

**FINAL**

*SUPPLEMENTAL  
ENVIRONMENTAL  
IMPACT REPORT  
FOR  
HIGH SCHOOL NO. 5*

*SCH NO. 2002101020*

*prepared for:*

*SUBMITTED TO*

**Contact:  
Lorrie Ruiz  
Assistant Director,  
Facilities Planning**

*prepared by:*

*THE PLANNING  
CENTER/DC&E*

**Contact:  
Dwayne Mears, AICP  
Principal, School Facilities  
Planning**

*NOVEMBER 2013*

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*HIGH SCHOOL NO. 5*

*SCH NO. 2002101020*

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*SUBMITTED TO*

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*ISD-28*

*NOVEMBER 2013*

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- A. Revised Traffic Study (High School No. 5 Project Traffic Impact Analysis Report)

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# 1. Introduction

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## 1.1 INTRODUCTION

This Final Supplemental Environmental Impact Report (FSEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.).

According to CEQA Guidelines, Section 15132, the FSEIR shall consist of:

- (a) The Draft Supplemental Environmental Impact Report (DSEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the DSEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the DSEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DSEIR for the High School No. 5 during the public review period, which began September 23, 2013, and closed October 22, 2013. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DSEIR comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

## 1.2 FORMAT OF THE FSEIR

This document is organized as follows:

**Section 1, Introduction.** This section describes CEQA requirements and content of this FEIR.

**Section 2, Response to Comments.** This section provides a list of agencies and interested persons commenting on the DSEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A01 through A09 for letters received from agencies and organizations, and R01 for the letter received from interested individuals). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

## 1. Introduction

**Section 3. Revisions to the Draft SEIR.** This section contains revisions to the DSEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the DSEIR for public review.

The responses to comments contain material and revisions that will be added to the text of the FSEIR. IUSD staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the DSEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DSEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

### 1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FSEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DSEIRs.

## 2. Response to Comments

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Section 15088 of the CEQA Guidelines requires the Lead Agency (IUSD) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DSEIR and prepare written responses.

This section provides all written responses received on the DEIR and IUSD's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DSEIR are excerpted in this document, the sections are shown indented. Changes to the DSEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
<b>Agencies &amp; Organizations</b>			
A01	Santa Ana Regional Water Quality Control Board	October 3, 2013	2-5
A02	Irvine Ranch Water District	October 15, 2013	2-11
A03	OC Public Works	October 24, 2013	2-15
A04	City of Irvine Community Development	October 22, 2013	2-19
A05	Department of Toxic Substances Control	October 22, 2013	2-37
A06	Five Point Communities Management, Inc.	October 22, 2013	2-43
A07	California Department of Transportation	October 22, 2013	2-47
A08	State Clearinghouse	October 23, 2013	2-57
A09	South Coast Air Quality Management District	October 29, 2013	2-61
<b>Residents</b>			
R01	Larry Agran, City of Irvine Council Member	October 22, 2013	2-65

## 2. Response to Comments

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## 2. Response to Comments

LETTER A01 – Santa Ana Regional Water Quality Control Board (2 page[s])

**A01**



### Santa Ana Regional Water Quality Control Board

October 3, 2013

Lorrie Ruiz  
Irvine Unified School District  
5050 Barranca Parkway  
Irvine, CA 92604

#### COMMENTS ON DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR HIGH SCHOOL NO. 5 (STATE CLEARINGHOUSE NO. 2002101020)

Dear Ms. Ruiz:

Thank you for providing Regional Board staff with the opportunity to comment on the Draft Supplemental Environmental Impact Report for High School No. 5 ("DSEIR"). The project consists of the construction of a new high school on a graded site with a maximum enrollment capacity of 2,600 students within District 5 of the Great Park Neighborhoods. Please accept the following comments.

On page 8-19, the SDEIR states that "project applicants" must submit, and City of Irvine ("City") staff must approve, a Water Quality Management Plan ("WQMP") prior to issuance of a grading permit. This is an incomplete description of the requirements on the City. The City is required to have project applicants submit and have approved a preliminary WQMP prior to approval of the project and adoption or certification of CEQA documents. A final WQMP must be submitted and approved prior to issuance of a grading permit. Please clarify specifically that the Irvine Unified School District ("District") will submit a preliminary and final WQMP according to the requirements on the City.

A01-1

One of the purposes of submitting a preliminary WQMP is to minimize conflicts between structural storm water treatment controls with other project elements, such as buildings, and to ensure that proposed structural controls are serious commitments by project proponents. Regional Board staff notes that a "stormwater retention basin" or underground tanks are proposed but that their location is not known and neither is shown on conceptual site plans. Because of the potential for conflicts, Regional Board staff requests that a preliminary WQMP be approved by the City prior to certification or adoption of the final SEIR.

A01-2

CAROLE H. BESWICK, CHAIR | KURT V. BERCHTOLD, EXECUTIVE OFFICER

3737 Main St., Suite 500, Riverside, CA 92501 | www.waterboards.ca.gov/santaana



## 2. Response to Comments

Irvine Unified School District

- 2 -

October 3, 2013

Regional Board staff also requests that appropriate site plans in the final SEIR show the approximate location(s) of the underground tanks and any other structural treatment controls that have the potential to create conflicts. Regional Board staff requests that the structural treatment controls be shown in the final SEIR whether they are developed through the WQMP process or through compliance with the Construction General Permit's post-construction requirements.

A01-3

Regional Board staff presumes that the construction of High School No. 5 will involve at least partial construction of public rights of way at the perimeter of the project area to provide immediate access. But it is not clear who will be responsible for this construction and the related development of structural treatment controls for runoff from the public rights of way. Regional Board staff requests that the District provide additional information on this matter in the final SEIR.

A01-4

If you have any questions regarding these comments, please contact me at [adam.fischer@waterboards.ca.gov](mailto:adam.fischer@waterboards.ca.gov) or at (951) 320-6363.

Sincerely,



Adam Fischer  
Environmental Scientist

cc: City of Irvine – Amanda Carr  
Irvine Unified School District – Lorrie Ruiz ([LorrieRuiz@iusd.org](mailto:LorrieRuiz@iusd.org))

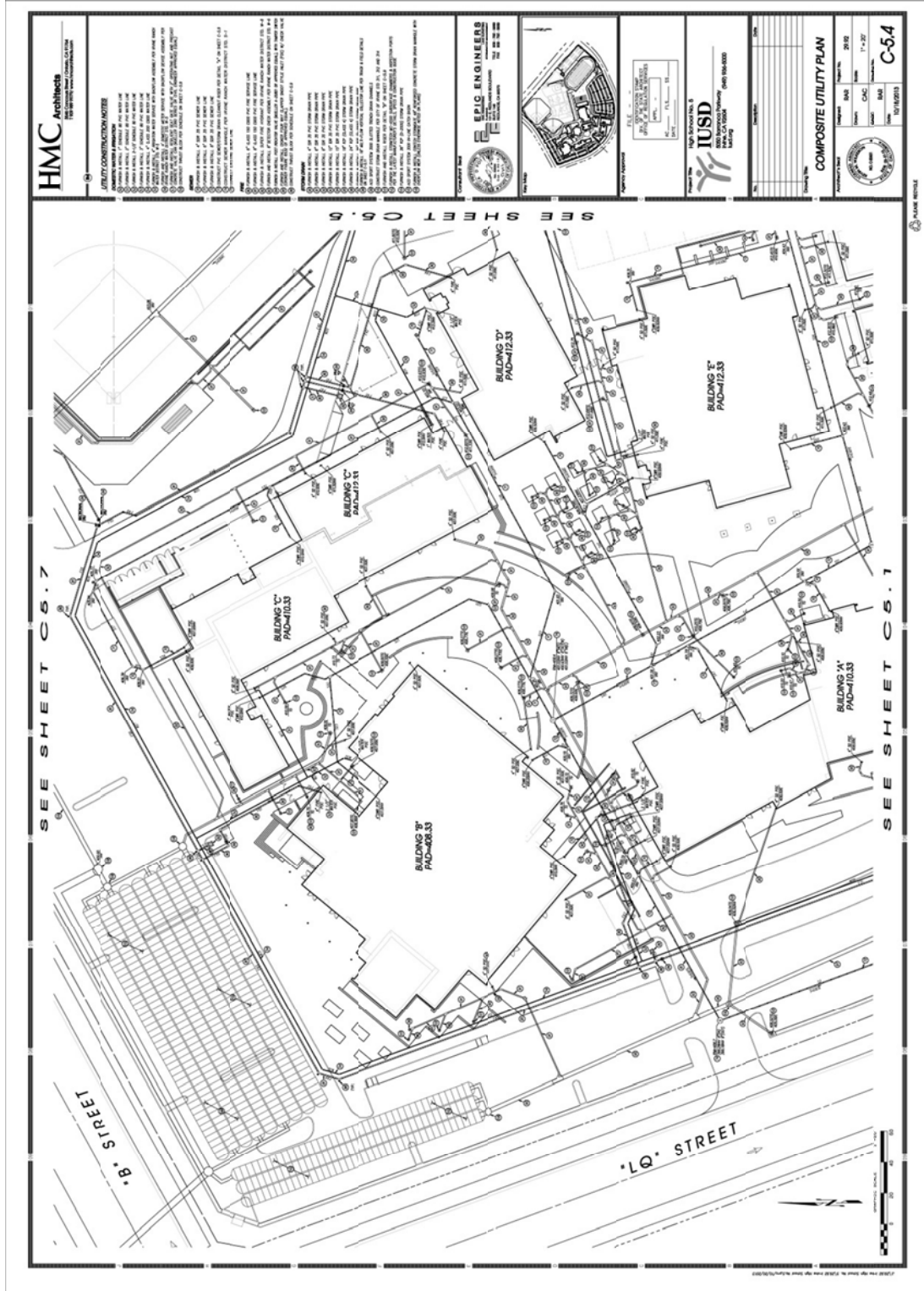
## 2. Response to Comments

### **A01. Response to Comments from Adam Fischer, Environmental Scientist, Santa Ana Regional Water Quality Control Board, dated October 3, 2013.**

- A01-1 This comment is referencing Mitigation Measure H/WQ1 beginning on page 8-18 of the Draft SEIR. This mitigation measure comes from the 2011 Certified EIR, and is the responsibility of the developer (i.e., Heritage Fields), not the Irvine Unified School District. The developer will comply with this mitigation by submitting a preliminary and final WQMP to the City. After this mitigation measure has been satisfied, the District will receive the site from the developer as a superpad, mass-graded and compacted, with backbone infrastructure installed and stubbed wet and dry utilities.
- A01-2 The District is currently preparing a WQMP per the City of Irvine's template. However, based on the conversation with Michael Yang, PE., City of Irvine Senior Water Quality Engineer, because no permit is requested from the City by the District, the City is not required to review or approve the WQMP for the Proposed Project. Although it will not be reviewed by the City, the WQMP will include other structural treatment controls per the City of Irvine's standards as necessary to ensure that no potential water quality conflicts occur. Please see Appendix A, *Rough Grading Plans*, for the underground tank locations.
- A01-3 See A01-2. Refer to Figures 1a and 1b, following this page.
- A01-4 The construction of public rights-of-way around the perimeter of the high school referenced in this comment will be completed by the developer prior to the District's acquisition of the site. The developer will be responsible for related structural treatment controls for runoff from the public rights of way.

## 2. Response to Comments

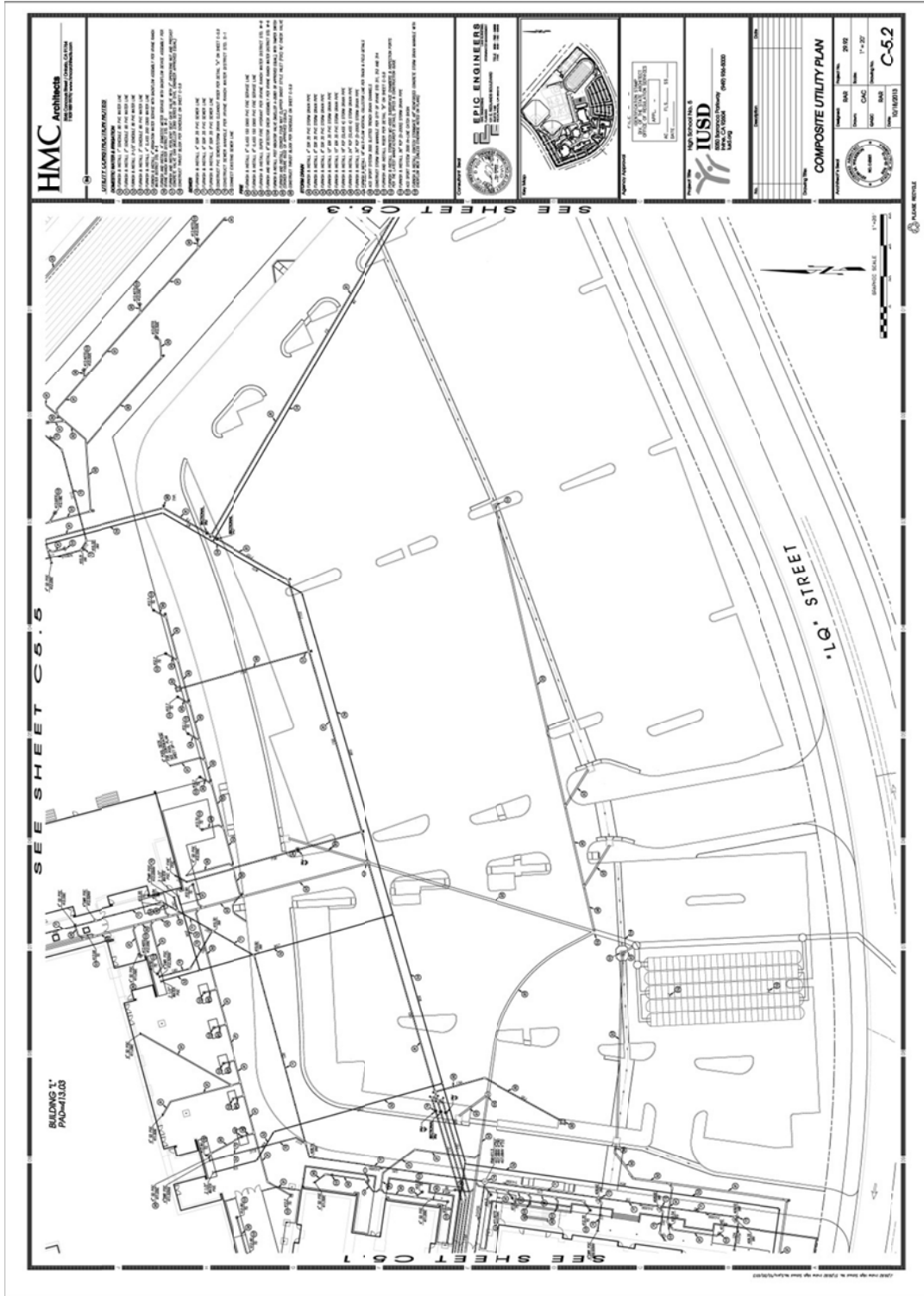
Figure 1a      Underground Tank Locations





2. Response to Comments

Figure 1b      Underground Tank Locations



## 2. Response to Comments

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## 2. Response to Comments

LETTER A02 – Irvine Ranch Water District (1 page[s])

**A02**



**IRVINE RANCH WATER DISTRICT**

15600 Sand Canyon Ave., P.O. Box 57000, Irvine, CA 92619-7000 (949) 453-5300

October 15, 2013

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

Re: Notice of Completion/Notice of Availability for High School No. 5 Draft Supplemental Environmental Impact Report (DSEIR)

Dear Ms. Ruiz:

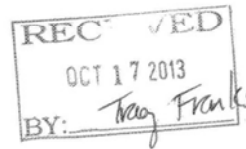
Irvine Ranch Water District (IRWD) has received the Irvine Unified School District's (IUSD) Notice of Completion and Notice of Availability for the High School No. 5 Draft Supplemental Environmental Impact Report. IRWD offers the following comments:

- |  |       |
|--|-------|
| 1. The Draft SEIR correctly identifies IRWD as the provider for potable and non-potable water service for the project site.  | A02-1 |
| 2. Within Section 5.9.1.1 Water Services Environmental Setting, it should be noted that: IRWD is a multiservice agency that provides potable and non-potable water supply and wastewater collection, treatment and disposal services to a population of approximately 330,000, within an area covering 115,531 acres (181 square miles). | A02-2 |
| 3. It should be noted that when final planning is completed for the high school site, a sub-area master plan (SAMP) addendum should be completed to verify how the water and sewer service would serve the high school site. The previous SAMP identified the high school but did not identify its current location.                     | A02-3 |

IRWD appreciates the opportunity to comment on the DSEIR for the High School Site No. 5. If you have any questions or require additional information, please contact me at 949-453-5326.

Sincerely,

Jo Ann Corey  
Engineering Technician III  
IRWD Water Resources & Environmental Compliance



cc: Mike Hoolihan, IRWD

S:/depllist/admin/710/corey/IRWD Comment Letter 101513 DRAFT.docx

## 2. Response to Comments

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## 2. Response to Comments

### **Response to Comments Jo Ann Corey, Engineering Technician III, IRWD Water Resources & Environmental Compliance, dated October 15, 2013.**

A02-1 Comment noted. No response is necessary.

A02-2 Comment noted. No response is necessary.

A02-3 Per your comment, when final planning is completed for the high school, a sub-area master plan (SAMP) addendum will be completed to verify hot the water and sewer service would serve the project site since the previous SAMP identified the high school but did not identify its current location.

## 2. Response to Comments

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## 2. Response to Comments

LETTER A03– Orange County Public Works (2 page[s])

**A03**



*Ignacio G. Ochoa, P.E., Interim Director*  
300 N. Flower Street  
Santa Ana, CA 92703  
P.O. Box 4048  
Santa Ana, CA 92702-4048  
Telephone: (714) 667-8800  
Fax: (714) 967-0896

NCL-13-047

October 24, 2013

Ms. Lorrie Ruiz, Assistant Director of Facilities  
Irvine Unified School District  
5050 Barranca Parkway  
Irvine, California 92604

**SUBJECT:** Revision to County's comment letter dated October 21, 2013 on the Notice of Completion and of Availability for the High School No. 5 Draft Supplemental Environmental Impact Report Project (This letter supersedes the prior comment letter).

Dear Ms. Ruiz:

The County of Orange has reviewed the Notice of completion and of Availability for the High School No. 5 Draft Supplemental Environmental Impact Report Project and offers the following comments which are limited to the issues relevant to the interests and mandated responsibilities of the Local Oversight Program/Industrial Clean-up, Water Quality Department, and the Hazardous Materials Surveillance Section of the Health Care Agency, Environmental Health Division:

1. Continue to consult with Orange county Health Care Agency, stated in this CEQA document, for issues relating to:
  - Abandoned underground storage tanks and piping, and soil remediation. Contact Geniece Higgins at (714) 433-6260 or [ghiggins@ochca.com](mailto:ghiggins@ochca.com) for assistance.
  - Wells, water quality, and cross connection. Contact Mike Fennessy at (714) 433-6280 or [mfennessy@ochca.com](mailto:mfennessy@ochca.com) for assistance.
  - Hazardous Materials reporting, and Hazardous Waste storage and disposal. Contact Christine Lane at (714) 433-5210 or [clane@ochca.com](mailto:clane@ochca.com) for assistance.
  
2. The reference of Page 8-18 to compliance with the General Dewatering NPDES Permit of the Santa Ana RWQCB is not correct. Discharging of non-contaminated groundwater produced by de-watering shall comply with NPDES discharge Permits No. R8-2009-0045 and R8-2007-0041, specifically for groundwater in the San Diego Creek/Newport Bay Watershed. Discharging of contaminated groundwater would require its own NPDES permit.

A03-1

A03-2

## 2. Response to Comments

If you have any questions or need clarification please do not hesitate to call me at (714) 667-3211.

Sincerely,



Polin Modanlou, Manager  
Strategic Land Planning Division  
OC Public Works/OC Planning Services  
300 North Flower Street  
Santa Ana, California 92702-4048  
[Polin.Modanlou@ocpw.ocgov.com](mailto:Polin.Modanlou@ocpw.ocgov.com)

c: Christine Lane, Health Care Agency/Environmental Health  
Chris Crompton, Manager, OC Public Works/Environmental Resources



## 2. Response to Comments

### **Response to Comments from Polin Modanlou, Manager, Strategic Land Planning Division, OC Public Works/PC Planning Services, dated October 24, 2013.**

- A03-1 Comment noted. The District will continue to consult with Orange County Health Care Agency with issues concerning hazardous materials and water quality.
- A03-2 Comment noted. Mitigation Measure H/WQ1 as stated in page 8-18 will be performed by the developer prior to delivery of the project site to the District. The District will receive a superpad site, mass-graded and compacted, with backbone infrastructure installed. Therefore, it is anticipated that Heritage Fields will comply with the appropriate NPDES permit requirements concerning discharge of non-contaminated groundwater, including its own NPDES permit

## 2. Response to Comments

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## 2. Response to Comments

LETTER A4 – City of Irvine Community Development (9 page[s])

A04



Community Development

[cityofirvine.org](http://cityofirvine.org)

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575

(949) 724-6000

October 22, 2013

Ms. Lorrie Lujan-Ruiz  
Assistant Director of Facilities  
Irvine Unified School District  
5050 Barranca Parkway  
Irvine, California 92604

**SUBJECT: Draft Supplement to Orange County Great Park Environmental Impact Report (SCH 2002101020) for High School No. 5**

Dear Ms. Lujan-Ruiz:

The City of Irvine staff has reviewed the Draft Supplement to Orange County Great Park Environmental Impact Report (SCH 2002101020) for High School No. 5 and has the following comments:

Section 1 – Executive Summary

1. Page 1-7: The statement that the City is divided into 51 planning areas is incorrect as there are not 51 planning areas in Irvine. Consider changing the language to, "The City of Irvine is divided into multiple planning areas...". A04-1
2. Pages 1-7 & 3-1: The statement "The Great Park Neighborhoods is also known as Heritage Fields Development" should be modified to "The Great Park Neighborhoods development is owned by Heritage Fields El Toro, LLC." A04-2
3. Mitigation Monitoring Table: Clarify if this table should be modified to include the Irvine Unified School District (IUSD) proposed Mitigation Measures that are applicable to the project (i.e., IUSD 6-1, etc.) A04-3

Section 2- Introduction

4. Page 2-7 – Explain why Barry Curtis is the contact for the documents listed in Chapter 13, which includes documents that the City of Irvine does not possess. Please revise this section accordingly. A04-4

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## 2. Response to Comments

Ms. Lorrie Ruiz  
October 22, 2013  
Page 2

### Section 3 – Project Description

5. The City of Irvine is proceeding with the SSEIR for Heritage Fields 2012 Project GPA/ZC (“2012 Modified Project”) that analyzes the relocation of this 2,600-student high school to the southwest portion of the Orange County Great Park. On September 10, 2013, the Irvine City Council authorized the offer of a 40-acre site within the Orange County Great Park as an alternative site for the high school. We understand that IUSD has initiated the due diligence/site approval process to review this site, including a site visit by the State on October 2. Accordingly, please revise the Project Description of the High School No. 5 DSEIR to include the alternative high school location as a project alternative and revise the traffic study and DSEIR to include an analysis of this alternative, including potential significant impacts caused by this project alternative for all study years. | A04-5
6. Clarify whether the recreational facilities such as the aquatics complex, tennis courts, softball/baseball fields, as well as the 2,940-seat stadium and 720-seat performing arts center will be available for public or non-enrollment population use. With the exception of the stadium, clarify whether these facilities have been incorporated into the analysis. | A04-6

### Section 5 – Environmental Analysis

#### *Subsection 5-01 Aesthetics*

7. Under the proposed 2012 Modified Project, Development District 5 would be primarily residential. In order to ensure that the lights do not impact the residents, revise Mitigation Measure AE-1 to modify the reference to “sensitive resources” to clearly identify the lights will avoid spillover effects on the adjacent “residential uses as well as sensitive receptors”. | A04-7

#### *Subsection 5-04 Hazards and Hazardous Materials*

8. Please include analysis and discussion regarding impacts to the high school site that might occur as result of accidental rupture (due to strong seismic event, due to erosion from flooding or other) of the membrane encapsulating the former landfill at IRP-3. Please include discussion of potential for future discovery of landfill contents at IRP-3 that could impact the high school site. | A04-8

#### *Subsection 5-06 Noise*

9. Mitigation Measures – Due to proximity to planned residential uses across Irvine Boulevard in Development District 7 and proposed residential uses in Development District 5 (the areas surrounding the high school), staff has | A04-9

## 2. Response to Comments

Ms. Lorrie Ruiz  
 October 22, 2013  
 Page 3

concerns with the use of the PA system. These development districts are planned to be primarily residential and use of the PA system may result in future land use incompatibilities depending the hours of use and noise generated by the stadium. Consider revising the mitigation measures to set limits on the hours of use (i.e., limit to hours of operation to 10 p.m.).

### *Subsection 5-08 Transportation and Traffic*

- |  |        |
|--|--------|
| 10. Ensure that all comments and revisions in this Section, as applicable are carried forward to the Traffic Impact Analysis Report.   | A04-10 |
| 11. Table 5.8-1 of the DSEIR and Table 2 of the traffic study: Confirm the number of residential dwelling units within District 1N assumed in the interim-year 2015/2017 conditions to ensure consistency with the 2011 Approved Project, 2012 Modified Project Option 1 and 2012 Modified Project Option 2 interim-year project assumptions.  | A04-11 |
| 12. Table 5.8-3 of the DSEIR and Table 3-1 of traffic study: Confirm the average daily traffic (ADT) volumes identified for 2013 (existing conditions) and 2013 Existing Plus Project along Irvine Blvd. between SR-133 and Alton Parkway as the data appear to be inconsistent with the count data included as part of the 2012 Modified Project.   | A04-12 |
| 13. Provide further explanation as to why the approach applied for the traffic analysis is not the approach previously suggested by the City for the baseline analyses for the Year 2035, Pending 2035, Post 2035 and Pending Post-2035 conditions.  | A04-13 |
| 14. Confirm the 2017, 2035 and Post-2035 No Project data for consistency with the 2011 Approved Project data. Staff would expect similar data with the exception of differences that may be caused due to annual growth projection assumptions. Additionally, confirm the 2017 No Project ADT volumes along Irvine Boulevard between SR-133 and Alton Parkway shown in Table 7-1 of the traffic study for consistency with the 2011 Approved Project data.   | A04-14 |
| 15. Tables 5.8-10, 5.8-17 and all arterial analysis in the traffic study: The arterial analysis included in the DSEIR and traffic study for all study years identifies deficiencies, but does not identify whether a significant impact results from those deficiencies. Consistent with the performance criteria identified in the City of Irvine's Traffic Impact Analysis Guidelines, adopted August 24, 2004, we suggest that a peak hour link analysis (PHLA) be performed for all links which exceed the defined LOS standard when comparing the forecast ADT volume-to-roadway capacity. The PHLA will determine directional AM and PM volume-to-capacity (V/C) ratios for each link which is projected to exceed | A04-15 |

## 2. Response to Comments

Ms. Lorrie Ruiz  
October 22, 2013  
Page 4

LOS standards. If a significant impact results from the PHLA, then a corresponding mitigation measure should also be identified. Based on the data provided in Table 5.8-10, PHLA should be prepared for the following arterial link (plus any missing links if applicable, see further below):

- Irvine Boulevard between "Z" Street and "B" Street - 2035 and Post-2035 (2011 Approved, 2012 Modified Options 1 and 2)

Additionally, we suggest that the Arterial LOS tables for all study years should be revised to add missing arterial roadway segments within the study area and close proximity to the project as follows:

- Irvine Boulevard between "LY" Street and "Z" Street
- Irvine Boulevard between "B" Street and "LQ" Street
- "LQ" Street between "Z" Street and "B" Street
- "LQ" Street between "B" Street and Irvine Boulevard
- Trabuco Road between Sand Canyon Avenue and SR-133
- Trabuco Road between SR-133 and "O" Street

16. It appears that a different ICU calculation methodology from the City's methodology was applied at the locations listed below. Please confirm and revise accordingly:

A04-16

- 306. Sand Canyon Avenue & Oak Canyon
- 305. Sand Canyon Avenue & I-5 south bound ramps
- 338. Alton Parkway & Irvine Boulevard
- 367. Bake Parkway & I-5 north bound ramps
- 563. "B" Street & Irvine Boulevard (Year 2013 includes only project traffic. Revise to add background traffic.)
- 800. "LQ" Street & Irvine Boulevard (Year 2013 includes only project traffic. Revise to add background traffic.)
- ICU's in tables are inconsistent with the data in Appendices for the following intersections: 303, 316, 317, 368, 486, 487, 557, 569, 605, 626, 631, 782 and 787. Review these locations.

17. Pages 5.8-107, 5.8-130, 5.8-150 and Table 5.8-18b: Based on the ICU data included in the DSEIR and traffic study, a project impact at intersection #317-SR133 north bound ramps/Irvine Boulevard should be identified for the Post-2035 (2011 Approved Project) scenario. The PM peak hour ICU value for No Project is 0.88 (D) and With Project is 0.91 (E). City/CMP facilities analyzed within the North Irvine Transportation Mitigation (NITM) Program are LOS 'D' acceptable; therefore, the City considers this intersection deficient at LOS "E" and the project would be responsible for mitigating this impact back to

A04-17

## 2. Response to Comments

Ms. Lorrie Ruiz  
October 22, 2013  
Page 5

- acceptable LOS "D". Please provide proposed improvement needed to mitigate this PM peak hour impact. |
18. Page 5.8-2 (and elsewhere throughout the document and traffic analysis): The Analysis Methodology section of the DSEIR mentions that the year 2017 analysis is "per City requirement." Additionally, footnote 1 references text that states, "The City of Irvine's current traffic impact analysis guidelines require the analysis of the interim year, year 2035 and post year 2035 conditions. Because the city currently defines the interim year as 2017, the traffic analysis conducted an interim year analysis for the year 2017, which would occur after High School No. 5 opening year of 2016." For further clarification, the City does not require the establishment of a new or extrapolated baseline year as was done for this analysis, but rather the requirement to assume the buildout of the project by one of the current traffic model horizon years. | A04-18
19. Figure 5.8-1 and Figure 5.8-2: Confirm the study area as it appears that intersection ID# 566 is shown at two locations. Also provide Existing Geometry and Control figures for project-adjacent intersections #563-B/Irvine Boulevard and #800-LQ Street/Irvine Boulevard. These are missing from the figures in the DSSEIR and the traffic study. | A04-19
20. Page 5.8-16: Confirm the methodology used to arrive at the No Project 2035 and Post-2035 conditions (2012 Modified Project, Options 1 and 2) as this discussion is missing from the Trip Distribution section. | A04-20
21. Page 5.8-18: The Stadium trip distribution sections includes language stating that the "...distribution percentages on local arterials are proportional to 2011 daily traffic volumes published by the City of Irvine." Please clarify and revise language to source the specific document referenced, whether it is the 2011 Approved Project data or some other source. Staff is unable to confirm the source. | A04-21
22. Page 5.8-19: The multiple existing conditions analyses seem excessive and confusing. Please clarify why multiple "existing plus project" conditions analyses were performed. | A04-22
23. Year 2013 With Project ICU calculations do not include background traffic on Irvine Boulevard at intersections #563 "B" Street/Irvine Boulevard and #800 "LQ" Street/Irvine Boulevard. Revise Existing Plus Project ICUs, intersection summary tables, traffic volume figures, and signal warrant analysis for these project adjacent intersections. | A04-23

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24. Figure 5.8-6: Confirm the Year 2017 intersection geometry shown for "O" Street/Marine Way(#560) and "O" Street/LV" for consistency with the 2011 Approved Project. | A04-24
25. Figures 5.8-8, 5.8-9, 5.8-10: The Year 2017 With Project intersection ICUs and turning volume figures for 2011 Approved and 2012 Modified Project Options 1 and 2 scenarios included in the DSEIR and traffic study include only project traffic (no background traffic on Irvine Boulevard) for project-adjacent intersection #563 "B" Street/Irvine. Additionally, the Year 2017 (2011 approved project) With Project volume data for "B" Street/Irvine Boulevard is missing. Revise to add missing data and ensure that background traffic on Irvine Boulevard is included in all ICU calculations, signal warrant analyses, etc. | A04-25
26. The ultimate width of Irvine Boulevard along the property frontage will be constructed to accommodate three eastbound through lanes between "B" Street and "LQ" Street. The site planning and design of the high school shall not preclude the ultimate street width of Irvine Boulevard as a six-lane major highway, and the geometry at "LQ" Street/Irvine Boulevard must accommodate the eastbound right turn (RT) lane at the intersection. | A04-26
27. The ultimate geometry at "LQ" Street/Irvine Boulevard includes dual westbound left turn (LT) lanes on Irvine Boulevard at the intersection. The width of "LQ" Street south of Irvine Boulevard must be constructed to accommodate these two southbound receiving lanes coming from Irvine Boulevard. Staff recommends that the segment of "LQ" Street between Irvine Boulevard and the first high school driveway include a right-turn only lane into the school driveway in addition to the through lane. | A04-27
28. Page 5.8-143 and 5.8-146: In Section 5.8.8 of the DSEIR, revise the language pertaining to the TRAN4 mitigation measure for both the 2011 Approved Project and the 2012 Modified Project to be consistent with each as follows: | A04-28
- First sentence of TRAN4 paragraph: Delete text to read, "...the landowner or subsequent property owner shall pay the costs of the following mitigation..."
29. Page 5.8-147: In Section 5.8.8 of the DSEIR, revise language pertaining to both TRAN5 and TRAN7 Mitigation Measures for the 2012 Modified Project to be consistent as follows: | A04-29



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<ul style="list-style-type: none"><li>• Bake Parkway &amp; Rockfield Boulevard: Delete text "Fully funded LFTM improvement" to simply read, "Conversion of a westbound through lane..."</li></ul>	
30. Page 5.8-151 Confirm that mitigation measures T-2 and T-3 are consistent with similar mitigation measure requirements of the University High School Stadium project.	A04-30
31. As part of this traffic analysis and/or as part of subsequent project site planning, an access analysis shall be submitted to the City for review, provide an evaluation of the City's Transportation Design Procedures (TDPs) when evaluating site access and circulation for typical conditions as well as special events (i.e., stadium usage). The detailed analysis should include recommendations for lane geometries, intersection controls and all other site access issues for the project based on the City's Transportation Design Procedures (TDPs). If prepared as part of a future effort, this EIR should include a mitigation measure T-4 that identifies the project commitment to prepare this detailed site access and circulation analysis.	A04-31
<b>Section 7- Alternatives</b>	A04-32
32. See comment 5 above.	
<b>Traffic Impact Analysis Report</b>	
33. Ensure that all comments and revisions in this traffic report as applicable are carried forward to Traffic and Transportation Section of the DSEIR.	A04-33
<b>Executive Summary</b>	
34. Clarify the origin of the 2013 existing condition count data.	A04-34
35. The report states that the stadium driveway counts were conducted at Irvine Stadium. Clarify whether or not the proposed stadium and Irvine stadium are comparable in size and function.	A04-35
<b>Additional Comments</b>	
36. Traffic Impact Analysis Report states that City of Irvine staff provided future turning movement volumes from Irvine Transportation Analysis Model (ITAM). To clarify, the latest version of ITAM was used for the purpose of this EIR and traffic analysis as the 2011 Approved Project and 2012 Modified Project were utilized as the environmental baseline for this project.	A04-36

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|---|--------|
| 37. Page F1-21: In addition to the 0.02 impact criteria, a significant impact is also considered to result when a project takes a location from acceptable LOS to unacceptable LOS regardless of the ICU increase.  | A04-37 |
| 38. Page F1-22: Clarify why only major arterials and intersections only within a 1.5 mile radius are identified.  | A04-38 |
| 39. Page F1-68: The introductory text describes this project as a stadium project, although it is a high school project as well. Clarify this in the text.  | A04-39 |
| 40. Page F1-69: The report states that the trip distribution is assumed to be based on 11,242 residential units, not including the proposed Great Park Neighborhoods development. Clarify that "proposed" is in reference to the pending 2012 project and not the proposed units as part of the 2011 project, these units should be included and the following tables seem to corroborate that. | A04-40 |
| 41. Page F1-69: Clarify the 20percent trip origin/destination percentage for the Great Park Neighborhoods. This area represents more than 4,894 dwelling units and the 20 percent seems low.  | A04-41 |
| 42. Various tables: The deficient locations are inconsistently flagged. For example Table 7-10, Location # 303, 305. Flag all deficiencies consistently in all tables (i.e., colored flags).  | A04-42 |
| 43. Page F1-142: Provide further explanation as to the Irvine stadium data was used. Do the Estancia High School and San Diego examples somehow corroborate the Irvine stadium counts?  | A04-43 |
| 44. Page F1-144: location 367 and Page F1-152: location 303 should have a V/C changes of 0.01   | A04-44 |
| 45. Page F1-151: location 368 AM LOS should be LOS 'E'.   | A04-45 |
| 46. Driveway 6, in addition to assessment when the fourth leg of the intersection is installed, the project should conduct further detailed analysis upon implementation of the site planning for the high school as part of the suggested Mitigation Measure T-4.  | A04-46 |
| 47. Section 8.3 Pedestrian and Bicycle Circulation: No mention of pedestrian circulation from off-site areas has been provided. Most of the pedestrians or bicyclists will be coming from the Great Park Neighborhoods districts. Therefore, mentioning of Class I Primary and Secondary Off-Street trails should be identified in the DEIR. Crossings at Stop-Controlled intersections         | A04-47 |

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should have been analyzed in the traffic study and been checked for the pedestrian signal warrant, especially for the Project Option w/Stadium proposal.

48. Section 8.1.2 Sight Distance Analysis: The sight distance analysis does not analyze the intersection sight distance for clear sight triangles. Provide this analysis to help determine the setbacks for landscaping, monuments, etc.

A04-48

49. Intersection 558 ("O" Street/Irvine Boulevard) and Intersection 560 ("O" Street/Marine Way) may change due to the Five Point District 1 Modification application and the update to the approved Traffic Study. This will provide a free right turn lane at Intersection 558 for south bound "O" Street to west bound Trabuco Road and dual left turns at east bound Marine Way to north bound "O" Street.

A04-49

50. The Traffic Study does not discuss "Traffic Control for School Areas" which is Part 7 of the California Manual on Uniform Traffic Control Devices (MUTCD). Provide this as a Special Issue in the traffic study and explain how these requirements will be implemented.

A04-50

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

Sincerely,



Eric M. Tolles, S.E.  
Director of Community Development

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

## 2. Response to Comments

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## 2. Response to Comments

### **Response to Comments from Eric Tolles, S.E., Director of Community Development, dated October 22, 2013.**

- A04-1 The text has been revised per this comment. See Chapter 3, *Revisions to the Draft SEIR*, of this FSEIR.
- A04-2 The text has been revised per this comment. See Chapter 3, *Revisions to the Draft SEIR*, of this FSEIR.
- A04-3 Table 1-1, Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation, lists the mitigation measures that are applicable to the high school project. The reference to items listed as IUSD-x beginning on page 1-11 of the Draft SEIR are Plans, Programs and Policies (PPPs) and not mitigation measures. It is unnecessary to add the PPPs to this table.
- A04-4 The intent was to indicate that the City of Irvine is the custodian of the Certified EIR that includes the 2003 OCGP EIR, 2011 Supplemental EIR, and eight addenda, not the entire documents listed in Chapter 13, Bibliography. See Chapter 3, *Revisions to the Draft SEIR*, of this FSEIR for clarification.
- A04-5 As stated in Section 7.1.1, *Purpose and Scope*, of the DSEIR, CEQA Guidelines 15126.6[a] states that an EIR shall describe “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project[.]” The fact that an alternative site was brought up prior to the release of the DSEIR alone does not warrant a discussion of the alternative site in the EIR. Section 7.2.2, *Different Site Analysis of the DSEIR* indicates that the only significant and unavoidable impacts resulting from the Proposed Project is operations-related emissions of volatile organic compound (VOC), and any alternative site that would achieve the project’s objectives would have the same significant operations-related emissions impacts, therefore, review of an alternative site, including the 40-acre site referred to as “Site B” is unnecessary for the purposes of this CEQA review.

Please note that the District has agreed to and has initiated a separate due diligence process to review Site B. As part of that effort, representatives from the City, IUSD, Orange County Great Park Corporation and the California Department of Education (CDE) toured the site. The CDE representative conducted its Initial School Site Evaluation (SFPD 4.0 form), which raised certain concerns that must be addressed through these future studies.

A separate traffic analysis has been prepared by Urban Crossroads on October 14, 2013 as part of the City of Irvine’s Final Heritage Fields Project 2012 GPA/ZC Second Supplemental Environmental Impact Report (2012 Modified Project FSSEIR) to analyze the potential traffic conditions with an alternative site location for High School No. 5 (site known as Site B). This study is included as Appendix I, High School No. 5 Alternative Site Analysis to the 2012 Modified Project FSSEIR. While this study included analysis of Site B, the District will complete additional traffic analysis as part of its due diligence and CEQA process.

- A04-6 The recreational facilities identified in the project description would be available for community use as required under the Civic Center Act. The District will manage the facility in conjunction with

## 2. Response to Comments

other campus facilities to minimize conflicts and impacts on neighboring uses. The District will form a Stadium Use Advisory Committee similar to the Committee for the University High School Stadium. The use of these facilities has been incorporated into the analysis as shown in Table 3-1, *High School No. 5 Tentative Event Schedule*.

A04-7 Figure 5.1-3, *Conceptual Nighttime Lighting Contours –Football Stadium*, demonstrates that the light at the nearest possible residential property line would be less than 0.5 fc. The significance threshold employed for residential uses is 2.0 fc, so there would be no significant impact on residential properties. It is not necessary to apply the more restrictive standards used for sensitive biological resources (0.5 fc).

A04-8 The *Ballona Wetlands Land Trust v. City of Los Angeles* case makes clear that CEQA is focused on a project's impact on the environment and not the environment's impact on projects. Therefore, including a discussion regarding impacts to the high school from the IRP-3 landfill site is not required. The Proposed Project will not disturb or upset the capped landfill.

California Education Code Section 17213 requires school districts that receive state funds to construct new schools to obtain a determination from DTSC that the project site does not pose a significant risk to human health or the environment prior to constructing and operating a school. The site investigation is underway with oversight from DTSC. Environmental samples have been proposed at the Project Site boundary closest to the former landfill footprint to evaluate if any residual contaminants from historical operations have encroached onto the Project Site. Should contamination be encountered, and the District chooses to proceed with acquisition of the Project Site, remediation would be performed with DTSC oversight and final approval.

Groundwater is encountered at approximately 200 to 220 feet below ground surface beneath the landfill. Groundwater flow is toward the northwest, away from the Site. Surface drainage generally flows southwest, cross-gradient from the Site, following the slope of the land. The capped landfill is hydraulically separated from the proposed Site by the Agua Chinon Wash. The proposed High School would include off-site street and drainage improvements, which would preclude flooding.

Components of the remedy for the landfill include:

- A single-barrier cap with a flexible membrane liner to prevent contact with landfill materials and reduce the infiltration into landfill contents.
- Prior to capping, wastes from IRP Site 3 Unit 4 and Unit 1 (Areas A1 through A3 and Waste Areas B through F) were consolidated in IRP Site 3, Unit 1 Waste Area A. All waste consolidated were radiologically screened for Radium 226.
- Erosion control features to control surface water flow and protect the integrity of the cap.
- Temporary fencing, signs, and locks to restrict access to the sites until the remedy is in place.
- Land-use restrictions applying to the landfill areas and extending approximately 100 feet off the waste boundaries to protect the landfill covers ensure the containment remedy and contents of the landfill are not disturbed without approval of the FFA signatories, and allow the Navy and other agencies access to the sites for maintenance and monitoring.

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Construction of structures within the 100-foot buffer zone will require concurrence of the FFA signatories and the California Integrated Waste Management Board (now known as CalRecycle).

- Monitoring to detect migration of contaminants from the landfills. Wells will be secured to prevent damage.
- A LFG collection and/or venting system to actively collect and vent LFG as necessary and passively vent or monitor gas during inactive periods.
- Passive gas control gravel trenches within the compliance monitoring zone during remedy implementation as an added measure of safety.
- A California Integrated Waste Management Board monitoring protocol with compliance LFG monitoring probes within 50 feet of the landfill waste boundary to facilitate perimeter monitoring and assess migration of LFG.
- Settlement monuments to detect settlement of the landfill materials.
- The cap, drainage features, settlement monuments, and security features will be inspected and maintenance will be performed as necessary to assure the integrity of the landfill cap and prevent unauthorized access.
- Periodic reviews (at least every five years) to evaluate the monitoring results and verify that the action remains protective of human health and the environment.

The landfill does not contain a significant amount of liquids, or vapors that would be expected to migrate to the Site in the event that the landfill was compromised as a result of a seismic event. Monitoring of the landfill indicates that methane has not been detected in perimeter monitoring probes, and volatile organic compounds were detected at low levels. In addition, the landfill will be inspected following significant events such as earthquakes (greater than magnitude of 4.0), wild fires, and major storms; and if feasible, these inspections will be conducted within 24 hours and not later than a week from the occurrence of the event.

The Department of the Navy is responsible for monitoring and maintenance of the engineered landfill cap. Long term monitoring and maintenance is being performed in accordance with the Final Operation and Maintenance/Long-Term Monitoring Plan, Operable Unit 2C, IRP Sites 3 and 5, Former Marine Corps Air Station, El Toro, California. The purpose of the long term monitoring and maintenance activities at IRP Site 3 is to monitor the effectiveness of the landfill cap, drainage structures, landfill gas (LFG) and groundwater monitoring systems, LFG treatment systems (if necessary), site security features, and to document that the remedy components are performing as designed to protect human health and the environment. The long term monitoring and maintenance activities at IRP Site 3 is being performed pursuant to the requirements of the Final Record of Decision, Operable Unit 2C, Installation Restoration Program Landfill Sites 3 and 5, Former Marine Corps Station El Toro, California. Title 27 California Code of Regulations (CCR) §20950 and §21180, stipulates that landfills should be maintained and monitored for a period of not less than 30 years after completion of the closure construction or as long as wastes pose a threat to water quality. The Comprehensive Environmental Response and Compensation Liability Act (CERCLA) requires

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the effectiveness of the remedy to be evaluated every five years so long as the future uses associated with the landfill remain restricted.

- A04-9 Mitigation Measure AE-2 already requires that field activities are concluded by 10 PM and field lights are off or substantially dimmed (allowing for safe exit) by 10 PM. Therefore, no additional mitigation measure to set limits on the hours of use is necessary. Furthermore, no significant noise impacts have been identified and IUSD 6-2 is a Plans, Program, and Policies (PPP) measure that will be incorporated into the project design and operation.

### Traffic Comments

- A04-10 Appendix A, *Revised Traffic Study*, includes revisions made per your comments.
- A04-11 The numbers of dwelling units in Table 2 of the traffic study has been updated. These changes do not impact the project trip distribution for any of the analysis scenarios. The changes are incorporated herein by reference, and supersede and replace the Table 5.8-1 of the DSEIR.
- A04-12 The ADT volumes identified for 2013 (existing conditions) and 2013 Existing Plus Project along Irvine Blvd have been reviewed and corrected as necessary to conform to the count data included as part of the 2012 Modified Project.
- A04-13 The baseline traffic volumes for the forecast Year 2035 and Post 2035 were based on the turning movement volumes published in the traffic studies conducted for the Great Park Neighborhoods (GPN) 2011 Approved Project EIR and the 2012 Modified Project EIR. Because the environmental document prepared for the High School #5 is a supplement to the 2011 GPN Approved Project EIR, this approach ensures consistency with the baseline future traffic volume forecasts in the study area between projects.
- A04-14 The 2017, 2035, and Post 2035 No Project volumes were derived by applying an annual growth factor (equivalent to growth of 1.5% per year) to the Year 2015, Year 2030, and Post 2030 volumes from the traffic study for the 2011 Approved Project and the 2012 Modified Project. The 2017 No Project ADT volumes along Irvine Blvd have been reviewed and corrected as necessary to conform to the count data included as part of the 2012 Modified Project.
- A04-15 Additional roadway segments have been added to the arterial analysis at all locations where volume data is available. A PHLA has been added to the study and includes all analyzed links that exceed the defined daily LOS standard. No significant traffic impacts are forecast.
- A04-16 Freeway ramp intersections were analyzed using both the ICU and HCM methodologies, and both sets of TRAFFIX worksheet reports were included in the Appendix of the Revised Traffic Study included in Appendix A to this FEIR. The analysis results have been updated in the summary tables throughout the report to show the ICU level of service. The background traffic on Irvine Blvd has been included in the Year 2013 analysis for intersections #563 and #800.



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- A04-17 The analysis results for all freeway ramp intersections (including #317) have been updated in the summary tables to reflect ICU Level of Service. A significant impacts has been identified during the 2035 WP and Post-2035 WP 2011 Approved Project scenarios in the AM Peak for intersection #317. The identified mitigation measure for this intersection would involve modify the northernmost EB dual free right turn lane to permit an EB through movement, resulting in 3 EB through lanes at this intersection.
- A04-18 The traffic study has been modified to remove text that implies that the City of Irvine requires a new or extrapolated baseline year analysis.
- A04-19 Figure 2.1, Project Study Area has been revised in the Revised Traffic Study to replace Figure 5.8-1 of the DSEIR. Figure 3.1, Existing Study Intersection Geometry and Control, has been revised in the Revised Traffic Study to replace Figure 5.8-2 of the DSEIR. They reflect the proper location of intersection #566. In the existing condition, intersections #563 and #800 do not exist, as “B” Street and “LQ” Street have not been constructed yet. High School No. 5 is proposed to be constructed before the surrounding District 5 would be developed, so the portions of “B” Street and “LQ” Street that front the school site would be constructed as part of the High School No. 5 project.
- A04-20 Year 2035 baseline traffic volumes were derived by applying a growth factor of 1.0773 (equivalent to an annual growth rate of 1.5% over five years) to the Year 2030 volumes from the Heritage Fields Project 2012 – GPA/ZC Traffic Study. The Post-2035 volumes are assumed to be equivalent to the Post-2030 volumes from the 2012 Traffic Study. This discussion is included in the “Future Traffic Without the Proposed Project” section.
- A04-21 Daily traffic volumes were obtained from the City of Irvine Public Works Neighborhood Traffic Engineering Average Daily Traffic Flow (3-Year Average, 2009-2011) map available online here: <http://www.cityofirvine.org/civica/filebank/blobload.asp?BlobID=21099>
- ADT values were also obtained from the Annual Traffic Volume Maps available on the Orange County Transportation Authority (OCTA) website. The report text has been revised to cite the sources.
- A04-22 A trip distribution assumption was prepared for each scenario (2011 AP, 2012 MP O1, and 2012 MP O2) based on the associated residential development locations and quantities. There are three different “With Project” project trip volume sets, and therefore three different Existing Condition With Project scenarios in the analysis.
- A04-23 The Year 2013 With Project analysis has been updated to include background traffic on Irvine Boulevard at intersections #563 and #800. Existing Plus Project ICUs, intersection summary tables, traffic volume figures, and signal warrant analysis have been revised for these intersections.

## 2. Response to Comments

- A04-24 The intersection geometry shown for “O” Street/Marine Way (#560) and “O” Street/ ”LV” Street (#608) have been updated in Figure 5.6-8 and in the analysis.
- A04-25 The Year 2017 With Project analysis has been updated to include background traffic on Irvine Boulevard at intersection #563. Existing Plus Project ICUs, intersection summary tables, traffic volume figures, and signal warrant analysis have been revised. See Appendix A, *Revised Traffic Study* for revised figures.
- A04-26 It is assumed that the section of Irvine Blvd fronting the project site (between “B” Street and “LQ” Street) will be constructed to provide sufficient width for a left turn pocket, three through lanes, and a right turn pocket on the eastbound approach to “LQ” Street. In the Year 2013 and Year 2017 analyses, there are assumed to be only two eastbound receiving lanes on Irvine Blvd east of “LQ” Street, so the eastbound approach to the intersection is modeled with a left turn pocket, two through lanes and a right turn pocket. Although the street will be wide enough to provide three eastbound through lanes, it will not operate with that capacity until a third eastbound receiving lane is constructed east of “LQ” Street. Text has been added to the report to clarify these assumptions.
- A04-27 The traffic analysis includes the dual westbound left turn lanes on Irvine Blvd at “LQ” Street, and the southbound right turn pocket from “LQ” Street into the first high school driveway.
- A04-28 Mitigation Measure TRAN4 applies to the developer of the 2011 Approved Project and 2012 Modified Project (i.e., Heritage Fields) and the District has no authority to revise the mitigation language; therefore, is not applicable.
- A04-29 The mitigation measure for the 2012 Modified Project scenario at Bake Pkwy & Rockfield Blvd is revised to be described in the traffic study as the conversion of a westbound through lane.
- A04-30 Mitigation Measure T-2 and T-3 are similar to parking requirements of the University High School.
- A04-31 An evaluation of site access and circulation under the City’s Transportation Design Procedures (TDPs) will be prepared as part of a subsequent site design process.
- A04-32 See the response to Comment A04-5.
- A04-33 Revisions made per the comments are incorporated as part of the FSEIR and the revised traffic study has been included in the Appendix A, *Revised Traffic Study*.
- A04-34 The Year 2013 intersection volumes were obtained by applying a growth factor of 1.5 percent to turning movement counts taken in 2012 as part of the Heritage Fields Project 2012 – GPA/ZC Traffic Study
- A04-35 The stadium at High School No. 5 would be comparable in size and function to the stadium at Irvine High School. A statement to this effect has been added to the revised traffic study report.

## 2. Response to Comments

- A04-36 The report text has been modified to clarify that baseline traffic conditions for all scenarios (2011 AP, 2012 MP Options 1 and 2) were obtained by applying growth factors equivalent to 1.5 percent per year to the 2015, 2030 and post-2030 volumes used in the Heritage Fields Project 2012 – GPA/ZC Traffic Study. The original source of these traffic volume forecasts is ITAM Version 8.4-10.
- A04-37 Section 2.5 of the Revised Traffic Study (Appendix A to this FEIR), Traffic Analysis Performance Criteria, has been updated to state that a significant impact also occurs when a project takes a location from an acceptable LOS to unacceptable LOS.
- A04-38 The study arterials and intersections were selected based on the attendance area for the school and a reasonable assumption about where project-generated trips may originate from.
- A04-39 The word “stadium” has been removed from the introductory paragraph.
- A04-40 The purpose of the statement was to note that there are an estimated 11,242 residential units within the assumed High School #5 attendance area but outside of the Great Park Neighborhoods area. The word “proposed” has been removed from the sentence to alleviate any confusion regarding the 2011 Approved Project and 2012 Modified Project Option 1 and 2 scenarios.
- A04-41 The table has been updated to reflect that 25 percent of the project trips are assumed to be generated from the Great Park Neighborhoods in the 2011 Approved Project scenario in Year 2017.  $[(4,283/(4,283+11,242))*0.9=0.25]$
- A04-42 All deficient locations (LOS E or LOS F) are now shaded in the summary tables of the Revised Traffic Study (Appendix A).
- A04-43 There is no specific data available for high school stadiums in the ITE Trip Generation manual. Peak hour trips are estimated based on driveway counts taken at Irvine High School during an football game event, and total daily traffic is estimated based on the Estancia High School study and the San Diego trip generation rates.
- A04-44 This rounding error has been corrected in the table. See Appendix A, *Revised Traffic Study*.
- A04-45 The ICU level of service results have been updated. See Appendix A, *Revised Traffic Study*.
- A04-46 Additional analysis of Driveway 6 will be conducted as part of subsequent site planning efforts.
- A04-47 Existing Class I Primary and Secondary Off-Street bicycle trails have been identified in this section.
- The pedestrian and bicycle circulation along internal roadways within the Great Park Neighborhoods may be analyzed as part of a separate study once the future development in the

## 2. Response to Comments

area has been designed. The residential and community commercial land uses proposed for District 4 have not yet been constructed.

- A04-48 Construction level drawings are not currently available and adequate distance would be provided for the safe access to and from the Project Site. The District will provide minimum peripheral visibility for the driveways per Caltran's Highway Design Manual. No significant impacts concerning the intersection sight distance is anticipated and a separate detailed sight distance study is not required. However, if deemed necessary, a detailed analysis can be performed as part of a separate study once construction level drawings are available for the site and surrounding roadways.
- A04-49 The intersection lane geometry analyzed in this report is consistent with the Heritage Fields Project 2012 – GPA/ZC Traffic Study. There are no project related impacts identified at intersections #558 and #560. The modifications described are expected to result in better forecast traffic operations than what has been included in the original DEIR analysis.
- A04-50 The District would comply with the requirements of the Part 7, California Manual on Uniform Traffic Control Devices, "Traffic Control for School Areas." The future development in the area has not been designed and the residential and community commercial land uses proposed for District 4 have not been constructed. School traffic control plans, school route plan maps, school crossing locations and controls would be provided as required. The residential and community commercial land uses proposed for District 4 have not yet been constructed.

## 2. Response to Comments

LETTER A05 – Department of Toxic Substances Control (3 page[s])



### Department of Toxic Substances Control

Deborah D. Raphael, Director  
5796 Corporate Avenue  
Cypress, California 90630



**Edmund G. Brown Jr.**  
Governor

**A05**

October 22, 2013

Ms. Lorrie Ruiz, Assistant Director  
Facilities Planning  
Irvine Unified School District  
5050 Barranca Parkway  
Irvine, California 92604

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR IRVINE  
UNIFIED SCHOOL DISTRICT, PROPOSED HIGH SCHOOL NO. 5, IRVINE, ORANGE  
COUNTY (SCH 2002101020, SITE CODE: 404880)

Dear Ms. Ruiz:

The Department of Toxic Substances Control (DTSC) has reviewed and is providing comments on the Irvine Unified School District (District) proposed High School #5 (Site) Supplemental Environmental Impact Report (Draft SEIR) dated September 2013. The Site is located on the southeast corner of Irvine Boulevard and future "B" Street, east of Sand Canyon and Highway 133, and west of Alton and Bake Parkways. The Site is on a portion of the former Marine Corps Air Station El Toro (MCAS El Toro), in planning Area 51 of the Orange County Great Park.

The proposed high school site encompasses approximately 40.3 acres of land. Portions of the Site have been used for agricultural purposes since the 1950s. A former (abandoned in place) jet fuel line runs across the northern portion of the Site in an east west direction. A Draft Preliminary Environmental Assessment Workplan (PEA Workplan – The Planning Center | DC&E, October 14, 2013) was submitted to DTSC for review. The PEA Workplan proposes investigation activities to address possible historical impacts to the Site from on-site agricultural activities, the former jet fuel line, and proximity to former MCAS landfill. The District entered into a School Cleanup Agreement (Docket Number HSA-EOA 12/13-019) with DTSC on September 17, 2012 for oversight of environmental investigation and cleanup activities.

The environmental investigation, mitigation and/or removal, if deemed necessary, should continue to be conducted under DTSC oversight. The Draft SEIR, requires an analysis of the potential public health and environmental impacts associated with the proposed response action, pursuant to requirements of the California Environmental

♻️ Printed on Recycled Paper

## 2. Response to Comments

Ms. Lorrie Ruiz  
October 22, 2013  
Page 2

Quality Act (Pub. Resources Code, div. 13, §21000 et seq), and its implementing Guidelines (Cal. Code Regs., tit.14, §15000 et seq.), prior to approval or adoption of the Draft SEIR for the project. For CEQA purposes, the response action is part of the project, since the construction of the school cannot proceed without it.

Based on a review of the Draft SEIR, DTSC requests the following to be incorporated in the SEIR for DTSC approval of the project:

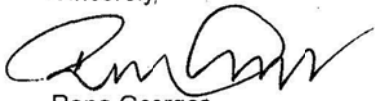
1. The discussion presented in Section 5.4 (Hazards and Hazardous Materials) of the Draft SEIR does not provide the detail necessary to meet the above requirements. In light of the shortened review period requested by the District to avoid overcrowding of existing high schools, DTSC strongly recommends incorporating a conservative projection of cleanup, mitigation and/or removal actions in this document. This prudent action would allow DTSC to use this document and refine any details upon conclusion of its oversight of the site investigative activities underway and support the District's need for expedited review and action. The District submitted several environmental assessment reviews with DTSC feedback as well as the October 2013 PEA Workplan which provides substantive information to assess potential hazards, hazardous waste constituents, nature, extent and remedies for mitigation and/or removal. If sufficient information to discuss the potential proposed mitigation and/or removal actions, and their associated impacts to the Site and the surrounding environment, are not incorporated in the Draft SEIR, then an Addendum or Supplement to the Draft SEIR may be required along with the associated delays. DTSC believes there is sufficient environmental site information on the proposed environmental assessment of the project area at this time to include such information and to avoid additional CEQA supplements and associated delays. A05-1
2. The current removal of the jet fuel pipeline was not discussed in Section 5.4.1 – Fuel Pipeline System. This information is part of the environmental condition at the Site and may also be included in potential mitigation activities described in the above comment by DTSC. A05-2
3. If the District plans to use State funds for the project, then the District shall comply with the requirements of Education Code sections 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268. A05-3

## 2. Response to Comments

Ms. Lorrie Ruiz  
October 22, 2013  
Page 3

If you would like to discuss this matter further, please contact me at (714) 484-5320 or [rgeorges@dtsc.ca.gov](mailto:rgeorges@dtsc.ca.gov).

Sincerely,



Rana Georges  
Project Manager  
Schools Evaluation and Brownfields Cleanup Branch  
Brownfields and Environmental Restoration Program

rs/yg/kh/rg

cc: State Clearinghouse (via e-mail)  
Office of Planning and Research

Mr. Michael O'Neill (via e-mail)  
Department of Education – Sacramento, CA

Ms. Nancy Ritter (via e-mail)  
DTSC CEQA Tracking Center – Sacramento HQ

Kimberley A. Hudson (via e-mail)  
Office of Environmental Planning & Analysis – Sacramento, HQ

B&ERP Reading File – Cypress

CEQA Reading File – Cypress

## 2. Response to Comments

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## 2. Response to Comments

### **Response to Comments from Rana Georges, Project Manager, Schools Evaluation and Brownfields Cleanup Branch, Brownfields and Environmental Restoration Program, DTSC, dated October 22, 2013.**

A05-1 The District will continue to conduct the environmental investigation, mitigation and/or removal with DTSC oversight should it proceed with acquisition of the property. Due to the fact that full environmental investigation of the Site has not yet been completed, and that there is no existing evidence that contamination exists on the Site, or that any remediation of the Site is necessary, it would be premature to hazard a guess at what would be necessary to implement a response action at this time. Therefore, developing a “projection” of cleanup, mitigation and/or removal actions for inclusion in the SEIR as suggested by this comment would be based on speculation as this point.

The District recognizes that the separate process it is undertaking with the oversight of DTSC may identify such conditions, but these conditions are not known at this time and such speculation is not appropriate. The District further recognizes that if it is determined during the DTSC process that some form of cleanup is required, it may be necessary to complete, and is prepared to complete an Addendum or Supplement as the CEQA lead agency. As mentioned above, the District will continue to conduct the environmental investigation, mitigation and/or removal with DTSC oversight should it proceed with acquisition of the property. The District is dedicated to securing a safe school site that meets the stringent standards of DTSC. If the results of the investigation reveal that remediation is necessary, the District will comply with CEQA requirements for implementing the remedial project, and will prepare the appropriate documentation.

A05-2 Comment noted. The removal of the former jet fuel and aviation gas pipelines was recently completed with DTSC oversight. As mentioned in the Draft SEIR, the District will comply with Education Code Section 17213, which includes a determination from DTSC that the Project Site does not pose a significant risk to human health or the environment prior to site acquisition. Removal of the pipelines was monitored and there was no evidence found that a release of hazardous substances occurred, or that any remediation is necessary for issues related to the pipelines.

A05-3 The District does plan to seek reimbursement of costs through the State program and understands fully the requirements of Education Code sections 17213.1 and 17213.2. The District will comply with Education Code Section 17213, which includes a determination from DTSC that the Project Site does not pose a significant risk to human health or the environment prior to Site acquisition.

## 2. Response to Comments

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## 2. Response to Comments

LETTER A06 – Five Point Communities, Inc. (1 page[s])

A06



25 Enterprise, Suite 400  
Aliso Viejo, CA 92656  
Phone (949) 349-1000 Fax (949) 349-1075

October 22, 2013

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

**Subject:** Response to Section 5 Environmental Analysis for the High School No. 5  
Draft Supplemental Environmental Impact Report

Dear Ms. Ruiz:

Heritage Fields El Toro, LLC ("Heritage Fields") has reviewed the High School No. 5 Draft Supplemental Environmental Impact Report ("EIR"). Thank you for the opportunity to comment.

Heritage Fields offers the following corrections to the Figure 5.8-1 legend (as shown on the attached exhibit):

- a. Interchange associated with Intersections 486 and 487 should be labeled in the legend as "NITM Proposed Interchange – 2030"
- b. The following should be labeled as "OCGP Proposed Road – 2015"
  - i. "O" Street from Marine Way to Ridge Valley
  - ii. Trabuco Road from Intersection 486 to "LY" Street
  - iii. "LY" Street from Trabuco Road to Irvine Boulevard
  - iv. "A" Street from "LQ" Street to Irvine Boulevard
  - v. Marine Way from "O" Street to Great Park Boulevard
- c. The following should be labeled as "OCGP Proposed Road – 2030"
  - i. Marine Way from Great Park Boulevard to Bake Parkway
  - ii. "B" Street from Marine Way to Irvine Boulevard
- d. The intersection notations at existing/proposed Marine Way and Sand Canyon appear to be incorrect
- e. The portion of Marine Way from Intersection 560 to Great Park Boulevard West only should be "OCGP Proposed Road – 2015"

A06-1

Please contact me at (949) 349-1076 with questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads 'Jennifer Bohan'.

Jennifer Bohan  
Vice President of Engineering  
Five Point Communities Management, Inc.  
Development Manager for Heritage Fields El Toro, LLC

## 2. Response to Comments

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## 2. Response to Comments

**Response to Comments from Jennifer Bohan, Vice President of Engineering, Five Points Communities Management, Inc., Development Manager for Heritage Fields El Toro, LLC, dated October 22, 2013.**

A06-1 Figure 5.8-1 has been revised per your comment and is included in Figure 2.1 Project Study Area of the Appendix A, *Revised Traffic Study*.

## 2. Response to Comments

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## 2. Response to Comments

LETTER A07 – California Department of Transportation (7 page[s])

**A07**

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN Jr., Governor

**DEPARTMENT OF TRANSPORTATION**

District 12  
3347 Michelson Drive, Suite 100  
Irvine, CA 92612-8894  
Tel: (949) 724-2241  
Fax: (949) 724-2592  
TTY 711  
www.dot.ca.gov



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**October 22, 2013**

Lorrie Ruiz  
Irvine Unified School District  
5050 Barranca Parkway  
Irvine, Ca 92604

File: IGR/CEQA  
SCH#: 2002101020  
Log #: 1157Z  
SR I-5,I-405,SR-133, -241

**Subject: High School No.5 Draft Supplemental Environmental Impact Report**

Dear Ms. Ruiz,

Thank you for the opportunity to review and comment on the **Notice of Completion and Notice of Availability for High School No. 5 Draft Supplemental Environmental Impact Report**.

This project involves the construction and operation of a comprehensive high school with various recreational amenities such as main and practice gymnasiums, 2,940-seat stadium, 720-seat performing arts center, aquatics complex, hard courts, tennis courts, and softball/baseball fields. The campus would also include an underground stormwater retention basin. The project is located at the southeast corner of Irvine Boulevard and future "B" Street, east of San Canyon and Highway 133.

**The Department of Transportation (Department) is a commenting agency** on this project which we submitted comments on October 21, 2013 and we have the additional following comments:

- |  |       |
|--|-------|
| <ol style="list-style-type: none"> <li>1. A Traffic Management Plan (TMP) for construction vehicles should be submitted to Caltrans in order to minimize the impacts to State highway facilities. Any hauling of materials should not occur during A.M and P.M peak periods of travel on State facilities during demolition and construction of the proposed project. All vehicle loads should be covered so that materials do not blow over or onto the Department's Right-of-Way.</li> </ol>   | A07-1 |
| <ol style="list-style-type: none"> <li>2. Active Transportation Considerations: All schools should carefully consider the inclusion of Safe Routes to School strategies in the development and design of school traffic considerations. The traffic analysis should address the bike and pedestrian traffic in all areas. Dedicated, easily visible routes for walking or biking will not only reduce the need for vehicle trips to schools, but will reduce congestion related accidents and promote healthy, sustainable transportation alternatives for residents of all ages.</li> </ol> | A07-2 |
| <ol style="list-style-type: none"> <li>3. Arterial Improvements: As you mentioned, the school is being developed in a location where the internal street infrastructure doesn't currently exist. If the school proposes to have after-school</li> </ol>  | A07-3 |

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## 2. Response to Comments

Ms. Ruiz  
October 22, 2013  
Page 2

events (sports, plays, graduation) or other community uses (some have libraries open to the community; or radio/tv station or other similar after-hours proposals) that will cause significant circulation issues during peak periods, please address those issues in your document. We encourage the School District to work closely with the City of Irvine to develop strategies to offset any impacts in these possible cases. | A07-3


4. All traffic signings and striping within Caltrans R/W shall be in conformance with the Department's standard, California MUTCD 2012 edition. | A07-4

5. Traffic Impact Study (TIS) should include cumulative impact of the project as well as the future Great Park developments on SR-241/Portola Pkwy interchanges. | A07-5

Finally, please refer to the Departments comments on the 2012 Great Park Neighborhoods SSEIR Response to Comments made on October 11, 2013. High School No. 5 is on a portion of area 51 within the Great Parks development and our previous comments relate to this project. | A07-6

Please continue to keep us informed of this project and any future developments, which could potentially impact the State Transportation Facilities. If you have any questions or need to contact us, please do not hesitate to call Miya Edmonson at (949) 724-2228.

Sincerely,



Maureen El Harake, Branch Chief  
Regional-Community-Transit Planning

C: Scott Morgan, Office of Planning and Research

Enclosure

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## 2. Response to Comments

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN Jr., Governor

### DEPARTMENT OF TRANSPORTATION

District 12  
3347 Michelson Drive, Suite 100  
Irvine, CA 92612-8894  
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Fax: (949) 724-2592  
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www.dot.ca.gov



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**October 21, 2013**

Lorrie Ruiz  
Irvine Unified School District  
5050 Barranca Parkway  
Irvine, Ca 92604

File: IGR/CEQA  
SCH#: 2002101020  
Log #: 1157Z  
SR I-5,I-405,SR-133, -241

#### **Subject: High School No.5 Draft Supplemental Environmental Impact Report**

Dear Ms. Ruiz,

Thank you for the opportunity to review and comment on the **Notice of Completion and Notice of Availability for High School No. 5 Draft Supplemental Environmental Impact Report**.

This project involves the construction and operation of a comprehensive high school with various recreational amenities such as main and practice gymnasiums, 2,940-seat stadium, 720-seat performing arts center, aquatics complex, hard courts, tennis courts, and softball/baseball fields. The campus would also include an underground stormwater retention basin. The project is located at the southeast corner of Irvine Boulevard and future "B" Street, east of San Canyon and Highway 133.

**The Department of Transportation (Department) is a commenting agency on this project and we have the following comments:**

1. A Traffic Management Plan (TMP) for construction vehicles should be submitted to Caltrans in order to minimize the impacts to State highway facilities. Any hauling of materials should not occur during A.M and P.M peak periods of travel on State facilities during demolition and construction of the proposed project. All vehicle loads should be covered so that materials do not blow over or onto the Department's Right-of-Way.
2. Active Transportation Considerations: All schools should carefully consider the inclusion of Safe Routes to School strategies in the development and design of school traffic considerations. The traffic analysis should address the bike and pedestrian traffic in all areas. Dedicated, easily visible routes for walking or biking will not only reduce the need for vehicle trips to schools, but will reduce congestion related accidents and promote healthy, sustainable transportation alternatives for residents of all ages.
3. Arterial Improvements: As you mentioned, the school is being developed in a location where the internal street infrastructure doesn't currently exist. If the school proposes to have after-school events (sports, plays, graduation) or other community uses (some have libraries open to the

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## 2. Response to Comments

Ms. Ruiz  
October 21, 2013  
Page 2

community; or radio/v station or other similar after-hours proposals) that will cause significant circulation issues during peak periods, please address those issues in your document. We encourage the School District to work closely with the City of Irvine to develop strategies to offset any impacts in these possible cases.

4. All traffic signings and striping within Caltrans R/W shall be in conformance with the Department's standard, California MUTCD 2012 edition.

Finally, please refer to the Departments comments on the 2012 Great Park Neighborhoods SSEIR Response to Comments made on October 11, 2013. High School No. 5 is on a portion of area 51 within the Great Parks development and our previous comments relate to this project.

Please continue to keep us informed of this project and any future developments, which could potentially impact the State Transportation Facilities. If you have any questions or need to contact us, please do not hesitate to call Miya Edmonson at (949) 724-2228.

Sincerely,



Maureen El Harake, Branch Chief  
Regional-Community-Transit Planning

C: Scott Morgan, Office of Planning and Research

Enclosure

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## 2. Response to Comments

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

### DEPARTMENT OF TRANSPORTATION

DISTRICT 12  
3347 MICHELSON DRIVE, SUITE 100  
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PHONE (949) 724-2000  
FAX (949) 724-2019  
TTY 711  
www.dot.ca.gov



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October 11, 2013

Mr. Barry Curtis  
Manager of Planning Services  
City of Irvine  
P.O. Box 19575  
Irvine, Ca 92623

File: IGR/CEQA  
SCH#: 2002101020  
Log# 1157 X  
I-405, I-5, SR 133, SR 241

Subject: 2012 Great Park Neighborhoods SSEIR Response to Comments

Dear Mr. Curtis:

Thank you for the opportunity to meet September 30, 2013 and discuss your responses to our comment letter dated August 12, 2012 regarding the Heritage Fields 2012 Great Park Neighborhoods Project. Below is the additional clarification we requested at the above referenced meeting. Also memorialized in this letter, are the names of documents needed for clarification, which you provided subsequent to our discussion and are listed below:

- Overall Responses to Transportation Planning Comments Regarding the Heritage Fields Project 2012 GPA/ZC DEIR Traffic Impact Analysis (9.13.13 Urban Crossroads) regarding transportation issues, trip generation/distribution and queuing analysis for on- and off-ramps
- TOPICAL RESPONSE 3 (9.13.13 Draft)

During our discussion, Traffic Operations continued to have concerns with responses A5-2, A5-9, A5-10 and A5-12. These concerns are reiterated below for the record:

#### 1. Regarding Response A5-2:

Section 1.4 "Project Summary" indicates that the 2012 modified project includes a conversion, totaling the number of dwelling to 10,700, in comparison to the already approved 4,894 dwelling units. This is more than a doubling of the residential daily traffic. And per Table 5.12-4 & PDF file I1- Traffic Impact Analysis (Table 3-8); the modification consists of 9,784 added daily trips (in 2030 & beyond) in comparison to the previously submitted project. And even though a percentage of those trips are for the new high school, please explain how the additionally generated traffic by this project has no significant impact between the freeways segments I-5, 405, 133, 241 and 261 mainline and ramps and can be handled without additional mitigation? Additionally, you are counting on outside agencies to implement certain mitigations that were not evaluated in their ability to accommodate these new additions.

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## 2. Response to Comments

Mr. Curtis  
October 11, 2013  
Page 2

### 2. Regarding A5-9 Response:

In response to Caltrans' request for a queuing analysis for the Bake Parkway and Lake Forest Drive ramps, you indicate "A project impact is not indicated at either the Bake Parkway or Lake Forest Drive interchange with the I-5 Freeway, based upon both the intersection capacity analyses and the ramp capacity analyses....The difference between a ramp capacity analysis and queuing analysis is that a ramp analysis looks at the level of service based on the volume of the ramps while a queuing analysis looks at whether or not those cars stack back into the flow of traffic on the mainline." However, we believe a project of this magnitude will have significant impacts on all the ramp storage within the study area; therefore a queuing analysis is required to determine the extent of the back up to the mainline.

### 3. Regarding A5-10 Response:

In response to Caltrans' request for an explanation as why the LOS and V/C ratio for 2030 showed significant improvement from 2015 data, you responded that you are relying on a list of roadway and intersection improvements programmed to occur between 2015 and 2030. But again, these improvements were planned before this modification occurred, and that not all of these projects are a definite. You also indicated that "The SR-241 extension is included in the background condition for 2030 conditions because it is identified in the Transportation Corridor Agency Capital Improvement Program (the "TCAIP"). Moreover, it is an assumed improvement in the Orange County Transportation Analysis Model (OCTAM)." — . The uncertainty of the SR 241 extension precludes a reasonable assumption that this project will contribute to the shift in traffic patterns for this study, therefore further evaluation without this assumption should be considered.

### 4. Regarding A5-12 Response:

In response to Caltrans' questioning why the year 2030 Without Project and with the 2012 Modified Project in Table 7-13 & 7-14 still show some locations to have an improved LOS even though the project is adding 2000 vehicles during the peak hour to an area that already has a failing LOS. [Examples are: NB Culver onramp at I-5 Lake Forest SB on & NB off-ramps at I-5, SB Sand Canyon onramp at I-405]. You stated: "The 2012 Modified Project increase in peak hour trip ends is the result of the project's land use mix which localizes project traffic in the immediate area through improved jobs/housing balance." However, one cannot assume that all those newly created jobs will be filled with local residents and that this project doesn't attract commuters and visitors.

In closing, we are aware that the NITM program is committed to the construction of the SR 133/Trabuco Road Interchange. The Department would like to be on record that we support its implementation at the earliest possible opportunity, especially as Sand Canyon and other

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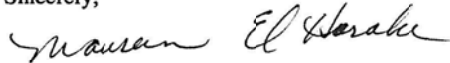
## 2. Response to Comments

Mr. Curtis  
October 11, 2013  
Page 3

interchanges in the vicinity of this development area are already experiencing long delays due to high demand.

Thank you again for meeting with us, and for providing the additional clarification. Please continue to keep us informed on this project as well as any future developments, which could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Miya Edmonson at (949) 724-2228.

Sincerely,



Maureen El Harake, PMP Chief,  
Regional-Community-Transit Branch  
Caltrans District 12  
(949) 724-2086

c: Lan Zhou, Deputy Director of Planning  
Jose Hernandez, Traffic Operations South;  
Sun-Sun Murillo, Supervising Transportation Analyst  
City of Irvine, Community Development  
Scott Morgan, Governor's Office of Planning and Research

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## 2. Response to Comments

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## 2. Response to Comments

### **Response to Comments from Maureen El Harake, PMP Chief, Regional-Community-Transit Branch, Caltrans District 12, dated October 22, 2013.**

- A07-1 Prior to construction, the IUSD will prepare a construction traffic management plan identifying the routes that would be utilized by construction traffic traveling to and from the project site
- A07-2 Comment noted. As stated in the DSEIR, the Project Site would be compatible and have integrated circulation system with the rest of the Great Park Neighborhoods, including pedestrian and bike access. The District will incorporate Safe Routes to School strategies where feasible to encourage walking and biking to and from the proposed high school. IUSD will develop a Safe Routes to School map once the attendance boundaries have been finalized.
- A07-3 IUSD will develop a Safe Routes to School map for the proposed high school once the attendance boundary has been finalized. The High School No. 5 facilities (the performing arts center, tennis courts, softball/baseball fields, etc.) may be available for public or non-enrollment population use on a very limited basis on weekends and weekday evenings. However, these activities would not significantly contribute to weekday peak hour trip generation. Therefore, would not cause significant circulation issues during peak periods other than already analyzed in the traffic study. The traffic analysis includes traffic impacts with the stadium use. Offsite roadway improvements would be provided in conjunction with the Great Park Neighborhoods and IUSD would continue to coordinate with Heritage Fields and the City to implement strategies that could offset potential traffic impacts.
- A07-4 Comment noted. All traffic signings and striping within Caltrans right-of-way will be in conformance with the Department's standard, California MUTCD 2012 edition.
- A07-5 The Proposed Project is not anticipated to create a significant traffic impact at the interchange of SR-241 and Portola Parkway as this intersection is outside of the proposed attendance boundary for the high school. Therefore, few vehicle trips generated by the project would be anticipated to travel through this intersection. The 2012 Great Park Neighborhoods SSEIR being prepared by the City of Irvine addresses potential cumulative impacts at this intersection that would result from future Great Park developments.
- A07-6 Responses to these comments are provided as part of the EIR being prepared by the City of Irvine for the Great Park Neighborhoods project.

## 2. Response to Comments

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## 2. Response to Comments

LETTER A08 – Governor’s Office of Planning and Research (2 page[s])

**A08**



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor’s Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

October 23, 2013

Lorrie Ruiz  
Irvine Unified School District  
5050 Barranca Pkwy  
Irvine, CA 92604

Subject: High School 5  
SCH#: 2002101020

Dear Lorrie Ruiz:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 22, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

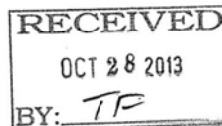
“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse



Enclosures  
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A08-1

## 2. Response to Comments

### Document Details Report State Clearinghouse Data Base

**SCH#** 2002101020  
**Project Title** High School 5  
**Lead Agency** Irvine, City of

**Type** EIR Draft EIR  
**Description** Note: Shorter Review

IUSD proposes to construct and operate a comprehensive high school housing 2,600 students with various recreational amenities such as main and practice gymnasium, 2,940-seat stadium with nighttime lighting and PA system, 720-seat performing arts center, aquatics complex, hard courts, tennis courts, and softball/baseball fields.

#### Lead Agency Contact

**Name** Lorrie Ruiz  
**Agency** Irvine Unified School District  
**Phone** 949 936 5308 **Fax**  
**email** bcurtis@ci.irvine.ca.us  
**Address** 5050 Barranca Pkwy  
**City** Irvine **State** CA **Zip** 92604

#### Project Location

**County** Orange  
**City** Irvine  
**Region**  
**Lat / Long** 33° 40' 12" N / 117° 43' 44" W  
**Cross Streets** Sand Canyon Avenue & Irvine Boulevard  
**Parcel No.**  
**Township** 5/6S **Range** 8W **Section** **Base**

#### Proximity to:

**Highways** I-5, 405, SR-133, 241  
**Airports**  
**Railways**  
**Waterways** San Diego Creek  
**Schools**  
**Land Use** Vacant agriculture/8.1 Trails and Transit Oriented Development (TTOD)/Planning 51 Orange County Great Park

**Project Issues** Air Quality; Food Plain/Flooding; Forest Land/Fire Hazard; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual; Archaeologic-Historic; Biological Resources; Geologic/Seismic; Minerals; Soil Erosion/Compaction/Grading; Vegetation; Wetland/Riparian

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; California Highway Patrol; Caltrans, District 12; Regional Water Quality Control Board, Region 8; Native American Heritage Commission; Department of Toxic Substances Control

**Date Received** 09/23/2013 **Start of Review** 09/23/2013 **End of Review** 10/22/2013

## 2. Response to Comments

### **Response to Comments from Scott Morgan, Director, State Clearinghouse, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, dated October 23, 2013.**

A08-1 Comment noted. The District has complied with the State Clearinghouse review requirements. No further response is necessary.

## 2. Response to Comments

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## 2. Response to Comments

LETTER A09 – South Coast Air Quality Management District (1 page)



### South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

**A09**

E-mailed: October 29, 2013  
LorrieRuiz@iusd.org

October 29, 2013

Ms. Lorrie Ruiz  
Irvine Unified School District  
5050 Barranca Parkway  
Irvine, CA 92604

#### Review of the Draft Supplemental Environmental Impact Report (DSEIR) for High School No. 5 Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the Lead Agency and should be incorporated into the Final SEIR as appropriate.

The proposed project could require additional remedial activities due to potential sources of soil contamination from previous land uses on the project site and within the project area. As a result, the SCAQMD staff recommends that the Lead Agency ensure compliance with SCAQMD Rule 1166.

A09-1

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions regarding air quality that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Francis".

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

MK:DG  
ORC130924-08  
Control Number

## 2. Response to Comments

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## 2. Response to Comments

### **Response to Comments from Ian MacMillan, Program Supervisor, Inter-Governmental Review, Planning, Rule Development & Area Sources, dated October 29, 2013.**

A09-1 The DTSC process is on-going, but there is no evidence currently that indicates that remediation is required. If such conditions do arise, the District may prepare an Addendum or Supplement to the EIR and the SCAQMD will be notified of its publication. Additionally, the District will comply with all applicable regulations, including SCAQMD Rule 1166, if such remedial activity is required.

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## 2. Response to Comments

LETTER R1 – Larry Agran, Irvine City Council Member (4 page[s])

**R01**



Larry Agran, Councilmember

[cityofirvine.org](http://cityofirvine.org)

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575

949-724-6233

October 22, 2013

Ms. Lorrrie Ruiz  
Assistant Director of Facilities  
Irvine Unified School District  
5050 Barranca Parkway  
Irvine, California 92604

**RE: Comments on the Draft Supplemental Environmental Impact Report (DSEIR) to Orange County Great Park and High School No. 5**

Dear Ms. Ruiz:

I have reviewed the Draft Supplemental Environmental Impact Report (DSEIR) regarding Irvine Unified School District's (IUSD) plan to site and construct a new high school. I believe the DSEIR fails to comply with the requirements of the California Environmental Quality Act (CEQA) in a number of important respects.

R01-1

The DSEIR fails to analyze the alternative and environmentally "superior" site located within the Orange County Great Park – commonly referred to as "Site B" – that was offered by the City of Irvine to IUSD at the September 10, 2013 Irvine City Council meeting. The DSEIR also fails to analyze the cumulative impacts on the environment posed by both the construction of the new high school and the County of Orange's plans to significantly expand the James A. Musick (Jail) Facility.

Accordingly, I offer the following comments and requests for additional information:

**Project Alternatives**

Section 15121(a) of the CEQA Guidelines states that the purpose of an Environmental Impact Report is to:

R01-2

Inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, **and describe reasonable alternatives to the project.** (Emphasis added).

An EIR, however, is not limited to the discussion of a reasonable range of project alternatives; CEQA provides that an EIR should seek to identify environmentally "superior" alternatives.

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In Chapter 7, the DSEIR identifies and discusses alternatives that were considered by the District during the scoping process. These include the No Project/No Development Alternative, and the Reduced Capacity Alternative. No discussion of different site alternatives was provided. In fact, the Different Site Alternative was rejected for further analysis in Section 7.2.2 apparently because “development of the Proposed Project at an alternative location would likely result in similar impacts as those analyzed in this SEIR.” (Chapter 7, page 3). It is unclear how such a conclusion was reached without a thorough study and analysis of an alternative location.

R01-2  
(cont'd)

The City of Irvine, on September 10, 2013, offered IUSD a reasonable alternative site – “Site B” – that should have been considered as part of the DSEIR’s analysis of environmentally “superior” alternatives. The September 10<sup>th</sup> offer of the alternative site – which emerged from an earlier April 9, 2013 City Council meeting at which Superintendent Terry Walker and IUSD Legal Counsel Andreas Chialtas participated – was made between the time when the Notice of Preparation of an EIR was published on April 30, 2013 and the publication of the DSEIR on September 23, 2013. IUSD was aware that Site B was available as a reasonable alternative prior to publication of the DSEIR.

R01-3

The Site B alternative would enable the District to meet enrollment demands and is compatible with the vision and goals of the Great Park. Accordingly, analysis of alternatives in the DSEIR is insufficient because it did not analyze all of the requisite CEQA issues concerning Site B. In general, it is unclear whether the baseline was proper; whether an alternative site will mitigate impacts on wildlife and wildlife corridors; and how pending zone changes, entitlements, and general plan changes will affect this environmental analysis.

Specifically, the DSEIR did not analyze the Hazardous Materials issues at the proposed site. More information and analysis is needed. The DSEIR states that the original military base landfill, opened in 1943 and now “capped,” is 750 feet from the proposed site. Yet, the DSEIR concludes that “a less than significant impact is anticipated” based on “prior regulatory approvals and a requirement for further environmental regulatory review for school sites.” (Chapter 5, Section 4, Page 33). It should be noted that the DSEIR draws a conclusion based on a Federal Finding of Suitability to Transfer (FOST) and does nothing to address school-related health and safety concerns even though CEQA Guidelines, in Appendix G, state that a project would normally have a significant effect on the environment if the project is situated within 2,000 feet of a significant disposal of hazardous waste.

R01-4

Therefore, given the close proximity of the proposed project to the landfill, is it reasonable to assume that prior regulatory approvals and the requirement for further environmental reviews warrant a finding of “a less than significant impact?” Is there any reason to believe that the California State Department of Toxic Substances Control will approve this site? Are other schools located next to landfills? And if so, have they experienced any health or safety complications? What are the potential health and safety issues associated with being located next to a landfill? What are the chances that the health and safety of the students and employees of the high school will be compromised? How will long-term health outcomes for students and

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employees be monitored? Will specific longitudinal epidemiological studies be organized? What mitigation measures must be employed? What are the emergency procedures necessary to manage problems associated with the landfill? Will construction and operation of the high school contribute to degradation of the landfill? What needs to be done to monitor the integrity of the landfill itself for the next 100 years or more?

In addition, there are a number of transportation-related issues that were insufficiently addressed in the DSEIR. For example, with respect to Greenhouse Gas (GHG) emissions, in Chapter 5, Section 3, the DSEIR concludes, in part, that the proposed project would have a less than significant impact on GHG emissions because “the proposed project would result in reduced school trip lengths, as there would be a neighborhood high school, and without which, the students would have to travel to a remote site.” (Page 17-18). In other words, the DSEIR asserts that travel to a “remote site” would result in an inferior alternative, in part, because greater distances would increase trip lengths and “greater GHG emissions would be generated.” (Chapter 7, Page 8). Site B, however, would also be a neighborhood high school, which will result in the reduction of trip lengths. (In fact, thousands of prospective students already live in close proximity to Site B.) Yet, no analysis of the transportation-related GHG emissions for Site B was undertaken. Accordingly, a number of questions must be answered: Would Site B help reduce GHG emissions? Would transportation emissions be less at Site B than Site A? Would trip lengths and vehicle miles traveled be reduced in general at Site B? Does the proposed project comply with AB 32 (Global Warming Solutions Act)? Does the proposed project comply with SB 375 (Sustainable Communities and Climate Protection Act of 2008)? Would Site B comply with AB 32 and SB 375?

R01-5

Student safety was also not addressed in the DSEIR. Increased travel distance for students has the potential to increase transportation-related injuries and fatalities. The DSEIR should have discussed the impact of longer commutes and how that affects pedestrian access and safety. In addition, the DSEIR failed to address the impacts of students traveling off-campus for lunch or other purposes.

R01-6

Finally, the DSEIR failed to analyze whether Site B would provide any traffic advantages over the proposed project. For example, the DSEIR failed to consider how significant the traffic problem would be due to competing demands for road space by school and jail traffic (supply trucks, employees, the transport of inmates, and visitors) resulting from a major expansion of the James A. Musick Jail. Also, would Site B provide easier access to public transportation options than the proposed project? This has further impacts on greenhouse gas emissions and air quality that need to be considered.

R01-7

### Cumulative Impacts

Section 15130 of the CEQA Guidelines states that an EIR is required to discuss the cumulative impacts of a project when its incremental effects are cumulatively considerable. Under CEQA, “cumulatively considerable” means that the “incremental effects of an individual project are

R01-8



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significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

R01-8

Section 15355 of the CEQA Guidelines defines cumulative impacts to be “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” and can result from “a single project or a number of separate projects.”

Here, the DSEIR failed to analyze the combined cumulative impact on the environment caused by both the proposed new high school *and* expansion of the James A. Musick Jail. Under the Musick Jail expansion EIR and Master Plan, the Jail could expand to include up to 7,584 beds with the capability of housing maximum-security inmates. In fact, a new facility on the property with 512 beds is set for construction to begin in May 2016. And, the Orange County Board of Supervisors recently approved an additional 384 new beds. Effectively, with the additional expansion of the Musick facility, a growing “mega-jail” will be located 0.68 miles – just 1,000 yards – from the proposed project. Regardless of studies that downplay the significance of locating a school next to major correctional facilities, common sense would suggest that it would not be desirable to place a school so close to a large jail, especially when an alternative site is available that is farther away, as is the case here with Site B.

The cumulative impacts analysis in the DSEIR fails to address the cumulative impacts from construction and operation of the proposed high school *and* the James A. Musick Jail on: 1) transportation options; 2) transportation safety; 3) traffic; 4) the effects of increased traffic on the school site, surrounding communities, wildlife, Agua Chinon, and the jail; 5) wildlife in general, including, but not limited to Agua Chinon, and habitat loss; 6) the landfill; 7) hazardous materials; 8) GHG emissions resulting from combined traffic, construction, and operation of the two facilities; 9) emergency procedures; 10) light and noise impacts on wildlife, the school site, and surrounding communities; 11) fire protection, emergency services and police protection; 12) aesthetic impacts; and, 13) water, including water services and supplies.

Finally, cumulative impacts and studies should be reassessed since assumptions were based on development plans, which are currently being reviewed and subject to change.

Thank you for the opportunity to comment on this document.

Sincerely,



Larry Agran  
Irvine City Councilmember

## 2. Response to Comments

### **R01. Response to Comments from Larry Agran, Councilmember, City of Irvine, dated October 22, 2013.**

R01-1&2 As stated in Section 7.1.1, *Purpose and Scope*, of the DSEIR, CEQA Guidelines 15126.6[a] states that an EIR shall describe “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project[.]” Therefore, the fact that an alternative site was brought up prior to the release of the DSEIR alone does not warrant an alternative site discussion in the EIR. Section 7.2.2, *Different Site Analysis of the DSEIR*, indicates that the only significant and unavoidable impacts resulting from the Proposed Project is operations-related emissions of volatile organic compound (VOC), and any alternative site that would achieve the project’s objectives would have the same significant operations-related emissions impacts. The same operations-related emissions are anticipated because the maximum school capacity and program assumptions for an alternative site analysis would be same. Similarly, it is reasonable to assume that development of the Proposed Project at an alternative location would likely result in similar, and in some cases, greater impacts than those analyzed in the DSEIR because all other environmental impacts would be reduced to a less than significant level. Therefore, review of an alternative site, including the 40-acre site referred to as “Site B” under this DSEIR is not required; accordingly, the DSEIR’s alternative analysis is adequate.

Please note that the District has agreed to and has initiated a separate due diligence process to review Site B. As part of that effort, representatives from the City, IUSD, Orange County Great Park Corporation and the California Department of Education (CDE) toured the site. The CDE representative conducted its Initial School Site Evaluation (SFPD 4.0 form), which raised certain concerns that must be addressed through future studies.

R01-3 The baseline for the Proposed Project is the Approved 2011 Project, and the Proposed Project would not result in significant and unavoidable impacts related to wildlife and wildlife corridors, zoning, or other land use issues. Therefore, no mitigation for those issues by an alternative site is necessary.

R01-4 The comment indicates that CEQA guidelines, Appendix G, states that a project would normally have a significant effect on the environment if the project is situated within 2,000 feet of a significant disposal of hazardous waste. While this potential environmental impact is not found in the CEQA guidelines Appendix G, it is criteria related to California Code of Regulations, Title 5 requirements for school site safety. The purpose of the criteria is to evaluate if there are uncontrolled hazardous substance release sites that may impact the proposed school site. Based on the analysis, no uncontrolled hazardous substance release sites that may impact the Project Site were identified. All sites within 2,000 feet of the proposed school have been evaluated by federal and state regulatory agencies, and there is no evidence that they have impacted the Project Site. In addition, as indicated in Response A05-1 through A05-3 to comments from DTSC, the District will comply with Education Code Section 17213, which includes a determination from DTSC that the Site does not pose a significant risk to human health or the environment prior to Site acquisition.

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The comment asks the question if there is reason to believe that DTSC will approve the Project Site for school use, given the close proximity to the landfill. The District has met with DTSC to discuss its requirements for investigating the proposed school site, and DTSC is currently reviewing a proposed workplan developed for the investigation. DTSC is required to either approve the site if there is no indication of a risk to human health or the environment, or require remediation that would be protective of human health and the environment. Based on communication with DTSC, there is no reason to believe that DTSC would not fulfill its mandate.

The comment refers to health and safety issues associated with landfills, student and employee health monitoring and epidemiological studies. California Education Code Section 17213 requires school districts who receive state funds to construct new schools to obtain a determination from DTSC that the Site does not pose a significant risk to human health or the environment prior to constructing and operating a school. The site investigation is underway with oversight from DTSC. Environmental samples have been proposed at the Site boundary closest to the former landfill footprint to evaluate if any residual contaminants from historical operations have encroached onto the Site. Should contamination be encountered, and the District chooses to proceed with acquisition of the Site, remediation would be performed with DTSC oversight and regulatory approval. Based on the existing data, there is no evidence that suggests that the capped landfill is impacting the proposed school site. Therefore, since there is no source of contamination impacting the proposed school site, there would be no exposure to Site occupants. Monitoring the proposed school site would only be necessary if there was a threat of exposure to hazardous substances, which is not supported by the existing data.

The comment also refers to emergency procedures to manage problems associated with the landfill. According to the Final O&M/LTM Plan, the landfill will be inspected following significant events such as earthquakes (greater than magnitude of 4.0), wild fires, and major storms; and if feasible, these inspections will be conducted within 24 hours and not later than a week from the occurrence of the event. These procedures are designed to expediently identify and remedy any problems associated with the landfill during unexpected events.

The comment asks if construction and operation of the high school would contribute to the degradation of the landfill, and what would need to be done to monitor the integrity of the landfill. The construction and operation of the high school would not impact the landfill, as no activities would occur on the landfill property. The Department of the Navy is responsible for long term monitoring of the landfill. The purpose of the long term monitoring and maintenance activities at IRP Site 3 is to monitor the effectiveness of the landfill cap, drainage structures, landfill gas (LFG) and groundwater monitoring systems, LFG treatment systems (if necessary), site security features, and to document that the remedy components are performing as designed to protect human health and the environment. The long term monitoring and maintenance activities at IRP Site 3 is being performed pursuant to the requirements of the Final Record of Decision, Operable Unit 2C, Installation Restoration Program Landfill Sites 3 and 5, Former Marine Corps Station El Toro, California. Title 27 California Code of Regulations (CCR) §20950 and §21180, stipulates that landfills should be maintained and monitored for a period of not less than 30 years after completion of the

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closure construction or as long as wastes pose a threat to water quality. CERCLA requires that the effectiveness of the remedy be evaluated every five years so long as the future uses associated with the landfill remain restricted.

R01-5 The SEIR found that the Proposed Project would not have a significant impact on GHG emissions. It is unnecessary for the District to review an alternative site when the impact is not significant. The SEIR found that the GHG impact was not significant and the project is consistent with South Coast Air Quality Management District's most recent target efficiency threshold and the project is consistent with AB 32.

R01-6 Placement of high school at the currently proposed site would reduce travel distances relative to the conditions in the 2011 Certified EIR. The District has not reviewed Site B at this point and is not required to for the purposes of this CEQA document.

The District plans an open campus like all of its other high school campuses. Detailed plans for future development are not yet available that would allow the District to review precise locations of where students may travel for lunch. However, the City has undergone years of study and planning to ensure that its road network is safe for pedestrians and bicyclists as well as motor vehicles. The City and District are continuing their process to ensure that the specific sidewalks, crosswalks, signage, etc., around the immediate vicinity of the campus provide for safe travel. Further, the District is committed to develop a Safe Routes to School plan for this campus.

R01-7 The statement that the SEIR fails to address the competing demands for road space by school and jail traffic is incorrect. The traffic analysis contained in the 2011 Certified EIR, the 2012 Modified Project EIR and this SEIR have all incorporated the expansion of the James A. Musick Facility.

R01-8 Both the 2011 Approved Project and 2012 Modified Project conservatively estimated traffic impacts from the Musick Facility expansion. The assumed baseline condition for the Musick Facility Expansion for the futures years were 2,060 trips for interim year 2015 and 5,460 trips for year 2030, accounting for an increase of up to 1,024 beds for the interim year and maximum of 7,584 beds at buildout. However, according to the Memorandum of Understanding between the Orange County Board of Supervisors and the City of Lake Forest, the maximum inmate capacity is not anticipated to exceed 3,100 inmates. And the County Supervisors so far has approved construction of additional 896 beds. Therefore, the Proposed Project has adequately analyzed the cumulative traffic impacts of the Musick Facility expansion and no adverse impacts are anticipated.

As explained in the DSEIR, the issues raised concerning the proximity of the High School site to the the James A. Musick Facility are not CEQA issues, meaning they are not issues related to the potential impacts of the project on the environment. These are issues relevant to the California Department of Education's review of the site and additional information relevant to this topic will be presented to the Board of Education for its deliberation.

## 2. Response to Comments

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## 3. Revisions to the Draft SEIR

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### 3.1 INTRODUCTION

This section contains revisions to the DSEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DSEIR publication; and/or (3) typographical errors. This section also includes revised mitigation measures to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the DSEIR. The provision of the revised mitigation measures does not alter any impact significance conclusions as disclosed in the DSEIR. Changes made to the DSEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

### 3.2 DSEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the DEIR.

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Page 1-7, Section 1.3 Project Location. The following text has been revised in response to Comment A04-1.

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The City of Irvine is divided into ~~51 different~~ multiple Planning Areas and the Orange County Great Park encompasses PA 30 and PA 51 as shown in Figure 3-1.

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Page 1-7, Section 1.3 Project Location. The following text has been revised in response to Comment A04-1.

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The Great Park Neighborhoods development is owned by ~~is also known as the~~ Heritage Fields El Toro, LLC ~~Development.~~

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Page 2-7, Section 2.4 Incorporation By Reference. The following text has been revised in response to Comment A04-4.

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~~All of the documents listed in Chapter 13, as well as~~ †The aforementioned certified EIR documents including the 2003 OCGP EIR, 2011 OCGP SEIR, and eight addenda that are incorporated by reference, ~~are available~~ for review at:

City of Irvine Community Development Department  
One Civic Center Plaza  
Irvine, CA 92623-9575  
Contact: Barry Curtis, Manager of Planning and Development Services at (949) 724-7453

### 3. Revisions to the Draft SEIR

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Page 3-2, Section 3.3, Project Background. The following text is added to the end of this section in response to general comments concerning surrounding land uses.

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Under the 2011 Approved Projects, residential tract maps have been approved by the City for District 7 (across Irvine Boulevard) and within District 4 to the north (along the south side of Irvine Boulevard. If the 2012 Modified Project is approved, single- and multi-family residential development would also be developed along the eastern and southern boundaries of the High School. Therefore, if the 2012 Modified Project is approved, the immediate surroundings of the High School would be residential and open space.

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Page 5.8-2, Section 5.8.1, Environmental Setting, Analysis Methodology. The following text has been revised based on the Revised Traffic Study included as Appendix A.

---

The project is scheduled for an opening year of 2016, however, per City requirements, the year 2017 is analyzed. The Interim Year 2017 analysis is presumed to occur after the project is complete and the school has been operating for approximately one year.

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Page 5.8-2, Section 5.8.1, Environmental Setting, Analysis Methodology, Footnote 1. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Existing: Year 2013
- Interim: Year 2017<sup>1</sup>
- Interim: Year 2035<sup>1</sup>
- Buildout: Post-2035<sup>1</sup>

<sup>1</sup>The City of Irvine's current traffic impact analysis guidelines require the analysis of the interim year, year 2035, and post year 2035 conditions. Because the city currently defines the interim year as 2017, the traffic analysis conducted an interim year analysis for the year 2017, which would occur after High School No. 5 opening year of 2016. Year 2017 baseline volumes were derived by applying a growth factor of 1.03 (equivalent to an annual growth rate of 1.5 percent over two years) to the Year 2015 volumes from the Heritage Fields Project 2012 – GPA/ZC Traffic Study for the 2011 Approved Project, 2012 Modified Project Option 1 and 2012 Modified Project Option 2 scenarios. Year 2035 and Post 2035 baseline volumes were derived by applying a growth factor of 1.0773 (equivalent to an annual growth rate of 1.5 percent over five years) to the Year 2030 and Post 2030 volumes from the 2012 Traffic Study. The Post-2035 volumes are assumed to be equivalent to the Post-2030 volumes from the 2012 Traffic Study.

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Page 5.8-7, Section 5.8.1, Environmental Setting, Existing Average Daily Traffic Volumes and Levels of Service. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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ADT volumes for the study area network are summarized in Table 5.8-3 and as shown all study area segments currently operate at LOS C or better. Year 2013 volumes were estimated by applying a growth factor equivalent to 1.5 percent per year to data obtained from the Heritage Fields Project 2012 – GPA/ZC Traffic Study.

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### 3. Revisions to the Draft SEIR

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Page 5.8-8, Section 5.8.1, Environmental Setting, Existing Peak Hour Intersection Levels of Service. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- ~~Bake Parkway and I-5 NB Ramps (#367)~~ Sand Canyon Avenue and I-5 SB Ramps (#305) - LOS “F”
- 

Page 5.8-19, Section 5.8.5.2 Existing Year 2013, Intersection Analysis, 2011 Approved Project. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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All study area intersections are calculated to operate at LOS C or better under 2013 with project conditions with the exception of ~~Bake Parkway and I-5 NB Ramps~~ Sand Canyon Avenue and I-5 SB Ramps, which operates at a deficient LOS F during the PM peak hour with and without the project.

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Page 5.8-35, Section 5.8.5.2 Existing Year 2013, Intersection Analysis, Modified Project Option 1. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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As seen in Tables 5.8-8a and b, all study area intersections are calculated to operate at LOS C or better under 2013 with project conditions with the exception of ~~Bake Parkway and I-5 NB Ramps~~ Sand Canyon Avenue and I-5 SB Ramps, which operates at LOS F during the PM peak hour without the project. There are no project impacts under the year 2013 scenarios.

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Pages 5.8-36 and 37, Section 5.8.5.2 Existing Year 2013, Intersection Analysis, Modified Project Option 2. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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As seen in Tables 5.8-9a and b, all study area intersections are calculated to operate at LOS D or better under 2013 with project conditions with the exception of ~~Bake Parkway and I-5 NB Ramps~~ Sand Canyon Avenue and I-5 SB Ramps, which operates at LOS F during the PM peak hour without the project. There are no project impacts under the year 2013 scenarios.

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Pages 5.8-47, Section 5.8.5.3 Year 2017, Arterial Analysis – All Scenarios. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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#### 2011 Approved Project

- Irvine Boulevard: “LQ” St to Alton Parkway (#800) - LOS ~~F~~ E

#### 2012 Modified Project Options 1 and 2

- Irvine Boulevard: “B” Street to “LQ” Street – LOS F
- Irvine Boulevard: “LQ” Street to Alton Parkway – LOS F

### 3. Revisions to the Draft SEIR

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Pages 5.8-47, Section 5.8.5.3 Year 2017, Intersection Analysis, 2011 Approved Project. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Sand Canyon Avenue and SB I-5 Ramps (#305) - LOS E (AM)
- Sand Canyon Avenue and Oak Canyon Road (#306) - LOS E (PM)

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Pages 5.8-51, Section 5.8.5.3, Year 2017, Intersection Analysis, 2012 Modified Project Option 1. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Sand Canyon Avenue and SB I-5 Ramps (#305) - LOS E (AM)
- Sand Canyon Avenue and Oak Canyon Road (#306) - LOS E (PM)

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Pages 5.8-55, Section 5.8.5.3, Year 2017, Intersection Analysis, 2012 Modified Project Option 2. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Sand Canyon Avenue and SB I-5 Ramps (#305) - LOS E (AM)
- Sand Canyon Avenue and Oak Canyon Road (#306) - LOS E (PM)

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Pages 5.8-60, Section 5.8.5.4 Year 2035, Arterial Analysis – All Scenarios. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Irvine Boulevard: “Z” St to “B” St - LOS F
- Irvine Boulevard: “LQ” St to Alton Parkway - LOS F
- Irvine Boulevard: “LY” Street to “Z” St - LOS E
- Irvine Boulevard: “B” Street to “LQ” St - LOS F
- Trabuco Road : SR-133 to “O” – LOS F

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Pages 5.8-60, Section 5.8.5.4 Year 2035, Intersection Analysis, 2011 Approved Project. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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This scenario has ~~one~~ two project impacts at the intersections of “LQ” Street and Irvine Boulevard (#800) and SR-133 NB Ramps and Irvine Boulevard (#317):

- Sand Canyon Avenue and I-5 NB Ramps (#303) - LOS E (~~AM~~) and LOS F (PM)
- Sand Canyon Avenue and I-5 SB Ramps (#305) - LOS F (AM)
- Sand Canyon Avenue and Oak Canyon Road (#306) - LOS E (AM)
- “A-02” Street/”LQ” Street and Irvine Boulevard (#800) - LOS E (AM)
- SR-133 NB Ramps and Irvine Boulevard (#317) – LOS E (AM)

### 3. Revisions to the Draft SEIR

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Pages 5.8-89, Section 5.8.5.4 Year 2035, Intersection Analysis, 2012 Modified Project Option 1. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Sand Canyon Avenue and I-5 NB Ramps (#303) - LOS E ~~(AM)~~ and LOS F (PM)
  - Sand Canyon Avenue and I-5 SB Ramps (#305) - LOS F (AM) and LOS E (PM)
- 

Pages 5.8-93, Section 5.8.5.4 Year 2035, Intersection Analysis, 2012 Modified Project Option 2. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Sand Canyon Avenue and I-5 NB Ramps (#303) - LOS E ~~(AM)~~ and LOS F (PM)
  - Sand Canyon Avenue and I-5 SB Ramps (#305) - LOS F (AM) and LOS E (PM)
- 

Pages 5.8-98, Section 5.8.5.5 Post 2035, Approved Project, Arterial Analysis. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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Post-2035 With Project deficient segment locations under 2011 Approved Project scenario includes these ~~five~~ seven segments:

- Sand Canyon Ave: Portola Pkwy to Irvine Blvd - LOS E
  - Sand Canyon Ave: Trabuco Rd to Marine Way - LOS E
  - Portola Pkwy: Jeffrey Rd to Sand Canyon Ave - LOS E
  - Irvine Boulevard: “Z” St to “B” St - LOS E
  - Irvine Boulevard: “LQ” St to Alton Parkway - LOS F
  - Irvine Boulevard: “B” Street to “LQ” Street – LOS E
  - Trabuco Road: SR-133 Freeway to “O” Street – LOS F
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Pages 5.8-107, Section 5.8.5.5 Post 2035, 2011 Approved Project, Intersection Analysis. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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This scenario has ~~one~~ two project impacts at the intersections of “LQ” Street and Irvine Boulevard (#800) and SR-133 NB Ramps and Irvine Boulevard (#317):

- Sand Canyon Avenue and I-5 NB Ramps (#303) - LOS E ~~(AM)~~ and LOS F (PM)
  - Sand Canyon Avenue and I-5 SB Ramps (#305) - LOS F (AM) and LOS E (PM)
  - Sand Canyon Avenue and Oak Canyon Road (#306) - LOS E (AM)
  - “A-02” Street/”LQ” Street and Irvine Boulevard (#800) - LOS E (AM)
  - SR-133 NB Ramps and Irvine Boulevard (#317) – LOS E (AM)
- 

Pages 5.8-112, Section 5.8.5.5 Post 2035, 2012 Modified Project Option 1, Arterial Analysis. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Sand Canyon Ave: Trabuco Rd to Marine Way - LOS E

### 3. Revisions to the Draft SEIR

- Portola Pkwy: Jeffrey Rd to Sand Canyon Ave - LOS E
  - Irvine Boulevard: “Z” St to “B” St - LOS E
  - Irvine Boulevard: “LQ” St to Alton Parkway - LOS F
  - Irvine Boulevard: “B” Street to “LQ” Street – LOS E
  - Trabuco Road: SR-133 Freeway to “O” Street – LOS F
- 

Pages 5.8-112, Section 5.8.5.5 Post 2035, 2012 Modified Project Option 1, Intersection Analysis. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Sand Canyon Avenue and I-5 SB Ramps (#305) - LOS F (AM) and LOS E (PM)
- 

Pages 5.8-125, Section 5.8.5.5 Post 2035, 2012 Modified Project Option 2, Arterial Analysis. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Sand Canyon Ave: Trabuco Rd to Marine Way - LOS E
  - Portola Pkwy: Jeffrey Rd to Sand Canyon Ave - LOS E
  - Irvine Boulevard: “Z” St to “B” St - LOS E
  - Irvine Boulevard: “LQ” St to Alton Parkway - LOS F
  - Irvine Boulevard: “B” Street to “LQ” Street – LOS E
  - Trabuco Road: SR-133 Freeway to “O” Street – LOS F
- 

Pages 5.8-125, Section 5.8.5.5 Post 2035, 2012 Modified Project Option 2, Intersection Analysis. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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- Sand Canyon Avenue and I-5 SB Ramps (#305) - LOS F (AM) and LOS E (PM)
- 

Pages 5.8-130, Section 5.8.5.6 Signal Analysis. The following text has been revised based on the Revised Traffic Study included as Appendix A.

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Based on the forecast volumes, the intersections of “B” Street & Irvine Boulevard (#563) and “LQ” Street & Irvine Boulevard (#800) satisfy the criteria for the peak hour signal warrant, and will be signalized as part of the project traffic signals are not warranted at all unsignalized study intersections and site access driveways for all analysis scenarios. Traffic signals are not warranted at any of the other unsignalized study intersections and site access driveways scenarios in the Opening Year and Year 2017.

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Pages 5.8-150, Section 5.8.9 Additional Mitigation for High School No. 5, Impact 5.8.1. The following mitigation measure has been revised based on the Revised Traffic Study included as Appendix A.

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### 3. Revisions to the Draft SEIR

#### Impact 5.8-1

T-1 The following additional roadway improvement is required beyond those required for 2011 Approved Project as a result of changes to the traffic generation rates, high school trip distribution and analysis years relative to the 2012 Modified Project SSEIR, as requested by the City of Irvine. The District shall work with the City and Heritage Fields to reconcile any differences between this assessment and the Heritage Fields SSEIR data set. Final mitigation may be modified prior to certification of the Final SEIR, so long as adequate levels of service are maintained in accordance with the City's adopted thresholds.

#### Year 2035 - 2011 Approved Project

- Add northbound left turn lane, resulting in dual –northbound left-turn lanes at “LQ” Street and Irvine Boulevard (#800)
- Reconfigure west leg of intersection to allow a third eastbound thru-lane at SR-133 NB Ramps and Irvine Boulevard (#317)

#### Post-2035 - 2011 Approved Project

- Add northbound left turn lane, resulting in dual –northbound left-turn lanes at “LQ” Street and Irvine Boulevard (#800)
- Reconfigure west leg of intersection to allow a third eastbound thru-lane at SR-133 NB

### 3. Revisions to the Draft SEIR

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## Appendix A. Revised Traffic Study

## Appendix

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