAL RESOURCES. Would the project:

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less Than Significant Impact	No evidence of a wildlife corridor was found during the biological survey performed for the Certified EIR. In addition, according to the Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) and Implementation Agreement, there are no designated preserve areas within the Project Site. The Proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species. The Project Site is designated TTOD in the OCGP Plan and is not part of the wildlife corridor designed as part of the OCGP Plan. Therefore, impacts would be less than significant.
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less Than Significant Impact	The City of Irvine enacted the Urban Forestry Ordinance (UFO) in 1994. A tree is defined by the UFO as any woody plant species that can typically grow with a single trunk and a distinguishable crown and have a height of 15 feet or greater at maturity (Municipal Code Section 5-7-404). The Project Site does not contain any trees. Implementation of the Proposed Project would not conflict with the UFO and impacts would be less than significant.
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Less Than Significant Impact	The Project Site was analyzed in the Certified EIR as TTOD. Development in accordance with the OCGP would not conflict with the adopted NCCP/HCP because it designated portions of Planning Area 51 for habitat preserve. Although the Project Site is in Planning Area 51, it is not designated habitat preserve by the adopted NCCP/HCP. Development of the Proposed Project would not conflict with the NCCP/HCP. Impacts would not be significant.

V. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	No Impact	Section 15064.5 defines historical resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered to be “historically significant” if it meets one of the following criteria: <ul style="list-style-type: none"> i) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
--	-----------	--

8. Impacts Found Not to Be Significant

*Table 8-1
Project Impacts Found Not to Be Significant*

		<ul style="list-style-type: none"> ii) Is associated with the lives of persons important in our past; iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or iv) Has yielded, or may be likely to yield, information important in prehistory or history. <p>The Project Site is vacant and does not contain any structures. No listings under the National Register of Historic Places would be impacted by the Proposed Project. No impacts related to historical resources would occur.</p>
d) Disturb any human remains, including those interred outside of formal cemeteries?	No Impact	There are no known human remains in the project area. However, because grading activities could uncover previously unknown human remains, in the event that remains are uncovered, California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 require that the District stop all work in the area of the find and notify the County Coroner and the Native American Heritage Commission. Mandatory compliance with these requirements would ensure that impacts to human remains are less than significant.
VI. GEOLOGY AND SOILS. Would the project:		
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:		
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Source: Division of Mines and Geology Special Publication 42)	No Impact	The Project Site does not lie within or immediately adjacent to a fault-rupture hazard zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act. The nearest Alquist-Priolo Earthquake Fault Zone is the Elsinore Fault and is located approximately 12.5 miles northeast of the Project Site. On the basis of existing geologic maps, the potential for tectonic fault rupture at the Project Site is considered negligible. Therefore, no impact is anticipated.
ii) An active earthquake fault or fault trace, or is it located within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan? [Ed. Code, § 17212; CCR Title 5 § 14010 (f)]	No Impact	As mentioned above, the Project Site does not lie within or immediately adjacent to a fault-rupture hazard zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act. The nearest Alquist-Priolo Earthquake Fault Zone is the Elsinore Fault and is located approximately 12.5 miles northeast of the Project Site. On the basis of existing geologic maps, the potential for tectonic fault rupture at the Site is considered negligible. In addition, the City of Irvine General Plan Safety Element and Seismic Element does not designate the Project Site as geologically hazardous. No impact is anticipated.

8. Impacts Found Not to Be Significant

*Table 8-1
Project Impacts Found Not to Be Significant*

iii) The construction, reconstruction, or relocation of any school building on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building? [Ed. Code § 17212; CCR, Title 5 § 14010 (f)]	No Impact	The Project Site is not underlain by any trace of a known geological fault. The two nearest active faults from Planning Area 51 are a branch of the Newport-Inglewood Fault 11.8 miles to the west and the Elsinore Fault 12.4 miles northeast. No impact is anticipated.
iv) Strong seismic ground shaking?	Less Than Significant Impact	The Project Site is not underlain by any active faults. However, there are a number of faults in the area—including the Newport-Inglewood Fault 11.8 miles to the west and the Elsinore Fault 12.4 miles to the northeast—that could cause moderate to strong ground shaking on the Project Site. During seismic events from numerous sources in the Orange County region, the Project Site is expected to experience moderate to strong ground shaking. However, geologic impacts associated with the Proposed Project would not be substantially greater than any other site in seismically active southern California. Moreover, standard engineering design practices would mitigate ground-motion impacts to a less than significant level. The high school would be designed in accordance with the seismic requirements of the California Building Code (CBC), Title 24, California Code of Regulations. A comprehensive geotechnical evaluation, including development-specific subsurface exploration and laboratory testing, would be required prior to design and construction of any school structures, and recommendations contained therein would be implemented as required. Therefore, impacts would be less than significant.
v) The construction, reconstruction, or relocation of any school building on a site subject to moderate-to-high liquefaction?	Less Than Significant Impact	The Project Site and surrounding area have been shown in the City of Irvine General Plan (2012) and CDMG (2001) to have a remote susceptibility to liquefaction. Historic high groundwater levels indicate groundwater has been greater than 40 feet below ground surface (CDMG 2000a). Liquefaction and seismic settlement potential cannot be ruled out in the alluvial formations underlying the Site. Final liquefaction and seismic settlement potential at the Site must be evaluated by a standard site-specific engineering geology/geotechnical investigation. Liquefaction and seismic settlement can be mitigated by proper engineering design. A comprehensive geotechnical evaluation, including development-specific subsurface exploration and laboratory testing would be required prior to design and construction of any school structures and recommendations contained therein will be implemented as required. A less than significant impact is anticipated.
vi) The construction, reconstruction, or relocation of any school building on a site subject to landslides?	No Impact	The Project Site is flat and is not identified as being subject to landslides (DMG 2001). The 2003/2011 also indicates that the Project Site does not have any significant impacts from landslides. No impact is anticipated.

8. Impacts Found Not to Be Significant

*Table 8-1
Project Impacts Found Not to Be Significant*

b) Result in substantial soil erosion or the loss of topsoil?	No Impact	Grading associated with the Proposed Project would involve the removal of soils, compaction, and possible import and export of fill materials. These activities would temporarily expose soils surfaces to increased wind and water erosion. However, these activities will be regulated by the Regional Water Quality Control Board requirement to prepare and implement a Storm Water Pollution Prevention Plan. In addition, the Project Site is relatively flat, will be developed as a school, and will contain buildings, and be landscaped and paved. Only a very minimal amount of soil erosion would be expected during its operation. A less than significant impact is anticipated.
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	No Impact	The Project Site is identified as SRA-2 (Seismic Response Areas) by the City of Irvine General Plan Seismic Element, with denser soils/deeper groundwater. The Certified EIRs also indicates that the project area has soils that are well suited for grading and construction and no adverse impacts from landslides, lateral spreading, subsidence, liquefaction or collapse. As mentioned above, a comprehensive geotechnical evaluation, including development-specific subsurface exploration and laboratory testing would be required prior to design and construction of any school structures and recommendations contained therein will be implemented as required. No impact is anticipated.
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Less Than Significant Impact	The Certified EIR indicates that some expansive soils may be present in localized areas in the project area. The high school would be designed in accordance with the requirements of the California Building Code (CBC), Title 24, California Code of Regulations. A comprehensive geotechnical evaluation, including development-specific subsurface exploration and laboratory testing would be required prior to design and construction of any school structures, and recommendations contained therein will be implemented as required. Therefore, impacts would be less than significant.
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	The Proposed Project would be connected to the municipal sewer system, and no septic tanks or alternative waste water disposal systems would be necessary. No impact is anticipated.

IIX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant Impact	The Proposed Project would involve the development and operation of a new high school. Significant amounts of hazardous materials would not be routinely transported, used, or disposed of in conjunction with the Proposed Project. Maintenance of the facility would likely require the use of cleaners, solvents, paints, and other janitorial products that are potentially hazardous. However, these materials would be utilized in relatively small quantities
---	------------------------------	--

8. Impacts Found Not to Be Significant

*Table 8-1
Project Impacts Found Not to Be Significant*

		and would be stored in compliance with established state and federal requirements. These materials would be used in accordance with normal operational safety practices, as employed at other school facilities within the District. Therefore, impacts would be less than significant.
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less Than Significant Impact	See Section 3.8 (a) above.
h) Is the property proposed school site 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? [CCR, Title 5 § 14010 (c)]	No Impact	Based on correspondence with Southern California Edison, there are no high voltage power lines within 350 feet of the Project Site. Therefore, no impact is anticipated.
k) Is the proposed school site located on a site containing or underlain by naturally occurring hazardous materials?	Less Than Significant Impact	There is no evidence for naturally occurring serpentine rock or formations containing significant quantities of asbestos in the surrounding region. In addition, there are no oil or natural gas fields located beneath the Site. With respect to radon, the Orange County region is classified by the United States Environmental Protection Agency as a low potential (at or less than 2 picocuries per liter). Therefore, impacts would be less than significant.
m) 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)] (Two nautical miles = 12,152 feet) (Does not apply to school sites acquired prior to January 1, 1966.)	No Impact	The Project Site is not within two miles of a public airport. The nearest airport, John Wayne International Airport, is over 8.5 miles from the Project Site. No impact is anticipated.
n) 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?	No Impact	There are no private airstrips or airport in the project vicinity. No impact is anticipated.

8. Impacts Found Not to Be Significant

Table 8-1

Project Impacts Found Not to Be Significant

IX. HYDROLOGY AND WATER QUALITY. Would the project:		
b) Substantially deplete groundwater supplies or substantially interfere with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less Than Significant Impact	The Certified EIR indicates that development of the project area will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Groundwater quality and ongoing military base remediation activities will be discussed as part of Section 3.8, <i>Hazards and Hazardous Materials</i> .
f) Otherwise substantially degrade water quality?	Less Than Significant Impact	The Proposed Project is required to comply with state, regional, and local water quality standards, and there are no unusual conditions associated with the Proposed Project that could result in substantial water quality degradation other than discussed in above Section 3.9 (e).
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	No Impact	The Project Site is zoned X by the FEMA Flood Insurance Map (map ID# 06059C0315J), indicating that it is out of 100-year and 500-year flood hazard zones. The Proposed Project would not construct any housing within a 100-year flood hazard area. No impact is anticipated.
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	No Impact	The Project Site is zoned X by the FEMA Flood Insurance Map (map ID# 06059C0315J). The Proposed Project would not impede or redirect flood flows within a 100-year flood hazard area. No impact is anticipated.
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	No Impact	The Certified EIR indicates that there is no levee or dam in the vicinity of the project area. Implementation of the Proposed Project would not result in a significant risk of loss, injury or death involving failure of a levee or dam. No impact is anticipated.
j) Is the Project Site subject to flooding or dam inundation? [Ed. Code § 17212; CCR, Title 5 § 14010 (g)]	No Impact	The Certified EIR indicates that there is no levee or dam in the vicinity of the project area. No flooding or dam inundation impact is anticipated.
k) Inundation by seiche, tsunami, or mudflow?	No Impact	A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. The Certified EIR indicates that there are no inland bodies of water, dams, or levees that could pose a substantial flood hazard to the Project Site. A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. There are no slopes on the Project Site that could pose a substantial flood hazard due to a mudflow. A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The Project Site is approximately nine miles inland from the Pacific Ocean. No substantially adverse risk of flooding due to a tsunami is anticipated. No impacts related to seiche, tsunami, and mudflow would occur.

8. Impacts Found Not to Be Significant

Table 8-1

Project Impacts Found Not to Be Significant

X. LAND USE AND PLANNING. Would the project:		
a) Physically divide an established community?	No impact	The Project Site and its surrounding areas are currently undeveloped and do not contain any established community. Development of the Proposed Project would not physically divide an established community. No impact is anticipated.
d) Conflict with any applicable habitat conservation plan or natural community conservation plan?	Less Than Significant Impact	Although Planning Area 51 contains designated habitat preserve in accordance with the Orange County Central-Coastal NCCP, the project is not part of this habitat preserve, and development of the Project Site would not conflict with any of the HCPs or NCCPs. No significant impacts to NCCP/HCPs were identified in the Certified EIR. Impacts would not be significant.
XI. MINERAL RESOURCES. Would the project:		
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	No Impact	The Certified EIR determined that development in the project area would not result in any impact on mineral resources because the site did not contain any such resources. The Project Site is mapped as Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey, designating areas where available geologic information indicates there is little likelihood that significant mineral resources are present. No impact is anticipated.
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No Impact	The Project Site does not contain any locally important mineral resources and is not delineated on a local general plan or other land use plans. No impact is anticipated.
XII. NOISE. Would the project result in:		
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	The Project Site is approximately eight miles from the John Wayne International Airport. No airport noise impact is anticipated.
g) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	There is no private airstrip in the project vicinity. The Proposed Project would not expose people to excessive noise levels related to a private airstrip. No private airstrip noise impact is anticipated.
XIII. POPULATION AND HOUSING. Would the project:		
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact	The Proposed Project would serve the existing and future district population, especially the future Great Park neighborhoods. The area surrounding the Project Site is already approved for development, and the Proposed Project is not a growth-inducing project. Implementation of the Proposed Project would not induce substantial population in the area. No impact is anticipated.

8. Impacts Found Not to Be Significant

Table 8-1

Project Impacts Found Not to Be Significant

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	No Impact	The Project Site is currently vacant, and no displacement of housing is involved with the project implementation. No impact would occur.
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	No Impact	The Project Site is currently vacant, and no replacement of housing is involved with the project implementation. No impact would occur.

XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

c) Schools?	No Impact	The Proposed Project would provide additional school facilities to meet the educational needs of the future Great Park neighborhoods. No additional school demands would be created and no schools impact is anticipated.
d) Parks?	Less Than Significant Impact	The proposed high school would serve the existing and future student population in the District boundaries that are already served by the existing local and regional parks system in the area. Development of the Proposed Project would not create the need for new parks or exacerbate the existing parks. Instead, the athletic facilities of the high school would complement the existing and future parks system in the City. Parks-related impacts would not be significant.
e) Other public facilities?	No Impact	The Proposed Project would not increase the need for other public facilities such as libraries and museums. No impact is anticipated.

XV. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No Impact	The Proposed Project would serve the existing and future district school population that is served by existing and future neighborhood and regional parks or other recreational facilities. The proposed high school would provide various athletic facilities and would not create the need for use of other existing recreational facilities in the area. The Proposed Project would not result in substantial physical deterioration of the recreational facilities in the area. No impact is anticipated.
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No Impact	The Proposed Project would serve the existing and future district school population that is served by existing and future neighborhood and regional parks or other recreational facilities. The proposed high school would provide various athletic facilities and would not create the need for use of other existing recreational facilities in the area. The Proposed Project would not require the construction or expansion of recreational facilities. No impact is anticipated.

8. Impacts Found Not to Be Significant

Table 8-1

Project Impacts Found Not to Be Significant

XVI. TRANSPORTATION/TRAFFIC. Would the project:		
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	No Impact	The nearest airport, John Wayne International Airport, is approximately eight miles to the southwest. Development of the Proposed Project would not change the area air traffic patterns. No impact is anticipated.
g) Is the proposed school site within 1,500 feet of a railroad track easement? [CCR, Title 5 § 14010(d)]	No Impact	The Project Site is not within 1,500 feet of a railroad track easement. The nearest railroad track, OCTA Metrolink, is 1.6 miles southwest of the Project Site. No impact is anticipated.
17. UTILITIES AND SERVICE SYSTEMS. Would the project:		
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less than Significant Impact	<p>Development of the Proposed Project would result in solid waste generation during construction and operation of the high school. Solid waste generated in the project area is collected by the County of Orange Integrated Waste Management Department (IWMD) and hauled to the Frank R. Bowerman Landfill, at 11002 Bee Canyon Access Road in Irvine. This landfill facility is permitted to accept a daily maximum of 11,500 tons per day and is scheduled to close in approximately 2053.</p> <p>The Proposed Project would generate solid waste during construction resulting from clearing and grubbing of the site and from the building construction. The generation of construction waste would occur on a short-term basis and, because of the lack of demolition, the resulting volume of construction-generated waste is anticipated to be insignificant. Moreover, construction and demolition debris are required to be recycled to comply with the 50 percent diversion rate pursuant to Assembly Bill (AB) 939. Potentially hazardous construction waste would only be disposed of at facilities permitted to receive them and in accordance with local, state, and federal regulations.</p> <p>Operation of the proposed high school would result in an increased volume of solid waste received at local landfills. Assuming a generation factor of one pound of waste per student per day, an estimated 2,600 pounds of daily waste would be generated by the Proposed Project. The increased waste generation amount would be negligible when compared to the 11,500 tons of daily capacity at the Frank R. Bowerman Landfill. The existing landfill has the capacity to accommodate the solid waste demands resulting from the proposed high school. Therefore, impacts would be less than significant.</p>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	Less than Significant Impact	The following federal and state laws and regulations govern solid waste disposal. The EPA administers the Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965, which govern solid waste disposal. In the State of California, Assembly Bill (AB) 939 (Integrated Solid Waste Management Act of 1989; PRC 40050 et seq.) required every California city

8. Impacts Found Not to Be Significant

*Table 8-1
Project Impacts Found Not to Be Significant*

	<p>and county to divert 50 percent of its waste from landfills by the year 2000 by such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled for a 15-year period. AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects. The Proposed Project would comply with all laws and regulations governing solid waste and the county's strategies for waste reduction. Additionally, to reduce the amount of waste going into local landfills from schools, the state passed the School Diversion and Environmental Education Law, Senate Bill 373, which required CalRecycle to develop school waste reduction tools. In compliance with this law, CalRecycle encourages school districts to establish and maintain a paper recycling program in all classrooms, administrative offices, and other areas owned and leased by the school district. Participation in this and other such programs would further reduce solid waste generated from the project and assist in the county's compliance with AB 939. The Proposed Project would comply with all federal, state, and local statutes and regulations related to solid waste and no impact would result from the project implementation. No mitigation measures are necessary. Therefore, impacts would not be significant.</p>
--	---

8.2 POST INITIAL STUDY ASSESSMENT

Certain of the impacts associated with Biological Resources, Cultural Resources, Hydrology and Water Quality and Utilities and Service Systems were identified in the Initial Study as potentially significant as compared to the 2011 Certified EIR, and would be addressed in this Supplemental EIR. After further review of Project plans, it was determined that these impacts were within the parameters of the Certified EIR and therefore do not trigger the need for further review in this Supplemental EIR.

The Mitigation Agreement between the District and Heritage Fields provides for the site to be delivered to the District in a super pad condition, mass-graded and compacted, with backbone infrastructure installed (roadway, storm drains, sanitary sewer, water, etc.) and stubbed wet and dry utilities. The Project Site is approved for mixed uses under TTOD zoning, and development of the Project Site as proposed as a high school would not create any new impact or increase the severity of any impacts related to biological resources, cultural resources, hydrology and water quality and wastewater treatment capacity -as set forth in Section 15162 of the CEQA Guidelines.

The following mitigation measures are the responsibility of the developer and would be performed prior to delivery of the Project Site to the District, and associated impacts are part of the 2011 Approved Project.

8. Impacts Found Not to Be Significant

Biological Resources

- BIO-1 Prior to approval of a subdivision map for each project area, a focused survey for the southern tarplant, mountain plover, and burrowing owl shall be conducted. Prior to approval of a subdivision map for development within, or in proximity to Serrano Creek, a focused survey shall be conducted for the least Bell's vireo and southwestern willow flycatcher. Should the focused survey identify a significant population of southern tarplant or mountain plover, or the presence of burrowing owls, least Bell's vireo, or southwestern willow flycatcher in an area proposed for development, impacts shall be avoided through incorporation of the species into an open space easement or if impacts cannot be avoided, then mitigation shall be negotiated through consultation with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG).
- BIO-2 Prior to approval of a subdivision map for each project area, a wetland delineation shall be performed for all areas within the master plan sub-area that contain the potential for wetland habitat and/or jurisdictional waters. The loss of impacted wetlands shall be mitigated through the implementation of a wetland mitigation plan prepared and accepted by the appropriate agency (i.e., U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, California Department of Fish and Game). Wetlands impacted on-site shall be mitigated through on-site or off-site replacement, re-creation (i.e. within the proposed wildlife corridor), and/or revegetation as deemed acceptable by the appropriate jurisdictional agencies.
- BIO-3 The City shall continue to work with State and federal agencies during the implementation of the Proposed Project to implement the revegetation/restoration plan for the wildlife corridor. Measures such as sight and sound barriers, including artificial sound walls and natural diversions (e.g. hedges and tree lines) shall be incorporated into corridor design to ensure the viability of the corridor. The City shall implement the corridor consistent with the design criteria and viability analysis established in the OCGP FEIR.
- BIO-4 Prior to issuance of a grading permit for each project area, a complete inventory of all trees of trunk diameter at breast height (DBH) greater than six inches and any significant (as determined by a certified arborist selected by the City) plants on the project site, excluding those within the habitat preserve shall be prepared. This inventory shall be prepared by an arborist certified by the International Society of Arboriculture and shall include (but not be limited to) data for each tree such as species, variety, DBH, condition (excellent, good, fair, poor, dead), and any recommendations. All trees in this inventory shall be considered "Significant Trees" under the City of Irvine's Urban Forestry Ordinance (UFO) (Section 5-7-401 et al) and the UFO shall apply to all trees included in this inventory.

Cultural Resources

- CULT-1 Prior to subdivision for development, a detailed archaeological report(s) shall be prepared within PAs 51 and 30. This report(s) shall specifically address the potential for encountering archaeological resources at the time specific development is proposed. The

8. Impacts Found Not to Be Significant

report(s) shall provide recommendations to prevent degradation of archaeological resources such as site avoidance and data recovery. Recommendations contained in the report shall be implemented. Compliance with this measure shall be verified by the Community Development Department.

CULT-2 Monitoring of excavation and grading activities associated with future development in PAs 51 and 30 shall be conducted by a certified archaeologist in accordance with the report required in Mitigation Measure Cult1. If resources are encountered in the course of ground disturbance, the archaeological monitor shall be empowered to halt grading and to initiate an archaeological testing program. The testing shall include recordation of artifacts, controlled removal of the materials, and an assessment of their importance under CEQA and the City's local guidelines. Compliance with this measure shall be verified by the Community Development Department.

CULT-3 Prior to the issuance of grading permits and/or building permits for any future development in PAs 51 and 30, a detailed mitigation program shall be submitted by the applicant to the City of Irvine to address archaeological resources discovered during grading. Provisions of the program shall include an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be available. Work may continue on other parts of the construction site while archaeological resource mitigation takes place. The City of Irvine has standard conditions applied prior to the issuance of grading permits when a project site includes potentially significant archaeological sites. These include retaining a qualified archaeologist, establishing procedures for cultural and scientific resource surveillance, and protection of any resources discovered during the grading process. Compliance with this measure shall be verified by the Community Development Department.

CULT-4 Prior to the issuance of any grading and/or building permits, a mitigation program shall be submitted by the developer to the City of Irvine to address the accidental discovery or recognition of any human remains. The program shall include the following:

- There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the county coroner must be contacted to determine that no investigation of the cause of death is required, and
- If the coroner determines the remains to be Native American:
 - The coroner shall contact the Native American Heritage Commission within 24 hours.
 - The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
 - The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of,

8. Impacts Found Not to Be Significant

with appropriated dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or

- Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.
- The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.
- The descendant identified fails to make a recommendation; or
- The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Compliance with this measure shall be verified by the Community Development Department.

P-1

Prior to issuance of a grading permit for any portion of the project area, a qualified paleontologist shall be retained by the City or designee to carry out an appropriate paleontology investigation of the area proposed for grading. (A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques.) The City of Irvine has standard conditions applied prior to the issuance of grading permits when a project site includes potentially significant paleontological sites, and paleontological monitoring conditions have not been attached to the previous map approval. These standard conditions include retaining a qualified paleontologist, establishing procedures for cultural and scientific resource surveillance, and protection of any resources discovered during the grading process.

When fossils are discovered, the paleontologist (or paleontological monitor) shall recover them. In most cases, this fossil salvage can be completed in a short period of time. However, some fossils specimens (such as a complete large mammal skeleton) may require an extended salvage period. In these instances the paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert or halt grading to allow recovery of fossil remains in a timely manner. Because of the potential for the recovery of small fossil remains, such as isolated mammal teeth, it may be necessary in certain instances to set up a screen-washing operation on-site.

Fossil remains collected during the monitoring and salvage portion of the mitigation program shall be cleaned, repaired, sorted, and cataloged. Compliance with this measure shall be verified by the Community Development Department.

8. Impacts Found Not to Be Significant

Hydrology and Water Quality

H/WQ1 Prior to issuance of a grading permit, the applicant shall provide evidence that the development of the project area shall comply with City of Irvine adopted Grading and Water Quality Ordinances to ensure that the potential for soil erosion is minimized on a project-by-project basis. Specifically, the National Pollutant Discharge Elimination System (NPDES) discharge permitting requirements to which the City is obligated will ensure that construction activities reduce, to the maximum extent feasible, the water quality impacts of construction activities. The NPDES permit guidance states that “industrial/commercial construction operations that result in a disturbance of one acre or more of total land area...and residential construction sites that result in the disturbance of five acres or more...shall be required to develop and implement BMPs...to control erosion and siltation and contaminated runoff from the construction sites.” Note: In March 2003 this provision will apply to residential construction sites that result in the disturbance of one acre or more.

The City’s standard conditions of approval indicate that a Storm Water Pollution Prevention Plan (SWPPP) shall be prepared prior to the approval of grading permits for any project site in order to reduce sedimentation and erosion. The SWPPP shall include the adoption of erosion and sediment control practices such as desilting basins and construction site chemical control management measures.

Additionally, prior to the issuance of a grading permit, project applicants must submit, and the Director of Community Development or designee must have approved, a Water Quality Management Plan (WQMP). The WQMP must identify the Best Management Practices (BMPs) that will be used on the site to control predictable pollutant runoff after the site is occupied. Ongoing operations after construction would be subject to the Countywide Municipal NPDES Stormwater Permit, for which the City is a Co-Permittee. This WQMP shall identify, at a minimum, the routine, structural, and non-structural measures specified in the Countywide NPDES DAMP Appendix which they are applicable to a project, the assignment of long-term maintenance responsibilities (specifying the developer, parcel owner, maintenance association, lessee, etc.), and shall reference the location(s) of structural BMPs.

Also in accordance with standard City project permitting and approval procedures, Notices of Intent (NOI) for coverage of projects under the General Construction Activity Storm Water Runoff Permit will be submitted to the State Water Resources Control Board prior to issuance of grading permits in the project area. This requirement will be met to the satisfaction of the Director of Community Development of any disturbance of one acre or more of soil in the project area. Also in force during the period of construction would be the General Dewatering NPDES permit of the Santa Ana RWQCB, as well as the provisions of the Countywide Permit.

The Mitigation Measures will be implemented in accordance with local and State regulatory requirements. As future projects are planned and designed in the project area, specific BMPs and other water quality control methods will be utilized to reduce water quality degradation in the Newport Bay watershed. Future projects in the proposed project area will acknowledge and implement those additional requirements that may be

8. Impacts Found Not to Be Significant

imposed by RWQCB in the future. Compliance with these measures shall be verified by the Community Development Department.

H/WQ2 Prior to issuance of a grading permit, evidence (e.g., in the form of a construction management plan) shall be provided that demonstrates that all stormwater runoff and dewatering discharges from the project area shall be managed to the maximum extent practicable or treated as appropriate to comply with water quality requirements identified in the Santa Ana Regional Water quality Control Board Basin Plan, including Total Maximum Daily Load (TMDL) Implementation Plan adopted for this watershed.

H/WQ3 Prior to approval of the first tentative tract or parcel map in the project area, detailed hydrologic and hydraulic analysis shall be conducted. Studies and analysis shall be prepared in accordance with OCFCD methodologies and standards and the Flood Control Master Plan for San Diego Creek, as well as any additional guidelines in effect at the time of project design. Recommendations contained in the hydrology studies and/or hydraulic analysis to address drainage/flooding issues related to proposed development shall be implemented. Compliance with this measure shall be verified by the Community Development Department.

H/WQ4 Prior to issuance of a building permit for any unit within the 100-year floodplain, developers with property located in the newly delineated 100-year floodplain shall be required to construct such improvements as necessary to remove the property from the 100-year floodplain. Additionally, the developer shall prepare a Letter of Map Revision (LOMR) request to have the FIRMs revised to remove the development areas from the 100-year floodplain upon completion of the approved flood control facilities. The LOMR request shall be filed upon completion of design of the flood control improvements to contain or redirect the 100-year flood flows away from the property.

After the improvements are constructed, Record Drawings and a maintenance agreement with, or letter from, a public agency shall be submitted to FEMA to complete the LOMR process.

*Table 8-2
Post Initial Study Assessment*

<i>Environmental Issue</i>	<i>Revised Initial Study Determination</i>	<i>Discussion</i>
IV. BIOLOGICAL RESOURCES. Would the project:		
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Less Than Significant Impact. Further review in this DSEIR is unwarranted.	Three types of wildlife habitat in the project area provide ample resources for wildlife: annual grasslands, coastal sage scrub, and riparian. Several sensitive plant species potentially occur in the project area. The Project Site is currently being used for crops. However, impacts related to habitat modifications and special status species were addressed and mitigated through the Certified EIR. The Project Site would be pre-graded and delivered to the District. Therefore, impacts associated with site preparation and grading would not be greater than and mitigated for in the Certified EIR. Implementation of the

8. Impacts Found Not to Be Significant

Table 8-2
Post Initial Study Assessment

<i>Environmental Issue</i>	<i>Revised Initial Study Determination</i>	<i>Discussion</i>
		Proposed Project would not result in any new significant impacts or increase the severity of impacts previously identified for in the 2011 Approved Project.
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Less Than Significant Impact Further review in this DSEIR is unwarranted.	Three types of wildlife habitat in the project area provide ample resources for wildlife: annual grasslands, coastal sage scrub, and riparian. Several sensitive plant species potentially occur in the project area. Impacts related to natural communities were addressed and mitigated through the Certified EIR and the Final Habitat Mitigation and Monitoring Plan was approved by CDFW in December 2011 and ACOE in February 2012. The Project Site is zoned TTOD and is approved for urban mixed uses under the 2011 Approved Project. The Project Site would be mass-graded and delivered to the District prior to project construction. Therefore, impacts to biological resources associated with mass grading of the Project Site would be comparable to the 2011 Approved Project. Implementation of the Proposed Project would not increase the severity of impacts on any sensitive natural communities.
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less Than Significant Impact Further review in this DSEIR is unwarranted.	<p>The Project Site does not contain any protected wetlands as defined by Section 404. Although the Project Site is in Planning Area 51, which contains protected wetlands, impacts to have been mitigated through the Certified EIR in BIO-2 (see above).</p> <p>The Project Site would be mass-graded and delivered to the District prior to construction. Therefore, any biological impacts associated with the Project Site would be mitigated per the 2011 Approved Project and no additional impacts to wetlands would result from the proposed development. Agua Chinon is immediately west across B Street, and would be improved as a soft-bottom natural floodway. Moreover, the defined wetland area within the Planning Area 51 is limited in size and currently highly disturbed. The Proposed Project would not alter the backbone drainage system proposed under the 2011 Approved Project to change the hydrology of the 2011 Approved Project Site. Therefore, the Proposed Project would not result in any new significant impacts or an increase in the severity of significant impacts identified in the Certified EIR.</p>
V. CULTURAL RESOURCES. Would the project:		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Less Than Significant Impact Further review in this DSEIR is unwarranted.	The Certified EIR states that the majority of previously documented archaeological resources in the project area are in the portions of Planning Area 51 designated as 1.4 Habitat Preserve in the zoning ordinance, within the FAA site. Ten prehistoric archaeological sites and eight isolated prehistoric artifacts have been recorded in the northeastern

8. Impacts Found Not to Be Significant

*Table 8-2
Post Initial Study Assessment*

<i>Environmental Issue</i>	<i>Revised Initial Study Determination</i>	<i>Discussion</i>
		<p>habitat preserve portion of Planning Area 51. The known sites occur on ridges between Borrenco Canyon Wash and Agua Chinon Wash. In addition, as part of the base realignment and closure cleanup plan for MCAS El Toro, further evaluation of one additional archaeological site in the central portion of Planning Area 51 was recommended. Although the Project Site is not in the habitat preserve, considering the sensitivity of the area, there is the potential that archaeological resources are present that may be disturbed during grading activities associated with the proposed project. However, the Project Site would be mass-graded and delivered to the District for development. Therefore, mitigation measures CULT-1 through CULT-4 as required under the Certified EIR would be implemented to reduce impacts related to archaeological resources and the Proposed Project would not result in any new significant impacts to archaeological resources.</p>
<p>c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>	<p style="text-align: center;">Less Than Significant Impact</p> <p>Further review in this DSEIR is unwarranted.</p>	<p>The Certified EIR identified the project area as having low sensitivity for paleontological resources. However, because there is the potential that previously unknown paleontological resources could be disturbed during grading activities, Mitigation Measure P-1 (see above) is incorporated into the Certified to reduce impacts.</p> <p>The Project Site is already approved for urban mixed uses, and prior to delivery of the Project Site to the District, potential impacts to paleontological resources would be mitigated to a less than significant level. The subsequent fine grading by the District would not result in any new significant impacts to paleontological resources or increase the severity of impacts.</p>

IX. HYDROLOGY AND WATER QUALITY. Would the project:

<p>a) Violate any water quality standards or waste discharge requirements?</p>	<p style="text-align: center;">Less Than Significant Impact</p> <p>Further review in this DSEIR is unwarranted.</p>	<p>With the Certified EIR's inclusion of project design features and adherence to SWRCB/RWQCB standards and Mitigation Measures H/WQ1 and H/WQ2, the Approved Project would result in less than significant impacts related to water quality. With respect to operations, the Approved Project would incorporate water quality features in conformance with DAMP/RWQCB standards to ensure that it will have a less than significant impact on post-construction water quality and downstream effects.</p> <p>The Proposed Project would not increase runoff or change to approach to satisfying water quality requirements. Therefore, no additional water quality impacts or impacts of a greater severity would result from the proposed development.</p>
--	---	--

8. Impacts Found Not to Be Significant

Table 8-2
Post Initial Study Assessment

<i>Environmental Issue</i>	<i>Revised Initial Study Determination</i>	<i>Discussion</i>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less Than Significant Impact Further review in this DSEIR is unwarranted.	The proposed High School would involve less impervious surface as compared to the uses included in TTOD land use designations and therefore, would reduce potential interference with groundwater recharge as compared to the Approved Project.
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Less Than Significant Impact Further review in this DSEIR is unwarranted.	The TTOD land use designation provides a multi-use environment with various urban land uses including educational uses. Development and operation of a high school would involve a significant change in the course of a stream or river, in a manner that would result in substantial erosion or siltation as compared to the Approved Project. The area would be developed in a similar manner following either the Approved Project or the proposed High School. Drainage patterns and the infrastructure required are within the range expected in the TTOD. Implementation of the Proposed Project would not result in any new significant impacts or increase the severity of impacts previously identified for in the 2011 Approved Project.
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less Than Significant Impact Further review in this DSEIR is unwarranted.	The TTOD land use designation provides a multi-use environment with various urban land uses including educational uses. Development and operation of a high school would not involve a significant change in the course of a stream or river, or increase the rate or amount of surface runoff as compared to the Approved Project. Runoff rates and potential impacts on downstream areas are within the range expected in the TTOD. Implementation of the Proposed Project would not result in any new significant impacts or increase the severity of impacts previously identified for in the 2011 Approved Project.
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less Than Significant Impact Further review in this DSEIR is unwarranted.	The TTOD land use designation provides a multi-use environment with various urban land uses including educational uses. Development and operation of a high school would not involve stormwater discharges that are within the range expected in the TTOD and would not contain constituents that would exceed wastewater treatment requirements of the RWQCD. Therefore, the Proposed Project would not result in new impacts compared to the 2011 Approved Project and impacts would be less than significant.

8. Impacts Found Not to Be Significant

*Table 8-2
Post Initial Study Assessment*

<i>Environmental Issue</i>	<i>Revised Initial Study Determination</i>	<i>Discussion</i>
XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:		
a) Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?	Less Than Significant Impact Further review in this DSEIR is unwarranted.	Wastewater generated by the Proposed Project would be served by Irvine Ranch Water District (IRWD). Collected sewage flows to the Michelson Water Recycling Plant (MWRP) where it is cleaned through the recycling process for irrigation and other uses in the community. The 2003/2011 EIR indicates that IRWD has adequate capacity to serve the OCGP. MWRP currently treats approximately 18 million gallons of wastewater per day, and with the completion of the expansion in later 2013, the capacity will increase to 28 mgd. The Proposed Project is not anticipated to result in the exceedance of the Irvine Ranch Water District's capacity to treat wastewater. IRWD is regulated by law to treat wastewater consistent with the requirements and standards of the Regional Water Quality Control Board (RWQCB). Since IRWD is required to treat wastewater at a standard consistent with RWQCB regulation standards, no significant impact related to exceeding wastewater treatment standards is anticipated. The TTOD land use designation provides a multi-use environment with various urban land uses including educational uses. Development and operation of a high school would involve wastewater discharges that are within the range expected in the TTOD and would not contain constituents that would exceed wastewater treatment requirements of the RWQCD. Therefore, the Proposed Project would not result in new impacts compared to the 2011 Approved Project and impacts would be less than significant.
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.		
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	No Impact Further review in this DSEIR is unwarranted.	The Project Site would be delivered to the District as a mass-graded site and mitigation measures BIO-1 through BIO-4, CULT-1 through CULT-4, and P-1, required under the Certified EIR would ensure that impacts related to biological resources and cultural resources to be less than significant. Therefore, the Proposed Project would not create any new or more severe impacts as compared to the 2011 Approved Project, and, therefore, the Certified EIR adequately addressed potential impacts related to biological resources and cultural resources. No impacts to biological or cultural resources would occur.

8. Impacts Found Not to Be Significant

This page intentionally left blank.