CEQA FINDINGS OF FACT
REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE NORTHWOOD HIGH SCHOOL FIELD LIGHTING IMPROVEMENT PROJECT

STATE CLEARINGHOUSE NO. 2025051426

Exhibit A

SECTION A
BACKGROUND

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project, pursuant to sections 15091 and 15093 of the CEQA Guidelines and section 21081 of the Public Resources Code. This document provides the findings required by CEQA and the specific reasons for considering the project acceptable.

The lead agency is responsible for the adequacy and objectivity of the EIR. The Irvine Unified School District (IUSD or District), as lead agency, has subjected the Draft Environmental Impact Report (Draft EIR) and Final Environmental Impact Report (Final EIR) to its own independent review and analysis.

PROJECT LOCATION

The Northwood High School campus (Northwood HS or campus) is at 4515 Portola Parkway (Assessor's Parcel Number 527-151-03) in the City of Irvine in Orange County. The project site is bounded by Yale Avenue to the east, Portola Parkway to the south, vacant land to the west, and Twisted Oak to the north. The campus is approximately one mile to the east of State Route 261 (SR-261) and 2.2 miles north of Interstate 5 (I-5).

The City of Irvine is in close proximity to the cities of Tustin, Santa Ana, Costa Mesa, and Newport Beach on the west side and the cities of Lake Forest, Laguna Hills, and Laguna Woods and unincorporated Orange County on the east side.

PROJECT SUMMARY

Proposed Project

The proposed project includes the installation of four new athletic field lights adjacent to the existing track and field. Two light poles with athletic field lights would be on the northwest

border of the track and field, and two light poles with athletic field lights would be on the southeast border of the track and field. Each light pole would be approximately 70 feet in height, include nine light fixtures, and have a load capacity of 66.64 kilowatts (kW). The athletic field lighting would be directed toward the field and would be used to add lighting for nighttime sporting events, other school events, and non-school events.

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

The proposed improvements at Northwood HS may be used for sporting events and practices, other school events, and non-school events. The proposed event scheduling is contingent on District operational needs and may be modified at the District's discretion. Sporting events and practices are anticipated to consist of Freshman and Junior Varsity (JV) tackle football, flag football, girls and boys soccer, girls and boys lacrosse, track and field, and band. The field will also be used for football practices; however, Varsity tackle football games will continue to be held at Irvine HS. The track and field may also be used for other school events, such as graduation, and non-school events.

Construction of the proposed project is anticipated to occur in a single phase and is anticipated to start in Spring 2026 and end in Summer 2026. The proposed project would not require the demolition of any existing structures, and no new buildings would be constructed on the campus. Additionally, the proposed project would not increase the student capacity or enrollment at Northwood HS.

Alternative 2: Restricted Hours Alternative

In response to public comments received during the Draft EIR circulation period, the District has elected to move forward with Alternative 2 (Restricted Hours Alternative) for the Northwood High School Field Lighting Improvement Project.

Under this Alternative, the District will proceed with the installation of four new athletic field light poles around the existing football field. However, the project's operational profile will be modified to require that all field use conclude and all lights be extinguished by 9:00 pm, rather than the originally proposed 10:00 pm. Additionally, installation of the PA system has been removed from Alternative 2.

Because Alternative 2 involves the same physical infrastructure but results in a one-hour reduction in evening light duration, the environmental impacts are less than or equal to those analyzed in the Draft EIR. Therefore, the existing environmental analysis remains valid, providing a conservative and sufficient evaluation of the reduced impact profile associated with Alternative 2.

ENVIRONMENTAL REVIEW PROCESS

In conformance with CEQA and the CEQA Guidelines, the District conducted an extensive environmental review of the proposed project. The environmental review process has included:

- Completion of a Notice of Preparation (NOP) on May 28, 2025. The public review period extended from May 28, 2025, to June 26, 2025. Copies of the NOP were made available for public review at the Irvine Unified School District, Facilities Planning and Construction Services Department, Northwood HS, and the District's website. Copies of the NOP were sent via certified mail to state and local agencies and Native American Tribes that are historically affiliated with the area, and provided to all property owners within a 500-foot radius of the entire Northwood HS campus.
- Completion of the scoping process where the public was invited by the District to participate in a scoping meeting held on June 3, 2025. The meeting was conducted in person at the Northwood HS Theater. The notice of a public scoping meeting was included in the NOP.
- Preparation of a Draft EIR and supporting technical appendices, which were made available for a 45-day public review period beginning September 29, 2025, and ending November 12, 2025. Section 1.2, *Environmental Review Process*, of the Draft EIR describes the issues identified for analysis in the Draft EIR. In compliance with Sections 15085(a) and 15087(a)(1) of the CEQA Guidelines, the District, serving as the lead agency, published a Notice of Completion (NOC) and Notice of Availability (NOA) of the Draft EIR, which indicated that the Draft EIR and all associated technical appendices could be viewed at the following locations:
  - Irvine Unified School District, Facilities Planning and Construction Services Department, 2015 Roosevelt, Irvine, CA 92620
  - Northwood High School, 4515 Portola Pkwy, Irvine, CA 92620
  - Irvine Unified School District website: https://iusd.org/business-services/facilities-planning-construction-services/bidder-information-public-notices

The NOC and NOA were transmitted to the State Clearinghouse and County Clerk and were distributed to State and local agencies, organizations, and all property owners within 500 feet of the project site and/or those who previously requested such notice.

- A community meeting was held on October 20, 2025, to present an overview of the CEQA process, the project description, and the conclusions in the Draft EIR. The meeting was conducted in person at Northwood HS. Attendees were given the option to present verbal and written comments during the meeting.

- Preparation of a Final EIR includes the Responses to Comments to the Draft EIR, the Findings of Fact, and Mitigation Monitoring and Reporting Program (MMRP). The Final EIR/Response to Comments contains comments received on the Draft EIR and responses to those comments.
- The Final EIR was posted to the District website on February 6, 2026 and is available online at: https://iusd.org/business-services/facilities-planning-construction-services/bidder-information-public-notices.
- A 10-day notification of the Final EIR was sent to commenting agencies electronically on that same day.
- A public hearing on the proposed project and the Final EIR was held before the Irvine Unified School District Board of Education on February 17, 2026.

RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project includes, but is not limited to, the following documents and other evidence:

- The NOP, NOA, and all other public notices issued by the District in conjunction with the proposed project.
- The Draft EIR and Final EIR for the proposed project.
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR.
- All responses to the written comments that were submitted by agencies or members of the public during the public review comment period on the Draft EIR.
- All written and verbal public testimony presented during a noticed public hearing for the proposed project.
- The Mitigation Monitoring and Reporting Program.
- The reports and technical memoranda included or referenced in the Draft EIR and Final EIR.
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR and Final EIR.
- The Resolutions adopted by the District's Board of Education in connection with the proposed project, and all documents incorporated by reference therein.
- Matters of common knowledge to the District, including but not limited to federal, State, and local laws and regulations.
- Any documents expressly cited in these Findings.
- The District's file for the proposed project.

CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for the District's actions related to the proposed project are at the following locations:

- Irvine Unified School District, Facilities Planning and Construction Services Department, 2015 Roosevelt, Irvine, CA 92620
- Northwood High School, 4515 Portola Pkwy, Irvine, CA 92620

The District is the custodian of the administrative record for the proposed project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the District:

Irvine Unified School District
Facilities Planning and Construction Services Department
2015 Roosevelt
Irvine, CA 92620
KathleenGil@iusd.org

This information is provided in compliance with Public Resources Code section 21081.6(a)(2) and CEQA Guidelines section 15091(e).

FINDINGS AND FACTS AND OVERRIDING CONSIDERATIONS

The District, as lead agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the Draft EIR and Final EIR.

Specifically, regarding findings, CEQA Guidelines section 15091 provides:

> (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
>
> 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
>
> 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the

finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

(b) The findings required by subsection (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in section 15091(a)(1) may include a wide variety of measures or actions, as set forth in CEQA Guidelines section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

FORMAT

This section summarizes the significant environmental impacts of the proposed project, describes how these impacts are to be mitigated, and discusses various alternatives to the proposed project, which were developed in an effort to reduce the remaining significant environmental impacts. All impacts are considered potentially significant prior to mitigation unless otherwise stated in the findings.

The remainder of this section is divided into the following subsections:

Section B, Summary of Environmental Impacts, presents the summary of impacts of the proposed project.

Section C, Findings on Impacts Determined to Be Less Than Significant, presents the impacts of the proposed project that were determined in the Draft EIR to be less than significant without the addition of mitigation measures and presents the rationales for these determinations.

Section D, Findings on Impacts Mitigated to Less Than Significant, presents significant impacts of the proposed project that were identified in the Final EIR, the mitigation measures identified in the Mitigation Monitoring Reporting Program, and the rationales for the findings.

Section E, Findings on Significant Unavoidable Impacts, presents significant impacts of the proposed project that were identified in the Final EIR.

Section F, Findings on Project Alternatives, presents alternatives to the proposed project and evaluates them in relation to the findings set forth in section 15091(a)(3) of the CEQA Guidelines, which allows a public agency to approve a project that would result in one or more significant environmental effects if the project alternatives are found to be infeasible because of specific economic, social, or other considerations.

SECTION B
SUMMARY OF ENVIRONMENTAL IMPACTS

The following is a summary of the environmental topics considered in the EIR to have no impact a less than significant impact, a less than significant impact with incorporation of mitigation measures, or a significant and unavoidable impact.

Less Than Significant Impact or No Impact

The NOP determined that 10 environmental factors would have no impact if the proposed project were implemented.

- Agriculture and Forestry Resources
- Biological Resources
- Energy
- Greenhouse Gas Emissions
- Land Use/Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Wildfire

The Draft EIR determined that 7 environmental factors would have less than significant impacts if the proposed project is implemented.

- Aesthetics
- Air Quality
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Transportation
- Utilities and Service Systems

Less Than Significant Impact with Mitigation Incorporated

The Draft EIR determined that the following three environmental factors would have potentially significant impacts without mitigation.

- Cultural Resources
  - Impacts to archaeological resources
- Geology and Soils
  - Impacts to paleontological resources
- Tribal Cultural Resources
  - Impacts to tribal cultural resources

Significant and Unavoidable Impact

Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. The Draft EIR did not identify any significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the proposed project.

SECTION C
FINDINGS ON IMPACTS DETERMINED TO RESULT IN NO IMPACT OR LESS THAN SIGNIFICANT IMPACT

Notice of Preparation

The NOP determined that the proposed project would have no impact to the following topics: Agriculture and Forestry Resources, Biological Resources, Energy, Greenhouse Gas Emissions, Land Use/Planning, Mineral Resources, Population and Housing, Public Services, Recreation, and Wildfire.

Draft EIR

It was determined that potential environmental effects would not result from the proposed project or would result but would not have a significant impact on the environment, for the following topical areas: Aesthetics, Air Quality, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation, and Utilities and Service Systems. This determination was made based on the findings of the Draft EIR prepared for the proposed project. The following summary briefly describes those environmental topics that were found not to be significant or less than significant with compliance with existing regulations, as detailed in each respective topical section of Chapter 3 of the Draft EIR.

AESTHETICS

Impact 3.1-1: The proposed project would not have a substantial adverse effect on a scenic vista.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.1-10 of Section 3.1, *Aesthetics*, of the Draft EIR.

The Santiago Hills are designated by the City of Irvine General Plan as Notable Visual Resources. However, the project site is not in the viewshed of Santiago Hills or any other scenic resources. Existing development on the project site does not currently obstruct or interfere with views of Santiago Hills. The project site is currently a built-out school with existing sports fields and the proposed four light poles would be visible from the surrounding neighborhood; however, the new development would not degrade background views of the Santiago Hills. Implementation of the proposed project would not result in the obstruction or degradation of existing scenic views.

Finding:

The proposed project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.1-2: The proposed project would not substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.1-10 of Section 3.1, *Aesthetics*, of the Draft EIR.

The California Scenic Highway Program seeks to preserve and protect areas of outstanding natural beauty that are visible from state highways. The project site is not located within or near a Scenic Highway designated by the California Department of Transportation (Caltrans). There are no designated scenic highways within the City of Irvine. The nearest officially designated state scenic highway is SR-91, which is approximately 9 miles north of Northwood HS . Due to the distance, topography, and intervening development, Northwood HS is not visible from a designated state scenic highway. The proposed project would not damage scenic resources within a state scenic highway.

Finding:

The proposed project would not substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings. No impact would occur, and no mitigation measures are necessary.

Impact 3.1-3: The proposed project would not conflict with applicable zoning and other regulations governing scenic quality.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.1-10 of Section 3.1, *Aesthetics*, of the Draft EIR.

The project site is in an urbanized area. According to the US Census Bureau, the City of Irvine has a population of approximately 318,683, which meets the definition of an urbanized area (at least 100,000) as defined in the PRC section 21071, Urbanized Area. The existing vertical elements of the campus that are visible from the residential areas to the south, permanent sidewalk light poles near the tennis courts, score board, trees, fencing, basketball hoops, and school buildings. The proposed project includes the installation of four 70-foot light poles with nine light fixtures each. The project is consistent with the existing campus zoning and land use designation. Implementation of the proposed project would not violate any regulations governing scenic quality. As the project site is already developed with school uses, the proposed light poles would not interfere with public views and would not conflict with regulations governing scenic quality. Therefore, impacts would be less than significant.

Finding:

The proposed project is in an urbanized area, and the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.1-4: The proposed project would not expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.1-11 of Section 3.1, *Aesthetics*, of the Draft EIR.

For the purposes of this analysis, a standard of 0.9 foot-candle (fc) was used for a significance determination. The 0.9 fc is selected because it sets the standard below the level of typical street lights (1.0 to 5.0 fc) and it is below twilight levels (1.0 fc), which ensures that bedrooms are not subjected to sleep-depriving light intrusion. Additionally, industry best practices recommend that exterior lighting levels be further reduced to 0.2 fc or less after curfew hours to further reduce impacts on human circadian rhythms, nighttime wildlife activity, and general skyglow.

Existing on-site sources of artificial light include light emanating from building interiors, building and security lights, sidewalks, and parking lots. Existing off-site lighting sources include street lighting, vehicular lighting, and exterior lighting on existing residential uses. The nearest light sensitive receptors are the single-family residences south of the Northwood HS campus, across Portola Parkway.

The proposed project would install field lighting required to effectively illuminate the track/field for Northwood HS student and community use. The proposed maximum field illumination level would be approximately 58 fc. Illumination along the track/field be an average of approximately 30.55 fc, and 52.34 on football field.

On June 3, 2025, existing conditions of the project site were documented. Location 1 is at the intersection of Yale Lane and Portola Parkway facing northwest; Location 2 is along Portola Parkway facing northeast towards the football field; and Location 3 is in the residential neighborhood north of the project site near the intersection of Stallion and Twisted Oak, facing southwest toward the campus.

Light Spill

Some of the design elements for light control and reduced spill lighting include mounting height and steep aiming angles, various lighting modes, visors and shielding, reflective housing around the luminaires, number of luminaires, and appropriate light levels. The proposed light poles incorporate all these elements, and each element can be arranged individually to control and minimize any potential spill lighting impacts. Additionally, there are existing street light poles in the surrounding area. The proposed project would not be inconsistent with the surrounding existing conditions during the daytime.

The Musco lighting plans measure lighting within 150 feet of the field. The highest light level at that boundary is at or below 0.1 fc, which is below the 0.9 fc threshold of significance and below the 0.2 fc measurement for after curfew. Since the increased mounting heights of the proposed lights allow the lamps to be directed down to the playing surface and not at a right angle across the track/field, and the nearest residential property line across Portola Parkway to the south of the project site is beyond the 150-foot boundary line, no residential properties will experience a measurable increase in lighting as a result of the project. Therefore, the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Impacts would be less than significant.

Generation of Glare

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

Finding:

The proposed project would not expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area. Less than significant impacts would occur, and no mitigation measures are necessary.

AIR QUALITY

Impact 3.2-1: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.2-30 of Section 3.2 *Air Quality*, of the Draft EIR.

The proposed project is not anticipated to result in population or employment growth that would exceed the demographic growth forecasts in the 2022 AQMP. Moreover, the proposed project would not result in exceedances of South Coast AQMD regional significance thresholds and would not contribute to existing or projected AAQS violations. Therefore, the proposed project would be considered consistent with the AQMP.

Finding:

Impacts to applicable air quality management plans would be less than significant, and no mitigation measures are necessary.

Impact 3.2-2: The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.2-32 of Section 3.2, *Air Quality*, of the Draft EIR.

Construction

Construction of the proposed project would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from site preparation, field lighting installation, and utility trenching. Air pollutant emissions from construction activities on-site would vary daily as construction activity levels change. Construction of the proposed project would not result in an exceedance of the regional significance thresholds for any criteria air pollutant. This impact would be less than significant.

Operation

The maximum daily emissions from operation-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, impacts to the regional air quality associated with operation of the proposed project would be less than significant.

Finding:

Construction and operation associated with the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant in exceedance of South Coast AQMD's threshold criteria. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.2-3: The proposed project would not expose sensitive receptors to substantial pollutant concentrations.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.2-34 of Section 3.2, *Air Quality*, of the Draft EIR.

Construction

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. The maximum daily NO_X, CO, PM_{10}, and $PM_{2.5}$ construction emissions from on-site construction-related activities would be less than their respective South Coast AQMD screening-level LSTs, and this impact would be less than significant. The proposed project is anticipated to be completed in approximately 6 months, which would limit the exposure to on-site and off-site receptors. Furthermore, construction activities would not generate on-site exhaust emissions that would exceed the screening-level construction LSTs. Thus, construction emissions would not pose a health risk to on- and off-site receptors, and project-related construction health impacts would be less than significant.

Operation

Operation of the proposed project would not generate substantial emissions from on-site stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur on-site and would require a permit from South Coast AQMD. The proposed project would entail the renovation of the existing track and field with addition of field lighting, which does not fall within these categories of uses. Localized air quality impacts related to operation-related emissions would be less than significant.

Since South Coast AQMD currently does not have adopted CO hotspot screening criteria, the Bay Area Air District's recommended threshold was used in this analysis. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single

intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—to generate a significant CO impact.

The proposed project would result in a maximum of 150 new peak hour trips and a maximum of 2,460 intersection turning counts at the intersection of Portola Parkway and Yale Avenue. As such, the proposed project would not add vehicle trips to the regional roadway network to cause an exceedance of 44,000 vehicles per hour or 24,000 vehicle per hour where vertical and/or horizontal mixing is substantially limited at an intersection. Therefore, implementation of the proposed project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the project area. Impacts would be less than significant.

Finding:

The proposed project would not expose sensitive receptors to substantial pollutant concentrations during construction or operation. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.2-4: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.2-37 of Section 3.2, *Air Quality*, of the Draft EIR.

Construction

During construction activities, construction equipment exhaust and application of asphalt and architectural coatings would generate odors. Any construction-related odor emissions would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reached any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of odor-producing materials. Therefore, impacts associated with construction-generated odors are considered less than significant.

Operation

The type of facilities that are considered to have objectionable odors include wastewater treatment 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, and food manufacturing facilities. The project site is within an existing campus; the proposed project would include recreational uses and would not include the types of land uses that create objectionable odors. Additionally, the proposed project would be required to comply with South Coast AQMD Rule 402, which would minimize and provide a control for objectionable or offensive odors that

are reported to the South Coast AQMD. The proposed project would not generate potentially significant odor impacts affecting a substantial number of people. Therefore, impacts would be less than significant.

Finding:

The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation measures are necessary.

CULTURAL RESOURCES

Impact 3.3-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.3-13 of Section 3.3, *Cultural Resources*, of the Draft EIR.

On-Campus Historical Resources

The proposed project would be implemented within the existing Northwood HS campus. Northwood HS is not listed as a historical resource in the National Register of Historic Places (NRHP), California Historical Landmarks (CHL), or California Register of Historic Resources (CRHR). The Irvine General Plan EIR provides a list of historical resources in the City and does not list the Northwood HS campus. The property was constructed in 1999 and did not play a significant role in the development and expansion of the City. As such, the property does not qualify as a historical resource under CEQA.

Off-Campus Historical Resources

Historic resources within the City include four buildings listed on the NRHP and the CRHR, eight properties listed on the CHRI, one area with a CHL plaque, and three areas with a CPHI plaque. The nearest historical resource is the Frances Packing House, which is approximately 1.5 miles southwest of the project site. The proposed project would be confined to the boundaries of the Northwood HS campus. Project construction would be limited in scope and would involve minimal demolition activities. Given the nature of the proposed project, the distance, and intervening development, the proposed project would not impact this historical resource or any others. Therefore, no off-campus historical resources would be impacted, and this impact would be less than significant.

Finding:

The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.3-3: The proposed project could disturb any human remains, including those interred outside of dedicated cemeteries.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.3-16 of Section 3.3, *Cultural Resources*, of the Draft EIR.

There are no known cemeteries or human burials at the project site. However, the proposed project has the potential to uncover previously unknown human remains during the construction phase which would consist of excavation of a hole for installation of the proposed light poles and utility trenching on the project site.

If human remains are encountered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall halt and remain halted. The Orange County Coroner shall investigate the circumstances, manner, and cause of any death and recommend the treatment and disposition of the human remains to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the California Public Resources Code. The coroner is required to determine, within two working days of being notified of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the NAHC, who will contact the “most likely descendant.” The most likely descendant shall receive access to the discovery and provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements in Sections 5097.94 and 5097.98 of the Public Resources Code, Section 7050.5 of the California Health and Safety Code, and CEQA Guidelines Section 15064.5 (PRC § 5097.9; AB 389, 2023).

Although soil-disturbing activities associated with the proposed project could result in the discovery of human remains, compliance with existing law would ensure that impacts would be less than significant.

Finding:

The proposed project could disturb any human remains, including those interred outside of dedicated cemeteries. Impacts would be less than significant, and no mitigation measures are necessary.

GEOLOGY AND SOILS

Impact 3.4-1: The proposed project would not subject residents [or occupants, visitors, etc.] to potential seismic-related hazards, 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. (Refer to Division of Mines and Geology Special Publication 42.)

ii) Strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction.

iv) Landslides.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.4-12 of Section 3.4, *Geology and Soils*, of the Draft EIR.

Fault Rupture

An active fault, for the purposes of the Alquist-Priolo Act, is one that has ruptured in the last 11,000 years . Based on the California Department of Conservation (DOC) fault activity map of California, the proposed project site is not within an Alquist-Priolo Earthquake Fault Zone for fault rupture hazard for fault rapture hazard, and no known active or potentially active faults exist on the project site . The closest Alquist-Priolo Earthquake Fault Zones are the Newport-Inglewood-Rose Canyon fault zone (approximately 14 miles west of the project site) and Elsinore fault zone (approximately 10.5 miles north of the project site). The probability of fault offset at the project site from a known active fault is very low. In a seismically active area, the remote possibility exists for future faults in areas where no faults previously existed; however, the probability of surface faulting and consequent secondary ground failure from previously unknown faults is also very low. Therefore, impacts related to fault rupture would be less than significant.

Seismic Shaking

The project site is not located within an established Alquist-Priolo Earthquake Fault Zone. However, the project site, like most areas in California, is subject to ground movement associated with earthquakes along the active faults. The degree of ground shaking and earthquake-induced damage is dependent on multiple factors, such as distances to causative faults, earthquake magnitudes, and expected ground accelerations.

According to the U.S. Geological Survey and California Geological Survey, there are several regional faults within Alquist-Priolo Special Study Zones near the project site that could result in seismic hazards should an earthquake occur along one of them, including the Newport-Inglewood-Rose Canyon fault zone (approximately 14 miles west of the project site) and Elsinore fault zone (approximately 10.5 miles north of the project site). As stated in Section 3.4.2, the San Joaquin Hills blind thrust fault is the only known fault within the City of Irvine and is located approximately 5 miles southwest of the project site.

The proposed project would be required to comply with the seismic design parameters of the California Building Code (CBC), which regulates all building and construction projects and implements a minimum standard for building design and construction that includes specific requirements for seismic safety and evacuation. Additionally, the Division of State Architects (DSA) would be required to review and approve the project plans which will ensure that the structures are sufficiently designed to withstand ground shaking. Therefore, impacts related to seismic shaking would be less than significant.

Liquefaction

According to the California Department of Conservation Liquefaction Zones Mapper, the proposed project is not within an identified liquefaction zone; the nearest liquefaction zone is located approximately 0.3 miles to the east. Additionally, the Irvine General Plan does not identify the project site as within a liquefaction hazard zone. Additionally, the proposed project would be designed and constructed to withstand liquefaction potential consistent with CBC and DSA review, which would ensure that impacts related to liquefaction would be reduced to less than significant. Therefore, impacts related to liquefaction would be less than significant.

Landslides

The project site is flat and developed with the existing Northwood HS campus. According to the US Geological Survey United States Landslide Inventory and Susceptibility map, the project site is not within an identified landslide susceptibility zone; the nearest landslide susceptibility zone is located directly adjacent to the Northwood HS campus to the east. As stated in Section 3.4.2, according to the General Plan Safety Element, the project site is within a landslide hazards area. However, because the site is already developed, relatively flat, and would be designed and constructed to withstand liquefaction potential consistent with the geotechnical report's recommendations, CBC and DSA review, the potential for landslide-related impacts would be low. Therefore, impacts related to landslides would be less than significant.

Finding:

The proposed project would not subject occupants to potential seismic-related hazards, including the risk of loss, injury, or death involving fault rupture, seismic shaking, liquefaction or landslides. Impacts would be less than significant; and no mitigation measures are necessary.

Impact 3.4-2: The proposed project would not result in substantial soil erosion or the loss of topsoil.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.4-14 of Section 3.4, *Geology and Soils*, of the Draft EIR.

The project site contains flat terrain, which decreases the project's potential to accelerate erosion. The project site is developed with the existing Northwood HS campus. Implementation of the proposed project would require limited earthwork, which includes site clearing, drill holes for installation of proposed light poles, shallow excavation and grading for site work, and utility trenching. The proposed project does not contain any subterranean levels and would not require extensive excavation, which could expose more soils to erosion. According to Websoil survey by the United States Department of Agriculture (USDA), the project site is primarily located within Sorrento loam, 2 to 9 percent slopes. Sorrento loam has low erosion potential. Additionally, the geotechnical report determined that the project site is suitable for the proposed project following the recommendations presented. Therefore, the proposed project would not result in substantial soil erosion or loss of topsoil, and impacts would be less than significant.

Finding:

The proposed project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant; and no mitigation measures are necessary.

Impact 3.4-3: The proposed project would not 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.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.4-14 of Section 3.4, *Geology and Soils*, of the Draft EIR.

As discussed above, the project site is not in a liquefaction zone or a landslide susceptibility zone. Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope toward a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements, and such movement typically damages pipelines, utilities, bridges, and structures. Due to the project site not being in an identified liquefaction susceptibility zone, the potential for lateral spreading is considered low.

According to the United States Geological Survey Areas of Land Subsidence in California, the project site is not within an area subject to subsidence. The collapse of soils occurs with (1) an

open, partially unstable, partially saturated fabric; (2) sufficient total stress to make the soil structure metastable; (3) the presence of a bonding agent or sufficient soil suction to stabilize the soil in the metastable condition; and (4) the addition of water, which reduces soil suction or softens/destroys the bonding agent, thereby causing shear failures at the inter-aggregate or inter-particle contacts. Additionally, the City of Irvine has not experienced any acute subsidence events, and it is unlikely to occur in the City's future. Further, the geotechnical report determined that the project site is suitable for the proposed project following the recommendations presented. As discussed above, the proposed project would be designed and constructed to withstand landslide, liquefaction, lateral spreading, subsidence, liquefaction, or collapse potential. With adherence to the CBC and with DSA's review and recommendations presented in the geotechnical report, the proposed project would not result in or contribute to on- or off-site impacts. Therefore, this impact is less than significant.

Finding:

The proposed project would not 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. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.4-4: The proposed project would not be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.4-15 of Section 3.4, *Geology and Soils*, of the Draft EIR.

Expansive soils contain certain types of clay minerals that shrink when they dry out and swell when soils become wet, resulting in the potential for cracking building foundations and in some cases, structural distress of the buildings themselves. According to Websoil survey by the USDA, the project site is primarily located within Sorrento loam, 2 to 9 percent slopes. Sorrento loam is well-drained and has low erosion and shrink-swell potential. Additionally, the geotechnical report indicates that the project site has a low expansion potential. Therefore, this impact is less than significant.

Finding:

The proposed project would not be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. Impacts would be less than significant; and no mitigation measures are necessary.

Impact 3.4-5: The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.4-15 of Section 3.4, *Geology and Soils*, of the Draft EIR.

The proposed project would not require the installation or use of a septic tank or alternative wastewater disposal system. Therefore, no impacts would occur.

Finding:

The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. No impact would occur; and no mitigation measures are necessary.

HAZARDS AND HAZARDOUS MATERIALS

Impact 3.5-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.5-17 of Section 3.5, *Hazards and Hazardous Materials*, of the Draft EIR.

Construction

Construction of the proposed project would require small amounts of hazardous materials such as vehicle fuels, lubricants, grease, and transmission fluids. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project would comply with existing regulations of several agencies—the EPA, Cal/OSHA, United States Occupational Safety and Health Administration, and United States Department of Transportation. Impacts would be less than significant.

Operation

The proposed project would consist of the installation of four new stadium lights located adjacent to the existing track and field, utility trenching, and hardscaping. No manufacturing, industrial, or other uses using large amounts of hazardous materials would occur within the Northwood HS campus. Operation of the proposed project would not transport, use, store, or dispose of hazardous materials beyond typical school facilities such as cleaning and maintenance supplies (e.g., cleaners, paint, pesticides). Operation of the proposed project would use cleaners and other chemicals in small quantities, which is not typically considered hazardous materials that could result in a significant hazard to the public or the environment.

No new uses on-site are proposed. Compliance with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, the proposed project would not create substantial hazards to the public or the environment. Impacts would be less than significant.

Findings:

The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.5-2: The proposed project would not 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.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.5-18 of Section 3.5, *Hazards and Hazardous Materials*, of the Draft EIR.

As discussed in Section 3.5(a) of the Draft EIR, construction activities would require small amounts of hazardous materials, including vehicle fuels, lubricants, grease and transmission fluids. The use, transportation, and disposal of hazardous materials would be in accordance with regulatory standards and manufacturers' specifications. Hazardous materials would be used in small quantities and stored so they do not pose significant safety hazards. Operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities such as cleaning and maintenance supplies (e.g., cleaners, paint, pesticides). Operation of the proposed project would use cleaners and other chemicals in small quantities, which is not typically considered hazardous materials that could result in a significant hazard to the public or the environment. Compliance with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be less than significant.

Findings:

The proposed project would not 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. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.5-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.5-17 of Section 3.5, *Hazards and Hazardous Materials*, of the Draft EIR.

The project site is located on the Northwood HS campus. The proposed project would consist of installing four new stadium lights adjacent to the existing track and field, utility trenching, and hardscaping. As stated in Section 3.5(a) of the Draft EIR, construction activities would require small amounts of hazardous materials, including vehicle fuels, lubricants, grease, and transmission fluids. Additionally, operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities such as cleaning and maintenance supplies (e.g., cleaners, paint, pesticides). Operation of the proposed project would use cleaners and other chemicals in small quantities, which is not typically considered hazardous materials that could result in a significant hazard to the public or the environment. The proposed project would also comply with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials.

Other than the Northwood HS campus, there are no existing or proposed schools within one-quarter mile of the project site. The nearest existing school is Orchard Hills School, which is 0.5 mile northwest of the project site. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste on the project site and is not within one-quarter mile of an existing or proposed school campus. Therefore, impacts would be less than significant.

Findings:

The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.5-4: The proposed project would not be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.5-19 of Section 3.5, *Hazards and Hazardous Materials*, of the Draft EIR.

California Government Code Section 65962.5 requires referencing a list of hazardous materials sites, hazardous waste discharges for which the State Water Control Board has issued certain types of orders, public drinking water wells collecting detectable levels of organic contaminants, underground storage tanks with reported unauthorized releases, and solid waste disposal facilities from which hazardous waste has mitigated.

A review of six databases from federal, state, and local environmental regulatory agencies was conducted to identify properties near the project site with reported unauthorized releases of

hazardous materials and to identify properties that use, generate, store, treat or dispose of hazardous materials and chemicals, or release hazardous materials which may impact the campus.

Three sites were identified in the CalEPA list as belonging to the California Environmental Reporting System (CERS). These sites include the project site, Rattlesnake Reservoir, and AT&T Mobility.

The hazardous chemicals stored at Northwood HS include Sodium hypochlorite, sodium bicarbonate, trichloroisocyanuric acid, hydrochloric acid, and calcium chloride, commonly known as pool maintenance chemicals used for water treatment and sanitation. The chemicals stored at Rattlesnake Reservoir include sodium hypochlorite and sodium bisulfite (disinfectants and dichlorination agents used in water treatment processes) and diesel. The chemicals stored at AT&T Mobility include diesel fuel no. 2 and lead acid batteries. These are common items found in most commercial and residential uses and are not considered significant hazardous waste.

According to CalEPA, Northwood HS had six open violations in 2018 related to the failure to submit a hazardous materials release response plan (HMRRP). However, the school submitted HMRRPs in 2023 and 2024 without any reported violations. Rattlesnake Reservoir had seven violations related to the failure to submit a HMRRP in 2017, 2019, and 2021, but submitted HMRRPS in 2022 and 2023 without violations. AT&T Mobility does not have any violations. Though all three sites store hazardous chemicals, their locations would not pose a significant potential hazard to the public or the environment because of the small amount of hazardous waste being produced and the continued oversight by the Orange County Environmental Health Division (OCEHD).

Additionally, Northwood High School is identified by EnviroMapper as an active generator of off-spec, aged, or surplus organics (waste code 331), typically expired or unused chemicals from science classrooms, which are classified as Non-RCRA Hazardous Waste Liquids. Hazardous waste is classified as non-RCRA hazardous waste if it does not exhibit specific hazardous characteristics (ignitability, corrosivity, reactivity, or toxicity) under certain regulations, is not listed as an RCRA hazardous waste, or meets specific State-defined criteria. It may also be classified as non-RCRA hazardous waste if it meets alternative criteria, such as being excluded under federal regulations or requiring special management.

Any hazardous waste generation and disposal are subject to federal and state regulations. Therefore, impacts related hazardous sites within one-quarter mile of the project site creating a significant hazard to the public or the environment would be less than significant.

Findings:

The proposed project would not be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would

create a significant hazard to the public or the environment. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.5-5: The proposed project would not be within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would result in a safety hazard or excessive noise for people residing or working in the project area.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.5-21 of Section 3.5, *Hazards and Hazardous Materials*, of the Draft EIR.

The nearest public-use airport is John Wayne Airport, approximately 7.5 miles southwest of the project site. The project site is not located within two miles of a public or private airport. The project site is not within any of the safety zones of the John Wayne Airport or within the 60 CNEL John Wayne Airport noise contours. Therefore, no impact would occur.

Findings:

The proposed project would not be within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would result in a safety hazard or excessive noise for people residing or working in the project area. No impacts would occur, and no mitigation measures are necessary.

Impact 3.5-6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.5-22 of Section 3.5, *Hazards and Hazardous Materials*, of the Draft EIR.

The City of Irvine's Office of Emergency Management (OEM) coordinates the City's preparedness efforts for hazards that could impact the community. The OEM works with all City departments, having primary responsibility for specific response functions, and ensures department-level plans and procedures are incorporated in the plan and its annexes. The OEM also maintains the Emergency Operations Center, trains emergency response staff and volunteers, and coordinates with Orange County Operational Area, California Office of Emergency Services, and Federal Emergency Management Agency.

The City's Local Hazard Mitigation Plan (LHMP) is designed to identify the City's hazards, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term natural or human-made hazard risks to human life and property for the City and its residents. The purpose of the City's Emergency Operations Plan (EOP) is to establish a strategic response plan if an emergency occurs. The plan provides an overview of concepts and components of the City's emergency management organization within the

Standardized Emergency Management System and describes responsibility of federal, state, and county entities to protect life and property. The Orange County Fire Authority (OCFA) and the Irvine Police Department (IPD) handle smaller incidents on a day-to-day basis. During the construction and operation phases, the project would not interfere with any of the daily operations of the OCFA, the IPD, or OEM, which supports emergency planning and response efforts Irvine. All construction activities would be required to be performed per the City's standards and regulations. The proposed project would be required to provide the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases.

The proposed project would consist of installing four new stadium lights next to the existing track and field and utility trenching. These improvements would occur entirely within the boundaries of the campus, and access is provided via Yale Avenue and Northwood High School Private Road. Construction activities would be limited in scope and duration and would not require road closures or significant changes to on- or off-site circulation. The proposed project would have no impact on emergency response or evacuation plans. The project site is located within Evacuation Management Zone: Orchard Hills 1D, and evacuation routes in the vicinity include Wolf Trail and a portion of Yale Avenue, which connect to the portion of Yale Avenue and Northwood High School Private Road that serves the school. The proposed project would not alter the existing access or egress points, nor would it result in any permanent changes to road capacity, traffic controls, or emergency access routes. Adequate evacuation routes would continue to be provided to the project site.

The proposed project would also be required to go through DSA's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations in the CBC to ensure that proposed project development does not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.). The proposed project would not impair implementation of the City's LHMP and OEP. The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant.

Findings:

The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.5-7: The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.5-23 of Section 3.5, *Hazards and Hazardous Materials*, of the Draft EIR.

According to CAL FIRE's Fire Hazard Severity Zone in LRA Viewer, the project site is located within an LRA and is not in a Very High Fire Hazard Severity Zone (FHSZ). The northern portion of the project site is located in Moderate and High FHSZs. The nearest Very High FHSZ is just north of the project site, adjacent to the campus. The project site is flat and developed with the Northwood HS campus. Surrounding the project site are urban uses. The proposed project would not involve new construction in previously undeveloped areas or expansion toward adjacent Very High FHSZs. The proposed project would be designed in accordance with the California Building Code and California Fire Code. Project design plans would be reviewed by the DSA. Fire suppression equipment specific to construction would be maintained on-site. Additionally, project construction would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. The proposed project would not change the uses or boundaries of the facilities to place buildings and structures, students, or members of the public closer to wildland fires. Therefore, the proposed project would not expose people or structures to a significant risk due to wildfires beyond existing conditions. Impacts would be less than significant.

Findings:

The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant, and no mitigation measures are necessary.

HYDROLOGY AND WATER QUALITY

Impact 3.6-1: The proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.6-13 of Section 3.6, *Hydrology and Water Quality,* of the Draft EIR.

Construction

Grading, excavation, and construction activities associated with the proposed project may impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

The proposed project consists of the installation of four new athletic field lights around the existing football field. The proposed project may also consist of trenching for the installation of an electrical line to provide electricity for the four athletic field lights, and is anticipated to disturb approximately 1,500 square feet. Additionally, the proposed project is anticipated to include expansion of hardscaping, which would be limited to the installation of the athletic field light poles and installation of the power distribution equipment and lighting control equipment. The proposed project is not required to prepare a Stormwater Pollution Prevention Plan (SWPPP) because the total area of disturbance is approximately 1,500 square feet, which is well below the one-acre threshold that triggers SWPPP requirements. However, BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction would be incorporated. These include, but are not limited to:

- Erosion controls (e.g., earth dikes and swales, mulching, slope drains, compost blankets).
- Sediment controls (e.g., silt fence, sediment trap, sandbag or straw bale barriers).
- Tracking controls (e.g., stabilized construction entrance/exit, tire wash).
- Non-storm water management (e.g., dewatering practices, vehicle and equipment cleaning).
- Materials and waste management (e.g., material storage, hazardous waste management, soil management).
- Good housekeeping practices.

Implementation of BMPs throughout the construction phase of the proposed project will address anticipated and expected pollutants of concern due to construction activities. The proposed project would comply with all applicable water quality standards and waste discharge requirements. Therefore, the construction of the proposed project would not violate water quality standards or waste discharge requirements and would not otherwise substantially degrade water quality, resulting in a less-than-significant impact.

Operation

Once the proposed project has been constructed, urban runoff could include a variety of contaminants that are typical of the operation of school athletic facilities (see Section 3.5, Hazards and Hazardous Materials). As discussed previously, the proposed project would be required to comply with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be less than significant. Implementation of the proposed project would not substantially increase the amount of impervious surfaces on the project site. Therefore, operational impacts related to runoff would remain similar to existing conditions on-site.

Furthermore, as part of the Statewide Trash Amendments, the District would adhere to the requirements of the City of Irvine Municipal Code Section 6-8-3, which include the installation and maintenance of full-capture trash screening devices at curb inlets, grate inlets, and catch basin inlets. With compliance with federal, State, county, and local regulations and code

requirements, the proposed project would have a less than significant impact on surface or groundwater quality during the operational phase. Therefore, this impact is less than significant.

Findings:

Impacts to water quality standards or waste discharge requirements would be less than significant, and no mitigation measures are necessary.

Impact 3.6-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.6-13 of Section 3.6, *Hydrology and Water Quality*, of the Draft EIR.

The City of Irvine is located within Basin 8-1, which is classified as a medium-priority basin due to heavy reliance on the Basin's groundwater as a source of water supply. There are minimal stormwater recovery systems. IRWD captures dry weather runoff via Peters Canyon Channel Water Capture. As described in Chapter 2, Project Description, of the DEIR, the proposed project would not change current enrollment or staffing. Therefore, overall water demand is not expected to increase and there would be no impact on groundwater supplies.

The project site is already built out with hardscape and impervious surfaces, and implementation of the proposed project would not substantially increase the amount of impervious surfaces on the project site. Hardscaping is minimal and limited to the installation of the athletic field light poles and installation of the power distribution equipment and lighting control equipment, which would disturb approximately 1,500 square feet. No new landscaping, including irrigation systems for the landscaping, are proposed. Stormwater runoff will continue to drain into the City's MS4 system, with no adverse effect on groundwater recharge. The proposed project would not interfere with groundwater recharge. Therefore, this impact is less than significant.

Findings:

The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.6-3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the

course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-site.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

iii) 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.

iv) Impede or redirect flood flows.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.6-16 of Section 3.6, *Hydrology and Water Quality*, of the Draft EIR.

During construction, temporary erosion control measures as described in Section 3.6.4(a) of the Draft EIR will prevent sediment runoff, through the construction BMPs. The proposed project includes minimal ground-disturbing activities that could potentially cause erosion. The proposed project would not change existing uses on-site nor would it increase student capacity. The proposed project is not anticipated to substantially alter the existing on-site drainage patterns; however, any alterations that would occur would be designed to meet local, state, and federal water quality standards and to ensure that stormwater flows do not result in substantial erosion or siltation. The proposed project would not substantially alter the existing drainage pattern of the site, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site. Therefore, impacts would be less than significant.

The proposed lighting improvements at Northwood HS would not substantially increase the rate or amount of surface runoff in a manner that would result in on- or off-site flooding. The project involves minimal new impervious surfaces, which include the concrete foundations for four light poles and a small equipment pad. Additionally, the project will adhere to City's stormwater regulations, ensuring proper compaction and restoration of any disturbed areas to prevent erosion. Given the negligible change in impervious area and the absence of modifications to major drainage pathways, the proposed project would not alter existing runoff patterns or exceed the capacity of local stormwater infrastructure which would not result in flooding on or off-site. Therefore, impacts would be less than significant.

Construction of the proposed project would temporarily introduce potential sources of pollution on-site, such as oils, solvents, and gasoline, that are typical of construction activities. Equipment and potentially hazardous materials would be maintained and stored in accordance with manufacturer instructions. The proposed project includes limited disturbance which exempts the project from formal SWPPP requirements. Therefore, compliance with federal, state, and local regulations and implementation of BMPs would ensure that the proposed

project would not result in substantial additional sources of polluted runoff during construction. A less-than-significant impact related to substantial additional sources of polluted runoff would occur during each construction phase.

The proposed project would result in the installation of four new stadium lights adjacent to the existing track and field. The expansion of hardscaping would be limited to the installation of the athletic field light poles and the concrete pad for the installation of the power distribution equipment and lighting control equipment. The proposed project would result in a minor increase of impervious surfaces onsite, approximately 1,500 total square feet. Stormwater from the proposed project would flow to onsite stormwater facilities and to stormwater drainage system in the public right of way like existing conditions. As such, the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Therefore, compliance with federal, State, county, and local regulations and code requirements would ensure that the proposed project would not alter existing drainage patterns in a manner that would result in substantial additional sources of polluted runoff during operation. A less-than-significant impact related to substantial additional sources of polluted runoff would occur during the operation of the proposed project.

The proposed project would not substantially alter the existing drainage pattern of the project site or the surrounding area. According to the FEMA flood zone map, the project site is not in a flood zone and is in a highly developed area of the city. Additionally, the project site is located within the existing Northwood HS campus. Construction and operation of the proposed project would not impede or redirect flood flows. Therefore, this impact is less than significant.

Findings:

The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.6-4: The proposed project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.6-18 of Section 3.6, *Hydrology and Water Quality*, of the Draft EIR.

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no large water tanks in the area, but Orchard Estates Retarding Basin is approximately 0.4 mile northeast of the project site.

According to DWR's Dam Breach Inundation Map viewer, the project site is within the Orchard Estates Retarding Basin inundation area. The project components, consisting primarily of light poles, electrical conduits, and PA equipment, would contain no hazardous materials that could be released during flood events including a seiche. During construction, temporary erosion control measures as described in Section 3.6.4(a) of the Draft EIR will prevent sediment runoff through construction BMPs.

The project site is within FEMA Flood Zone X, areas with minimal flood hazard. Additionally, the project site is approximately 15 miles from the Pacific Ocean and is not in a tsunami zone. Impacts would be less than significant with compliance with FEMA and the City's Floodplain District requirements. Therefore, this impact is less than significant.

Findings:

The proposed project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.6-5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.6-19 of Section 3.6, *Hydrology and Water Quality*, of the Draft EIR.

As previously mentioned in Section 3.6.4(b) of the Draft EIR, the proposed project would not affect groundwater and would not obstruct implementation of a sustainable groundwater management plan. The proposed project would comply with existing local, regional, and State regulations and would not obstruct implementation of a water quality control plan. Therefore, this impact is less than significant.

Findings:

The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are necessary.

NOISE

Impact 3.7-1: The proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in

excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.7-22 of Section 3.7, *Noise*, of the Draft EIR.

Construction

Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively disregarding other attenuation effects from air absorption, ground effects, and shielding effects provided by intervening structures or existing solid walls), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site (site of each development phase) with different equipment mixes, loads, and power requirements.

The expected construction equipment mix was estimated and categorized by construction activity using the Federal Highway Administration Roadway Construction Model (RCNM). Assuming the nearest sensitive receptor to the closest boundary for project construction activities, construction-related noise levels would be up to 67 dBA Leq at residences to the south. Construction noise levels at receptors further away are estimated to be even less.

Because the proposed project's construction activities would not exceed the FTA noise standards (80 Leq), would comply with the City's municipal code, and would comply with the applicable noise-related General Plan policies, the proposed project's construction-related noise impacts would be less than significant.

Operation

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

A Track and Field event would have a maximum capacity event of up to 400 spectators. The nearest residential uses are located to the south of the track and field across Portola Parkway and are shielded by an existing 6-foot sound wall. Sports events and other school events are

temporary periodic (not daily) events that occur throughout the school year Monday through Saturday during regular campus operating hours (2:30 pm to 9:00 pm). Spectator capacity would range from 130 participants to up to 400 participants. Existing sports events and other school events at the track and field range from 130 to 400 participants. Band activities would remain the same.

The proposed project's operational scenarios were modeled using SoundPLAN computer software. SoundPLAN uses industry-accepted propagation algorithms based on International Organization for Standardization (ISO) and ÖAL-28 standards for outdoor sound propagation. The modeling calculations account for classical sound wave divergence (spherical spreading loss with adjustments for source directivity from point sources) plus attenuation factors due to air absorption and ground effects. Additionally, SoundPLAN provides for other correction factors, including level increases due to reflections, source directivity, and source tonality.

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

- Rowdy crowd cheering (Bleachers)[1] was assumed for a cumulative 10 minutes per hour and each cheer interval assumed to last approximately 10 seconds.
- On-field player activity was assumed to occur for a cumulative of 25 minutes per hour.
- On-field referee whistle activity was assumed to occur for a cumulative of 25 minutes per hour.

The residential receptors to the south of the project site are shielded by an existing 6-foot continuous sound wall. Modeled SoundPLAN scenario inputs, results and operational noise contours associated with project track and field and practice field noise on the project site and in the greater community for all scenarios.

Future sports events noise levels range from 23.2 dBA to 40.5 dBA Leq at the nearest noise sensitive receptors to the track and field. Proposed project noise levels attributable to sports events would be similar to existing noise levels, however, would occur during the evening hours and not extending past 9:00 pm. Future sports events at the track and field would result in noise levels more than 10 dBA below ambient noise conditions at the nearest noise-sensitive receptors. In addition, future sports events at the track and field would also result in a negligible increase of less than 1 dBA over ambient noise levels. Furthermore, Section 6-8-205 of the Municipal Code exempts school bands, school athletic and school entertainment events, provided said events are conducted on school property or authorized by special City permit

[1] To ensure a conservative analysis of high-level noise impacts, crowd noise was analyzed in the Draft EIR; however, bleachers are not proposed as part of the proposed project.

from the noise level standards in Section 6-8-204 of the City of Irvine Noise Ordinance. Therefore, this impact would be less than significant.

Findings:

The proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.7-2: The proposed project would not generate excessive groundborne vibration or groundborne noise levels.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.7-28 of Section 3.7, *Noise*, of the Draft EIR.

Construction

Construction activities have the potential to generate varying degrees of ground vibration, depending on the construction procedures and equipment. The use of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

For reference, a vibration level of 0.2 in/sec PPV is used as the limit for nonengineered timber and masonry buildings, which would conservatively apply to the surrounding structures. Typical construction equipment can generate vibration levels ranging from 0.21 inch per second (in/sec) peak particle velocity (PPV) at 25 feet. the proposed construction activities would not exceed the 0.2 in/sec PPV FTA standard. Moreover, the proposed project would comply with General Plan Policy 4c, which requires all plans submitted for development review to use the vibration standards published by the FTA. Therefore, vibration damage impacts would be less than significant.

Operation

Proposed project operation would not include any substantial long-term vibration sources. Therefore, no significant vibration effects would occur; impacts would be less than significant.

Findings:

The proposed project would not generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.7-3: The proposed project is not within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project would expose people residing or working in the project area to excessive noise levels.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.7-30 of Section 3.7, *Noise* of the Draft EIR.

The nearest airport to the Northwood HS campus, including the project site, is John Wayne Airport, approximately seven miles southwest. Therefore, due to distance, the proposed project would not expose people residing or working in the project area to excessive noise levels related to air travel. No impacts would occur.

Findings:

The proposed project is not within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project would expose people residing or working in the project area to excessive noise levels. No impact would occur, and no mitigation measures are necessary.

TRANSPORTATION

Impact 3.8-1: The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.8-11 of Section 3.8, *Transportation*, of the Draft EIR.

As discussed in Section 3.8.2 of the Draft EIR, pedestrian access at the project site is provided by Portola Parkway, Yale Avenue, and Wolf Trail; painted crosswalks exist at the intersection of Yale Avenue and Wolf Trail; and OCTA bus and Irvine Connect routes are near the campus. Additionally, the campus has installed various bike racks, and bike storage areas throughout the campus. The proposed project would be located on the Northwood HS campus and would not preclude the district from continuing to improve on campus bicycle or pedestrian facilities. The proposed project would allow existing activities on campus to occur into the evening hours, and would not result in an increase in student capacity that would substantially decrease the performance or safety of nearby facility. The proposed project would not construct any new vehicle or pedestrian access points on the project site (i.e., sidewalks, driveways), or pedestrian facilities (i.e., bike racks), that would alter the existing circulation on campus. The campus would continue to utilize the existing non-motorized and pedestrian facilities.

The proposed improvements at the high school's athletics field are consistent with the goals, objectives, and policies in the Circulation Element of the Irvine General Plan, and the project

would not adversely affect the performance of any roadway, transit, or non-motorized (pedestrian and bicycle) transportation facilities. Additionally, the proposed project would not conflict with the City's Trip Reduction Ordinance.

Based on the traffic analysis, the discussion of non-motorized transportation and transit, and a review of the Circulation Element of the City of Irvine General Plan, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

SCAG Connect SoCal Consistency

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

Findings:

The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.8-2: The proposed project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.8-12 of Section 3.8, *Transportation*, of the Draft EIR.

Section 15064.3(b)(1) of the CEQA Guidelines state that projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact. Currently, Varsity tackle football games for Northwood HS are held at remote locations, including Irvine High School, which is approximately 2.5 miles from Northwood HS. Varsity tackle football games would continue to be held at Irvine HS. The installation of lights at the project site would provide the opportunity for student athletes to attend practices and games, including soccer and lacrosse, at their school, which would eliminate the need to travel to another field and result in shorter travel distances. Thus, since the project would provide the opportunity for additional athletics events to be held at the Northwood High School campus instead at other schools in the District, it would result in a reduction in VMT because Northwood HS would be closer to most of the homes in the attendance area compared to the schools where the activities currently take place.

The City of Irvine's "Traffic Study Guidelines" include screening criteria that can be used to identify when a proposed project is anticipated to result in a less than significant VMT impact. The document states that a locally serving public school (kindergarten through 12th grade) can be screened from requiring a VMT impact analysis and that no further VMT analysis is required. Based on these guidelines, this athletics facility project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and would have a less-than-significant VMT impact.

Findings:

The proposed project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.8-3: The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.8-13 of Section 3.8, *Transportation*, of the Draft EIR.

The proposed project would not include any on- or off-site access or circulation features that would create or increase any design hazards or incompatible uses. Access to the school site would continue to be provided by four existing driveways on Yale Avenue and one existing driveway on Portola Parkway adjacent to the athletics field. There would be no modifications to these driveways or to the study area street network and all improvements within the school site would be consistent with the criteria of the Division of the State Architect (DSA).

The increased levels of traffic, the increased number of pedestrians, and the increased number of vehicular turning movements that would occur at the driveways and at the nearby intersections would result in an increased number of traffic conflicts and increase the probability of an accident occurring. These impacts would not be significant, however, because the streets, intersections, and driveways are designed to accommodate the anticipated levels of vehicular and pedestrian activity. These streets and intersections have historically been accommodating daily school-related traffic for the existing school. The proposed project's athletics field improvements would be compatible with the design and operation of a high school, and the proposed project would not result in any modifications to the existing access or circulation features at the school.

As the existing street network could readily accommodate the anticipated increase in vehicular, pedestrian, and bicycle activity, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, this impact is less than significant.

Findings:

The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.8-4: The proposed project would not result in inadequate emergency access.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.8-14 of Section 3.8, *Transportation*, of the Draft EIR.

The existing on-campus access and circulation system, including roadways, parking lots, and fire lanes, would continue to accommodate emergency services. The proposed project would be required to maintain emergency access to the project site and would not modify any existing vehicle access points, including those used for emergency access to the campus or project site.

Emergency access to the school site is provided by four existing driveways on the west side of Yale Avenue that provide access to the school's parking lots plus an additional driveway on the north side of Portola Parkway. This driveway provides access to an on-site circulation road that runs along the west and north sides of the school campus and connects to Yale Avenue on the east side of the campus. The existing access and circulation features at the school, including the driveways, parking lots, on-site roadways, and fire lanes, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The proposed project would be designed to accommodate emergency access to the athletics complex. The existing access/circulation features at the school were subject to the District's design requirements and were approved by the Fire Department and the DSA. Emergency vehicles could continue to readily access the athletics field and all other areas of the school via on-site travel corridors. The proposed project would not result in inadequate emergency access and no impact would occur.

Findings:

The proposed project would not result in inadequate emergency access. No impact would occur, and no mitigation measures are necessary.

UTILITIES AND SERVICE SYSTEMS

Impact 3.10-1: The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications

facilities, the construction or relocation of which could cause significant environmental effects.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.10-11 of Section 3.10, *Utilities and Service Systems*, of the Draft EIR.

Water

The proposed project consists of new lighting poles for the track and field and utility trenching. No new development is proposed that would require the installation of a water line connection, and school capacity would not increase. Water is currently provided to the campus and project site by the IRWD. Potable water would continue to be provided to the campus through connections to the existing water mains. No water system improvements are proposed. As further discussed under Section 3.10(b), the IRWD provides water to the campus from MWDOC, local groundwater and surface water supplies, and recycled water. Therefore, the City has sufficient water capacity to continue serving the project site. The proposed project would not require the construction of new or expanded water facilities that could cause significant impacts. Therefore, this impact is less than significant.

Wastewater

No development is proposed that would generate wastewater or entail installation of a wastewater line connection to serve any new buildings, and school capacity would not increase. As further discussed in Section 3.10(c) of the Draft EIR, the proposed project would not substantially increase wastewater. Wastewater generated during sporting events would be conveyed to the existing sewer lines on campus. Therefore, the proposed project would not require the construction of new or expanded wastewater facilities that could cause significant environmental effects. Therefore, this impact is less than significant.

Stormwater Infrastructure

The proposed project would result in a slight increase in impervious surfaces compared to existing conditions with the installation of new lighting poles and base. The increase in impervious surfaces due to the proposed project would be minor, and the majority of the project site would remain in its current state. No new buildings are proposed, and school capacity would not increase. Expansion of hardscaping would be limited to the installation of the stadium light poles in concrete and the installation a concrete pad for the area of the power distribution equipment and lighting control equipment. Additionally, installation of the conduit lines would result in demolition and then the reinstallation of existing hardscaping and would not result in an expansion of hardscaping. No other areas would be hardscaped. The stormwater from the proposed project would be conveyed to existing stormwater drains on campus or to the neighboring storm drain system along roadways. The proposed project would not significantly increase or change the stormwater volume, rate, or pattern beyond connecting to the existing stormwater system. Therefore, this impact is less than significant.

Energy Infrastructure

Electricity is provided by SCE. The proposed project would connect to existing electric power infrastructure for operation. Underground system electrical conduit lines would be installed to connect the proposed stadium light poles to power distribution equipment and lighting control equipment that would be located north of the track and field.

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

Natural gas service is provided by SoCalGas. The proposed new lighting poles will be all electric. No new development that would require the use of natural gas is proposed. The proposed project would not require the construction of new or expanded natural gas facilities. Therefore, this impact is less than significant.

Other Utilities

There are existing telecommunications facilities and services in the immediate area for the proposed project to connect to, if necessary. The proposed project would not require additional telecommunications facilities demand. The proposed project would not require off-site construction or relocation of utilities, and therefore, this impact is less than significant.

Findings:

The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.10-2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.10-12 of Section 3.10, *Utilities and Service Systems*, of the Draft EIR.

IRWD is projected to have a water supply capacity of 178,727 AFY and a water supply surplus of 90,704 AFY through 2040, which would far exceed the proposed project's water supply demand.

Additionally, the 2020 UWMP includes a Water Shortage Contingency Plan (WSCP), which provides procedures for responding to various levels of supply shortages through a combination of supply augmentation and demand management measures.

The proposed project's increased water demand during sporting events would be negligible because the proposed project would not increase the campus's enrollment capacity; the events at the project site are existing events that already occur on campus; and the increased water demand would only occur during events/games, which are intermittent. No development is proposed that would require additional water use or the installation of a water line connection and school capacity would not increase. Based on the UWMP, the IRWD would have adequate water supplies to meet the water demands of the proposed project and the City during normal, dry, and multiple dry years. Therefore, this impact is less than significant.

Findings:

The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.10-3: The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.10-13 of Section 3.10, *Utilities and Service Systems*, of the Draft EIR.

No development is proposed that would generate wastewater or entail installation of a wastewater line connection to serve any new buildings and school capacity would not increase. Wastewater generation would occur during the operation of nighttime sporting events. The proposed project's increase in wastewater generation would be low compared to existing conditions for three reasons: first, the proposed project would not increase the campus's enrollment capacity; second, the events at the project site are existing events that already take place on campus; and third, the increased wastewater generation would only occur during events/games, which are intermittent. The proposed project's wastewater generation would be within the MWRP and LAWRP's remaining capacity of 28 mgd and 7.5 mgd, respectively. The proposed project would not require construction of new or expanded wastewater treatment facilities. Therefore, this impact is less than significant.

Findings:

The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's

projected demand in addition to the provider's existing commitments. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.10-4: The proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.10-13 of Section 3.10, *Utilities and Service Systems*, of the Draft EIR.

During construction, the proposed project would generate some demolition debris from clearance and waste debris from utility trenching. Construction solid waste generation would be minimal because construction of the proposed project would not require the demolition of buildings. CALGreen Section 5.408, Construction Waste Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

The proposed project would not increase student enrollment. The solid waste generated by the proposed project's operational activities would be negligible because the proposed project would not increase the campus's enrollment capacity and sporting and other events would occur infrequently and seasonally within the school year.

The waste generation as a result of the proposed project would be within the remaining capacity of 160,896,082 cubic yards at the Frank R. Bowerman Landfill remaining capacity of 160,896,082 cubic yards, and the proposed project would continue to be serviced by Waste Management and regional landfills. The proposed project would comply with the required regulation pertaining to construction and demolition waste and would not adversely impact landfill capacity or impair attainment of solid waste reduction goals. Therefore, this impact is less than significant.

Findings:

The proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant, and no mitigation measures are necessary.

Impact 3.10-5: The proposed project would comply with federal, state, and local statutes and regulations related to solid waste.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.10-13 of Section 3.10, *Utilities and Service Systems*, of the Draft EIR.

The proposed project is required to comply with federal, state, and local statutes and regulations related to solid waste and would continue this practice. The Construction and

Demolition Debris Recycling Ordinance requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction and operation be recycled and/or salvaged for reuse. The City of Irvine implements policies to reduce generation of solid waste through the City's debris recycling and reuse ordinance (PPP UTIL-7) and waste reduction (PPP UTIL-8) and City standard conditions related to solid waste recycling (PPP UTIL-9 and PPP UTIL-10). Project development would not conflict with laws governing solid waste disposal, and therefore, this impact is less than significant.

Findings:

The proposed project would comply with federal, state, and local statutes and regulations related to solid waste. Impacts would be less than significant, and no mitigation measures are necessary.

SECTION D
FINDINGS ON IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

The following summary describes impacts of the proposed project that, without mitigation, could result in significant adverse impacts. Upon implementation of the mitigation measures provided in the Draft EIR, these impacts would be considered less than significant.

CULTURAL RESOURCES

Impact 3.3-2: The proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.3-14 of Section 3.3, *Cultural Resources*, of the Draft EIR.

Only two historical archaeological sites have been recorded in City of Irvine; both are in the eastern portion of the City and consist of historic domestic refuse. The proposed project would be confined to the boundaries of the Northwood HS campus. Project construction would be limited in scope and would involve minimal ground-disturbing activities. Excavation would disturb approximately 1,500 square feet and would include utility trenching and the installation of light poles. The project site is surrounded by development and is not near any creeks, thereby decreasing the chance that any previously undiscovered prehistoric archaeological deposits are located on the project site. However, there is still a potential for discovery of buried archeological resources that have not previously been encountered. Therefore, this impact would be considered potentially significant.

Mitigation Measure CUL-1 would be implemented for the proposed project to address the potential to encounter any additional artifacts or subsurface archaeological resources during

project-related ground-disturbing activities. With the implementation of MM CUL-1, potential impacts to archaeological resources would be reduced to less than significant.

Mitigation Measures:

CUL-1 Prior to the commencement of grading activities, the District shall ensure that an archaeologist who meets the Secretary of the Interior's (SOI) standards for professional archaeology has been retained for the proposed project and will be on-call during all grading and other significant ground-disturbing activities that would occur beneath the existing artificial fill. The qualified archaeologist shall ensure that the following measures are followed for the proposed project:

Prior to any ground disturbance, the Qualified Archaeologist will conduct a preconstruction Cultural Resources Awareness Training (CRAT) to familiarize the members of the construction team overseeing or conducting ground-disturbing activities with the archaeological sensitivity of the project area, the potential to encounter archaeological resources, the types of archaeological material that could be encountered, and procedures to follow if archaeological deposits and/or artifacts are encountered during construction. The SOI-qualified archaeologist shall prepare and distribute a brochure describing the appropriate actions to take if any archaeological resources are encountered.

Prior to any ground disturbance, the (SOI)-qualified archaeologist shall prepare an Archaeological and Tribal Monitoring Plan that outlines the methods to be undertaken during monitoring and the steps to be taken in the event of an archaeological discovery.

In the event that a prehistoric archeological site indicators (such as obsidian and chert flakes and chipped stone tools; grinding and mashing implements [e.g., slabs and hand stones, and mortars and pestles]; bedrock outcrops and boulders with mortar cups; and locally darkened midden soils) or a historic-period archaeological site indicators (such as fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits [e.g., wells, privy pits, dumps]), is uncovered during grading or other construction activities, all ground-disturbing activity within 50 feet of the discovery shall be halted. The District shall be notified of the potential find and a qualified archeologist shall be retained to investigate its significance (CEQA Guidelines15064.5[f]).

If significant Native American cultural resources are discovered for which a treatment plan must be prepared, the District or the archaeologist on-call shall contact the applicable Native American tribal representative(s). If requested by the Native American tribe(s), the District or archaeologist on call shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, reburial, re-turn of artifacts to tribe).

Findings:

Implementation of Mitigation Measure CUL-1 would reduce potential impacts to archaeological resources to less than significant. Therefore, no significant unavoidable adverse impacts relating to cultural resources have been identified.

GEOLOGY AND SOILS

Impact 3.4-6: The proposed project may indirectly destroy a unique paleontological resource.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.4-15 of Section 3.4, *Geology and Soils*, of the Draft EIR.

Paleontological resources or fossils are remains of ancient plants and animals that can provide scientifically significant information about the history of life on earth. This sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit. According to the Irvine 2045 General Plan EIR, the project site is in an area of moderate paleontological sensitivity. As stated in Section 3.4.2 of the Draft EIR, the UCMP database did not report any fossil localities at or near the project site.

The project site is developed with an existing football field on the Northwood HS campus; though paleontological resources are not expected to be discovered during project construction, it is possible that unknown paleontological resources could be discovered during grading activities and utility trenching for the proposed light poles. Therefore, this impact would be considered potentially significant.

Implementation of Mitigation Measure GEO-1 would address the potential to encounter any paleontological resources during project-related ground-disturbing activities. With the implementation of MM GEO-1, potential impacts to paleontological resources would be reduced to less than significant.

Mitigation Measures:

GEO-1 In the event that fossils or fossil locality deposits are discovered during construction, excavations within 50-feet of the fossil locality shall be temporarily halted until removal of the fossil localities. The contractor shall notify a qualified

paleontologist to investigate its significance. If the fossil locality is determined to be significant by the qualified paleontologist, the paleontologist shall work with the District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the District determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important.

Findings:

Implementation of Mitigation Measure GEO-1 would reduce potential impacts to paleontological resources to less than significant. Therefore, no significant unavoidable adverse impacts relating to cultural resources have been identified.

TRIBAL CULTURAL RESOURCES

Impact 3.9-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k).

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.9-12 of Section 3.9, *Tribal Cultural Resources*, of the Draft EIR.

The project would not impact tribal cultural resources listed on any of the registers of historic resources. The nearest historical resource is the Frances Packing House, which is approximately 1.5 miles southwest of the project site. The project site is surrounded by development and is not near any creeks, thereby decreasing the chance that any previously undiscovered tribal cultural resources are located on the project site. Due to the developed nature of the project site and surrounding area, the proposed project would not impact a resource listed on the CRHR, NRHP, CHL, or CPHI or in a local register of historical resources.

However, development of the proposed project could encounter previously unknown tribal cultural resources and human remains. Although no known tribal cultural resources have been identified on the project site, ground-disturbing activities as part of the proposed project have the potential to disturb subsurface deposits possessing traditional or cultural significance to Native American or other descendant communities. While the project would be confined within the existing campus boundary and would involve minimal construction, any grading beneath existing artificial fill could reach previously undisturbed soils where buried cultural resources may exist. Therefore, this impact is potentially significant.

Mitigation Measure TCR-1 through TCR-3 would be implemented for the proposed project to address the potential to encounter any tribal cultural resources during project-related ground-disturbing activities. With the implementation of Mitigation Measures TCR-1 through TCR-3, potential impacts to tribal cultural resources would be reduced to less than significant.

Mitigation Measures:

TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

a) The Irvine Unified School District (IUSD) shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

b) A copy of the executed monitoring agreement shall be submitted to the Irvine Unified School District (IUSD) prior to commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

c) The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Irvine Unified School District (IUSD) upon written request to the Tribe.

d) On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for

the Irvine Unified School District (IUSD) that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the Irvine Unified School District (IUSD) that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

TCR-2 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

a) Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

a) Native American human remains are defined in PRC Section 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

b) If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code Section 5097.9, as well as Health and Safety Code Section 7050.5 shall be followed.

c) Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).

d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

e) Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Findings:

Implementation of Mitigation Measure TCR-1 through TCR-3 would reduce potential impacts to tribal cultural resources to less than significant. Therefore, no significant unavoidable adverse impacts relating to tribal cultural resources have been identified.

Impact 3.9-2: The proposed project could cause a substantial adverse change to a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Detailed support for this environmental impact conclusion is fully discussed starting on page 3.9-15 of Section 3.9, *Tribal Cultural Resources*, of the Draft EIR.

Tribal cultural resources consider the value of a resource to tribal cultural tradition, heritage, and identity to establish potential mitigation and to recognize that California Native American tribes have expertise concerning their tribal history and practices. As discussed in Section 3.3, *Cultural Resources* of the Draft EIR, there are no sensitive resources eligible for listing in the CRHR or the NRHR on the project site. The project site is not listed as a Historical Resource within the City of Irvine, as identified in the 2045 Irvine General Plan Draft EIR.

In accordance with PRC Section 21080.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. Pursuant to AB 52, the District certified mailed and emailed tribal consultation letters on May 28, 2025, inviting four tribes on their AB 52 list to consult on the project—the Gabrieleño Band of Mission Indians–Kizh Nation, Gabrielino–Tongva Indian Tribe, Juaneño Band of Mission Indians–Acjachemen Nation, and the San Gabriel Band of Mission Indians. One tribe, the Kizh Nation, requested to consult during the 30-day AB 52 consultation request window, and the District did not receive any additional responses from the tribes. Further, a Sacred Lands File request was submitted to the NAHC and received a negative result; there are no known sacred sites or tribal cultural resources in or in the vicinity of the project site.

Although unlikely, the potential exists to unearth tribal cultural resources during ground-disturbing activities. Therefore, this impact is potentially significant.

In the event tribal cultural resources are discovered, Mitigation Measures TCR-1 through TCR-3 and CUL-1 provide guidelines for how to protect tribal cultural resources. Under Mitigation Measure TCR-1, the District must retain a Native American monitor during all ground-disturbing construction activities. If tribal cultural resources are encountered, work must stop in the immediate area while the monitor and a qualified archaeologist assess the find. Mitigation Measure CUL-1 requires the District to retain a qualified archaeologist to be on call during grading activities, conduct preconstruction cultural resources training, and prepare a monitoring plan. If archaeological materials are discovered, work must stop within 50 feet of the find, and the archaeologist must evaluate its significance. If the discovery includes tribal cultural resources, appropriate tribal consultation is required to determine the proper course of action.

Findings:

Implementation of Mitigation Measure TCR-1 through TCR-3 and CUL-1 would reduce potential impacts to tribal cultural resources to less than significant. Therefore, no significant unavoidable adverse impacts relating to tribal cultural resources have been identified.

SECTION E
FINDINGS ON SIGNIFICANT UNAVOIDABLE IMPACTS

The Draft EIR did not identify any significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the proposed project.

SECTION F
FINDINGS ON PROJECT ALTERNATIVES

Alternatives Considered and Rejected During The Scoping/Project Planning Process

The following is a discussion of alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the Draft EIR.

- **Alternative Development Area**. CEQA requires a discussion of alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines, Section 15126.6[f][2][A].)

  The Alternative Development Area Alternative would result in the development of the proposed project in an alternate site. The proposed project by design is intended for the

Northwood HS campus. Consequently, an alternative off-site location is not a feasible alternative and would not meet the project objectives. Impacts that are identified as being potentially significant under the proposed project are due to construction-related activity such as inadvertent discovery of significant archaeological or cultural resources during excavation. These impacts could potentially occur regardless of the proposed project's location. For these reasons, an alternative that is in another location within the District is not addressed in this chapter. Because the project site is already developed as a school with athletic facilities, constructing the proposed project on a different site would likely increase environmental impacts. It was determined, therefore, that it is unlikely that there is an alternative project site that could potentially meet the objectives of the proposed project and reduce significant impacts of the project as proposed.

Alternatives Selected for Further Analysis

The following alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the Proposed Project but avoid or substantially lessen any of the significant effects of the project.

- **Alternative 1**: No-Project Alternative
- **Alternative 2**: Restricted Hours Alternative

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

The CEQA Guidelines require the analysis of a No Project Alternative. Under CEQA, the No Project Alternative must consider the effects of not approving the proposed project. The No Project Alternative describes the environmental conditions that exist at the time that the environmental analysis commences as well as what would reasonably be expected in the foreseeable future if the Proposed Project were not approved. (CEQA Guidelines, § 15126.6(e)(2).)

Under the No Project Alternative, the District would not approve any portion of the proposed project on the Northwood HS campus, and none of the mitigation measures identified within this Draft EIR would be necessary. Under the No Project Alternative, the proposed improvements at Northwood HS would not be implemented. The project site on campus would not have permanent lighting. The school would continue to operate under its current conditions, and no changes would take place.

Finding:

Under the No Project Alternative, the District would not approve any portion of the proposed project on the Northwood HS campus, and none of the mitigation measures identified within this Draft EIR would be necessary. Under the No Project Alternative, the proposed improvements at Northwood HS would not be implemented. The project site on campus would

not have permanent lighting. The school would continue to operate under its current conditions, and no changes would take place.

ALTERNATIVE 2: RESTRICTED HOURS ALTERNATIVE

Under the Restricted Hours Alternative, the proposed Northwood High School Field Lighting Improvement Project would be implemented and would include the installation of four new athletic field lights around the existing football field infrastructure. Under this Alternative, the difference from the proposed project is that field use would be required to stop at 9:00 pm, and lights would turn off at 9:00 pm instead of 10:00 pm.

Finding:

The Restricted Hours Alternative would have the same construction and operation characteristics as the proposed project, except field use would be required to stop at 9:00 pm and lights would turn off at 9:00 pm instead of 10:00 pm. As a result, impacts related to air quality, cultural resources, geology and soils, hazardous materials, hydrology and water quality, transportation, tribal cultural resources, and utilities and service systems would be similar to those of the proposed project. However, this Alternative would reduce the duration of exposure to light and noise; therefore, impacts to aesthetics and noise would be slightly reduced but would remain less than significant, as with the proposed project. Upon consideration, the District has decided to implement the Restricted Hours Alternative because it would meet the project objectives, provide a modest reduction in potential environmental effects related to nighttime lighting and noise, and would not introduce new or more severe impacts.

SECTION G
STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered “acceptable” (CEQA Guidelines, § 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the FEIR or elsewhere in the administrative record (CEQA Guidelines, § 15093 [b]). The agency’s statement is referred to as a Statement of Overriding Considerations.

The proposed project would not result in any significant and unavoidable adverse impacts. Accordingly, a Statement of Overriding Conditions is not required. The District has adopted all feasible mitigation measures and has examined alternatives to the proposed project. Upon consideration, the District has decided to implement Alternative 2. Because no significant and unavoidable impacts have been identified, no findings related to overriding considerations are necessary.