FINAL

Prepared For:

William S. Hart Union
High School District
21380 Centre Point Parkway
Santa Clarita, CA 91350

Castaic High School

Supplemental Environmental Impact Report

SCH No. 2004031110

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JULY 2014

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Castaic High School

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21380 Centre Point Parkway
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Prepared by:

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860 Hampshire Road, Suite P
Westlake Village, California 91361

July 2014

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1.0 INTRODUCTION

This Final Supplemental Environmental Impact Report (EIR) has been prepared by the William S. Hart Union (District) to evaluate modifications to the previously approved Castaic High School Project (referred to herein as the "Approved Project"). The Approved Project consists of the 198-acre "School Site," which includes the 58-acre site for development of the high school campus. In addition, the Approved Project provides for the grading and construction of other facilities on the School Site (such as water tanks, helipad, debris basins, and perimeter road), and grading and construction of access roads. The District's Governing Board ("Board") certified the Castaic High School Final EIR (referred to herein as the "certified EIR"; State Clearinghouse No. 2004031110) on October 17, 2012.

This Supplemental EIR evaluates modifications to the Approved Project to determine whether they would result in new or substantially more severe significant environmental impacts as compared with the impacts disclosed in the previously certified EIR.

As presented in the previously certified EIR, the Approved Project consists of the School Site, which includes a 58-acre campus for a comprehensive high school with approximately 250,000 square feet of building area, including several classroom buildings, a library, a performing arts building, a multipurpose building, a physical education building with gymnasium, and an administrative building. Athletic facilities would include a 5,000-seat football/soccer stadium with a running track, tennis courts, basketball courts, baseball and softball fields, and other play fields. The stadium and other fields would have nighttime lighting for evening sports events. The Approved Project proposes 868 parking spaces at the School Site.

As such, as Lead Agency, the District determined that as a result of new information and changes in the Approved Project's conditions, a Supplemental EIR would be required to determine whether the Approved Project, as modified, would result in new significant impacts, or if identified significant impacts as disclosed in the previously verified EIR would be reduced or eliminated.

The District is acting as Lead Agency for the environmental review of this Project pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.) and in accordance with the *Guidelines for the Implementation of the California Environmental Quality Act* (California Code of Regulations, Title 14, Section 15000 et seq.) because the District has the principal responsibility for approving changes to the Approved Project.

The District, as the Lead Agency for this proposal, is required by State *CEQA Guidelines* Section 15089 to prepare a Final Supplemental EIR. The Final Supplemental EIR will be used by the District as part of its

decision-making process, including determining appropriate conditions for changes to the Approved Project and incorporating measures into the Approved Project to mitigate significant environmental impacts.

The following documents were utilized during preparation of this Supplemental EIR and are incorporated into this document by reference. These documents are available for review at the William S. Hart Union High School District, 21515 Center Point Parkway, Santa Clarita, California, 91350.

- *Final Environmental Impact Report for the Castaic High School*, SCH No. 2004031110, prepared for the William S. Hart Union High School District, October 2012
- *Findings of Fact and Statement of Overriding Considerations*, Castaic High School
- *Mitigation Monitoring Program for Castaic High School*, prepared for the William S. Hart Union High School District, October 2012
- *Addendum to the Castaic High School Final Environmental Impact Report*, approved and adopted July 17, 2013

As discussed in the previously certified EIR, the Approved Project was determined to have no impact or less than a significant impact with regard to the following environmental topics:

- Agricultural Resources
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

The previously certified EIR established that, with mitigation incorporated, the Approved Project would result in less-than-significant impacts related to the following environmental impact areas:

- Biological Resources
- Cultural Resources

- Geology and Soils

The previously certified EIR established that the Approved Project would result in significant and unavoidable impacts with regard to the following environmental impact areas:

- Aesthetics
- Air Quality
- Noise
- Transportation and Traffic

CEQA requires a comparative evaluation of a project and alternatives to the project, including the "No Project" alternative. The previously certified EIR addressed a reasonable range of alternatives for the Approved

Project. There is no new information indicating that an alternative that was previously rejected as infeasible is in fact feasible, or that a considerably different alternative than those previously studied would substantially reduce one or more significant effects on the environment.

This Supplemental EIR evaluates whether the Approved Project, as modified, would result in new or substantially more severe significant environmental impacts compared to the impacts disclosed in the previously certified EIR, or if identified significant impacts as disclosed in the previously certified EIR would be reduced or eliminated.

Based on the modifications to the Approved Project, the District determined this Supplemental EIR should assess the following environmental topics, which are affected by the changes:

- Air Quality and Greenhouse Gas Emissions
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality

1.1 SUMMARY OF THE REVIEW PROCESS

The District released the Draft Supplemental EIR for a 45-day public review period beginning April 4, 2014, and ending on May 19, 2014.

This Notice of Availability of the Draft Supplemental EIR for review was available to the general public for review at the following locations:

- William S. Hart Union High School District, 21380 Centre Pointe Parkway, Santa Clarita, CA 91350
- Valencia Public Library, 23743 West Valencia Blvd., Valencia, CA 91355
- Castaic Public Library, 27971 Sloan Canyon Road, Castaic, CA 91384
- Stevenson Ranch Express Library, 26233 West Faulkner Drive, Stevenson Ranch, CA 91381
- Sloan Canyon Christian Academy, 28355 Sloan Canyon Road, Castaic, CA 91384

Following the completion of the review period for the Draft Supplemental EIR, the District prepared this Final Supplemental EIR as required by Section 15089 of the State *CEQA Guidelines*. The Final Supplemental EIR consists of comments received by the District during the 45-day public comment period, responses to those comments, and the January 2014 Draft Supplemental EIR, which has been updated to reflect new information, corrections, and changes based on the comments received (Volume II). Note that this Final Supplemental EIR incorporates the revised Draft Supplemental EIR by reference, and a disc containing the revised Draft Supplemental EIR is attached to this Final Supplemental EIR on the inside back cover.

As required by the State *CEQA Guidelines* Section 15088(b), the District has provided copies of this Final Supplemental EIR to each public agency that submitted comments on the Draft Supplemental EIR. The Final Supplemental EIR and revised Draft Supplemental EIR are also available for review at the following location:

William S. Hart High School District
21380 Centre Pointe Parkway
Santa Clarita, California 91350

In addition, the Final Supplemental EIR and Draft Supplemental EIR are available on the District's website at www.hartdistrict.org/castaic.

1.2 ORGANIZATION OF FINAL SUPPLEMENTAL EIR

As required by State *CEQA Guidelines* Section 15132, the Supplemental EIR consists of the following elements:

- A list of persons, organizations, and public agencies commenting on the Draft Supplemental EIR (see **Section 2.0**)
- Comments received on the Draft Supplemental EIR (see **Section 2.0**)
- Responses to significant environmental points raised in the review and consultation process (see **Section 2.0**)
- A Mitigation Monitoring and Reporting Program (MMRP), inclusive of revisions following the publication of the Draft Supplemental EIR (attached to this document as **Appendix 1.0**)
- A revision of the Draft Supplemental EIR (**Volume II**). The Draft Supplemental EIR has been revised pursuant to the response to the comments identified in Section 2 of this Supplemental EIR. As such, the changes to the updated Draft Supplemental EIR use ~~strikethrough~~ and double underline format (not Track Changes) to reflect all changes made.

1.3 DECISION-MAKING PROCESS

The District is the Lead Agency for this Supplemental EIR because it has the principal responsibility for approving changes to the Approved Project. The District will use the Supplemental EIR in its decision-making process to consider the environmental effects of the changes to the Approved Project. The State *CEQA Guidelines* require that the District certify the following prior to considering approving changes to of the Approved Project:

- The Supplemental EIR has been completed in compliance with CEQA.
- The Supplemental EIR was presented to the District in a public meeting and the District reviewed and considered the information contained in the Supplemental EIR prior to considering changes to the Approved Project.
- The Supplemental EIR reflects the District's independent judgment and analysis (State *CEQA Guidelines* Section 15090).

The District is also required by the State *CEQA Guidelines* Section 15091 to prepare and adopt one or more written findings of fact for each significant environmental impact identified in the Supplemental EIR. The possible findings are:

- Changes or alterations to the Approved Project are required, which will substantially lessen or avoid the significant impacts identified in the Supplemental EIR.

- These changes or alterations are within the responsibility and jurisdiction of another public agency and not the District and these changes have been adopted, or can and should be adopted, by such other agency.

- Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Supplemental EIR.

After considering the Supplemental EIR and these required findings, the District will consider whether to approve the changes to the Approved Project. For any remaining significant impacts, the District may determine these impacts are acceptable due to overriding considerations identified in a Statement of Overriding Considerations, as defined in the *State CEQA Guidelines* Section 15093.

2.0 RESPONSES TO COMMENTS

RESPONSE TO COMMENTS

This section provides copies of the comments submitted on the Draft Supplemental EIR. Each comment set is immediately followed by the corresponding responses.

The District received a total of eight comment letters from state agencies, local agencies, organizations, and the public. **Table 2.0-1, List of Comment Letters,** lists all comments and shows the comment set identification number for each letter.

Table 2.0-1
List of Comment Letters

Agency/Entity/Individual	Name of Commenter	Date of Comment	Draft Supplemental EIR Comment Letter No.
Newhall County Water District (NCWD)	Stephen L. Cole, General Manager	April 10, 2014	1
Castaic Lake Water Agency (CLWA)	Dan Masnada, General Manager	April 11, 2014	2
Denise Martin	Self	April 14, 2014	3
County of Los Angeles Fire Department (LACoFD)	Frank Vidales, Chief, Forestry Division, Prevention Services Bureau	April 29, 2014	4
Dean & Sherry Paradise	Self	May 10, 2014	5
County of Los Angeles Department of Public Works (LACDPW)	Anthony E. Nyivih, Assistant Deputy Director, Land Development Division	May 15, 2014	6
California Department of Fish & Wildlife (CDFW)	Betty Courtney, Environmental Program manager I, South Coast Region	May 27, 2014	7
Governor's Office of Planning and Research (OPR), State Clearinghouse	Scott Morgan, Director	May 28, 2014	8

NEWHALL COUNTY WATER DISTRICT
23780 North Pine Street • P.O. Box 220970 • Santa Clarita, CA 91322-0970
(661) 259-3610 Phone • (661) 259-9673 Fax • email: mail@ncwd.org

Directors: B. J. ATKINS, *President* MARIA GUTZEIT, *Vice President* KATHY COLLEY DANIEL MORTENSEN LYNNE A. PLAMBECK

April 10, 2014

Benjamin Rodriguez
William S. Hart Union High School District
21515 Centre Pointe Parkway
Santa Clarita, California 91350

Re: Water Service Availability

- Property Location: Castaic High School, Assessor Parcel Nos. 3247-068-001, 3247-068-002, 3247-068-003, 3247-068-004

The above-referenced development (the "Development") located in Castaic California, may lie within the service area of Newhall County Water District (the "District"). The District is prepared to provide water service to the Development subject to the following conditions and reservations:

1. Developer shall submit to the District all plans, designs, and fire department requirements for the Development in order that the District may design the necessary water system facilities required for the Development in accordance with the District's Rules and Regulations; or, at the District's option, the water system may be designed by Developer, subject to District's review and approval. 1-1

2. Developer shall, in accordance with the District's Rules and Regulations, and any required Water Service Agreement, pay all required fees and charges, including any required deposit amount in order to process plans, design and complete construction of required on-site and off-site improvements. 1-2

3. Developer shall grant the District any and all easements and, if necessary, sites for facilities required for water service, together with a policy of title insurance, satisfactory to the District, guaranteeing the District's title to such easements and sites. 1-3

4. Developer shall comply with all of the District's Rules and Regulations as those Rules and Regulations may be amended from time to time. 1-4

5. Developer acknowledges that water service to the Development shall be subject to availability of water. In relying upon this representation to provide water service, Developer is aware of the restrictions contained herein and the reliance of the District on groundwater and water supplied by the State Water Project. While there is currently no prohibition against establishing additional connections, the District has the authority to reduce and restrict service connections. Developer further acknowledges that this letter does not constitute any guarantee that, at the time of connection, water service will be available for the 1-5

Established in 1953

Development and, further, that District does not guarantee any specific quantities, pressures or flows with respect to water service. 1-5

6. This water service letter is exclusive to the Development and number of units described above and may not transferred or assigned to any other person or for any other purpose without the District's written consent. 1-6

7. Provision of water service is contingent upon the Development meeting the requirements of any other governmental entity having jurisdiction over the Development. 1-7

8. This letter and any representations made herein shall be null and void twelve (12) months from the date hereof. Developer shall not be entitled to any additional water connections for the Development on and after the expiration date of this letter. 1-8

9. At any time prior to connection and upon a finding by the District's Board of Directors that the District is unable to serve the Development pursuant to the District's Rules and Regulations, the District may revoke this letter. 1-9

10. Developer, for itself and on behalf of its successors, agrees to defend, at Developer's expense, any action brought against the District, or its agents, officers, directors, or employees, because of the issuance of any approvals or authorizations obtained herein. Developer agrees to reimburse the District for any costs, fees or expenses the District may incur as a result of any such legal action. Developer further agrees that in conducting the defense of such action, District shall be entitled to engage its own attorneys, the expense of which shall be paid by Developer. 1-10

11. Water supply availability is further conditioned expressly upon the Development being located within the boundaries of the District and effective completion of the annexation of the Development, or any portion thereof which is not now within the boundaries of Newhall County Water District, may be required. 1-11

12. Those portions of the Development located outside of the boundaries of the Castaic Lake Water Agency (CLWA) must be annexed to CLWA prior to becoming eligible for service with State Water Project water. CLWA should be contacted independently of the District for the most recent information regarding CLWA annexation requirements. 1-12

Sincerely,

NEWHALL COUNTY WATER DISTRICT

Stephen L. Cole
General Manager

RESPONSE TO LETTER 1: Newhall County Water District (NCWD), dated April 10, 2014

1-1 The comment states that the school district (as developer) shall submit to NCWD all plans, designs, and fire department requirements for the development in order that the NCWD may design the necessary water system facilities required for the Project in accordance with the NCWD's Rules and Regulations.

The District will submit necessary plans, designs, and fire department requirements as necessary to allow NCWD to complete the design of necessary water system facilities.

1-2 The comment notes that the school district (as developer) shall pay all required fees and charges, including any required deposit amount to process plans, design and complete construction of required on-site and off-site improvements.

The District will pay the normal fees and charges required of public agencies to process the necessary plans, and provide for the design and construction of on and off site improvements.

1-3 This comment states that the school district (as developer) shall grant NCWD any and all easements and, if necessary, sites for facilities required for water service, together with a policy of title insurance, satisfactory to NCWD, guaranteeing the NCWD's title to such easements and sites.

As required, the District will provide easements to NCWD for sites and facilities required for water service.

1-4 The comment states that the school district (as developer) comply with all of the NCWD's Rules and Regulations as those Rules and Regulations may be amended from time to time.

The District will comply with NCWD's Rules and Regulations as they apply to school districts and public agencies.

1-5 The comment states that the school district (as developer) should acknowledge that water service to the Project shall be subject to availability of water. Furthermore, the school district should acknowledge that this letter does not constitute any guarantee that water service will be available for the Project at the time of connection, nor does the NCWD guarantee any specific quantities, pressures, or flows with respect to water service.

The District understands that water service is based on the availability of water. Further, the District will work with NCWD to conserve water.

1-6 The comment states that the water service is exclusive to this Project and cannot be transferred or assigned to any other person or for any other purposed without the NCWD's consent.

The District understands that water service is exclusive to this Project and cannot be transferred or assigned to any other person or for any other purpose without the NCWD's consent.

1-7 The comment states the provision of the water service is contingent upon the Project meeting the requirements of any other governmental entity having jurisdiction over the Project.

The Project is subject to review by numerous State and local agencies. The District is diligently working with all required agencies to meet the approval requirements.

1-8 The comment states that the comments made by NCWD and representations therein are valid twelve (12) months from the date it was issued. The school district will not be entitled to any additional water connections on or after the expiration date.

The District understands that NCWD's comments are somewhat time sensitive, and the District is proceeding with the Project in a timely manner. The District understands that future changes in water supply may affect NCWD's comments.

1-9 The comment states that at any time prior to connection and upon a finding by the NCWD's Board of Directors that NCWD is unable to serve the Project pursuant to the its Rules and Regulations, the District may revoke this letter.

The District understands that if prior to connect circumstance regarding NCWD's ability to provide water, that it may not be able to serve the Project.

1-10 The comment states that the school district (as developer) agrees to defend any action brought against NCWD because of the issuance of any approvals or authorizations obtained herein. It further states that the school district shall agree to reimburse NCWD for any costs that may incur as a result of any legal action. Additionally, NCWD shall have the right to engage its own attorneys, the expense of which shall be paid by the school district.

The District understands that both it and NCWD are public agencies, and agrees to work with NCWD in resolving any disputes in accordance with state law.

1-11 The comment states that water supply availability conditioned expressly upon the Project being located within the boundaries of NCWD and effective completion of the annexation of the

Project site, or any portion thereof which is not now within the boundaries of NCWD, may be required.

As noted in the previously certified EIR (see Section 5.15.1, Water Service), the District has submitted an application to annex the School Site into the NCWD (Application for Reorganization No. 2013-01), and it is expected that NCWD would be the retail water provider for the proposed project.

1-12 The comment states that the portions of Project located outside of the boundaries of the Castaic Lake Water Agency (CLWA) must be annexed to CLWA prior to becoming eligible for service with State Water Project (SWP) water.

As noted on the latest (2010) CLWA "District and Division Boundaries Map" (see http://clwa.org/wp-content/uploads/2011/07/Division-Boundaries-Map.pdf), the School Site is located in CLWA's service area (Division 3) and does not require annexation.

April 11, 2014

Mr. Ben Rodriguez
Chief Operations Officer
William S. Hart School District
21380 Centre Point Parkway
Santa Clarita, California 91350

Re: Castaic Lake Water Agency Comments on the William S. Hart School District's (District) Supplemental Draft Environmental Impact Report for the Castaic High School Project (SCH No. 2004031110)

Dear Mr. Rodriguez:

The Castaic Lake Water Agency (CLWA) is the provider of imported water to the Santa Clarita Valley. The CLWA service area covers the proposed Project site and the Project's water retailer will be the Newhall County Water District (NCWD). In the opinion of CLWA, the ongoing drought in the State of California, as declared by the Governor on January 17, 2014, represents a set of changed circumstances relative to certification of the original EIR and its addendum that should be addressed in the Supplemental EIR. CLWA has reviewed the Supplemental Draft Environmental Impact Report (EIR) and submits the following comments:

UTILITY AND SERVICE SYSTEMS

The discussion of Water Service in the EIR will need to address the following potential impacts:

A. NEED FOR PAYMENT OF CASTAIC LAKE WATER AGENCY'S FACILITY AND CONNECTION FEES

The Project will use imported water from CLWA as a source of annual supply. The project's potable system will be connected to the NCWD potable water system, which will be supplied imported water to supplement groundwater supplies from NCWD. The other users of these supplies in the CLWA service area have paid for their share of costs by paying Facility Capacity Fees.

The failure of the Project to pay Facility Connection fees to the CLWA could result in the underfunding of imported water infrastructure within the CLWA service area. Avoidance of paying the Project's fair share of infrastructure costs could result in the inability of CLWA to fully fund capital and operations costs and thereby compromise CLWA's ability to serve potable water throughout its service area and to meet the water supply goals of the 2010 Santa Clarita Valley Urban Water Management Plan.

Therefore, a mitigation measure is required by the California Environmental Quality Act in order to avoid a significant impact to water supplies by the Project. All of the project documents listing mitigation need to specifically state that the CLWA Facility Capacity Fees will be paid by the District prior to project construction. Only with the

2-1

"A PUBLIC AGENCY PROVIDING RELIABLE, QUALITY WATER AT A REASONABLE COST TO THE SANTA CLARITA VALLEY"
27234 BOUQUET CANYON ROAD • SANTA CLARITA, CALIFORNIA 91350-2173 • 661 297•1600 FAX 661 297•1611
website address: www.clwa.org

payment of these fees from the District to CLWA will the Project's direct and cumulative impacts to water supplies be reduced to less than significant. Recommended language for the mitigation measure is as follows:

> Prior to executing a contract for the construction or alteration of a public school building, the District shall pay Facility Capacity Fees to the Castaic Lake Water Agency (CLWA) in accordance with CLWA policies and procedures.

2-1

The EIR should confirm that the mitigation measure is needed for the reasons set forth above. In addition, the EIR should clarify that the mitigation measure will be adopted should the District approve the proposed Project and that the measure will be incorporated into the MMP and Conditions of Approval so that the measure is fully enforceable.

B. REQUIRED WATER EFFICIENCY MEASURES

The State of California enacted SB SB7x-7 in September 2009. The law requires that all water service providers demonstrate a ten percent reduction in per capita potable water use by 2015 and a twenty percent reduction by the year 2020. Both CLWA and the NCWD are required to comply with the law's requirements. It is critical that, if the CLWA and NCWD are to comply with the law and meet demand during droughts such as the current one, new development incorporate all of the reasonably feasible water efficiency measures applicable to the Project. This is critical, in part, due to existing development needing to extensively retrofit to help meet the goal whereas new development can incorporate water efficiency measures during design and construction. These water efficiency measures should be identified as part of Project design and other water efficiency measures that are not part of the Project design should be included as mitigation measures in the DEIR. Both the design features and mitigation measures should be conditions of approval for the project.

2-2

CLWA appreciates the efforts of the District and looks forward to an EIR that is responsive to the concerns raised. If you have any questions, please contact Jeff Ford, Principal Water Resources Planner, at (661) 513-1281, or by e-mail at jford@clwa.org.

Sincerely,

Dan Masnada
General Manager

cc: CLWA Board of Directors
Steve Cole, General Manager, NCWD

RESPONSE TO LETTER 2: Castaic Lake Water Agency (CLWA), dated April 11, 2014

2-1 The comment states that prior to the construction of the Project, the school district shall pay Facility Capacity Fees to CLWA in accordance with the CLWA policies and procedures.

The District will pay the normal fees and charges required of public agencies to process the necessary plans, and provide for the design and construction of on- and off-site improvements.

2-2 The comment states that for the CLWA and NCWD to comply with efficiency standards, the Project must incorporate water efficiency measures during design and construction.

The Project has incorporated numerous water efficiency features as part of its design, and will incorporate Best Management Practices (BMPs) to reduce and conserve water use during construction.

Ben

>>> Denise Martin <denise.martin@centric.com> 5/14/2014 5:53 PM >>>
Hello Mr. Rodriguez,

The deadline for comments back to you on the latest Castaic High School report is tomorrow.

I have not heard back from you regarding my submission below. I have also contacted you personally and
left messages - no response.

Therefore, I am sending you this email again today.

Please acknowledge receipt.

Thank you,

Denise Martin

First sent to you April 14, 2014 -
Dear Mr. Rodriguez,

This is in response to the EIR report dated April 4, 2014.

My name is Denise Martin. Although I have never corresponded with you before, I have been in many discussions regarding this high school project location since it's inception with the developer's team, your colleagues and many others - for years now.

Although I appreciate the recent mitigation efforts set forth by Citizens For Castaic, your colleagues and yourself, I still find that one section of the EIR report remains unacceptable - 5.0 Significant Environmental Effects That Cannot Be Avoided If The Approved Project Is Implemented.

I live on Meadowgrass Dr. in the Encore/Bravo homes above the intersection of Sloan Canyon Rd. and Quail Valley Rd.

The horrendous impact to the traffic and noise alone, not to mention all the other problems associated with living near and in the path of a high school are unacceptable to many of us who bought homes in this area. I am referencing not only my neighborhood, but also our neighbors that live off of Parker Rd., Lake Hughes Rd., Sloan Canyon Rd. and Romero Canyon Rd. Many of us are long time residents. 3-1

Before I bought my house, I did extensive research on land uses, permits, zoning and also met with the then President of the Castaic Town Council to ensure that this sort of project (high school) would not be approved in this area. There were plans to build out Sloan Canyon Rd., but only to accommodate planned housing. Obviously, if I was given any indication that a high school would be built here, I would not have elected to buy this house. It was not my desire to live near a high school for reasons that I think are pretty apparent to most people. And, I am very aware of housing markets, etc. and know that this site selection has the potential to substantially devalue my house and others in this area should we chose to relocate because of this proposed high school location. 3-2

Over the years, there were other more appropriate high school sites that would have had far less negative impact to the environment and the Castaic residents in this area than this one. Some of the sites considered were strategically identified as being in or very close to the new larger neighborhoods that were built in Castaic that brought the residents that necessitated the need/desire to have a high school built in the first place.

3-3

Given all the significant irrevocable impacts clearly noted in the recent updated EIR that will remain, what can you tell me and my neighbors that would make this situation more palatable for us? We will deal with these significant issues every day. How is this right and fair to us? And, last but certainly not least, how can a project of this magnitude be approved knowing full well that these problems exist and cannot be mitigated?

3-4

I would appreciate acknowledgement of this correspondence.

Thank you,

Denise Martin

RESPONSE TO LETTER 3: Denise Martin, dated April 14, 2014

3-1 The comment states that the traffic, noise, and living near a high school are unacceptable impacts to local residents.

The District understands the traffic, noise and other environmental impacts associated with living near a high school may affect surrounding residents. As such, the District has completed an environmental impact report in accordance with the California Environmental Quality Act (CEQA). The District certified the initial EIR in October 2012 for the Approved Project. Subsequent to that, the District has completed this Supplemental EIR to address potential impacts associated with changes to the Approved Project.

As required in the State *CEQA Guidelines* Section 15126.4, both the certified and Supplemental EIRs identify feasible measures that could minimize significant adverse impacts. Further, as part of the EIR process, the district adopted a Mitigation Monitoring Reporting Program (MMRP) to ensure that the mitigation measures are implemented.

Even though the District identified mitigation measures to reduce impacts, it recognized that certain impacts cannot be reduced to a less-than-significant level even with mitigation, and as such adopted a statement of overriding considerations in accordance with Section 15093 of the *State CEQA Guidelines* noting that benefits of the Approved Project outweigh the unavoidable environmental risks.

3-2 The comment notes that the commenter has no desire to live near a high school and that this site selection has the potential to substantially devalue her home due to the construction of the Project.

The comment is noted. The comment offers no information on the environmental concerns related to the Approved Project.

3-3 The comment states that the location of the proposed high school would be more appropriate in larger, newer neighborhoods where a high school would be more useful to its local residents.

The District has completed an extensive site selection process that evaluated numerous site and locations. As discussed in the previously certified EIR (see Section 7, Alternatives), the District has conducted an exhaustive search for a high school site to serve the Castaic area.

The District certified an EIR on February 6, 2005, evaluating a potential high school site within the NorthLake Specific Plan area. The site lies in an unincorporated area of Los Angeles County,

north of the community of Castaic, west of Castaic Lake State Recreation Area, east of the Golden State Freeway (Interstate 5), and adjacent to a portion of the eastern boundary of the previously approved *Northlake Specific Plan* area. The EIR certified in 2005 explored eight alternative locations for the proposed high school in the Castaic area. These sites included Sterling Canyon, the Palmer site, the Sterling Industrial site, the Hasley/Del Valle site, the Lombardi site north of Hasley Canyon Road and east of Sloan Canyon Road, Romero Canyon, the Charlie Canyon/Tapia Canyon site, and the Hasley/Sloan site. Each site was evaluated for safety, location, environmental constraints, soils, topography, size and shape, accessibility, availability of public services and utilities, and cost. After presenting the sites to the Castaic Town Council, the District proceeded with a due diligence process on three sites: (1) NorthLake, (2) Hasley/Sloan, and (3) Hasley/Del Valle. The five remaining sites were eliminated from further consideration and would involve significantly greater environmental impacts than the three sites selected for further analysis. Development of the high school campus at NorthLake was dependent on the physical development of the NorthLake community to create access to the site. When the private development failed, the high school became infeasible and the search for a high school site began again.

On October 16, 2008, six school sites were considered, including Romero, Hasley-Sloan, Sterling Gateway, Sterling Residential, and Hasley/Del Valle and Palmer. The Board voted unanimously to move forward with the Sterling Residential property. However, it was subsequently discovered that the Sterling Residential property had restrictions that prohibited the development of a school on the property. The site selection process was reopened and on November 18, 2009, the Board considered three sites, including Romero Canyon, Hasley-Sloan, and Green Valley Ranch. Based on the consultant presentation and comments received from the public, the Board voted to proceed with Hasley-Sloan and Romero Canyon.

The Board prepared a review of the Hasley-Sloan and Romero Canyon sites and based on that review, directed staff to proceed with preparation of an EIR for the current Romero Canyon site. The Board approved issuance of a new NOP for this site and that site was the subject of the previously certified EIR in 2012.

3-4 The comment questions how changes to the Approved Project could be approved given the significant impacts noted in the Draft Supplemental EIR.

As noted in **Response to Comment 3-2**, the Supplemental EIR identifies mitigations that will reduce potential significant impacts to less than significant. Even though the District identified mitigation measures to reduce impacts, it recognized that certain impacts cannot reduced to a

level of less than significant even with mitigation, and as such adopted a statement of overriding considerations in accordance with Section 15093 of the *State CEQA Guidelines* noting that benefit of the Approved Project outweigh the unavoidable environmental risks.

COUNTY OF LOS ANGELES
FIRE DEPARTMENT
1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

April 29, 2014

Ben Rodriguez, Chief Operations Officer
William S. Hart Union High School District
Planning Section
21380 Centre Pointe Parkway
Santa Clarita, CA 91350

Dear Mr. Rodriguez:

SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT REPORT, SCH #2004031110, "CASTAIC HIGH SCHOOL PROJECT," IT INVOLVES THE CONSTRUCTION OF A TOTAL OF 198-ACRES, WHICH CONSISTS OF A 58-ACRE SITE FOR THE HIGH SCHOOL CAMPUS AND THE GRADING AND CONSTRUCTION OF OTHER FACILITIES ON THE SITE, SANTA CLARITA (FFER #201400056)

The Supplemental Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We have no comments at this time. 4-1

LAND DEVELOPMENT UNIT:

1. The Land Development Unit has no additional comments for this project. Please refer to the Land Development Unit's comments in FFER 201100046 and FFER 201200142. 4-2

2. Should any questions arise regarding the Land Development Unit's comments, please contact FPEA, Wally Collins, at (323) 890-4243.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS, ARTESIA, AZUSA, BALDWIN PARK, BELL, BELL GARDENS, BELLFLOWER, BRADBURY, CALABASAS, CARSON, CERRITOS, CLAREMONT, COMMERCE, COVINA, CUDAHY, DIAMOND BAR, DUARTE, EL MONTE, GARDENA, GLENDORA, HAWAIIAN GARDENS, HAWTHORNE, HIDDEN HILLS, HUNTINGTON PARK, INDUSTRY, INGLEWOOD, IRWINDALE, LA CANADA FLINTRIDGE, LA HABRA, LA MIRADA, LA PUENTE, LAKEWOOD, LANCASTER, LAWNDALE, LOMITA, LYNWOOD, MALIBU, MAYWOOD, NORWALK, PALMDALE, PALOS VERDES ESTATES, PARAMOUNT, PICO RIVERA, POMONA, RANCHO PALOS VERDES, ROLLING HILLS, ROLLING HILLS ESTATES, ROSEMEAD, SAN DIMAS, SANTA CLARITA, SIGNAL HILL, SOUTH EL MONTE, SOUTH GATE, TEMPLE CITY, WALNUT, WEST HOLLYWOOD, WESTLAKE VILLAGE, WHITTIER

Ben Rodriguez
April 29, 2014
Page 2

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. 4-3

2. The Oak Tree Permit, Report and Recommended Conditions of Approval should be included in the Supplemental Draft Environmental Impact Report Mitigation Measures. 4-4

3. The applicant should incorporate innovative design to reduce or eliminate the impact to the Oak resources. 4-5

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no comments or objection to the proposed project. The jurisdictional agency is the Department of Toxic Substances Control. 4-6

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

Frank Vidales

FRANK VIDALES, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:jl

RESPONSE TO LETTER 4: County of Los Angeles Fire Department, dated April 29, 2014

4-1 The comment states that the Los Angeles County Fire Department's Planning Division has no comments.

The comment is acknowledged.

4-2 The comment states that the Los Angeles County Fire Department's Land Development Unit has additional comments.

The comment is acknowledged.

4-3 The comment notes that the Los Angeles County Fire Department LACoFD), Forestry Division, has the statutory responsibilities of erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the Los Angeles County Oak Tree Ordinance.

The previously certified EIR notes that the School Site is in a Very High Fire Hazard Severity Zone as designated by the California Department of Forestry and Fire Prevention (see Section 5.7). Further, the District understands that certain statutory requirements are the responsibility of LACoFD as noted, and will comply with each as required.

As noted in the previously certified EIR (see Section 5.7, Hazards, and Section 5.12, Public Services), the District will comply with all of the LACoFD requirements specified. The Project's landscaping plan will include plants species that meet the LACoFD requirements to address fuel modification in a Very High Fire Hazard Severity Zone.

As required by the Los Angeles County Department of Public Works (LADCPW), the project will implement a Storm Water Pollution Prevention Program (SWPPP) and an Erosion and Sediment Control Plan (ESCP).

4-4 The comment notes that the oak tree permit, report and recommended conditions of approval should be included in the Supplemental Draft EIR's mitigation measures.

The Approved Project is located on land controlled by the District and as such is exempt from local oak tree ordinances. However, as noted in the previously certified EIR and the Supplemental EIR, while the Los Angeles County Oak Tree Ordinance does not apply to the school district, the District is using the ordinance and CDFW permit requirements to determine

impact significance and mitigation requirements. Mitigation measures are provided to reduce impacts to oak trees (see Section 4.2.5 - Mitigation Measures of the revised Draft Supplemental EIR.)

The Southern Access Route is within the jurisdiction of the Los Angeles County Oak Tree Ordinance and will require a permit to remove or encroach on oak trees. Presently, there are approximately 140 oak trees along the Southern Access Route; no determination has yet been made how many oaks would be impacted. However, as with oak trees on the remainder of the Approved Project, mitigation measures are provided to reduce impacts to oak trees (see Section 4.2.5 - Mitigation Measures of the revised Draft Supplemental EIR.)

4-5 The comment notes that the applicant should incorporate innovative design to reduce or reduce or eliminate the impact to the oak resources.

The Project has taken into consideration the location of oak trees and, to the extent possible, has been designed to avoid them. Where oak trees cannot be avoided, mitigation measures are provided to reduce impacts to oak trees (see Section 4.2.5 - Mitigation Measures, of the revised Draft Supplemental EIR.)

4-6 The comment states that the Los Angeles County Fire Department's Health Hazardous Materials Division has no comments or objections to the proposed changes to the Approved Project, and that the appropriate jurisdictional agency is the Department of Toxic Substances Control.

The comment is acknowledged.

SENT VIA EMAIL AND US REGISTERED MAIL

May 10, 2014

To: Ben Rodriguez
Wm. S. Hart Union High School District
21380 Centre Pointe Parkway
Santa Clarita, Ca 91350

Subject: Castaic High School-
Rasmussen/Hybrid Site Romero Canyon
Revised Environmental Impact Report

There are a number of issues in which the EIR is deficient; Hart Board cannot certify this EIR without an analysis of these impacts;

1. The revised Grading quantities have increase substantially from the original approval. Cumulative Impacts to the federally protected streambeds and Waters of the US have not been addressed. What are the total impacts for the entire project? What additional permits will be necessary for the site and all associated impacts? The Hart Board cannot certify this EIR without an analysis of these impacts. 5-1

2. The additional grading will require additional substantial quantities of water for grading purposes. What are the environmental impacts to the community of Castaic for such a massive diversion of water from the community during a drought as declared by the State Governor? Where will the water come from? How will it be delivered to the site? What are the impacts to the community? The Hart Board cannot certify this EIR without an analysis of these impacts. 5-2

3. The additional grading will require additional substantial slopes which will require additional planting and irrigation requiring additional water on a daily if not monthly basis. What are the environmental impacts to the community of Castaic for such a massive diversion of water from the community during a drought as declared by the State Governor? Where will the water come from? How will it be delivered to the site? What are the impacts to the community? The Hart Board cannot certify this EIR without an analysis of these impacts. 5-3

4. The expansion and relocation of the water tanks will further degrade the visual aesthetics of the project. Why is there no discussion of any mitigation of the water tanks impacts such as the use of berms to hide the water tanks? 5-4

5. How can the community evaluate the EIR when all the reports have not been completed? The Hydrology Report States in Section 4.4 "No drainage estimates have been completed for the Southern Access." Where are the reports? What are the impacts? "The Hart Board cannot certify this EIR without an analysis of these impacts. 5-5

6. The EIR states that off-site grading is required. There are no exhibits or impacts evaluated in the EIR. Who is the property owner? Are easements required? What is the extent of the grading? The Hart Board cannot certify this EIR without an analysis of these impacts. 5-6

7. The revised grading includes many additional acres of hillside grading. Since Visual Impacts cannot be mitigated we expect the liberal use of ***contour grading techniques*** to mitigate the visual impacts to the hillsides and significant ridgelines. This includes the use of colored concrete for the miles of bench drains required on the slopes. 5-7

8. The Executive Summary states that "the access road has been redesigned to act as an emergency overflow" – No discussion or impacts to the site has been considered in this event. What are the impacts for emergency vehicles and the school operation in such an event? What are the downstream impacts for such an event? Would emergency vehicles be prevented from accessing areas of the school site in such an event? What are the impacts to adjacent property owners to evacuate in such an emergency? The Hart Board cannot certify this EIR without an analysis of these impacts. 5-8

9. The Revised Hydrology Reports states that Valley Creek Road will be relocated to the west 25 feet and then the report lists 3 Options. The report goes on to discuss the Romero/Baringer connection and then give 4 options for roadway protection. Then the report gives another 2 options for the Romero/ Baringer wash crossing. Furthermore the report gives another 3 options for the crossing of Baringer and Sloan Canyon. This single stretch of road has a possible combination of 72 different environmental impacts. The Hart Board cannot certify this EIR without an analysis of these impacts. 5-9

10. The County has included Romero Canyon and Baringer Road within the DARK SKIES design ordinance. No Street Lights should be proposed for those roads, but the EIR does not address or show the design. The Hart Board cannot certify this EIR without an analysis of these impacts. 5-10

11. The design of Baringer Road does not show grading or retaining walls. How will the slopes be stabilized on my property? Will retaining walls be used to support my property? Will contour grading be used to mitigate the visual impacts? How will water quality of the roads be addressed? What will the alignment of the road be? Will additional easements be required? How will the slopes be stabilized? What are the cumulative impacts to the federally protected streambeds? The Hart Board cannot certify this EIR without an analysis of these impacts. 5-11

12. The revised design includes the use of a concrete lined channel. The expansion and use of concrete channels will further degrade the visual aesthetics of the project. Why is there no discussion of any mitigation of the channel such as the use of soil cement or colored concrete for the channels to mitigate the visual impacts, which are a significant impact to the environment? **5-12**

13. Section 3.2.3 States that " the access for the southern access has not changed from the Approved Project" however as I stated in my paragraph 6 above there is no discussion of the possible 72 options, which could impact the design of Baringer Road. Furthermore the Figure 3.0-12 is not legible. What are the grades? How high are the slopes? Are walls needed? Will the slopes be buttressed? Will drainage devices be required? What are impacts to the Waters of the US? How will Water Quality for the road be addressed? The Hart Board cannot certify this EIR without an analysis of these impacts. **5-13**

I am confident that the Hart Board will address these issues before certifying this EIR.

Dean & Sherry Paradise
NOISE SENSITIVE RECEPTORS
CASTAIC TOWN COUNCIL MEMBER
HASLEY CANYON REGION
29565 Baringer Road
Castaic, Ca 91384
661-803-2838
deanparadise@hotmail.com

The views of this letter are my views. I am a Civil Engineer and an elected member of the Castaic Town Council and resident of Castaic. The letter does not represent the views of other engineers, other residences of Castaic or other members of the Castaic Town Council.

RESPONSE TO LETTER 5: Dean and Sherry Paradise, dated May 10, 2014

5-1 The comment states that grading has substantially increased from the original Approved Project and cumulative impacts to the federally protected streambeds and waters of the United States have not been addressed. Additionally, the letter asks if there are additional permits that would be necessary for the site and all associated impacts.

The District has obtained permits from the appropriate agencies that have jurisdiction over the protected streambeds and waters. These include Streambed Alteration Agreement (SAA) No. 1600-2013-0090-R5 from the California Department of Fish and Wildlife (CDFW) for both the High School site and the East Access Route, Water Quality Certification (File No. 13-065) from the Los Angeles Regional Water Quality Control Board (LARWQCB), and acknowledgement from the U.S. Army Corps of Engineers (USAACE) stating that the Project qualifies as "non-notifying" in that the area of disturbance is less than 0.10 acres and there is no discharge in a special aquatic site. Copies of these permits are available in the appendices to the revised Draft Supplemental EIR.

The Project will require permits for the Southern Access Route prior to initiating any work; however, the jurisdictional delineations for that portion of the work are still in progress.

5-2 The comment notes the difference in grading would require additional water quantities and asks what the environmental impacts of this would incur. The comment further questions if the additional water would have negative impacts on the surrounding community.

The overall community of Castaic is serviced by several water districts including Valencia Water Company, Los Angeles County Waterworks District No. 36 (LACWWD 36), and Newhall County Water District (NCWD); each water purveyor has its own sources and allocations. Water usage is monitored closely by the water purveyors, and the State. Water will be provided to the Project by public water agencies; as noted in the previously certified EIR (see Section 5.15, Utilities), water purveyors serving the region include NCWD and LACWWD 36.

The supplied water will come from the existing agencies' water network, which includes groundwater from the Santa Clarita Valley, and the State Water Project. The water will be metered, purchased, and delivered to the Project via the permanent water main to be constructed within the East Access Route right-of-way, temporary waterline, water trucks, or any combination thereof from NCWD facilities. As noted in **Comment Letter No. 1** from NCWD dated April 10, 2014, in this Supplemental EIR, water is currently available for the Project. If water restrictions are mandated throughout the region, lower priorities such as construction

water will be regulated prior to impacting public health and safety. As such, if water availability is restricted or reduced by NCWD, grading operations shall be adjusted accordingly.

As stated in the previously certified EIR (see Section 5.15.1.3, Water Demand), NCWD indicated that it would be capable of providing water to the site, and that no new or expanded entitlements for water would be required. NCWD further indicated that the water consumption of the proposed school would not require infrastructure improvements or new facilities beyond the proposed utility extension and new pump station described in the previously certified EIR. These off-site improvements are considered part of the Approved Project, and any impacts associated with this proposed utility extension and new pump station were evaluated and analyzed throughout the previously certified EIR.

5-3 The comment states that the additional grading would require substantial slopes that will require additional planting and irrigation, which would create significant impacts on water supply to the surrounding community.

As noted in the previously certified EIR, (see Section 5.8, Hydrology), site-design BMPs would be incorporated into the project's design to reduce the potential impacts on surface water and groundwater quality. These include but are not limited to maximizing pervious areas, minimizing directly connected impervious areas, constructing hardscape with permeable materials, and implementing hydrologically functional landscape design. Specific details and guidelines for the implementation of site-design BMPs are provided in the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP) Manual.

Further, the Approved Project will utilize native/adapted and climate-tolerant plant material, and high-efficiency irrigation controllers with weather sensors (evapotranspiration [ET] weather-based). All slopes behind the school are designed to be "non-irrigated" and seeded with drought-tolerant natives. The front portion of these slopes adjacent to the campus proper will consists of low-water use plants with a combination of drip and high-efficient rotary systems.

The previously certified EIR (see Section 5.15.1.3, Water Demand), examined water demand, including indoor and outdoor use (including irrigating landscaping and playfields). As such, the previously certified EIR determined that there would not be a significant impact on water demand, and would not require any new or expanded water supplies.

5-4 The comment states that the expansion and relocation of the water tanks would further degrade the visual aesthetics of the project. The comment also suggests the use of berms to hide the water tanks.

The proposed water tanks are not being relocated as suggested by the commenter. Rather, to respond to the requirements of Division of State Architect (DSA) and California Geological Survey, the slope to the west of the tank is being "laid back" at a lower slope angle for stability purposes.

While slope does now include off-site grading, the overall slope is consistent with what was evaluated in the previously certified EIR. The previously certified EIR (see Section 5.1.3, Aesthetics) noted, "Graded slopes would extend up to elevations of about 2,120 feet for the water tank near the southwest corner of the project site, and 2,300 feet for the landslide removal near the northwest corner. Grading and construction of the school and access roads would significantly alter the existing natural terrain and existing conditions."

The previously certified EIR further notes "initial phase of construction would result in the most pronounced visual changes to the proposed project site. Other construction activities would include cut-and-fill operations, with hills and ridges excavated and fill material placed in portions of the drainages and low-lying areas. Initial grading activities would shape the landform, and finish grading would grade the proposed lots and streets to precise finish elevations."

"Construction of foundations and buildings, landscaping, and other related activities would follow site preparation and grading. The presence of equipment, vehicles, personnel, and other construction-related elements on the project site would temporarily degrade prominent views from publicly accessible observation points for moderate- and high-sensitivity viewers. Although short term in duration, this impact is considered significant. Implementation of Mitigation Measures AES-1 and AES-2 could reduce some construction-related aesthetic impacts; however, even with implementation of these measures, impacts would remain significant and unavoidable."

As aesthetics impacts were evaluated in the previously certified EIR and included analysis of the grading along the western slopes, and as changes in grading are consistent with that analysis, which determined the impacts to be significant and unavoidable, the Supplemental EIR did not expand upon the previous analysis.

5-5 The comment states that reports have not been completed, including the drainage estimates for the Southern Access Route. The comment states that the Supplemental EIR should not be certified without the analysis of these impacts.

The comment is incorrect in stating that hydrology reports have not been completed. The Draft Supplemental EIR (see Section 4.4.1, Technical Studies and Reports) identifies the previous

studies and current studies. The studies and comments are provided in Appendix 4.4, Hydrology Reports, of the revised Draft Supplemental EIR and include the following:

- *Hydrology Study for Castaic High School Site (Parcels 1 through 4 of Parcel Map 67132) in the Unincorporated Area of Los Angeles County,* Sikand Engineering Associates. October 25, 2013.
- *Review of Hydrology Study, PM No. 67132.* Los Angeles County Department of Public Works, Land Development Division, Hydrology Unit, October 29, 2013.
- *Hydrology Study for Castaic High School Site (Parcels 1 through 4 of Parcel Map 67132) in the Unincorporated Area of Los Angeles County,* Sikand Engineering/Planning/Surveying. January 25, 2014.
- *Hydrology Study for Castaic High School Access Road (Sloan Canyon Road) in the Unincorporated Area of Los Angeles County,* Sikand Engineering/Planning/Surveying. March 17, 2014.

These studies address the main School Site where the school campus will be located and the East Access Route. The Supplemental EIR notes that these reports are subject to review and approval by LACDPW.

The Southern Access Route alignment has not changed from that presented in the previously certified EIR. The Supplemental EIR provides a discussion of the drainage impacts as evaluated in the previously certified EIR as part of Impact 4.4.3-2 in Section 4.4.3, Hydrology.

Should there be changes in the proposed alignment, then subsequent studies may be required.

5-6 The comment notes that off-site grading will be required and that there are no exhibits or impacts evaluated in the Draft Supplemental EIR. It further requests information of the property owners and any easements that will be required, and the extent of grading.

Figure 3.0-4, Project Parcel Map, in the revised Draft Supplemental EIR shows the location of all parcels that may be affected by the Approved Project, including any changes in off-site grading; Table 3.0-1, Project Assessor Parcels, in the revised Draft Supplemental EIR lists the parcel numbers and landowners. Several easements will be required for off-site grading, construction, storm drainage, and other project components. Table 3.0-1 has been revised to reflect all off-site easements.

The Draft Supplemental EIR notes the extent of grading and changes from the Approved Project (see Section 3.2.2, Modifications to the Approved Project, and Figure 3.0-7, Comparison of Prior

and Revised Grading Areas – School Site). Further, Tables 3.0-3, Table 3.0-3, Estimated Grading Quantities – East Access Route, Table 3.0-4, Estimated Grading Quantities – Southern Access Route, and 3.0-6, Total Project Estimated Grading Quantities, in the Draft Supplemental EIR note the changes in grading volumes and other improvements. The Draft Supplement EIR analyzes these changes under the appropriate topics.

5-7 The comment states there will be unavoidable impacts due to the revised grading on the hillsides. The comment notes that the use of colored concrete should be used for bench drains required on the slopes.

The previously certified EIR (see Section 5.1, Aesthetics) analyzes the environmental effects of the Approved Project concerning aesthetics. As noted in **Response to Comment 5-4**, while the overall grading volumes have increased, the aerial extent has not substantially increased from those analyzed in the previously certified EIR (see Figure 3.0-7 of the Draft Supplemental EIR for a comparison of the prior and revised grading footprint for the School Site). As such, aesthetic impacts, which were determined to be significant and unavoidable in the previously certified EIR, were not reevaluated.

The previously certified EIR identified several mitigation measures to reduce the impact to aesthetics, including Mitigation Measure AES-6, which requires “natural-looking wall treatments and colors to reduce the visibility of the wall surface and blend it with the surrounding natural environment.” Further, it requires that these treatments have “low-sheen and non-reflective surface materials to reduce glare. All finishes shall be matte and roughened; use of smooth, trowelled surfaces and glossy paint shall be avoided.”

5-8 The comment states that there is a lack of discussion and impact analysis of emergency vehicles and school operations in the event of an emergency.

The previously certified EIR (see Section 5.7, Hazards, Impact 5.7-4), evaluated the potential of the Approved Project to interfere with emergency response plans (ERP). It was determined that the Approved Project would have no adverse impact on implementation of the ERP or the County of Los Angeles All-Hazard Mitigation Plan (AHMP). The Los Angeles County Fire Department would review site plans during project planning and require emergency access.

Further as noted in the previously certified EIR, (see Section 5.7, Hazards, Impact 5.7-4), the District has an established emergency response plan for all schools. In an emergency, families of District students are notified through the telephone ConnectED system. Emergency messages are also posted to the District’s website and can be accessed by clicking the "EMERGENCY"

button in the upper right-hand corner. The District also has an emergency response process (Standardized Incident Management System [SIM]) and National Emergency Management System [NIMS]), required by the Homeland Security Presidential Directive. This directive ensures a standardized nationwide approach for all governmental agencies to work together. These plans are on the school's website and are sent home in the school newsletter each year.

5-9 The comment notes that there are 72 different roadway options for Valley Creek Road provided in the Revised Hydrology Report and that they were not all analyzed in the report. The comment requests an analysis be completed for each potential impact of each roadway.

The Draft Supplemental EIR shows only one proposed alignment for Valley Creek Road (see Figure 3.0-6, Revised Conceptual School Site Plan). This alignment is the same as proposed in the previously certified EIR and has not changed. The current hydrology reports (see **Response to Comment 5-5**) reflect this alignment.

Further, the Draft Supplemental EIR (see Section 3.2.1, Description of the Approved Project) notes that the previously certified EIR evaluated two separate access scenarios for providing access to the School Site from both the north/east and south.

The Approved Project evaluated access routes from both Sloan Canyon and Romero Canyon Roads, and ultimately approved access from the east via Sloan Canyon Road–Canyon Hill Road (East Access) and from the south via Sloan Canyon Road–Baringer Road–Romero Canyon Road/Valley Creek Road (Southern Access). The access roads would be constructed within existing rights-of-way and easements.

The analysis presented in the Draft Supplemental EIR reflects the alignments approved by the District.

5-10 The comment states that Los Angeles County has included the Romero Canyon and Baringer Road within the County's Dark Skies design ordinance (Los Angeles County Municipal Code Section 22.44). As such, no streetlights should be proposed for those roads, but the environmental impact review does not address of show the design.

The Approved Project is located in an area of Los Angeles County that is subject to the County's Rural Outdoor Lighting District Ordinance (See Section 22.44.137, Castaic Area Community Standards District, of the Los Angeles County Municipal Code) which establishes a Rural Outdoor Lighting District and provides regulations that will permit reasonable uses of outdoor lighting for

nighttime safety and security, promote dark skies for the enjoyment and health of humans and wildlife and conserve energy and resources.

The ordinance does not prohibit streetlights but rather states that streetlights shall be installed at intersections on County roads where the Director of LACDPW determines that street lighting would alleviate traffic hazards, improve traffic flow, and promote safety and security for pedestrians and vehicles. It further notes that streetlights shall be placed the maximum distance apart with the minimum lumens allowable by LACDPW. The ordinance does prohibit certain types of lighting including drop-down lenses, mercury vapor lights, ultraviolet lights, and searchlights, laser lights, or any other lighting that flashes, blinks, alternates or moves.

The previously certified EIR (see Section 5.1.1, Aesthetics, Environmental Setting, Regulatory Framework) noted that the Approved Project is within the proposed Rural Outdoor Lighting District, and that the County was in the process of adopting a Rural Outdoor Lighting District Ordinance. The previously certified EIR (see Section 5.1.3, Impact Discussion 5.1-4) noted that while the District is not subject to the Los Angeles County Rural Outdoor Lighting District Ordinance, the District plans to develop a lighting plan that generally follows the intent of the ordinance to minimize lighting impacts.

While the previously certified EIR provided mitigation measures (AES-7 to AES-9) to minimize impacts from light and glare, it found that impacts would be significant and unavoidable.

As there is no change to the proposed lighting for the Approved Project, including street lighting, this topic was not evaluated in the Draft Supplemental EIR.

Streetlights will be designed and constructed in accordance with the Dark Skies Ordinance requirements. So as to maintain the dark skies characteristics of the rural outdoor lighting district to the maximum extent possible, streetlights in the rural outdoor lighting district shall be prohibited except where necessary at urban intersections with sidewalks, curbs, and gutters, or at intersections and driveways on County roads, where the Director of LACDPW finds that streetlights will alleviate traffic hazards, improve traffic flow, and/or promote safety and security of pedestrians and vehicles based on LACDPWs' highway safety lighting standards.

Where streetlights are installed in the area regulated by the ordinance, they shall:

- be placed at the maximum distance apart, with the minimum lumens allowable pursuant to LACDPW' highway safety lighting standards, as determined by the Director of LACDPW

- utilize full-cutoff (flat glass lens) luminaries so as to deflect light away from adjacent parcels
- be designed to prevent off-street illumination and glare

5-11 The comment states that the Supplemental EIR did not include the design of Baringer Road and show grading or retaining walls. The comment requests an explanation as to how the slopes will be stabilized.

As noted in the Draft Supplemental EIR (see Section 3.2.1, Description of the Approved Project), the Southern Access is approximately 1.3 miles in length and will extend from the School Site and Valley Crest Road to Romero Canyon Road to Baringer Road, and then Sloan Canyon Road to Hillcrest Parkway. The Southern Access route alignment (Sloan Canyon Road–Baringer Road–Romero Canyon Road/Valley Creek Road) has not changed from that provided in the previously certified EIR.

The Southern Route will include a 28-foot-wide two-lane roadway with 14-foot travel lanes in each direction within a 44-foot right-of-way of Baringer Road and Sloan Road to Hillcrest Parkway. The Southern Access will include an 8-foot-wide Class III bike lane and an optional 8-foot-wide multiuse trail on one side within the approved right-of-way. At the corner of Romero Canyon Road and Baringer Road, Romero Canyon would extend approximately 100 feet south and terminate with a gated emergency access to prevent nonemergency traffic from using Romero Canyon Road. All public roadway improvements associated with the Approved Project would include a 5- to 6.5-foot concrete sidewalk along one side of the road.

The final design of Baringer Road is not yet complete. There are various methods proposed to address slope stability, including retaining walls and contour grading. The design will need to meet the requirements of LACDPW.

As noted in the previously certified EIR (see Section 5.8.3, Impact 5.8-1), and the Draft Supplemental EIR (see Section 4.4.3, Impact 4.4.3-1), water quality will meet the requirements of the Statewide General Construction NPDES Permit No. CAS000002, under the terms of which the District is required to submit a Notice of Intent (NOI) to the State Water Quality Control Board (SWRCB) prior to the commencement of construction activities. In addition, a Storm Water Pollution and Prevention Plan (SWPPP) must be prepared and implemented at the Project Site, and revised as necessary as administrative or physical conditions change. In addition, the District must submit a local SWPPP and an Erosion Control and Sediment Plan (ECSP) to LACDPW prior to the issuance of grading permits.

Submittal of an NOI and implementation of the SWPPP and its associated BMPs throughout the construction phase of the proposed project would address anticipated and expected pollutants of concern as a result of construction activities. The proposed project would comply with all applicable water quality standards and waste discharge requirements.

As noted in **Response to Comment 5-1**, the Project will require permits for the Southern Access Route prior to initiating any work; however, the jurisdictional delineations for that portion of the work are still in progress.

5-12 The comment notes that the revised design includes the use of a concrete lined channel and states that such material will further degrade the visual aesthetics of the project. The comment asks what mitigation measures are proposed regarding the visual impacts.

See **Response to Comment 5-7**.

5-13 The comment notes that the Draft Supplemental EIR states "the access for the southern access has not changed from the Approved Project." However, as stated in Comment 5-9, there are a possible 72 options for the design of Baringer Road.

See **Response to Comment 5-9**.

GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

May 15, 2014

IN REPLY PLEASE
REFER TO FILE: LD-2

Mr. Ben Rodriguez, Chief Operations Officer
William S. Hart High School District
21380 Centre Pointe Parkway
Santa Clarita, California 91350

Dear Mr. Rodriguez:

SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (SEIR)
CASTAIC HIGH SCHOOL

Thank you for the opportunity to review the SEIR for the Castaic High School project. The project involves the construction of a new high school with a maximum capacity of 2,600 students and up to 175 staff members. The project area is located in the unincorporated County community of Castaic.

For specific revisions, additions, or deletions of wording directly from the project document, the specific section, subsection, and/or item along with the page number is first referenced then the excerpt from the document is copied within quotations using the following nomenclature:

Deletions are represented by a ~~strikethrough~~.
Additions are represented by *italics* along with an underline.
Revisions are represented by a combination of the above.

The following comments are for your consideration and relate to the environmental document only:

Section 1.0-Executive Summary:

1. Subsection 1.4.1, Description of the Approved Project, Access Routes, Southern Access, page 1.0-7: The first paragraph of this subsection references "Valley Crest Road" instead of "Valley Creek Road," which is how the majority of the document labels this proposed roadway. Reconcile.

6-1

In addition, Figure 3.0-3, Project Access Routes, on page 3.0-5, references "Valley Crest Road" while other figures throughout the document depict "Valley Creek Road." 6-2

2. Subsection 1.4.3, Description of the Approved Project, Construction, Grading, page 1.0-11: Given that the environmental document contains discrepancies in the grading quantities for the project (see comment no. 3 under the Geology and Soils Section and comment no. 13 under the Hydrology and Water Quality Section below) it is unclear if the project will be balanced on-site. Furthermore, the grading quantities for the project (including the access roads) cannot be substantiated at this time due to the lack of approved engineering studies (hydrology, geotechnical reports) and improvement plans. 6-3

If the project is not balanced on-site, the project will need to disclose the haul routes that will be used and discuss the impacts that the hauling will have. Specifically, the impacts on the structural integrity of the surrounding roadways and the proposed measures that will be used to mitigate the impact will need to be analyzed and discussed in the environmental document. 6-4

If you have any questions regarding executive summary comment Nos. 1 or 2, please contact Mrs. Patricia Constanza of the County of Los Angeles Department of Public Works' Land Development Division at (626) 458-4921 or pconstan@dpw.lacounty.gov.

3. Subsection 1.4.2, Modifications to the Approved Project, Access Routes, fourth paragraph, page 1.0-11: This paragraph should be modified as follows:

> "As currently proposed, the modifications to the Approved Project include drainage improvements for the East Access roadway consisting of a single debris basin at the northeast corner of the proposed elementary school property located on the south side of Sloan Canyon Road. This debris basin is designed to accommodate the consolidated total debris volume of the previously approved design for Tract No. 46335 along Sloan Canyon Road. The debris basin will serve a total upstream tributary area of 138.8 acres, and contain a total debris volume of 13,870 cu. yds. ~~as required by LACDPW~~. The inlet pipe has been designed to accommodate the 50-year, burned discharge of 286 cfs." 6-5

To date, an approved hydrology for this project has not been obtained from Public Works. Until such approval is given, the total debris volume cannot be substantiated.

In addition, similar statements were made in Section 3.0, Project Description, Subsection 3.2.2, Project Characteristics, Modifications to the Approved Project, Access Routes, page 3.0-16, and in Section 4.4, Hydrology and Water Quality, Subsection 4.4.3, Environmental Impacts, Proposed Access Drainage, East Access Route, page 4.4-17. These statements need to be corrected as indicated above. 6-6

If you have any questions regarding executive summary comment No. 3, please contact Mr. Andrew Ross of Land Development Division at (626) 458-4921 or aross@dpw.lacounty.gov.

4. Table 1.0-4, Summary of Project Mitigation Measures, Mitigation BIO-8, page 1.0-23: This mitigation as written currently states the following:

> "The Project shall comply with the requirements of the SWPPP as administered enforced by the Los Angeles County Department of Public Works during all construction activities. A copy of the SWPPP shall be maintained on site."

Comment No. 22 on Public Works' previous comment memo (on the DEIR) dated September 18, 2012 (attached), states that it is inaccurate to disclose that Public Works administers BMPs at a construction site. The above mitigation should be modified to reflect the same wording used in Chapter 5 of the final EIR, which is shown as Response A7-25 on page 3-48 of the final EIR. This wording is copied below and the excerpt is attached for reference: 6-7

> "The District's construction contractor and civil engineer would be responsible for administering, implementing, and ensuring compliance with BMPs addressing soil erosion and specified in the project SWPPP. Within unincorporated Los Angeles County, compliance with BMPs is enforced by the County of Los Angeles Department of Public Works."

In addition, this same correction should occur within Section 4.2, Biological Resources, Subsection 4.2.5, Mitigation Measures, BIO-8, page 4.2-45.

Lastly, similar statements are made within Section 4.3, Geology and Soils, Subsection 4.3.3, Environmental Impacts, Previously Certified EIR Analysis, third paragraph, page 4.3-19, and needs to be modified as indicated above. 6-7

If you have any questions regarding executive summary comment No. 4, please contact Mr. Diego Rivera of Land Development Division at (626) 458-4921 or dirivera@dpw.lacounty.gov.

Section 3.0-Project Description:

1. Subsection 3.2.1, Project Characteristics, Description of the Approved Project, Southern Access, page 3.0-10: Given the current alignment of the southern access road, a bridge or large culvert will be required to cross the existing floodplain. This should be noted and discussed in the SEIR. 6-8

2. Subsection 3.2.2, Project Characteristics, Modifications to the Approved Project, High School Campus, Fourth Bullet, page 3.0-10: The concrete lining of the channel was not at the request of the Los Angeles County Flood Control District. The Los Angeles County Flood Control District only requires flood protection be provided for the site. This should be clarified in the SEIR. 6-9

3. Subsection 3.2.2, Project Characteristics, Modifications to the Approved Project, Access Routes, page 3.0-15: This subsection does not include any discussions about the two culverts that are proposed for the eastern access road. These proposed improvements should be discussed/disclosed in the SEIR. 6-10

4. Subsection 3.2.2, Project Characteristics, Modifications to the Approved Project, Access Routes, page 3.0-15: This subsection lacks discussion about the southern access route and any associated improvements that may be required. Any proposed improvements along the southern access route should be discussed/disclosed in the SEIR. 6-11

   If you have any questions regarding project description comment Nos. 1 through 4, please contact Mr. Ross at (626) 458-4921 or aross@dpw.lacounty.gov.

5. Table 3.0-1, Project Assessor Parcels, page 3.0-7: The APNs listed do not all match up with our records. Provide an updated listing of APNs, especially for the off-site impacted properties. 6-12

Mr. Ben Rodriguez
May 15, 2014
Page 5

6. Subsection 3.2.1, Project Characteristics, Description of the Approved Project, Access Routes, page 3.0-8: The improvements associated with the access routes will impact adjoining off-site properties. The applicant shall disclose all related off-site impacts and secure related covenants/construction letters as part of this project. 6-13

7. Subsection 3.2.2, Project Characteristics, Modifications to the Approved Project, School Site, Third Bullet, Geologic Remediation Area, page 3.0-11: Modify the language for this bullet as follows:

    - "Geologic Remediation Area (see area "C" on Figure 3.0-7) 6-14

      -The County review has ~~requested~~ *required* the following changes:

        - Additional surface drainage facilities
        - More concrete details in the overflow facilities within the catchment area"

8. Subsection 3.2.2, Project Characteristics, Modifications to the Approved Project, School Site, Eighth Bullet, Channel outlet, page 3.0-14: Modify the language for this bullet as follows:

    - "Channel outlet (see area "H" on Figure 3.0-7)

      - ~~At the request of the County, the~~ *The* channel has been redesigned to outlet on the east side of Valley Creek Road. This is a change to the drainage concept, which results in fewer buried drainage structures and additional outlet structures. The prior design included a trapezoidal channel alignment that crosses Valley Creek Road from east to west using a 60-inch-diameter reinforced concrete pipe (RCP) that outlets to a proposed riprap channel then crosses back to the east using a box culvert and outlets to existing natural canyon. The redesigned alignment provides for the trapezoidal channel to be straight and follows the street alignment going south, then outlets through a long riprap and connects to the existing natural canyon." 6.15

If you have any questions regarding project description comment Nos. 5 through 8, please contact Mr. Rivera at (626) 458-4921 or dirivera@dpw.lacounty.gov.

Mr. Ben Rodriguez
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Section 4.2-Biological Resources:

1. Subsection 4.2.1, Environmental Setting, Jurisdictional Resources, School Site, page 4.2-17: The second paragraph of this subsection reads as follows:

   > "Impacts to Waters of the U.S. and State Waters on the School Site are subject to the conditions pursuant to project Army Corps of Engineers Nationwide Permit-File No. SPL 2006-01764-PHT, Regional Water Quality Control Board Certification-File No. 06-197 and California Department of Fish and Wildlife SAA File No. 1600-2010-0204 R5 REV 2."

   6-16

   These three jurisdictional permits are not current. The current permit/file numbers need to be updated and properly disclosed in the SEIR.

   If you have any questions regarding the biological resources comment, please contact Mr. Rivera at (626) 458-4921 or dirivera@dpw.lacounty.gov.

Section 4.3-Geology and Soils:

1. This section needs to be updated to include the revised information presented in the soils and geology report by Geolabs-Westlake Village dated February 5, 2014. Prior to disclosing the information in this report, however, the attached Public Works' Geotechnical and Materials Engineering Division comments need to be addressed as the comments may lead to revisions to the proposed grading, which will need to be accurately disclosed in the environmental document. 6-17

2. Subsection 4.3.1, Environmental Setting, Access Routes, East Access Route, page 4.3-13: The text and data within this subsection may need to be updated since the geology of the site has not been conclusively determined and the proposed grading may change. Please refer to the attached review comments issued by Geotechnical and Materials Engineering Division for Deeded Street No. 541. 6-18

3. Subsection 4.3.5, Mitigation Measures, pages 4.3-24 – 4.3-26: The GEO mitigation measures identified in this subsection (and further discussed within the Geology and Soils section beginning on page 4.3-21 and tabulated in the Executive Summary beginning on page 1.0-29) cannot be substantiated since the comments from Geotechnical and Materials Engineering Division have not been addressed/incorporated into the project documents/plans. 6-19

If you have any questions regarding geology and soils comment Nos. 1 or 3, please contact Jeremy Wan, jwan@dpw.lacounty.gov, (626) 458-7980, or Charles Nestle, cnestle@dpw.lacounty.gov, (626) 458-7984, of Geotechnical and Materials Engineering Division.

4. Subsection 4.3.1, Environmental Setting, Analysis of the Modifications to the Approved Project, second paragraph, page 4.3-21: The second paragraph of this subsection states that 2.344 million cubic yards of cut and 2.031 million cubic yards of fill is associated with the grading of the access roads. These figures conflict with what is shown in Table 3.0-6 (Total Project Estimated Grading Quantities) on page 3.0-26. The amount of fill for the access roads as shown on this table is 1.8964 million cubic yards. This needs to be reconciled. Furthermore, the grading quantities for the project (including the access roads) cannot be substantiated at this time due to the lack of approved engineering studies (hydrology, geotechnical reports) and improvement plans. 6-20

   If you have any questions regarding geology and soils comment No. 4, please contact Mr. Rivera at (626) 458-4921 or dirivera@dpw.lacounty.gov.

Section 4.4-Hydrology and Water Quality:

1. A hydrology study should be reviewed and approved by Public Works. This hydrology study will identify any needed infrastructure, changes in design for the project, or impacts as a result of the project. Once this report has been approved, the results of the study and any impacts should be included and discussed in the EIR. 6-21

2. All hydrology reports in Appendix 4.4 should be removed. None of these reports have been approved by Public Works nor do they represent the final design of the project, since review, is still pending. Once this report has been approved. the results of the study and any impacts should be included and discussed in the EIR. 6-22

3. Multiple bridges and/or culverts are proposed as part of this project: however, the EIR does not discuss the impacts from these devices. Any restriction of flow created by a bridge or culvert will change the flow characteristics of the stream and has the potential to create downstream impacts. The impacts of the proposed bridges and culverts should be further analyzed in the hydrology report and discussed in the EIR. 6-23

4. Subsection 4.4.1, Environmental Setting, Technical Studies and Reports, Previously Available Reports, page 4.4-1: This subsection incorrectly implies that the County of Los Angeles Department of Public Works (Public Works) has approved the drainage concept and the hydrology for the project, which is not the case and needs to be reconciled. Public Works has never approved a drainage concept or hydrology for this project. The report dated May 8, 2012, was submitted as part of the draft EIR, and Public Works made many comments on the draft EIR. No approval has ever been given for the project as shown. 6-24

5. Subsection 4.4.1, Environmental Setting, Technical Studies and Reports, Recent Studies, page 4.4-1: Remove all references to previously submitted, commented on, and returned plan checks for the hydrology report being reviewed by Public Works. Once the hydrology report has been finalized and approved by Public Works, the results and any impacts identified should be noted in the EIR. 6-25

6. Subsection 4.4.1, Environmental Setting, Water Quality, Surface Water Quality, page 4.4-6: This subsection should include discussions related to the County's 2009 Low-Impact Development requirements and how the project will comply with them. 6-26

7. Subsection 4.4.1, Environmental Setting, Flood Hazards, Designated Flood Zones, page 4.4-8. This subsection indicates that the school site is not within a 100-year flood zone; however, it lacks discussion/disclosure that the school site is within a Los Angeles County adopted floodway and revisions to the floodway will be required. Additionally, a part of the southern access road is within a FEMA Zone A; however, there is no discussion/disclosure of this in the SEIR. The appropriate disclosures should be made. 6-27

8. Subsection 4.4.3 Environmental Impacts, Previously Certified EIR Analysis, Proposed Drainage Facilities around High School Campus, page 4.4-14: The proposed drainage channel is not clearly or accurately described. The channel is not on the west side of Valley Creek Road. The most recent set of plans provided to Public Works do not show an engineered swale at the school site boundary. Additionally, the referenced figure does not clearly show the channel as proposed. 6-28

9. Subsection 4.4.3, Environmental Impacts, Previously Certified EIR Analysis, Access Drainage, Southern Access Route, page 4.4-14: The proposed bridge will be located 300 feet south of the southern school site boundary not 300 feet north of the boundary as stated in the SEIR. 6-29

10. Subsection 4.4.3, Environmental Impacts, Previously Certified EIR Analysis, Summary, page 4.4-15: The last sentence on this page states that hydrology impacts were considered less than significant in the previous EIR analysis; however, this finding was never substantiated due to the lack of an approved hydrology. An approved hydrology is necessary to determine if the impacts should be considered less than significant with mitigation or significant and unavoidable. At a minimum, impacts should be considered less than significant with mitigation incorporated since certain mitigation measures are included in the project. 6-30

    In addition, Table 1.0-3, Significance of Environmental Issues for the Castaic High School as Determined in the Previously Certified EIR, on page 1.0-13 should not have reflected a finding of less than significant for hydrology and water quality. 6-31

11. Subsection 4.4.3, Environmental Impacts, Analysis of the Modifications to the Approved Project, School Site Drainage, page 4.4-16: The last sentence on this page indicates that hydrology impacts would be less than significant; however, this finding cannot be substantiated due to the lack of an approved hydrology. An approved hydrology is necessary to determine if the impacts should be considered less than significant with mitigation or significant and unavoidable. At a minimum, impacts should be considered less than significant with mitigation incorporated since certain mitigation measures are included in the project. 6-32

    In addition, Table 1.0-2, Significance of Environmental Issues for Castaic High School as Determined in the Supplemental EIR, on page 1.0-13 should not reflect a finding of less than significant for hydrology and water quality. As indicated above, an approved hydrology will be necessary to determine if the finding for this aspect of the project is significant and unavoidable or less than significant with mitigation. 6-33

    Furthermore, Table 1.0-4, Summary of Project Mitigation Measures, on page 1.0-15 will need to be updated to reflect any mitigations necessary to offset hydrological impacts of the project. 6-34

    Moreover, the comments above also apply to the following sections within the supplemental EIR:

    a. Subsection 4.4.3, Environmental Impacts, Analysis of the Modifications to the Approved Project, Proposed Access Drainage, East Access Route, page 4.4-17. 6-35

b. Subsection 4.4.3, Environmental Impacts, Analysis of the Modifications to the Approved Project, Summary, page 4.4-21. 6-35

12. Figure 4.4-6, Proposed Hydrology of the East Access (Sloan Canyon Road), page 4.4-20: This figure should clearly label the proposed debris basin on the south side of the access road. 6-36

If you have any questions regarding hydrology and water quality comment Nos. 1 through 12, please contact Mr. Ross at (626) 458-4921 or aross@dpw.lacounty.gov.

13. Subsection 4.4.3, Environmental Impacts, Analysis of the Modifications to the Approved Project, First Paragraph, page 4.4-12: The first paragraph of this subsection states that the estimated grading amounts for the East Access route are approximately 1.8142 million cubic yards of cut and 680,000 cubic yards of fill. These figures conflict with what is shown in Table 3.0-6 (Total Project Estimated Grading Quantities) on page 3.0-26. The amount of fill for the east access road as shown on this table is 1.3664 million cubic yards. This needs to be reconciled. Furthermore, the grading quantities for the project (including the access roads) cannot be substantiated at this time due to the lack of approved engineering studies (hydrology, geotechnical reports) and improvement plans. 6-37

14. Subsection 4.4.3, Environmental Impacts, Analysis of the Modifications to the Approved Project, Second Paragraph, page 4.4-12: This paragraph indicates that a Storm Water Pollution Prevention Plan (SWPPP) and a Wet Weather Erosion Control Plan (WWECP) will need to be submitted by the applicant if grading activities will take place during the rainy season. All statements within this paragraph (and anywhere else it is mentioned) regarding the WWECP should be replaced with Erosion and Sediment Control Plan since the term WWECP is no longer being used. In addition, a state SWPPP is necessary regardless if grading is anticipated to occur during the rainy season or not because the site is greater than one acre. This statement should be clarified to reflect this. 6-38

If you have any questions regarding hydrology and water quality comment Nos. 13 or 14, please contact Mr. Rivera at (626) 458-4921 or dirivera@dpw.lacounty.gov.

Section 5.0 Significant Environmental Effects that Cannot be Avoided if the Approved Project is Implemented:

1. Subsection 5.4, Transportation and Traffic, Supplemental EIR, page 5.0-9: Modify the existing language in this subsection as follows:

> "~~The Supplemental EIR did not evaluate the impacts related to transportation and traffic and, therefore, did not revise the previously certified EIR's determinations relative to significant impacts. Impacts would remain significant as noted in the previously certified EIR.~~ *Since the Project elements and trip generations remain the same, the magnitude of the project impacts are the same as the impacts evaluated in the approved traffic study. The certified final EIR prepared for the approved project concluded that the project would have significant and unavoidable impacts. Consequently, impacts associated with the modified project would be similar to those of the approved project and would remain significant and unavoidable. No new mitigation is required or proposed.*"

6-39

2. Subsection 5.4, Transportation and Traffic, Supplemental EIR, page 5.0-8: This subsection should be modified to include discussions regarding a sixth mitigation measure, T-6 should be included as follows:

> T-6–Construction traffic related to hauling or delivery operations shall occur during off-peak hours.

6-40

This addition will also need to take place within Table 1.0-4 in Section 1.0, Executive Summary, pages 1.0-15 through 1.0-34.

If you have any questions regarding the significant environmental effects comment, please contact Andrew Ngumba of Public Works' Traffic and Lighting Division at (626) 300-4851 or angumba@dpw.lacounty.gov.

Mr. Ben Rodriguez
May 15, 2014
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If you have any other questions or require additional information, please contact Mr. Dubiel at (626) 458-4921 or mdubiel@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works

ANTHONY E. NYIVIH
Assistant Deputy Director
Land Development Division

MD:tb
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Enclosure

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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GAIL FARBER, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

September 18, 2012

IN REPLY PLEASE REFER TO FILE: LD-0

Mr. Tom Cole
William S. Hart Union High School District
21515 Centre Pointe Parkway
Santa Clarita, CA 91350

Dear Mr. Cole:

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
CASTAIC HIGH SCHOOL

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for Castaic High School project. The project involves the construction of a new high school with a maximum capacity of 2,600 students and up to 175 staff members. The project area is located in the community of Castaic, an unincorporated area of Los Angeles County.

The following comments are for your consideration and relate to the environmental document only:

Services-Traffic/Access

Road

1. The document may not adequately address/disclose acceptable roadway infrastructure improvements along the access routes for Scenarios 1 and 2, which are depicted in Figure 4-2 and described in many sections throughout the document including Section 4.5.3. Typical sections within the EIR should be provided for each individual roadway along the access routes and clearly be labeled. In addition, each segment of roadway within a given scenario should contain both an interim and an ultimate (build out) typical section. In order to effectively evaluate the interim and ultimate typical sections, a Traffic Study must be approved by the County of Los Angeles Department of Public Works' Traffic and Lighting Division. A conceptual striping plan showing the proposed improvements should also be submitted to Public Works for review and approval

concurrently with the Traffic Study. Where additional right of way may be required (such as along Barringer Road) to support the ultimate roadway section, provide further discussions on potential impacts to adjoining properties and the mechanism for securing any additional right of way.

2. It is recommended that the typical sections shown in Figure 4-3 and the discussions throughout the EIR take into account on-street parking as well bike lanes where appropriate. Discussions regarding the applicability of these features should be included in the EIR and reference should be made to the County of Los Angeles' Bikeway Master Plan, which can be obtained from the following link: http://dpw.lacounty.gov/pdd/bikepath/bikeplan/. While the EIR currently indicates that the new access roads will be designated as Class 3 bike routes, it is our opinion that since the Bikeway Master Plan shows existing/proposed bike lane classifications along roadways within the vicinity of, and at the main connection points to, Sloan Canyon and Hillcrest Parkway, implementation of dedicated, on-street bike lanes from the connection points to the school would be beneficial to preserve connectivity.

3. Discussion regarding the evaluation of the need for on-street parking and sidewalk connectivity should also be included in the EIR. Currently, the typical sections shown in Figure 4-3 show a proposal for a 5.5-foot-wide sidewalk. The EIR, and perhaps the Traffic Study, should evaluate the basis for the proposed width of sidewalk taking into account connectivity to existing sidewalks within the vicinity as well as the projected pedestrian traffic originating from the existing/proposed developed residential areas.

4. The EIR should address the impact of projected traffic along Parker Road, specifically the impacts to the homes directly fronting Parker Road, and recommend mitigations that would more appropriately apportion traffic between Parker and Sloan Canyon Roads. The EIR should also address the need for additional lanes or other improvements along Parker Road and Sloan Canyon Road easterly of the intersection of Parker and Sloan Roads.

5. Section 5.14.3 (page 5.14-6) of the DEIR indicates that the roadways would provide for one travel lane in each direction and an optional middle turn-lane. The same section of the DEIR goes on to state that Figure 4-3 in Section 4 shows the road section that will accommodate this. The Road Section shown in Figure 4-3, which only shows 28 feet of paved surface (curb to curb), will not accommodate a middle-turn lane. This needs to be reconciled.

6. There are incorrect references to the Traffic Study within the DEIR. The traffic Studies are found in Appendix J; however, the Executive Summary (page 1-7) and Section 4.5.3 (Page 4-6) of the document indicate that the traffic studies are presented in Appendix I.

7. In order to effectively evaluate the location of the proposed driveways to the school site, the circulation within the site, and the sight distance from the driveways, a full-size, scaled site plan should be submitted to Public Works for review and approval.

8. We generally agree with the DEIR that the intersection listed below will be significantly impacted by the proposed project under Scenario 1. The project shall be solely responsible for implementing the recommended mitigation measures prior to the opening of the school. A detailed signing and striping plan and traffic signal plan for these improvements shall be submitted to Public Works for review and approval.

   Sloan Canyon Road at Quail Valley Road
   East approach: Provide second through lane.
   West approach: Provide second through lane.
   Install traffic signal.

9. We generally agree with the DEIR that the intersections listed below will be significantly impacted by the proposed project under Scenario 1. However, we do not agree with the DEIR that the recommended improvements will sufficiently mitigate the project's significant impact to these County intersections. In accordance with the County's Traffic Impact Analysis guidelines, these intersections will still be significantly impacted by the project upon implementation of the mitigation measures recommended in the DEIR. The DEIR shall be revised to include improvements which mitigate the project's significant impact to these intersections in accordance with the County's Traffic Impact Analysis guidelines.

   Parker Road at Southbound I-5 Ramp

   Ridge Route Road at Northbound I-5 Ramp

   The Old Road at Parker Road

   Sloan Canyon Road at Parker Road

10. We generally agree with the DEIR that the intersection listed below will be significantly impacted by the proposed project under Scenario 2. However, we do not agree with the DEIR that the recommended improvements will sufficiently mitigate the project's significant impact to this County intersection. In accordance with the County's Traffic Impact Analysis guidelines, the intersection will still be significantly impacted by the project upon implementation of the mitigation measures recommended in the DEIR. The DEIR shall be revised to include improvements which mitigate the project's significant impact to this intersection in accordance with the County's Traffic Impact Analysis guidelines.

    Sloan Canyon Road at Parker Road

11. We generally agree with the DEIR that student enrollment at the campus shall not exceed the interim student capacity of 1,600 students unless the school implements staggered start times and completes one of the following improvements:

    a. Widen the pavement and restripe the northern public access route under both Option A and Option B to provide four lanes of travel (build-out condition for Scenario 1); or

    b. Complete the southern public access route, which includes Barringer Road and Sloan Canyon Road (Scenario 2).

12. Prior to receiving approval to increase student enrollment, the project shall submit a revised traffic study to Public Works for review and approval, which analyzes the impact to County intersections in the area as a result of the increased enrollment.

13. For all mitigation measures recommended for Scenarios 1 and 2, the project shall submit conceptual signing and striping plans and traffic signal plans to Public Works for review and approval. The conceptual plans shall demonstrate that the proposed improvements will be accommodated within the available public right of way and identify any required road and/or bridge widening.

14. The project shall submit conceptual signing and striping plans and traffic signal plans for all new proposed roadways to Public Works for review and approval. The conceptual plans shall depict all proposed travel lanes including bikeway facilities, lane widths, turn-lane storage lengths, striping transitions, and school area signs and markings.

15. The final location of all proposed school area warning signs and markings shall be determined during the review and approval of the detailed signing and striping plan. All proposed school area signs and markings shall be designed in accordance with the latest edition of the California Manual on Uniform Traffic Control Devices.

16. The final evaluation of the adequacy of roadway cross sections and sight distance shall be determined by Public Works' Land Development Division.

17. The project shall submit a Traffic and Parking Management Plan for planned events hosted at the stadium, during the morning and evening peak hours (6-8 a.m. and 4-6 p.m., respectively), to Public Works for review and approval. The Traffic and Parking Management Plan shall identify the public roadways used to access the site and address the need for additional traffic control along the route. The plan shall also include a parking analysis for onsite parking. Access routes and traffic control devices to accommodate any proposed offsite parking shall be analyzed as part of the Traffic and Parking Management Plan.

18. The proposed bikeway facility for Sloan Canyon Road shall be designed to be consistent with adjacent planned bikeway facilities. Please contact Public Works' Programs Development Division for more information.

19. The Transportation and Traffic Section of the DEIR shall include level of service and traffic signal warrants analyses for the new access route intersections listed below.

    Option A

    Mandolin Canyon Road at Harp Canyon Road
    Romero Canyon Road at Harp Canyon Road
    Romero Canyon Road at Valley Creek Road
    Valley Creek Road at High School Driveways 1 through 4

    Option B

    Sloan Canyon Road/Canyon Hill Road at Mandolin Canyon Road
    Canyon Hill Road/High School Driveway 3 at Valley Creek Road
    Valley Creek Road at High School Driveways 1, 2, and 4

Grading

20. There are discrepancies within the DEIR relating to the estimated project grading (onsite and offsite). Table 4-7 of the DEIR (page 4-13) shows an estimated project site grading (for onsite and offsite access roads) of 6,310,000 cy of fill and 6,310,000 cy of cut (Maximum–which includes 4,850,000 cy of cut and 5,100,000 cy of fill onsite and the worst case scenario for the access roads). In addition, below Table on 4-7 there is a paragraph that indicates the gated emergency access road would involve an additional 3,000 cy of cut and fill. Page 5.5-11 of the DEIR (Impact 5.5-5) states, however, the following: "site grading would include about 4,890,000 cy of cut and 4,890,000 cy of fill. Grading for project access roads would involve an additional 1,630,000 cy of cut and 348,000 cy of fill." These discrepancies would need to be reconciled. The grading figures presented in the EIR should disclose an estimate of both cut and fill for the total project. This includes onsite and all offsite grading necessary (including all access roads and emergency access roads). Please note that the grading quantities disclosed will need to be adjusted based on the Road comments above.

21. In addition, after the discrepancy above is reconciled and there is more than 10,000 cy of imported or exported material the EIR should disclose a designated haul route. The structural integrity of the roadways along the haul route must be evaluated in the environmental document along with any mitigations (e.g., reconstruction of the roadway) to bring the structural section to an acceptable level. As an alternative, the environmental document must indicate the procedures that the applicant will take to evaluate the pre- and post-structural integrity of the roadways along the haul route. Furthermore, a disclosure must be made that the project will be responsible for reconstructing the haul route roadways to bring the structural section to an acceptable level should it be found that damage occurred during offsite hauling.

22. The third paragraph on page 5.5-11 (Impact 5.5-5) discusses the need for SWPPP's and Best Management Practices (BMPs) and goes on to state in the last sentence the following: "Within unincorporated Los Angeles County, compliance with BMPs are administered by the Los Angeles County Department of Public Works." This is inaccurate and should be modified to state that the owner/owner's representatives (engineers, contractors, agents, etc.) are responsible for administering, implementing, and ensuring compliance with all appropriate BMPs to address soil erosion.

If you have any questions regarding the traffic/access comments 1 through 7 and 20 through 22, please contact Matthew Dubiel at (626) 458-4921 or mdubiel@dpw.lacounty.gov.

If you have any questions regarding the traffic/access comments 8 through 19, please contact Gerald Ley at (626) 300-4822 or gley@dpw.lacounty.gov.

Hazards-Flood/Water Quality

1. The DEIR does not adequately discuss the potential impacts to downstream property owners from the effects of hydromodification. The hydrology prepared for the project only analyzes the 50 year storm event and does not take into account potential impacts from the other more frequent storm events such as the 2 years, 5 years, and 10 years events.

2. The DEIR does not address the potential impacts to the natural drainage courses from the proposed bridges and culverts. Any restriction of flow created by a bridge or culvert will change the flow characteristics of the stream and has the potential to create downstream impacts. The impacts of the proposed bridges and culverts should be further analyzed in the hydrology report and discussed in the DEIR.

3. The project is located in a County Adopted Floodway per Adopted ML Map 388-ML8 for Romero Canyon. Impacts to the adopted floodway and impacts to the proposed infrastructure created by the existing floodway should be discussed in the DEIR.

4. The project is not exempt from County of Los Angeles' Low-Impact Development (LID) ordinance. The DEIR should discuss how the project will comply with the LID ordinance. The hydrology study for the project should provide analysis based on the County's LID Standard Manual.

5. The EIR does not adequately describe the scope of publicly maintained versus privately maintained drainage structures. The DEIR should discuss which alternatives call for large scale publicly maintained infrastructure and which alternatives propose privately maintained drainage system.

6. The DEIR mentions that 18,000 cy of debris will be routed around the site in a swale and drainage channel. It is not feasible to transport that amount of debris in a swale or channel. Debris retention facilities will most likely be required for this project and should be discussed as an alternative in the DEIR.

7. A hydrology study should be submitted to Public Works for review and approval. The analysis should address increases in runoff, any change in drainage patterns, debris producing areas, and the capacity of existing storm drain facilities. Provide line identification of all proposed drainage facilities. Preliminary soils and geology reports related to debris, retention, and detention basins may be required based on geographic and adverse geotechnical conditions. Provide engineering calculations to support sizing of debris, retention, and detention basins. Provide approximate flood hazard and bank erosion setbacks and lot identifications (as needed). Show slopes for existing and proposed streets. Provide a drainage/grading covenant for any offsite work.

   If you have any questions regarding the flood/water quality comments, please contact Christopher Sheppard at (626) 458-4921 or csheppard@dpw.lacounty.gov.

Hazards-Geotechnical/Geology/Soils

1. Complete copies of the soils reports (including logs and borings, geological maps, cross sections, slope stability analyses, liquefaction analyses, etc.) should be included in Appendix F of the EIR.

   If you have any questions regarding the geotechnical/geology/soils comments, please contact Jeremy Wan at (626) 458-4923 or jwan@dpw.lacounty.gov.

Services-Sewer/Water

Sewer

1. We cannot substantiate the DEIR finding for the sewer portion at this time. The impacts of proposed project on the existing sewer systems cannot be verified until a sewer area study is submitted for review and approved with no mitigations. Sewer mitigations and impacts found in the sewer area study, if any, should be reflected on the EIR.

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Water

1. A water will serve letter from the water purveyor is required.

   If you have any questions regarding the sewer/water comments, please contact Tony Khalkhali at (626) 458-4921 or tkhalkh@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact Ruben Cruz at (626) 458-4910 or rcruz@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works

ANTHONY E. NYIVIH
Assistant Deputy Director
Land Development Division

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3. Response to Comments from Agencies and Organizations

LETTTER A7 – County of Los Angeles Department of Public Works (9 page[s])

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

GAIL FARBER, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

September 18, 2012

IN REPLY PLEASE REFER TO FILE LD-0

Mr. Tom Cole
William S. Hart Union High School District
21515 Centre Pointe Parkway
Santa Clarita, CA 91350

Dear Mr. Cole:

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
CASTAIC HIGH SCHOOL

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for Castaic High School project. The project involves the construction of a new high school with a maximum capacity of 2,600 students and up to 175 staff members. The project area is located in the community of Castaic, an unincorporated area of Los Angeles County. A7-1

The following comments are for your consideration and relate to the environmental document only:

Services-Traffic/Access

Road

1. The document may not adequately address/disclose acceptable roadway infrastructure improvements along the access routes for Scenarios 1 and 2, which are depicted in Figure 4-2 and described in many sections throughout the document including Section 4.5.3. Typical sections within the EIR should be provided for each individual roadway along the access routes and clearly be labeled. In addition, each segment of roadway within a given scenario should contain both an interim and an ultimate (build out) typical section. A7-2

   In order to effectively evaluate the interim and ultimate typical sections, a Traffic Study must be approved by the County of Los Angeles Department of Public Works' Traffic and Lighting Division. A conceptual striping plan showing the proposed improvements should also be submitted to Public Works for review and approval A7-3

3. Response to Comments from Agencies and Organizations

Mr. Tom Cole
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concurrently with the Traffic Study. Where additional right of way may be required (such as along Barringer Road) to support the ultimate roadway section, provide further discussions on potential impacts to adjoining properties and the mechanism for securing any additional right of way. A7-4

2. It is recommended that the typical sections shown in Figure 4-3 and the discussions throughout the EIR take into account on-street parking as well bike lanes where appropriate. Discussions regarding the applicability of these features should be included in the EIR and reference should be made to the County of Los Angeles' Bikeway Master Plan, which can be obtained from the following link: http://dpw.lacounty.gov/pdd/bikepath/bikeplan/. While the EIR currently indicates that the new access roads will be designated as Class 3 bike routes, it is our opinion that since the Bikeway Master Plan shows existing/proposed bike lane classifications along roadways within the vicinity of, and at the main connection points to, Sloan Canyon and Hillcrest Parkway, implementation of dedicated, on-street bike lanes from the connection points to the school would be beneficial to preserve connectivity. A7-5

3. Discussion regarding the evaluation of the need for on-street parking and sidewalk connectivity should also be included in the EIR. Currently, the typical sections shown in Figure 4-3 show a proposal for a 5.5-foot-wide sidewalk. The EIR, and perhaps the Traffic Study, should evaluate the basis for the proposed width of sidewalk taking into account connectivity to existing sidewalks within the vicinity as well as the projected pedestrian traffic originating from the existing/proposed developed residential areas. A7-6

4. The EIR should address the impact of projected traffic along Parker Road, specifically the impacts to the homes directly fronting Parker Road, and recommend mitigations that would more appropriately apportion traffic between Parker and Sloan Canyon Roads. The EIR should also address the need for additional lanes or other improvements along Parker Road and Sloan Canyon Road easterly of the intersection of Parker and Sloan Roads. A7-7

5. Section 5.14.3 (page 5.14-6) of the DEIR indicates that the roadways would provide for one travel lane in each direction and an optional middle turn-lane. The same section of the DEIR goes on to state that Figure 4-3 in Section 4 shows the road section that will accommodate this. The Road Section shown in Figure 4-3, which only shows 28 feet of paved surface (curb to curb), will not accommodate a middle-turn lane. This needs to be reconciled. A7-8

3. Response to Comments from Agencies and Organizations

6. There are incorrect references to the Traffic Study within the DEIR. The traffic Studies are found in Appendix J; however, the Executive Summary (page 1-7) and Section 4.5.3 (Page 4-6) of the document indicate that the traffic studies are presented in Appendix I. A7-9

7. In order to effectively evaluate the location of the proposed driveways to the school site, the circulation within the site, and the sight distance from the driveways, a full-size, scaled site plan should be submitted to Public Works for review and approval. A7-10

8. We generally agree with the DEIR that the intersection listed below will be significantly impacted by the proposed project under Scenario 1. The project shall be solely responsible for implementing the recommended mitigation measures prior to the opening of the school. A detailed signing and striping plan and traffic signal plan for these improvements shall be submitted to Public Works for review and approval. A7-11

   Sloan Canyon Road at Quail Valley Road
   East approach: Provide second through lane.
   West approach: Provide second through lane.
   Install traffic signal.

9. We generally agree with the DEIR that the intersections listed below will be significantly impacted by the proposed project under Scenario 1. However, we do not agree with the DEIR that the recommended improvements will sufficiently mitigate the project's significant impact to these County intersections. In accordance with the County's Traffic Impact Analysis guidelines, these intersections will still be significantly impacted by the project upon implementation of the mitigation measures recommended in the DEIR. The DEIR shall be revised to include improvements which mitigate the project's significant impact to these intersections in accordance with the County's Traffic Impact Analysis guidelines. A7-12

   Parker Road at Southbound I-5 Ramp

   Ridge Route Road at Northbound I-5 Ramp

   The Old Road at Parker Road

   Sloan Canyon Road at Parker Road

3. Response to Comments from Agencies and Organizations

10. We generally agree with the DEIR that the intersection listed below will be significantly impacted by the proposed project under Scenario 2. However, we do not agree with the DEIR that the recommended improvements will sufficiently mitigate the project's significant impact to this County intersection. In accordance with the County's Traffic Impact Analysis guidelines, the intersection will still be significantly impacted by the project upon implementation of the mitigation measures recommended in the DEIR. The DEIR shall be revised to include improvements which mitigate the project's significant impact to this intersection in accordance with the County's Traffic Impact Analysis guidelines. A7-13

    Sloan Canyon Road at Parker Road

11. We generally agree with the DEIR that student enrollment at the campus shall not exceed the interim student capacity of 1,600 students unless the school implements staggered start times and completes one of the following improvements:

    a. Widen the pavement and restripe the northern public access route under both Option A and Option B to provide four lanes of travel (build-out condition for Scenario 1); or A7-14

    b. Complete the southern public access route, which includes Barringer Road and Sloan Canyon Road (Scenario 2).

12. Prior to receiving approval to increase student enrollment, the project shall submit a revised traffic study to Public Works for review and approval, which analyzes the impact to County intersections in the area as a result of the increased enrollment. A7-15

13. For all mitigation measures recommended for Scenarios 1 and 2, the project shall submit conceptual signing and striping plans and traffic signal plans to Public Works for review and approval. The conceptual plans shall demonstrate that the proposed improvements will be accommodated within the available public right of way and identify any required road and/or bridge widening. A7-16

14. The project shall submit conceptual signing and striping plans and traffic signal plans for all new proposed roadways to Public Works for review and approval. The conceptual plans shall depict all proposed travel lanes including bikeway facilities, lane widths, turn-lane storage lengths, striping transitions, and school area signs and markings. A7-17

3. Response to Comments from Agencies and Organizations

15. The final location of all proposed school area warning signs and markings shall be determined during the review and approval of the detailed signing and striping plan. All proposed school area signs and markings shall be designed in accordance with the latest edition of the California Manual on Uniform Traffic Control Devices. A7-18

16. The final evaluation of the adequacy of roadway cross sections and sight distance shall be determined by Public Works' Land Development Division. A7-19

17. The project shall submit a Traffic and Parking Management Plan for planned events hosted at the stadium, during the morning and evening peak hours (6-8 a.m. and 4-6 p.m., respectively), to Public Works for review and approval. The Traffic and Parking Management Plan shall identify the public roadways used to access the site and address the need for additional traffic control along the route. The plan shall also include a parking analysis for onsite parking. Access routes and traffic control devices to accommodate any proposed offsite parking shall be analyzed as part of the Traffic and Parking Management Plan. A7-20

18. The proposed bikeway facility for Sloan Canyon Road shall be designed to be consistent with adjacent planned bikeway facilities. Please contact Public Works' Programs Development Division for more information. A7-21

19. The Transportation and Traffic Section of the DEIR shall include level of service and traffic signal warrants analyses for the new access route intersections listed below. A7-22

    Option A

    Mandolin Canyon Road at Harp Canyon Road
    Romero Canyon Road at Harp Canyon Road
    Romero Canyon Road at Valley Creek Road
    Valley Creek Road at High School Driveways 1 through 4

    Option B

    Sloan Canyon Road/Canyon Hill Road at Mandolin Canyon Road
    Canyon Hill Road/High School Driveway 3 at Valley Creek Road
    Valley Creek Road at High School Driveways 1, 2, and 4

3. Response to Comments from Agencies and Organizations

Mr. Tom Cole
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Grading

20. There are discrepancies within the DEIR relating to the estimated project grading (onsite and offsite). Table 4-7 of the DEIR (page 4-13) shows an estimated project site grading (for onsite and offsite access roads) of 6,310,000 cy of fill and 6,310,000 cy of cut (Maximum–which includes 4,850,000 cy of cut and 5,100,000 cy of fill onsite and the worst case scenario for the access roads). In addition, below Table on 4-7 there is a paragraph that indicates the gated emergency access road would involve an additional 3,000 cy of cut and fill. Page 5.5-11 of the DEIR (Impact 5.5-5) states, however, the following: "site grading would include about 4,890,000 cy of cut and 4,890,000 cy of fill. Grading for project access roads would involve an additional 1,630,000 cy of cut and 348,000 cy of fill." These discrepancies would need to be reconciled. The grading figures presented in the EIR should disclose an estimate of both cut and fill for the total project. This includes onsite and all offsite grading necessary (including all access roads and emergency access roads). Please note that the grading quantities disclosed will need to be adjusted based on the Road comments above. A7-23

21. In addition, after the discrepancy above is reconciled and there is more than 10,000 cy of imported or exported material the EIR should disclose a designated haul route. The structural integrity of the roadways along the haul route must be evaluated in the environmental document along with any mitigations (e.g., reconstruction of the roadway) to bring the structural section to an acceptable level. As an alternative, the environmental document must indicate the procedures that the applicant will take to evaluate the pre- and post-structural integrity of the roadways along the haul route. Furthermore, a disclosure must be made that the project will be responsible for reconstructing the haul route roadways to bring the structural section to an acceptable level should it be found that damage occurred during offsite hauling. A7-24

22. The third paragraph on page 5.5-11 (Impact 5.5-5) discusses the need for SWPPP's and Best Management Practices (BMPs) and goes on to state in the last sentence the following: "Within unincorporated Los Angeles County, compliance with BMPs are administered by the Los Angeles County Department of Public Works." This is inaccurate and should be modified to state that the owner/owner's representatives (engineers, contractors, agents, etc.) are responsible for administering, implementing, and ensuring compliance with all appropriate BMPs to address soil erosion. A7-25

3. Response to Comments from Agencies and Organizations

If you have any questions regarding the traffic/access comments 1 through 7 and 20 through 22, please contact Matthew Dubiel at (626) 458-4921 or mdubiel@dpw.lacounty.gov.

If you have any questions regarding the traffic/access comments 8 through 19, please contact Gerald Ley at (626) 300-4822 or gley@dpw.lacounty.gov.

Hazards-Flood/Water Quality

1. The DEIR does not adequately discuss the potential impacts to downstream property owners from the effects of hydromodification. The hydrology prepared for the project only analyzes the 50 year storm event and does not take into account potential impacts from the other more frequent storm events such as the 2 years, 5 years, and 10 years events. A7-26

2. The DEIR does not address the potential impacts to the natural drainage courses from the proposed bridges and culverts. Any restriction of flow created by a bridge or culvert will change the flow characteristics of the stream and has the potential to create downstream impacts. The impacts of the proposed bridges and culverts should be further analyzed in the hydrology report and discussed in the DEIR. A7-27

3. The project is located in a County Adopted Floodway per Adopted ML Map 388-ML8 for Romero Canyon. Impacts to the adopted floodway and impacts to the proposed infrastructure created by the existing floodway should be discussed in the DEIR. A7-28

4. The project is not exempt from County of Los Angeles' Low-Impact Development (LID) ordinance. The DEIR should discuss how the project will comply with the LID ordinance. The hydrology study for the project should provide analysis based on the County's LID Standard Manual. A7-29

5. The EIR does not adequately describe the scope of publicly maintained versus privately maintained drainage structures. The DEIR should discuss which alternatives call for large scale publicly maintained infrastructure and which alternatives propose privately maintained drainage system. A7-30

3. Response to Comments from Agencies and Organizations

6. The DEIR mentions that 18,000 cy of debris will be routed around the site in a swale and drainage channel. It is not feasible to transport that amount of debris in a swale or channel. Debris retention facilities will most likely be required for this project and should be discussed as an alternative in the DEIR. A7-31

7. A hydrology study should be submitted to Public Works for review and approval. The analysis should address increases in runoff, any change in drainage patterns, debris producing areas, and the capacity of existing storm drain facilities. Provide line identification of all proposed drainage facilities. Preliminary soils and geology reports related to debris, retention, and detention basins may be required based on geographic and adverse geotechnical conditions. Provide engineering calculations to support sizing of debris, retention, and detention basins. Provide approximate flood hazard and bank erosion setbacks and lot identifications (as needed). Show slopes for existing and proposed streets. Provide a drainage/grading covenant for any offsite work. A7-32

   If you have any questions regarding the flood/water quality comments, please contact Christopher Sheppard at (626) 458-4921 or csheppard@dpw.lacounty.gov.

Hazards-Geotechnical/Geology/Soils

1. Complete copies of the soils reports (including logs and borings, geological maps, cross sections, slope stability analyses, liquefaction analyses, etc.) should be included in Appendix F of the EIR. A7-33

   If you have any questions regarding the geotechnical/geology/soils comments, please contact Jeremy Wan at (626) 458-4923 or jwan@dpw.lacounty.gov.

Services-Sewer/Water

Sewer

1. We cannot substantiate the DEIR finding for the sewer portion at this time. The impacts of proposed project on the existing sewer systems cannot be verified until a sewer area study is submitted for review and approved with no mitigations. Sewer mitigations and impacts found in the sewer area study, if any, should be reflected on the EIR. A7-34

3. Response to Comments from Agencies and Organizations

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Water

1. A water will serve letter from the water purveyor is required. | A7-35

If you have any questions regarding the sewer/water comments, please contact Tony Khalkhali at (626) 458-4921 or tkhalkh@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact Ruben Cruz at (626) 458-4910 or rcruz@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works

ANTHONY E. NYIVIH
Assistant Deputy Director
Land Development Division

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3. Response to Comments from Agencies and Organizations

A7. Response to Comments from County of Los Angeles Public Works dated September 17, 2012.

A7-1 and -2 A preliminary conceptual striping plan is included in Appendix K (*A7-1_Cross Sections*) of this FEIR. Since the final alignment of the streets is subject to adjustment in some areas, the scale (normally 1"=40') was reduced and details provided at each intersection and major driveway (such as the elementary school) with several typical interim/ultimate plan views and typical cross sections for each major roadway. On-street parking is not provided but Class 3 bike routes and sidewalk on one side with provisions for a variable width multi- purpose trail on the opposite side are included. The offsite access streets are in an existing residential area that has two-acre minimum lot size, which should provide adequate parking in each lot. Where additional R/W may be required (such as along Baringer Road) there are existing facilities that the District will attempt to avoid. There also appears to be old previous grading near Romero Canyon Road and the District will attempt to reduce roadway crossing limits of the existing flood plain and reduce or balance the roadway earthwork.

A7-3 The traffic studies supporting the EIR were submitted to the Department of Public Works with the DEIR Distribution; the DEIR public review period began July 24, 2012. The preliminary conceptual striping plan is included as Appendix A of this FEIR.

A7-4 Where additional right-of-way may be required (such as along Baringer Road) there are existing facilities that the District will attempt to avoid. The project team is currently working to secure the additional right-of-way.

A7-5 and A7-6 A sidewalk width of five feet is typical for low pedestrian volume areas and is consistent with standard County requirements. The proposed roadways are within a rural area and, as such, pedestrian volumes are expected to be minor. Typically for a rural roadway, the County would not include sidewalks; however due to the proposed roadways functioning as a route to a school, a sidewalk is recommended. On-street parking is not proposed nor anticipated along the roadway due to the negligible amount of development along the proposed roadway alignment. Should future development proposals show the need for on-street parking or wider sidewalks, those developments can propose modified sections consistent with their development plan. Final roadway cross-sections are subject to County approval and may include provisions for wider sidewalks or on-street parking if determined as necessary during the plan review and approval process.

A7-7 The EIR addresses the impacts of forecast traffic along Parker Road and identifies significant impacts that vary based on Scenario. In a developed area such as along Parker Road, roadway capacity needs are primarily defined by the lane requirements at intersections since intersections represent the limiting constraint in the system. Parker Road is also identified on the County Master Plan of Highways (MPH) as a limited secondary highway and, as such, has a functional classification that is expected to accommodate higher volumes of traffic than other classifications such as residential or collector streets. Properties that obtain access directly from a County highway can be expected to

3. Response to Comments from Agencies and Organizations

experience greater delays in access than would a property that obtains access from a residential or a collector street.

Under Scenario 1, significant impacts are shown to occur along Parker Road at Sloan Canyon Road, at The Old Road, at the Southbound I-5 Ramp, and at the Northbound I-5 Ramp. Under Scenario 2, significant impacts are shown to occur along Parker Road at Sloan Canyon Road only (see DEIR Table 5.14-27). Mitigation has been identified to the extent feasible, which results in significant and unavoidable impacts under Scenario 1 along Parker Road at The Old Road and at the I-5 Southbound Ramps (see DEIR Table 5.14-36). Under Scenario 2, the identified feasible mitigation fully mitigates the project's impacts. The traffic study area extends easterly of the intersection of Parker and Sloan Roads, and the analysis determined that the project would not result in significant impacts with the exception of along Parker Road at the locations listed above.

A7-8 The middle turn lane is proposed on the main access road from Quail Valley Road (on Sloan Canyon Road and Canyon Hill Road) to Valley Creek Road. This road section has 40 feet of paved surface (curb to curb) which will accommodate a middle turn lane.

A7-9 One of the 6 studies referenced in the original table was omitted in the circulated DEIR because it was later updated. The appendices were also re-numbered as shown below in Revised Table 5.14-1. This table is revised as shown in Chapter 4, *Revisions to the Draft EIR*, of this FEIR.

Table 5.14-1 Topics Analyzed in Traffic Studies

Time Horizon	*School Capacity*	*Access Road Scenario*	*Traffic Studies*
Existing Plus Project	1,600 and 2,600	1 and 2	J-2
Short-Term (2014) Plus Project	1,600 and 2,600	1	J-1, J-5
	1,600 and 2,600	2	J-4
Buildout Plus Project	2,600	1	J-1, J-5
	2,600	2	J-4
Proposed Access Road Intersections, Northern Route	2,600	and 2	J-1

A7-10 The proposed driveways to the high school site are shown on the preliminary conceptual site plan. A full size scaled site plan will be submitted for DPW review and approval.

A7-11 All of the recommended mitigation measures for impacts to the intersection of Sloan Canyon Road and Quail Valley Road are included in Mitigation Measure T-1 in Section 5.14, *Transportation and Traffic*, of the DEIR. The District would be responsible for the cost of all of the improvements in Mitigation Measure T-1, as stated in that Mitigation Measure. The District would submit a detailed signing and striping plan and a traffic signal plan to the Department of Public Works for approval at least six months before opening of the school.

3. Response to Comments from Agencies and Organizations

A7-12 The DEIR identifies the locations where project impacts remain significant and unavoidable (see DEIR Table 5.14-36), which includes the locations listed in the comment above. Under Scenario 1, additional mitigation to fully mitigate project impacts at those locations is not feasible. Under Scenario 2, all locations are fully mitigated with the identified feasible mitigation.

A7-13 As shown in DEIR Tables 5.14-33 and 5.14-35, the intersection of Sloan Canyon Road at Parker Road is fully mitigated by the identified mitigation under Scenario 2. Levels of service (LOS) with the mitigation are LOS A, and the maximum intersection capacity utilization (ICU) level is 0.60. As such, the recommended improvements will fully mitigate the project's significant impact.

A7-14 The comment accurately describes the mitigation identified in the DEIR.

A7-15 Full buildout of the project was analyzed in the DEIR. The school would increase enrollment each year as new class levels are added until buildout.

A7-16 Conceptual signing and striping plans and traffic signal plans will be submitted to Public Works for review and approval. All off-site roadway improvements would comply with the County roadway standards and the latest edition of the California Manual on Uniform Traffic Control Devices, and would be reviewed and approved by the County Department of Public Works prior to construction.

A7-17 See response to A7-16, above.

A7-18 The locations of all school area warning signs would be specified on the conceptual signing and striping plans to be submitted the County Department of Public Works for review and approval prior to construction.

A7-19 See response to A7-16, above.

A7-20 The District will prepare Traffic and Parking Management Plans for Public Works review and approval for special events expected to exceed typical levels of attendance.

A7-21 The proposed bikeway facility for Sloan Canyon Road would be consistent with adjacent planned bikeway facilities provided the existing right-of-way width is not increased on the interim. Parkway widths for a Class 2 and Class 3 bikeway will be shown on the preliminary conceptual striping (see Appendix K, *A7-1_Cross Sections*).

A7-22 The traffic studies that are provided as technical appendices to the EIR contain the level of service and traffic signal analysis for the intersections listed above. Since each of the locations listed above are future intersections that would be constructed to serve future development in the area, traffic signals are only required if the cross streets are constructed as assumed for the purpose of this cumulative conditions analysis. With the exception of the high school driveways, the project trips will not experience cross-traffic at these intersections until such time that the surrounding area is developed, thus the need for a traffic signal will be determined by the level of future development that occurs in these areas. As

3. Response to Comments from Agencies and Organizations

shown in the Supplemental Traffic Analysis (May 2012), under Option A each of the three roadway intersections listed above will require a traffic signal if the surrounding area is developed. Under Option B, the Sloan Canyon Road/Canyon Hill Road/Mandolin Canyon Road intersection will require a traffic signal if the surrounding area is developed. Under either Option, of the four proposed high school driveways, only the main high school driveway intersection (Driveway 3) is anticipated to require a traffic signal.

A7-23 Impact 5.5-5 in DEIR Section 5.5, *Geology and Soils*, is hereby modified in FEIR Chapter 5 as follows:

site grading would include about 4.89 million cubic yards (mcy) of cut and ~~4.89 mcy~~ 5.1 mcy of fill. Grading for project access roads would involve an additional 1.63 mcy of cut and ~~348,000 cy~~ 1.21 mcy of fill.

There is no import or export as the excess cut in the access roads is used to balance the site.

A7-24 There is no import or export as the excess cut in the access roads is used to balance the project.

A7-25 Page 5.5-11 in DEIR Section 5.5, Geology and Soils, is revised in FEIR Chapter 5 as follows.

The District's construction contractor and civil engineer would be responsible for administering, implementing, and ensuring compliance with BMPs addressing soil erosion and specified in the project SWPPP. Within unincorporated Los Angeles County, compliance with BMPs is ~~administered~~ enforced by the Los Angeles County Department of Public Works.

A7-26 Since the final improvement plans require a final hydrology study in addition to the preliminary hydrology study which shows that the 50 year event has no impact to downstream waters, it was concluded that 2, 5, and 10 year events would be included in the hydrology study for the final improvement plans.

A7-27 For Scenario #1, modified by Detail IV, shows that crossing of the natural drainage courses is being designed to span the floodway limits and will not create a restriction. For Scenario #2 there are no restrictions as the drainage facility outlets at Baringer Road. Detailed drainage concepts are included in Appendix K, *A7_Drainage Concepts*.

A7-28 Within the high school site, the upstream portion of the Adopted Floodway per Adopted ML Map 388-ML8 would be adjusted by processing an LA County modification request concurrent with preparation and processing of the final improvement plans and standard manual.

A7-29 The project will comply with the LA County Low-Impact Development (LID) ordinance by providing retention basins to retain any excess run-off volume. The improvement plan submittal will include the final hydrology study for the

project which will provide the final calculations for compliance with the County's LID Standard Manual.

A7-30 In general, privately maintained drainage facilities will be all facilities west and south of Valley Creek Road. Publicly maintained drainage facilities would be in Valley Creek Road and the adjacent drainage facilities along the east and north side of Valley Creak Road. As an option, subject to LA County approval, the District may decide to maintain the adjacent drainage facilities. Detailed drainage concepts are included in Appendix K, *A7_Drainage Concepts*.

A7-31-33 The County has recently indicated that debris retention facilities may be required. Debris facilities would include locations at the northeasterly side of the of Valley Creek Road and in a portion of TTM No. 46443 cul-de-sac area. The final hydrology study would include hydrologic calculations for increases in run-off, any change in drainage patterns, debris producing areas, and the capacity of any existing storm drain facilities. Final soils and geology reports will be submitted. Engineering calculations to support sizing of debris, retention and detention basins will be provided.

A7-34 A flow test will be required on the existing sewer mains prior to preparation of sewer plans to confirm the findings of the sewer study.

A7-35 Obtaining utility will-serve letters is not a requirement to obtain CEQA clearance prior to project approval. Utility responses to service questionnaires are not the same as a will-serve letter and do not create a contractual obligation to provide service. A water service will-serve letter will be requested after project approval.

Dist. Office N/A

Sheet 1 of 1

County of Los Angeles Department of Public Works
GEOTECHNICAL AND MATERIALS ENGINEERING DIVISION
GEOLOGIC REVIEW SHEET
900 So. Fremont Ave., Alhambra, CA 91803
TEL. (626) 458-7951

DISTRIBUTION
___ Dist. Office
1 Geologist
___ Soils Engineer
1 GMED File
1 LDD - Grading

Tract / Parcel Map		**Lot(s)**	
Parent Tract		**Location**	Castaic
Site Address	D.S. 541 - Canyon Hill Road	**APN**	
Geologist	Geolabs-Westlake Village	**Developer/Owner**	Castaic School District
Soils Engineer	Geolabs-Westlake Village	**Engineer/Arch.**	Sikand

Grading P.C. No. ___ For: Deeded Street 541
Plans received ---
Geologic Report(s) Dated ___
Soils Engineering Report(s) Dated ___
Geology and Soils Engineering Report(s) Dated 8/14/13
Additional Reports Reviewed ___

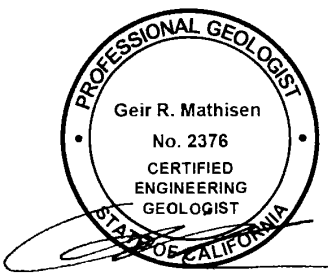
Action: Plan is not recommended for approval for reasons below.

Remarks/Conditions:

1. The grading shown on the geologic map does not match the proposed grading for the western terminus of Sloan Canyon Road (see Geologic Review Sheet dated 8/14/13 for information regarding Grading Plan Check No. 46443-00R1). The grading plans for Sloan Canyon Road show removal of the landslide down to bedrock. Discuss and revise the recommendations as necessary.
2. Depict boring B157 on the geologic map.
3. Based on the boring logs, the materials encountered in the borings do not appear to correlate with the layers presented on many of the geologic cross-sections. It is also questionable how the consultant is justifying the interpolation of data points considering the distance between the borings and the projection of data from the borings onto the geologic cross-sections. Therefore, additional subsurface data is required to substantiate the units presented on the geologic cross-sections. Clearly indicate on the boring-logs the specific units that are presented on the geologic cross-sections. The layers utilized in the slope stability models should be based on clearly defined units shown in the boring logs and properly displayed on the geologic map.
4. Provide additional cross-sections through the mapped landslide of the east portion of the site depicting the geologic conditions.
5. Required plans not submitted. To initiate review, submit plans.
6. The plan must be specifically approved by the consultant geologist by manual, original signature and date on each sheet prior to approval by the Geology Section. Submit two (2) sets for review.
7. Add the following as notes to the plan:

   In-grading inspections must be made by the consulting geologist and soils engineer. Monthly in-grading inspection reports must be submitted directly to the Geology and Soils Section by the consultants.

   Rough grading must be approved by a final engineering geology and soils engineering report. An As-Built Geologic Map must be included in the final geology report. Provide a final report statement that verifies work was done in accordance with report recommendations and code provisions (Section J105.12). The final report(s) must be submitted to the Geotechnical and Materials Engineering Division for review and approval.
8. Show all proposed corrective measures (buttresses, stability fills, deep removals, etc.) on the plan.
9. The Soils Engineering review dated 10-30-13 is attached.



Prepared by ___ Date 9/23/13
Geir Mathisen

Please complete a Customer Service Survey at http://dpw.lacounty.gov/go/gmedsurvey
DS 541 (Canyon Hill Rd)

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
GEOTECHNICAL AND MATERIALS ENGINEERING DIVISION

SOILS ENGINEERING REVIEW SHEET

Address: 900 S. Fremont Ave., Alhambra, CA 91803
Telephone: (626) 458-4925
Fax: (626) 458-4913

District Office ---
PCA GMGR
Sheet 1 of 1

Review No. 1
Grading for Deeded Street

DISTRIBUTION:
1 Drainage
1 Grading
1 Geo/Soils Central File
___ District Engineer
___ Geologist
1 Soils Engineer
1 Engineer/Architect

Deeded Street No. 541
Location Canyon Hill Road, Castaic
Developer/Owner Castaic School District
Engineer/Architect Sikand
Soils Engineer Geolabs-Westlake Village (8667)
Geologist Geolabs-Westlake Village

Deeded Street No. 541

Review of:

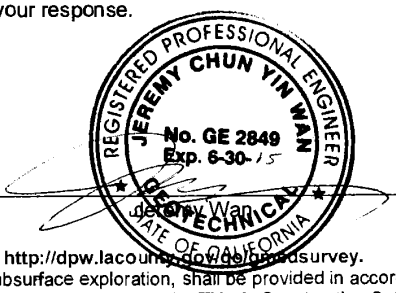
Soils Engineering and Geology Report Dated **8/14/13**

ACTION:

Plan is not recommended for approval.

REMARKS:

1. Submit two sets of grading plans to the Soils Section for verification of compliance with County codes and policies. No plan has been submitted to the Soils Section for review to date.
2. Provide copies of boring logs for Borings B133, B134, B135, GWV25, and GWV26.
3. Based on the shear data provided in the soils report, it appears that the peak and residual shear strength parameters used in the slope stability analyses for the coarse-grained Saugus formation are not conservative (i.e. obtained within the bottom 10% of the data envelope). Verify and provide additional data and/or reassign shear strength parameters for the material as necessary. Provide revised slope stability analyses and recommend mitigation if factors of safety are below the County's minimum standards.
4. The slope gradient shown on cross section 103-103' (4.5:1; H:V) does not appear to match the gradient shown on the geotechnical map (3:1). Verify and provide revised geotechnical map, cross section(s), and/or slope stability analyses as necessary. Recommend mitigation if factors of safety are below the County's minimum standards.
5. Provide additional slope stability analyses using the additional cross sections through the landslide as requested by Geology Section. Recommend mitigation if factors of safety are below the County's minimum standards.
6. Slope stability analyses will be reviewed when the issues related to geology of the site and shear strength parameters are resolved.
7. Additional slope stability analyses may be required when the geology of the site is conclusively determined.
8. The Soils Engineer of record must acknowledge all pertinent previous soil reports and make a statement that he agrees with their findings, conclusions, and recommendations or provide appropriate modifications.
9. Show the following on the grading plans:
   a. Existing and proposed grades. Clearly label cut/fill slopes. Areas of stability fill and buttress should be labeled as fill slopes.
   b. Indicate depth and delineate limits of removal and recompaction of unsuitable soils (i.e. depth and extent of landslides etc.).
   c. Details of keying and benching that show back-drains and back-drain outlets in the keyway and on benches.
   d. All standard notes regarding fill compaction and soil density testing requirements.
   e. All recommended mitigation measures, as necessary.
10. The Soils Engineer of record must review the grading plans and sign and stamp the plans in verification of his recommendations. Original manual signature and wet stamp are required.
11. Requirements of the Geology Section are attached.
12. Include a copy of this review sheet with your response.



Prepared by Jeremy Wan Date 10/30/13

Please complete a Customer Service Survey at http://dpw.lacounty.gov/gmed/surveys.
NOTICE: Public safety, relative to geotechnical subsurface exploration, shall be provided in accordance with current codes for excavations, inclusive of the Los Angeles County Code, Chapter 11.48, and the State of California, Title 8, Construction Safety Orders.
P:\gmepub\Development Review\Soils Review\Jeremy\DS 541, Canyon Hill Road, Castaic, GP-NA_1.doc

Dist. Office N/A

Sheet 1 of 1

L67132RD

County of Los Angeles Department of Public Works
GEOTECHNICAL AND MATERIALS ENGINEERING DIVISION
GEOLOGIC REVIEW SHEET
900 So. Fremont Ave., Alhambra, CA 91803
TEL. (626) 458-4925

DISTRIBUTION
__ Dist. Office
1 Geologist
__ Soils Engineer
1 GMED File
1 LDD - Grading

Tract / Parcel Map	TR 47807 & PM 67132	**Lot(s)**	
Parent Tract		**Location**	Castaic
Site Address	Romero Canyon Road	**APN**	3247-068-001 & -004
Geologist	Geolabs-Westlake Village	**Developer/Owner**	Wm S. Hart School Dist / Romero Cyn LLC
Soils Engineer	Geolabs-Westlake Village	**Engineer/Arch.**	Sikand

Grading P.C. No. N/A For: Castaic High School
Geologic Report(s) Dated
Soils Engineering Report(s) Dated
Geology and Soils Engineering Report(s) Dated 2/5/14, 7/12/13, 6/4/13, 5/2/13, 2/7/13, 11/12/10
Additional Reports Reviewed Fugro West: 5/26/10; RMA Group: 12/29/10; RSA: 11/12/99, 8/2/91, 7/18/90, 12/27/89

Action: Plan is not recommended for approval for reasons below.

Remarks/Conditions:

1. As requested in Geologic Review dated 10/17/13, a geologic cross section oriented through the axis of the Qls 1, 2, & 5 complex is needed because sections 3-3' and 10-10' trend through relatively thin portions of the landslide complex and do not illustrate the greatest impacts to the proposed development. The requested section should also clearly illustrate estimated removal depths of landslide debris and other unsuitable materials (on the geologic cross section).

2. On each GEOLOGIC cross section depict anticipated removal depths with a geologic contact line to illustrate the anticipated as-graded conditions. Citing an elevation is not sufficient unless the removal results in a horizontal plane.

3. As requested in Geologic Review dated 10/17/13, demonstrate that landslides Qls 7 and Qls 8 (Sheet C-3.4) are stable and will not affect the proposed grading. Incorporate recommendations for stabilization into the grading plans, as needed. Depict borings B-5 (RSA) and B118 (GLWV) on cross section 9-9'. Revise landslide plane to reflect data from those borings.

   Additionally, depict on this section a schematic temporary back-cut for the Qls1 landslide removal and address the effect of the back-cut on in-grading stability of Qls 7 and Qls 8.

4. The geologic map included with the 2/5/14 Geolabs-Westlake Village report depicts areas where landslide debris is proposed to be left in place, and these areas underlie proposed roads, slopes and infrastructure. Determine the total amount of settlement expected in these areas, the impact on stability of the proposed constructed slopes, and demonstrate that the settlement of the roads and infrastructure will not exceed County maximum limits. Consider requirements for compliance with County of Los Angeles Building Code §111 and comment 13 in Geologic Review dated 10/17/13 when responding to this item.

5. As requested in Geologic Review dated 10/17/13, the proposed 2:1 cut slope in landslide deposits (Qls 3) shown on Sheets C-3.3 and C-3.6 is recommended by the consultants to be reconstructed as a fill (geologic cross section 24-24'). Revise the proposed grading to reflect the consultant's recommendations. NOTE: The removal limits shown on Sheet 3.6 of the undated grading plans included with the most recent submittal do not include the entire slope.

6. As requested in Geologic review dated 10/17/13, Provide copies of DOGGR approval of abandonment of oils wells within the graded area.

7. The plan must be specifically approved by the consultant geologist by manual, original signature and date on each sheet prior to approval by the Geology Section. Submit two (2) sets for review.

8. The Soils Engineering review dated 3/20/14 is attached.

Prepared by  Reviewed by _____ Date 3/20/14
Charles Nestle

Please complete a Customer Service Survey at http://dpw.lacounty.gov/go/gmedsurvey
P:\Gmepub\Geology Review Forms Form GR.doc
3/18/08

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
GEOTECHNICAL AND MATERIALS ENGINEERING DIVISION

SOILS ENGINEERING REVIEW SHEET

Address: 900 S. Fremont Ave., Alhambra, CA 91803
Telephone: (626) 458-4925
Fax: (626) 458-4913

District Office LDD
Job Number PCA#: L67132RD
Sheet 1 of 2

Review No. 3

DISTRIBUTION:
1 Drainage
1 Grading
1 Geo/Soils Central File
District Engineer
1 Geologist
1 Soils Engineer
1 Engineer/Architect

Grading for High School – Castaic High School	
Tract	Portion of 47807 (Tent. Tract 67132)
Location	Romero Canyon Road
Developer/Owner	William S. Hart Union Hart School District
Engineer/Architect	Sikand
Soils Engineer	Geolabs – Westlake Village (W.O. 8667)
Geologist	Geolabs – Westlake Village

Review of:
Revised Grading Plans Dated by the Processing Center **2/11/14**
Soils Engineering and Geologic Report Dated **2/5/14,** 7/12/13, 6/4/13, 2/7/13, 11/12/10
Soils Engineering and Geologic Report for Tentative Tract 47807 Dated 12/14/06
Soils Engineering and Geologic Report for Tentative Tract 67132 Dated 3/9/07
Previous Review Sheet Dated 10/10/13

ACTION:
Grading plan is not recommended for approval.

REMARKS:

1. Requirements of the Geology Section are attached. Additional comments may arise once the geology of the site has been conclusively determined.

2. Provide temporary slope stability analyses for landslides Qls_7, and Qls_8. The slope stability analyses must model the critical condition during the construction of the buttress for landslide Qls_1. Utilize the revised geologic cross section 9-9' requested by the Geology Section (Remark #3 of the Geology Review Sheet). Indicate the various shear strength parameters used in the analyses, in the appropriate segments of each failure plane. Show locations of the cross sections used in slope stability analyses on the geotechnical map. Recommend mitigation if factors of safety are below County minimum standards.

3. Provide additional data for slope stability analyses in the middle section of cross section 5-5'. It appears the majority of critical failure surfaces from the slope stability analyses toes out at this location. Boring B108 used to describe this section does not appear to extend to the depth of the proposed slope. Therefore verify the material types used in the slope stability analyses at this location are accurate to the existing materials. Provide revised slope stability analyses and mitigation measures as necessary.

4. Per the latest submitted report, portions of landslide debris from Qls_1, Qls_2, and Qls_3, will be buried in place. These areas are shown to underlie proposed roads, slopes, and infrastructure. Therefore landslide debris must be shown to be stable and settlement analyses must be conducted. As requested by the Geology Section, provide soil data and soil testing such as, but not limited to, density, classification, consolidation, etc. throughout the entire depth of each landslide debris mass proposed to remain in place. Provide specific soil data and testing at each location to provide thorough and specific characterization. Provide static and seismic settlement analyses at each location to verify that the settlement will not exceed County standards for total and differential settlement. Provide data, substantiating analyses and revised recommendations.

5. Provide discussion on the shear strength parameters for alluvial materials shown on Plates B.5 and B.6. Cohesion values appear to be relatively high considering the soil descriptions for alluvial materials. Address the interpretation of the shear envelopes and the shear strengths. Clarify how the shear envelopes were determined. Revise shear envelope and shear parameters, if necessary.

6. Delineate depths and distinguish the location of the proposed fill materials on all of the geologic cross-sections. All fill materials on the cross sections should be clearly distinguishable (i.e. hatched, shaded, etc.) from the natural materials. The geologic cross sections must also show a delineated line at the lowest grade of the proposed fill. Revise cross sections as necessary.

7. Address whether the locations of the canyon sub-drains from the northern property will adequately capture the estimated flow, considering the depth of proposed removal and the depth of alluvium in the middle of the canyon. Sheet C-3.1 shows the alluvial canyon with sub-drain located at the toes of adjacent slopes rather than the deepest portion of the alluvial canyon. Verify and revise as necessary.

8. Specify the type of unit weight shown on the shear parameter table. Revise table to clarify. Review of field dry densities from lab data does not show densities greater than 130 pcf.

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
GEOTECHNICAL AND MATERIALS ENGINEERING DIVISION

SOILS ENGINEERING REVIEW SHEET

REMARKS (cont.): Sheet 2 of 2

9. Show area delineated as "Limits of Clay Bed/Siltstone Removal" on the grading plans. The recommended grading must be shown on the grading plans.

10. Show and/or extend the keyway of the north-facing slopes on the southern portion of the subject site. Show keyway in cross sections 22-22' and 22.2-22.2' on the geotechnical map and grading plans, as necessary.

11. Show the following on the geotechnical map and grading plans:
    a. Location of Geotechnical Setback Line on the proposed Helipad. Per the latest report the Soils Engineer, has recommended a 72' geotechnical setback from the top of the natural descending slope.
    b. Show areas of "Limits of Clay Bed/Siltstone Removal". Reference Geologic Map Sheet C-3.4, Plate 1.4.
    c. Show keyway for the proposed fill slopes depicted on cross sections 22-22', 22.2-22.2', and 24-24'.
    d. All recommended mitigation measures.

12. The Soils Engineer of record must review the grading plans and sign and stamp the plans in verification of his recommendations. Original manual signature and wet stamp are required.

13. Submit two sets of grading plans to the Soils Section for verification of compliance with County codes and policies.

14. Include a copy of this review sheet with your response.

NOTE(S) TO THE PLAN CHECKER/BUILDING AND SAFETY ENGINEER:
A. THE SOILS REPORT DATED 12/14/06 INDICATES THERE MAY BE ENVIRONMENTAL CONCERNS REGARDING THE EXISTING OIL WELL AT THIS SITE.
B. ON-SITE SOILS ARE CORROSIVE TO FERROUS METALS.

Reviewed by Yoshiya Morisaku Date 3/20/14

Please complete a Customer Service Survey at http://dpw.lacounty.gov/gmed/surveys

NOTICE: Public safety relative to geotechnical subsurface exploration shall be provided in accordance with current codes for excavations, inclusive of the Los Angeles County Code, Chapter 11.48, and the State of California, Title 8, Construction Safety Orders.

RESPONSE TO LETTER 6: County of Los Angeles Department of Public Works, dated May 15, 2014

6-1 The comment states that this subsection references "Valley Crest Road" instead of "Valley Creek Road," which is how the majority of the document labels this proposed roadway.

The correct name for the proposed roadway is "Valley Creek Road." The revised Draft Supplemental EIR has been corrected in Section 1.0, Executive Summary, and Section 3.0, Project Description.

6-2 The comment states that in Figure 3.0-3, Project Access Routes, references "Valley Crest Road" while other figures throughout the document depict "Valley Creek Road."

The correct name for the proposed roadway is "Valley Creek Road." Figure 3.0-3 in the revised Draft Supplemental EIR has been corrected.

6-3 The comment states that the environmental document contains discrepancies in the grading quantities for the project, and it is unclear if the project will be balanced on site. Furthermore, the grading quantities for the project cannot be substantiated at the time due to the lack of approved engineering studies (hydrology, geotechnical reports) and improvement plans.

The grading quantities presented in Section 3.2.3, Construction, Grading, of the Draft Supplemental EIR are correct. The total estimated grading quantities identified in the previously certified EIR and the revised estimates for the School Site are provided in Table 3.0-2, Estimated Grading Quantities – School Site. The estimated grading quantities for the roadways, including the East Access and Southern Access routes, are provided in Table 3.0-3, Estimated Grading Quantities – East Access Route, and Table 3.0-4, Estimated Grading Quantities – Southern Access Route, respectively. The total estimated grading volumes for the Southern Access route have not changed at this time. The total estimated grading quantities, including the School Site and the access routes, is provided in Table 3.0-6, Total Project Estimated Grading Quantities.

The quantities presented in other sections (Section 4.3, Geology and Soils, and Section, 4.4 Hydrology and Water Quality) of the revised Draft Supplemental EIR have been corrected as needed to reflect the correct grading amounts. The analysis of grading does not change. Grading volumes are estimates at this time based on the project engineer's calculations of cut and fill. The grading plans are subject to the review and approval of LACDPW.

CEQA does require that the quantities of grading be substantiated by LACDPW. As noted in the State *CEQA Guidelines* Section 15146, the degree of specificity required in an EIR will correspond

to the degree of specificity involved in the underlying activity that is described in the EIR. Further, the State *CEQA Guidelines* Section 15147 notes that the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Finally, the State *CEQA Guidelines* Section 15149(b) notes that in its intended usage, an EIR is not a technical document that can be prepared only by a registered professional, but rather serves as a public disclosure document explaining the effects of the proposed project on the environment, alternatives to the project, and ways to minimize adverse effects and to increase beneficial effects. CEQA recommends that the Lead Agency establish requirements or conditions on project design, construction, or operation to protect or enhance the environment; State statutes may provide that only registered professionals can prepare technical studies that will be used in or control the detailed design, construction, or operation of the proposed project and that will be prepared in support of an EIR.

The information contained in the Draft Supplemental EIR is based on "conceptual" grading plans. The final grading plans will be reviewed and approved by the LACDPW prior to issuance of a grading permit.

6-4 The comment states that if the Project is not balanced on-site, the Project will need to disclose the haul routes that will be used and discuss the impacts it will have. Specifically, the impacts on the structural integrity of surrounding roadways should be addressed, and include corresponding mitigation measures addressing the impact.

As noted in the Draft Supplemental EIR, the grading for the Project will be balanced between the East Access and the School Site (see Table 3.0-6 of the revised Draft Supplemental EIR. As such, there will not be any export of materials off site, and no haul routes will be required.

6-5 The comment state that Section 1.4.2 of the Draft Supplemental EIR should be modified as follows:

> *As currently proposed, the modifications to the Approved Project include drainage improvements for the East Access roadway consisting of a single debris basin at the northeast corner of the proposed elementary school property located on the south side of Sloan Canyon Road. This debris basin is designed to accommodate the consolidated total debris volume of the previously approved design for Tract No. 46335 along Sloan Canyon Road. The debris basin will serve a total upstream tributary area of 138.8 acres, and contain a total debris volume of 13,870 cu. Yds. ~~as required by LACDPW~~. The inlet pipe has been designed to accommodate the 50-year, burned discharge of 286 cfs.*

It was further noted that an approved hydrology for this project has not been obtained from LACDPW. Until such approval is given, the total debris volume cannot be substantiated.

Section 1.0, Executive Summary, of the revised Draft Supplemental EIR has been revised to reflect the request change.

The District understands that the LACDPW is currently reviewing the hydrology reports submitted, and that the issuance of grading permits will be dependent upon approval of the their review.

6-6 The comment notes that similar statements as noted in **Comment 6-5** were made in Section 3.0, Project Description, Subsection 3.2.2, Project Characteristics, Modifications to the Approved Project, Access Routes, and in Section 4.4, Hydrology and Water Quality Subsection 4.4.3, Environmental Impacts, Proposed Access Drainage, East Access Route. These statements need to be corrected.

Section 3.0, Project Description, and Section 4.4, Hydrology and Water Quality, of the revised Draft Supplemental EIR have been revised to reflect the requested changes.

6-7 The comment notes the difference in language from Table 1.0-4, Summary of Project Mitigation Measures, Mitigation Measure BIO-8, in which it states that the Project shall comply with requirements as enforced and administered by LACDPW. This comment states that it is inaccurate to disclose that LACDPW administers BMPs at a construction site. Instead, the table should note that the District's construction contractor and civil engineer would be responsible for administering BMPs needed in the Project. Additionally, statements need to be altered in Section 4.3, Geology and Soils, Subsection 4.3.3, Environmental Impacts, Previously Certified EIR Analysis, where it states LACDPW will administer and enforce BMPs.

Section 1.0, Executive Summary, Section 4.2, Biological Resources, and Section 4.3, Geology and Soils, of the revised Draft Supplemental EIR have been revised to reflect the comment.

6-8 The comment states that given the current alignment of the Southern Access road, a bridge or large culvert will be required to cross the existing floodplain and that this should be noted in the Supplemental EIR.

Section 3.2.1, Description of the Approved Project, has been modified in the revised Draft Supplemental EIR to note the need for bridges and/or culverts along Valley Creek Road and Baringer Road.

6-9 The comment states that Section 3.2.2, Modifications to the Approved Project, of the Draft Supplemental EIR and the need for the concrete lining of the channel was not at the request of the Los Angeles County Flood Control District (LACFCD). The LACFCD only requires this for the Project Site, and this should be clarified in the Supplemental EIR.

The modification to the Approved Project as described in Section 3.2.2 of the Draft Supplemental EIR reflect comments from a variety of agencies, including Division of the State Architect (DSA), the California Geological Survey (CGS), and LACDPW.

The design of the main channel on the high school campus will be designed to meet the requirements of Los Angeles County Flood Control District (LACFCD). While not specifically required by LACFCD, the most practical solution consists of a 10-foot-wide trapezoidal concrete channel that will convey stormwater from the School Site and be aligned adjacent to Valley Creek Road. The channel will include an inlet (at its origin on the northern part of the School Site), and as it conveys water will converge with a reinforced-concrete (RC) box (second bulked inlet), and will pass through two box culverts (at the intersection of Valley Creek Road and Canyon Hill Road, and under the access road driveway close to outlet), and terminate into a riprap channel outlet. The riprap channel outlet will then converge with a separate 36-inch reinforced-concrete pipe (RCP), draining a separate bulked-flow inlet. At this point, the stormwater flows will then empty into the natural portion of Romero Canyon Creek.

6-10 The comment states that Section 3.2.2, Modifications to the Approved Project, of the Draft Supplemental EIR does not include any discussions about the two culverts that are proposed for the East Access road.

To facilitate access, the District will extend an existing dirt roadway from Sloan Canyon Road to the School Site. The new road (Canyon Hill Road) will provide public access to the School Site and Campus in an east-west fashion. While the District is considering various options for the roadway, subject to approval by LACDPW, the volume of grading required and the areas to be disturbed are based on grading for the full-width right-of-way (80 feet). Adjacent to the Canyon Hill Road, surface water flows from the existing natural tributary area on the north side of the road will be conveyed through the 36-inch-diameter culvert crossing the road into the existing natural channel. A series of five culverts will run under the proposed Sloan Canyon Road to convey flows to the existing natural channel and watershed of Sloan Canyon Creek. In addition to the standard inlet and outlet structures containing grouted riprap pads, the five crossing structures will include:

a) a 42-inch-diameter concrete pipe with an inlet headwall (7.63 feet in height and 11 feet in length), and an outlet headwall (8 feet in height and 12 feet in length)

b) A\a 42-inch-diameter concrete pipe with an inlet headwall (9 feet in height and 10 inches in length), and an outlet headwall (4.4 feet in height and 12 feet in length) (optional future)

c) a 5-by-3-foot single concrete box, with an inlet headwall (5.25 feet in height and 12 feet in length), and an outlet headwall (7 feet in height and 12 feet in length)

d) a 42-inch-diameter concrete pipe with an inlet headwall (5.5 feet in height and 6 feet in length), and an outlet headwall (5.5 feet in height and 10 feet in length)

e) a 42-inch-diameter concrete pipe, with an inlet headwall (5.5 feet in height and 10 feet in length), and an outlet headwall (6 feet in height and 12 feet in length)

In addition to culverts, two debris basins are proposed to control sediment. The first basin is located on the Castaic Union Elementary School District property, while the second is located slightly downstream, on the Allard property. Both basins outlet into the proposed storm drain system that runs within Sloan Canyon Road and outlets in the existing storm drain per Planned Development (PD) Permit No. 1558.

LACFCD will be responsible for future maintenance of the following structures including:

a) all catch basins with laterals

b) the one culvert crossing along Valley Creek Road

c) the main concrete trapezoidal channel (that runs from north to south, adjacent and parallel, northerly and easterly of Valley Creek Road)

d) a 10-by-4-foot reinforced-concrete box lateral with bulked-flow inlet (located northeast of the site)

e) the terminus riprap channel that outlets into Romero Canyon Creek (located about 340 feet north of the south site boundary)

All other stormwater infrastructure will be privately maintained by the District.

Section 3.2.2, Modification to the Approved Project, Access Roads, of the revised Draft Supplemental EIR has been revised to reflect this information.

6-11 The comment states that the Draft Supplemental EIR lacks discussion about the Southern Access Route and any associated improvements that may be required. Any and all proposed improvements along the southern access route should be discussed in the Supplemental EIR.

As noted in the Draft Supplemental EIR (see Section 3.2.2, Modifications to the Approved Project), the access routes' alignments have not changed. The Southern Access is as proposed and described for the Approved Project; detailed engineering studies on the design have yet to be completed. Upon completion of those studies, detailed plans for the design will be provided to LACDPW for review.

Should the design change substantially from that described for the Approved Project in the previously certified EIR, subsequent environmental review will occur at that time.

6-12 The comment states that Table 3.0-1, Project Assessor Parcels, does not all match up with LACDPW records and asks that an updated listing of APNs, especially for the off-site impacted properties, be provided

Table 3.0-1 is based on information from the Los Angeles County Assessor's Office, and has been updated to reflect additional title search and easement requirements in the revised Draft Supplemental EIR.

6-13 The comment states the document shall disclose all related off-site impacts and secure related covenants/construction letters as part of this Project.

Table 3.0-1 in the revised Draft Supplemental EIR has been updated to reflect all necessary related off-site impacts and secure related covenants/construction letters.

6-14 The comment states that Section 3.2.2, Modifications to the Approved Project, School Site, of the Draft Supplemental EIR should be modified as follows:

- "Geologic Remediation Area (see area "C" on Figure 3.0-7)
  The County review has ~~requested~~ <u>required</u> the following changes:"

The requested change has been made to the revised Draft Supplemental EIR.

6-15 The comment states that Section 3.2.2, Modifications to the Approved Project, School Site, of the Draft Supplemental EIR should be modified as follows:

- "Channel outlet (see area "H" on Figure 3.0-7
  ~~At the request of the County, the~~ The Channel has been redesigned to outlet on the east side of the Valley Creek Road."

The requested change has been made to the revised Draft Supplemental EIR.

6-16 The comment states the three jurisdictional permits stated in Section 4.2.1, Environmental Setting, Jurisdictional Resources, School Site, are not current. The current permit/file numbers need to be updated and properly disclosed in the Supplemental EIR.

The Draft Supplemental EIR incorrectly listed the jurisdictional permit numbers. The permits listed were previously in effect for the School Site prior to recent applications for revised permits that also included the East Access Route.

The prior permits for the School Site, as listed in the Draft Supplemental EIR, include CDFW SAA 1600-2010-0204-RS-R5 Rev 2 for Tentative Tract 47807-1, LARWQCB Water Quality Certification for Proposed Tract 47807 File No. 06-197, and USACE Nationwide Permit Authorization File No. SPL-2006-01764-PHT for TT 47807 (Rough Grading).

The prior CDFW SAA listed has been updated and replaced with SAA 1600-2013-0090-R5 (Castaic High School and Access Road), and the LARWQCB Water Quality Certification has been supplemented with File No. 13-065 (Castaic Access Road Project, Sloan Canyon Creek.

The USACE for TT47807 is still active and the USACE has determined that the work to be performed along the East Access Route (Canyon Hill Road and Sloan Canyon Road) qualifies as "non-notification" pursuant to Nationwide Permit No. 14 in that (1) the loss of waters of the United States is less than 0.10 acre; or (2) there is no discharge in a special aquatic site including wetlands.

The revised Draft Supplemental EIR has been corrected to include this information, and the applicable permits have been included as appendices.

6-17 The comment states Section 4.3, Geology and Soils, of the Draft Supplemental EIR needs to be updated to include the revised information presented in the soils and geology report by Geolabs-Westlake Village dated February 5, 2014.

The February 5, 2014, Geolabs-Westlake Village soils and geology report has been added to the document list in Section 4.3 and to Appendix 4.3, Geology Reports, of the revised Draft Supplemental EIR.

As requested by LACDPW Geotechnical and Materials Engineering Division (GMED), the February 5, 2014, Geolabs-Westlake Village soils and geology report was based on the 40-scale improvement plans for the School Site and describes minor differences between those plans and the previously analyzed 100-scale plans, coupled with the LACDPW's design requirements, and were analyzed, resulting in insignificant changes to the previously recommended slope stabilization designs. In addition, additional details regarding mitigation of previously recognized soils and geology elements, such as the mudflow potential, were added to the 40-scale improvement plans and discussed in the February 5, 2014 report.

In addition, Geolabs-Westlake Village has responded to the LACDPW's GMED comments dated March 20, 2014, in the report dated May 27, 2014, and to comments dated June 10 and 11, 2014, in the report dated June 17, 2014. This report also has been added to the document list in Section 4.3 and to Appendix 4.3 of the revised Draft Supplemental EIR. No significant modification of the project design, including design criteria for mitigation of geotechnical elements, resulted from the additional analyses performed in response to the March 20, 2014 GMED comments.

6-18 The comment states that Section 4.3, Geology and Soils, of the Draft Supplemental EIR may need to be updated because geology of the School Site has not been determined and proposed grading may change as a result of comments made by LACDPW GMED for Deeded Street No. 541.

Geolabs-Westlake Village is currently preparing a report in response to the GMED's comments dated September 23, 2013, and October 30, 2013. That work is nearly complete, and no significant modification of the project design, including design criteria for mitigation of geotechnical elements, resulted from the additional analyses performed in response to those comments.

6-19 The comment states that the mitigation measures identified in Section 4.3, Geology and Soils, of the Draft Supplemental EIR cannot be substantiated because the comments from the Geotechnical study have not been addressed in the Supplemental EIR.

The mitigation measures identified in the Supplemental EIR are based on the information contained in the analysis and the underlying reports. As noted in **Response to Comments 6-17**

and **6-18,** no significant modification of the project design, including design criteria for mitigation of geotechnical elements, resulted from the additional analyses performed in response to comments from LACDPW.

As noted in **Response to Comment 6-3**, CEQA does require that the quantities of grading be substantiated by LACDPW. As noted in the State *CEQA Guidelines* Section 15146, the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity that is described in the EIR. Further, the State *CEQA Guidelines* Section 15147 notes that the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Finally, the State *CEQA Guidelines* Section 15149(b) notes that in its intended usage, an EIR is not a technical document that can be prepared only by a registered professional, but rather serves as a public disclosure document explaining the effects of the proposed project on the environment, alternatives to the project, and ways to minimize adverse effects and increase beneficial effects. CEQA recommends that the Lead Agency establish requirements or conditions on project design, construction, or operation to protect or enhance the environment; State statutes may provide that only registered professionals can prepare technical studies which will be used in or which will control the detailed design, construction, or operation of the proposed project and which will be prepared in support of an EIR.

The information contained in the Draft Supplemental EIR is based on "conceptual" grading plans. The final grading plans will be reviewed and approved by the LACDPW prior to issuance of a grading permit.

The State *CEQA Guidelines* Section 15126.4(a)(1) states that "an EIR shall describe feasible measures which could minimize significant adverse impacts." The State *CEQA Guidelines* Section 15126(a)(1)(B) further states that "formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way."

The mitigation measures listed in the revised Raft Supplemental EIR reduce significant impacts identified to less than significant levels.

6-20 The comment notes that Section 4.3, Geology and Soils, of the Draft Supplemental EIR states that 2.344 million cubic yards of cut and 2.031 million cubic yards of fill re associated with the

grading of the access roads. These figures conflict with what is shown in Table 3.0-6, Total Project Estimated Grading Quantities. The amount of fill for the access roads as shown is 1.8964 million cubic yards. This needs to be reconciled. In addition, the grading quantities for the project (including the access roads) cannot be substantiated at this time because of a lack of approved engineering studies.

See **Response to Comment 6-3**.

The grading quantities presented in Section 3.2.3, Construction, Grading, of the Draft Supplemental EIR are the correct quantities. The total estimated grading quantities identified in the previously certified EIR and the revised estimates for the School Site are provided in Table 3.0-2, Estimated Grading Quantities – School Site. The estimated grading quantities for the roadways, including the East Access and Southern Access Routes, are provided in Table 3.0-3, Estimated Grading Quantities – East Access Route, and Table 3.0-4, Estimated Grading Quantities – Southern Access Route, respectively. The total estimated grading volumes for the Southern Access Route have not changed at this time. The total estimated grading quantities, including the School Site and the access routes, is provided in Table 3.0-6, Total Project Estimated Grading Quantities.

The quantities presented in Section 4.3, Geology and Soils, of the revised Draft Supplemental EIR have been corrected as needed to reflect the correct grading amounts. The analysis of grading does not change. Grading volumes are estimates at this time based on the project engineer's calculations of cut and fill. The grading plans are subject to the review and approval of LACDPW.

6-21 The comment states that a hydrology study should be reviewed and approved by LACDPW. This hydrology study will identify any needed infrastructure, changes in design for the Project, or impacts as a result of the Project. Once this report has been approved, the results of the hydrology study and any impacts should be included and discussed in the Supplemental EIR.

The District has prepared numerous hydrology reports for the Approved and Modified Projects as listed in Section 4.4.1, Hydrology and Water Quality, Environmental Setting, Technical Studies and Reports, of the Draft Supplemental EIR.

Hydrology reports from the previously certified EIR include the following:

- *Drainage Concept and Hydrology Study for Castaic High School Site (Parcels 1 through 4 of Parcel Map 67132) in the Unincorporated Area of Los Angeles County,* Sikand Engineering/Planning/Surveying. May 8, 2012.

Following certification of the prior environmental impact report (EIR) for the Approved Project in October 2012, additional hydrology studies were prepared by the Project's geotechnical engineer, Sikand Engineering Associates, as part of the final engineering design process prior to construction. Following certification of the previous EIR, the District conducted additional investigations of the School Site and East Access Route.

These studies and comments include the following:

- *Hydrology Study for Castaic High School Site (Parcels 1 through 4 of Parcel Map 67132) in the Unincorporated Area of Los Angeles County,* Sikand Engineering/Planning/Surveying. October 25, 2013.
- *Review of Hydrology Study, PM No. 67132.* Los Angeles County Department of Public Works, Land Development Division, Hydrology Unit, October 29, 2013.
- *Hydrology Study for Castaic High School Site (Parcels 1 through 4 of Parcel Map 67132) in the Unincorporated Area of Los Angeles County,* Sikand Engineering/Planning/Surveying. January 25, 2014.
- *Hydrology Study for Castaic High School Access Road (Sloan Canyon Road) in the Unincorporated Area of Los Angeles County,* Sikand Engineering Associates. March 17, 2014.

As noted, these reports are subject to review and approval by LACDPW. All the above studies are provided in Appendix 4.4, Hydrology Reports, of the revised Draft Supplemental EIR.

6-22 The comment requests that all hydrology reports in Section 4.4, Hydrology and Water Quality, Appendix 4.4 of the Draft Supplemental EIR be removed because none of the studies have been approved by LACDPW nor do they represent the final design of the Project.

CEQA Section 21082.2 states that a public agency shall determine whether a project may have a significant effect on the environment based on substantial evidence in light of the whole record. As such, the District considers the hydrology studies contained in Section 4.4, Hydrology and Water Quality, Appendix 4.4, Hydrology Reports, and the associated comments substantial information, and therefore has included them in the Supplemental EIR to ensure full disclosure.

Further, the State *CEQA Guidelines* Section 15147 notes that the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Finally, the State *CEQA Guidelines* Section 15149(b) notes that in its intended usage, an EIR is not a technical document that can be

prepared only by a registered professional, but rather serves as a public disclosure document explaining the effects of the proposed project on the environment, alternatives to the project, and ways to minimize adverse effects and to increase beneficial effects.

6-23 The comment states that multiple bridges and/or culverts are proposed as part of this Project but their impacts are not discussed. The impacts of the proposed bridges and culverts should be further analyzed in the hydrology report.

The Approved Project as modified will include culverts along portions of the roadways to provide for surface water to drain. The proposed culverts are described in Section 3.2.2, Modifications to the Approved Project, in the revised Draft Supplemental EIR. Impacts associated with the use of culverts on the School Site and the East Access Route are described in Section 4.4, Hydrology and Water Quality, of the revised Draft Supplemental EIR.

Bridges may be installed as part of the Southern Access Route. Section 3.2.1, Description of the Approved Project, Access Routes, Southern Access, provides a description of potential use of bridges. Bridges will be initially designed to span the watercourse to avoid any impacts as discussed in the previously certified EIR. The preliminary design and analysis of the Southern Access Route, includes the use of bridges, and has not changed from that presented in the previously certified EIR. Prior to the completion of final design, hydraulic analysis. Including the need and use of any bridges, will be submitted to LACDPW to for review and approval.

6-24 The comment states that Section 4.4, Hydrology and Water Quality, of the Supplemental Draft EIR is incorrectly implied that the LACDPW has not approved the drainage concept and the hydrology for the project.

The Supplemental EIR does not state that LACDPW has approved any hydrology reports for the Project. It does state in Section 4.4.1, Hydrology and Water Quality, Environmental Setting, that "The high school campus *would be designed and constructed* in accordance with the recommendations contained in the hydrology studies *to be reviewed and approved by Los Angeles County Department of Public Works (LACDPW)* and the State of California, Division of the State Architect (DSA)" (*emphasis* added). The revised Draft Supplemental EIR further states that the hydrology reports "are subject to review and approval by LACDPW."

6-25 The comment states that all references to previously submitted, commented on, and returned plan checks for the hydrology report being reviewed by LACDPW should be removed.

See **Response to Comment 6-22.**

6-26 The comment states that the Draft Supplemental EIR should include discussions related to the County's 2009 Low-Impact Development requirements and how the Project will comply with such.

Low-Impact Development Standards have not been revised from the previously certified EIR (see Section 5.8, Hydrology and Water Quality). As discussed in the previously certified EIR, the School Site and Campus will include several classroom buildings; a library; performing arts, physical education, administrative, and multipurpose buildings; athletic facilities; a helipad; and a water tank. The School Site and Campus includes the construction of several stormwater infrastructure structures. As designed, four evaporation basins are proposed that will be located on the northwesterly side of the School Site. The basins, which vary in size (1.38 acres. 0.72 acres, 0.40 acres, and 0.34 acres), have been designed to cascade, such that water can spill over to the next lower basin through a down drain. An access ramp at the lowest elevation basin will also serve as a spillway for emergency overflow. These evaporation basins have been designed to have impermeable lined bottoms

Two detention/percolation basins will be constructed at the site as well. The first, located in the northern area of the site, will be a 5-foot-deep retention/percolation basin, with a surface area of 0.23 acres. On the south side of the School Site, a large pad will be constructed that will serve as a retention/percolation basin and also as an evaporation basin; this basin has a total surface area of 7.69 acres, with the retention/percolation portion consisting of 2.38 acres.

The retention/percolation basins will have landscaped dirt bottoms for water infiltration. Additionally, three bulked-flow inlets will be constructed on the perimeter of the School Site to collect water and debris.

Section 3.2.2, Modifications to the Approved Project, of the revised Draft Supplemental EIR does not change the design. As such, no further analysis necessary.

6-27 The comment indicates that Section 4.4.1, Environmental Setting, in the Draft Supplemental EIR states that the School Site is not within a 100-year flood zone. However, the comment states that the Draft Supplemental EIR lacks discussion/disclosure that the School Site is within a Los Angeles County Adopted Floodway and that revisions to the floodway will be required. Additionally, a part of the Southern Access road is within a Federal Emergency Management Administration (FEMA) Zone A, and there is no discussion/disclosure of this in the Supplemental EIR.

A Los Angeles County Adopted Floodway No. 388-ML8 adopted June 5, 1990, bisects the School Site and will be removed with the approval and construction of the proposed storm drain improvements within the high school property. A revision to the ML map will be processed and approval requested by the Los Angeles County Board of Supervisors as part of the Project.

The Southern Access road is adjacent to an existing watercourse and subject to flooding, as shown on the FEMA panel map No. 06037C0800F with an effective date of September 26, 2008, and a Los Angeles County Ordinance Floodway Map ML#388-ML5 and 6, adopted June 5, 1990. The final design Southern Access road will be subject to review and approval by LACDPW, and will be free of flood hazards. As appropriate, revisions will be made to both the FEMA and Los Angeles County Floodway Maps.

6-28 The comment states that in Section 4.4.3, Environmental Impacts, Impact 4.4.3-2, Previously Certified EIR Analysis, Proposed Drainage Facilities around High School Campus, in the Draft Supplemental EIR, the proposed drainage channel is not clearly or accurately described. The channel is not on the west side of Valley Creek Road. The most recent set of plans provided to LACDPW do not show an engineered swale at the school site boundary. Additionally, the referenced figure does not clearly show the channel as proposed.

The channel previously described in the previously certified EIR was revised to eliminate the culvert crossing under Valley Creek Road below driveway "D." The channel now parallels Valley Creek Road and outlets to the natural drainage course approximately 260 feet north of the south property line. A 10-foot-wide trapezoidal concrete channel will convey stormwater from the School Site, and the alignment of this channel runs north and east of Valley Creek Road. The channel will include an inlet (at its origin on the northern part of the site), and as it conveys water will converge with an RC box (second bulked inlet), will pass through two box culverts (at the intersection of Valley Creek Road and Canyon Hill Road and under the access road driveway close to the outlet), and terminate into a riprap channel outlet. The riprap channel outlet will then converge with a separate 36-inch-diameter RCP (draining a separate bulked flow inlet). At this point, the stormwater flows will then empty into the natural portion of Romero Canyon Creek.

6-29 The comment states that Section 4.4.3, Environmental Impacts, Impact 4.4.3-2, Previously Certified EIR Analysis, Southern Access, that a bridge will be located 300 feet south of the southern school site boundary, not 300 feet north of the boundary as stated in the Supplemental EIR.

The comment is noted and the revised Draft Supplemental EIR has been corrected.

6-30 The comment states that Section 4.4.3, Environmental Impacts, Impact 4.4.3-2, Previously Certified EIR Analysis, in the Supplemental EIR states that hydrology impacts were considered less than significant. However, the comment states that this finding was never substantiated due to the lack of an approved hydrology. An approved hydrology is necessary to determine if the impacts should be considered less than significant with mitigation or significant and unavoidable. At a minimum, impacts should be considered less than significant with mitigation incorporated since certain mitigation measures are included in the project.

The previously certified EIR was certified on October 17, 2012, and a Notice of Determination (NOD) was filed thereafter as required by the State *CEQA Guidelines* Section 15075. There were no objections raised by any agencies, including LACDPW, after the filing of the NOD.

The previously certified EIR determined environmental impacts associated with hydrology to be less than significant. The Supplemental EIR evaluates modifications to the Approved Project and new information that has been developed as a result of reviews by the LACDPW of the grading plans, and has also determined that impacts to hydrology, based on the conceptual plans completed to date, would be less than significant. No new information has been submitted to alter those findings.

The District acknowledges that a grading permit must be issued by LACDPW prior to the start of work, and that as part of the review process for the permit, a hydrology report must be considered by LACDPW. The District is currently in the processing of providing the necessary information to LACDPW to meet the requirements for the permit.

6-31 The comment states that Section 1.0, Executive Summary, Table 1.0-3, Significance of Environmental Issues for the Castaic High School as Determined in the Previously Certified EIR, of the Draft Supplemental should not have reflected a finding of less than significant for hydrology and water quality.

See **Response to Comment 6-30.**

6-32 The comment states that Section 4.4.3, Hydrology and Water Quality, of the Draft Supplemental EIR indicates that hydrology impacts would be less than significant. However, the comment indicates that this finding cannot be substantiated due to the lack of an approved hydrology. An approved hydrology is necessary to determine if the impacts should be considered less than significant with mitigation or significant and unavoidable. At a minimum, impacts should be

considered less than significant with mitigation incorporated since certain mitigation measures are included in the project.

See **Response to Comment 6-30.**

6-33 The comment states that Section 1.0, Executive Summary, Table 1.0-2, Significance of Environmental Issues for Castaic High School as determined in the Draft Supplemental EIR, should not reflect a finding of less than significant for hydrology and water quality. As indicated above, an approved hydrology will be necessary to determine if the finding for this aspect of the project is significant and unavoidable or less than significant with mitigation.

See **Response to Comment 6-30.**

6-34 The comment states that Section 1.0, Executive Summary, Table 1.0-4, Summary of Project Mitigation Measures, should be need to be updated to reflect any mitigation necessary to offset hydrological impacts of the project.

Impacts to hydrology and water quality have been determined to be less than significant, As such, no additional mitigation measures have been identified.

6-35 The commenter notes that **Comment 6-34** applies to the following sections within the Supplemental EIR:

a. Section 4.4.3, Environmental Impacts, Analysis of the Modifications to the Approved Project, Proposed Access Drainage, East Access Route.

b. Section 4.4.3, Environmental Impacts, Analysis of the Modifications to the Approved Project, Summary.

Impacts to hydrology and water quality have been determined to be less than significant. As such, no additional mitigation measures have been identified.

6-36 The comment states that the Figure 4.4-6, Proposed Hydrology of the East Access (Sloan Canyon Road), should clearly label the proposed debris basin on the south side of the access road.

Figure 4.4-6 has been revised to label the proposed debris basin in the revised Draft Supplemental EIR.

6-37 This comment states that the estimated grading amounts for the East Access route are approximately 1.8142 million cubic yards of cut and 680,000 cubic yards of fill. These figures

conflict with what is shown in Table 3.0-6, Total Project Estimated Grading Quantities, on page 3.0-26. The amount of fill for the East Access road as shown on this table is 1.3664 million cubic yards. This needs to be reconciled. Furthermore, the grading quantities for the project (including the access roads) cannot be substantiated at this time due to the lack of approved engineering studies (hydrology, geotechnical reports) and improvement plans.

See **Response to Comment 6-3**.

The grading quantities presented in Section 3.2.3, Construction, Grading, of the Draft Supplemental EIR are the correct quantities. The total estimated grading quantities identified in the previously certified EIR and the revised estimates for the School Site are provided in Table 3.0-2, Estimated Grading Quantities – School Site**.** The estimated grading quantities for the roadways, including the East Access and Southern Access Routes, are provided in Table 3.0-3, Estimated Grading Quantities – East Access Route, and Table 3.0-4, Estimated Grading Quantities – Southern Access Route**,** respectively. The total estimated grading volumes for the Southern Access route have not changed at this time. The total estimated grading quantities, including the School Site and the access routes, is provided in Table 3.0-6, Total Project Estimated Grading Quantities**.**

The quantities presented in Section 4.4, Hydrology and Water Quality**,** of the revised Draft Supplemental EIR have been corrected as needed to reflect the correct grading amounts. The analysis of grading does not change. Grading volumes are estimates at this time based on the project engineer's calculations of cut and fill. The grading plans are subject to the review and approval of LACDPW.

6-38 The comment indicates that the Supplemental EIR states that both a Storm Water Pollution Prevention Plan (SWPPP) and a Wet Weather Erosion Control Plan (WWECP) will need to be submitted if grading activities will take place during the rainy season. All statements regarding the WWECP should be replaced with Erosion and Sediment Control Plan (ESCP) since the term WWECP is no longer being used. In addition, a state SWPPP is necessary regardless if grading is anticipated to occur during the rainy season or not because the site is greater than one acre. The Supplemental EIR should be clarified accordingly.

The revised Draft Supplemental EIR has been revised to reflect this change.

6-39 The comment requests that Section 5.4, Traffic and Transportation, in the revised Draft Supplemental EIR be modified as follows:

> ~~*The Supplemental EIR did not evaluate the impacts related to transportation and traffic and, therefore, did not revise the previously certified EIR's determinations relative to significant impacts. Impacts would remain significant s noted in the previously certified EIR.*~~ *Since the Project elements and trip generations remain the same, the magnitude of the project impacts are the same as the impacts evaluated in the approved traffic study. The certified final EIR prepared for the Approved Project concluded that the Project would have significant and unavoidable impacts. Consequently, impacts associated with the modified Project would be similar to those of the Approved Project and would remain significant and unavoidable. No new mitigation is required or proposed.*

Section 5.4, Traffic and Transportation, in the revised Draft Supplemental EIR has been changed as requested.

6-40 Section 5.4, Transportation and Traffic**,** in the Supplemental EIR should be modified to include discussions regarding a sixth mitigation measure, T-6, to be included as follows:

> T-6 Construction traffic related to hauling or delivery operations shall occur during off-peak hours.

The comment requests that this mitigation measure be added to Table 1.0-4 in Section 1.0, Executive Summary.

As the Supplemental EIR did not examine traffic, and as noted by LACDPW in **Comment 6-39** above, "the magnitude of the project impacts are the same as the impacts evaluated in the approved traffic study. Consequently, impacts associated with the modified protect would be similar to those of the approved project and would remain significant and unavoidable. No new mitigation is required or proposed." The addition of the requested mitigation is not required.

Further, other than normal delivery of construction materials, no off-site hauling of soil from the site is required because all grading will be balanced within the project.

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May 27, 2014

Mr. Ben Rodriquez
William S. Hart Union High School District
21515 Centre Point Parkway
Santa Clarita, CA 91350
lrb@hartdistrict.org

Subject: Supplemental Draft Environmental Impact Report for Castaic High School, Los Angeles County, (SCH # 2004031110)

Dear Mr. Rodriquez:

The Department of Fish and Wildlife (Department) has reviewed the Draft Supplemental Environmental Impact Report (DSEIR) for the construction and operation of the Castaic High School campus and associated access routes (project).

The Department provided comments in a letter dated 9/02/2012 regarding the Draft Environmental Impact Report for the project. The DSEIR evaluates additional modifications to the approved project to determine whether they would result in new or substantially more severe significant environmental impacts as compared with the impacts disclosed in the approved project. As presented in the previously certified EIR, the approved project consists of the Castaic School site, which includes a 58-acre campus for a comprehensive high school with approximately 250,000 square feet of building area, including several classroom buildings, a library, a performing arts building, a multipurpose building, a physical education building with gymnasium, and an administrative building. Athletic facilities would include a 5,000-seat football/soccer stadium with a running track, tennis courts, basketball courts, baseball and softball fields, and other play fields. The stadium and other fields would have nighttime lighting for evening sports events. The Approved Project proposes 868 parking spaces at the School Site.

The approved Project provides for other facilities on the School Site including; a perimeter road (Valley Creek Road) to serve the campus, a Los Angeles County Fire Department helipad to serve the Castaic area, grading and construction of two above-ground water tanks, potential broadcasting facilities, potential advanced energy technology, such as solar photovoltaic panels for electricity, and storm water runoff facilities (debris basins).

The Department understands that additional grading acreages and changes in drainage configurations are proposed in the in the DSEIR for the project which necessitated revisiting project impacts to biological resources.

The project site is located in the community of Castaic, an unincorporated area of Los Angeles County. The nearest city is Santa Clarita about five miles south; Castaic Lake is northeast, east of the Interstate (I)-5, and the Los Padres National Forest is to the north. The project site will encompasses land east and west of Romero Canyon Road. The project site supports natural

terrain vegetated with chaparral, California sagebrush (*Artemisia californica*) associations, coast live oak (*Quercus agrifilia*), and annual grassland species.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the Project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed Project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 *et seq*.

Impacts to Biological Resources

1. Impacts to Native Birds - Page 1.0-24, mitigation measure BIO-11 states: "Prior to any vegetation disturbance between March 1 and September 15... ."

   Please adhere to the attached Department's bird nesting avoidance measures that recommends a bird nesting avoidance window that generally runs from February 1st -August 31st (as early as January 1 for some raptors) to assist in take avoidance of birds or their eggs. 7-1

2. Impacts to Burrowing Owl (*Athene cunicularia*) - Page 1.0-20, mitigation measure BIO-2 states: "Prior to any construction, a survey for burrowing owls shall be conducted by a qualified biologist within the breeding season prior to ground disturbance, which extends from February 1 to August 31. Burrowing owl surveys shall be conducted following the CDFW staff report on Burrowing Owl Mitigation (dated March 7, 2012). Should burrowing owls be found on site during the preconstruction survey, they should be relocated and mitigated in accordance with the CDFW staff report. Consultation with CDFW should occur for concurrence prior to implementing any relocation measures to ensure no potential "take" of burrowing owls."

   The Department concurs that breeding season surveys for burrowing owl are warranted to determine use of the project site by burrowing owl and to plan for impact avoidance and mitigation measures for unavoidable impacts to occupied habitat.

   Burrowing owl may occupy burrows at any time of year. Burrowing owl surveys should be conducted prior to ground disturbance activities at any time of year to avoid take of burrowing owls, including owls that may reside in burrows during times of the year outside of the nesting season. 7-2

3. Fencing Hazards to Wildlife - Page 3.0-10 describes modifications to the approved high school campus design that includes additional fencing along basins and channels.

   Birds and reptiles seek out hollow metal fence posts in which to reside and then may become trapped, resulting in mortality. Hollow fence posts should be capped to avoid this hazard. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality. Metal fence stakes should be plugged with bolts or other plugging materials to avoid this hazard. Further information on this subject may be found at: http://kern.audubon.org/death_pipes.htm. 7-3

4. Impacts to Oak Trees – Page 1.0-21, mitigation measure BIO-4 describes mitigation for project related impacts of up to 3.98 acres of coast live oak woodland, a sensitive plant community, in roadway alignments. These mitigations describe proposed oak woodland creation efforts.

   a. Because of the inherent difficulties of creating functional woodland habitat with associated understory components, the Department recommends that off-site acquisition of woodland habitat in the local area be considered. All acquired habitat should be protected under a conservation easement and deeded to a local land conservancy for management and protection. 7-4

   b. Because the goal of the mitigation is to recreate functioning woodland of similar composition, structure, and function to the selected oak woodland that was impacted, the mitigation site should mimic the function, density, percent basil, canopy, and vegetation cover, as well as other measurable success criteria before the mitigation should be deemed a success. Measurable success criteria (based on present site conditions and/or functional local native woodlands as reference sites) should be part of the plan to ensure that suitable woodland appropriate understory becomes established on the mitigation site. 7-5

   c. Oak trees are very long-lived species and take up to 20 years to show signs of stress and disease. The Department asks that the monitoring period for oak woodland be at least 10 years with a minimum of seven (7) years without supplemental irrigation. This allows the trees to go through one typical drought cycle, as our climate typically runs in seven year drought cycles on average. This should also be the minimal time needed to see signs of stress and disease in order to determine the need for replacement plantings. 7-6

   d. All seed and shrub sources used for tree and understory species in the mitigation planting site should be collected or grown from on-site sources or from adjacent areas and should not be purchased from a supplier. 7-7

   e. Oaks should be replaced by planting acorns as this method has been shown to result in greater oak survival when monitoring efforts (including the exclusion of herbivores) are employed to maximize seedling survival during the monitoring period. 7-8

   f. The final SEIR should clarify what, if any, herbivory fencing is proposed for the restoration site. The department recommends fencing the entire oak woodland mitigation area to keep herbivory of young trees to a minimum. Fencing should be constructed to be deer proof. This method, in the Department's experience, provides superior results to caging individual trees, which has very poor success in keeping trees from being browsed. Additionally, caging and placing tubes around young trees stunts growth and alters the growth habit of trees. 7-9

5. Impacts to Riparian Resources – Page 1.0-24, mitigation BIO-9 states: " During site clearing, vegetation removal, and grading, the District shall have a qualified biological monitor present on site to ensure that all measures required under the Lake or Streambed Alteration

Agreement (LSA) to be issued by the CDFW are followed. The biological monitor shall also observe and protect wildlife species to the extent practicable."

The existing LSA, number 1600-2013-0090-R5, REVISION 1, issued by the Department to the William S. Hart High School District for the currently approved project may require further consultation with the Department regarding current status, validity and applicability to the proposed amended project's impacts to Department jurisdictional streams. Please contact Mr. Brock Warmuth to discuss further at (805) 484-1691 or Brock.Warmuth@wildlife.ca.gov.

7-10

Thank you for this opportunity to provide comments. Please contact Mr. Scott Harris, Environmental Scientist, at (626) 797-3170 if you should have any questions and for further coordination on the proposed project.

Sincerely,

Betty J Courtney

Betty Courtney
Environmental Program Manager I
South Coast Region

Attachment

cc: Ms. Erinn Wilson, CDFW, Los Alamitos
Mr. Scott Harris, CDFW, Pasadena
State Clearinghouse, Sacramento

RESPONSE TO LETTER 7: California Department of Fish & Wildlife (CDFW), dated May 27, 2014

7-1 The comment states that the Supplemental EIR please adhere to CDFW's bird nesting avoidance measures that recommends a bird nesting avoidance window that generally runs from February 1 to August 31 (as early as January 1 for some raptors) to assist in the take avoidance of birds or their eggs.

Mitigation Measure BIO-11 in the revised Draft Supplemental EIR has been changed in Section 1.0, Executive Summary, and Section 4.2, Biological Resources, to reflect the requested change. Mitigation Measure BIO-10 provides avoidance for raptors from January 1 to September 1.

7-2 The comment states that CDFW concurs with Mitigation Measure BIO-2 that breeding season surveys for burrowing owls are warranted to determine use of the Project site by burrowing owl and to plan for impact avoidance and mitigation measures for unavoidable impacts to occupied habitat.

The comment is noted and no changes to the Supplemental EIR are required.

7-3 The comment notes that in Section 3.0, Project Description, of the Draft Supplemental EIR there is a description of modifications to the Approved Project's campus design that includes additional fencing along basins and channels. Since birds and reptiles seek out hollow metal fence posts to reside in, they may become entrapped, resulting in mortality. The comment provides recommendations to use hollow fencing to avoid potential hazards.

The comment is noted. No changes to the Supplemental EIR are required.

7-4 The comment states that in regard to impacts to oak trees identified in the Draft Supplemental EIR, CDFW recommends that off-site acquisition of woodland habitat in the local area be considered. All acquired habitat should be protected under a conservation easement and deeded to a local land conservancy for management and protection.

The District has reviewed potential impacts to oak trees in both the previously certified EIR (see Section 5.3, Biological Resources, Impact 5.3-2 and 5.3-3) and in the Draft Supplemental EIR (see Section 4.2.3, Biological Resources, Project Impacts, Impact 4.2-2).

The previously certified EIR (see Impact 5.3-3) found that while southern coast live oak riparian forest is listed as a sensitive vegetation type occurring in the region on the California Natural Diversity Database (CNDDB), and the disturbed coast live oak woodland has some similarity to the former plant community, the disturbed coast live oak woodland on the School Site is highly

disturbed and lacks the species diversity normally found in the community. Therefore, the coast live oak woodland on site is not considered to provide the habitat value of a sensitive natural community. Further, the previously certified EIR states that the alignments of the East Access and Southern Access Routes contain 3.98 acres of coast live oak woodland. The alignments surveyed for the proposed routes were assumed to be 300 feet wide; however, the actual disturbance areas would be 80-foot-wide rights-of-way plus scattered areas to be graded for landslide removals. Therefore, the actual disturbance area would be somewhat smaller than 3.98 acres.

As discussed in the Draft Supplemental EIR, in May 2013, the 30 oaks that were located within the School Site were removed as part of the site preparation process, with an additional five trees removed in February 2014 as part of brush clearance activities. Further, 45 oak trees were mapped along the East Access Route; of these, 20 were removed in February 2014.

As noted in the previously certified EIR, while the Los Angeles County Oak Tree Ordinance does not apply to the school district, the District is using the ordinance and CDFG permit requirements to determine impact significance and mitigation requirements. The Supplemental EIR notes that all oak trees will be replaced on the School Site per Mitigation Measure BIO-3.

The Draft Supplemental EIR further notes that approximately 60 oak trees are located along the Southern Access Route that could be removed as part of construction. As described previously, the final design of the Southern Access Route has not yet been completed; therefore, the exact number of oak trees that would be removed cannot be fully determined at this time. However, it is assumed that all of the oak trees could be impacted through removal or encroachment. All of these trees are within an area that would be subject to the Los Angeles County Oak Tree Ordinance. Impacts would be potentially significant. As with other oak tree removals, all oak trees will be replaced on the School Site per Mitigation Measure BIO-3.

The mitigation measures identified in the Supplemental EIR are sufficient to mitigate the loss of oaks and oak woodlands, and no off-site acquisition of woodland habitat is necessary.

7-5 The comment states that the Supplemental EIR include measurable success criteria (based on present site conditions and/or functional local native woodlands as reference sites) be part of the mitigation measure to ensure that suitable woodland understory becomes established.

The Supplemental EIR includes Mitigation Measure BIO-4, which includes success criteria for replanting and revegetation. As stated in Mitigation Measure BIO-4, plantings shall have a minimum of 80 percent survival, by species, the first year and 90 percent survival after the first

year, and/or shall attain 35 percent cover after three years and 60 percent cover after five years. The plantings shall maintain 60 percent cover after five years for the life of the Project. No single species shall constitute more than 50 percent of the vegetative cover. All plants must survive and grow for at least two years without irrigation. Weeds shall be controlled in the mitigation sites for five years or until plantings are well enough established to prevent detrimental competition between the exotic, invasive species with the revegetation plantings for water, nutrients, light, and space. The percent cover measurements shall be based on native plant species only.

The mitigation measure identified in the Supplemental EIR is sufficient to ensure long-term success. No further mitigation is required.

7-6 The comment states that CDFW requests that the monitoring period for oak woodland be at least 10 years with a minimum of seven (7) years without supplemental irrigation. This allows the trees to go through one typical drought cycle, as our climate typically runs in seven-year drought cycles on average. This should also be the minimal time needed to see signs of stress and disease to determine the need for replacement plantings.

As noted in Response to Comment 7-5, the Supplemental EIR includes Mitigation Measure BIO-4, which includes success criteria for replanting and revegetation. As stated in Mitigation Measure BIO-4, monitoring will occur for up to five years. The mitigation measure identified in the Supplemental EIR is sufficient to ensure long-term success. No further mitigation is required.

7-7 The comment suggests that all seed and shrub sources used for tree and understory species in the mitigation planting site should be collected or grown from on-site sources or from adjacent areas and should not be purchased from a supplier.

The Supplemental EIR includes Mitigation Measure BIO-5, which provides that seeds from Los Angeles County within the watershed, if possible, but no more than 30 miles of the Project site, shall be collected/supplied by a qualified commercial seed collector/supplier with experience in native seed collections. Mitigation Measure BIO-5 provides for the District's school facilities Project manager or the manager's designee and the Project and the landscape architect shall provide design documents, as approved by the Project biologist.

The mitigation measure identified in the Supplemental EIR is sufficient to ensure local species be used in the revegetation effort, and no further mitigation is required.

7-8 The comment suggests that oaks should be replaced by planting acorns because this method has been shown to result in greater oak survival when monitoring efforts (including the exclusion of herbivores) are employed to maximize seeding survival during the monitoring period.

The Supplemental EIR includes Mitigation Measure BIO-4, which provides that replacement trees shall be 1-gallon-container size.

The mitigation measure identified in the Supplemental EIR is sufficient, and no further mitigation is required.

7-9 The comment states that the Final Supplemental EIR should clarify what, if any, herbivory fencing is proposed for the restoration site. The CDFW recommends fencing the entire oak woodland mitigation area to keep herbivory of young trees to a minimum. Fencing should be constructed to be deer proof. This method provides superior results as opposed to caging individual trees, which can stunt and alter the growth of habitat trees.

During construction, fencing will be used to restrict access on and off site, and to protect specific resources (i.e., oak trees not to be removed). Fencing design will be such that it will keep vehicles, livestock, heavy equipment, herbicide and pesticide use, and other damaging elements away from sensitive natural areas such as wetlands, streams, riparian vegetation alongside streams, and populations of rare plants or animals. Vehicle and equipment traffic should also be kept out from under the dripline of mature trees.

To the extent possible, wildlife-friendly fencing will be used. As such, fences should be less than 40 inches high and visible to wildlife to prevent animals from colliding with it.

The mitigation measure identified in the Supplemental EIR is sufficient, and no further mitigation is required.

7-10 The comment notes that Mitigation Measure BIO-9 in the Draft Supplemental EIR requires monitoring to ensure that all measures under Lake or Streambed Alteration Agreements issued by CDFW are followed. Existing Lake or Streambed Alteration Agreement SAA-1600-2013-0090-R5, REV 1, issued by the CDFW to the District for the currently approved project, may require further consultation with CDFW regarding current status, validity, and applicability to the proposed changes to the Approved Project's impacts to jurisdictional streams.

As noted in **Response to Comment 6-16**, the Project is subject to a number of jurisdictional permits, including SAA-1600-2013-0090-R5 REV 1. As required by the conditions in these

permits and Mitigation Measure BIO-9, the District will monitor and report to CDFW compliance efforts through the duration of the Project. Should the District need to consult with CDFW during the implementation of SAA-1600-2013-0900-R5, it will do so.

The comment is noted and no changes are required to the Supplemental EIR.

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

May 28, 2014

Ben Rodriguez
William S. Hart Union High School District
21515 Centre Pointe Parkway
Santa Clarita, CA 91350

Subject: Castaic High School
SCH#: 2004031110

Dear Ben Rodriguez:

The enclosed comment (s) on your Supplemental EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on May 19, 2014. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

8-1

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2004031110) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

RESPONSE TO LETTER 8: Governor's Office of Planning and Research, State Clearinghouse, dated May 28, 2014

8-1 The comment states that the Supplemental EIR was submitted to the State Clearinghouse and that comments received by the Clearinghouse from state agencies during the review period have been forwarded. As the comments were received after the close of the review period, CEQA does not require Lead Agencies to respond to late comments. However, agencies are encouraged to incorporate additional comments and consider them prior to taking final action on changes to the Approved Project.

One late comment letter was received by the State Clearinghouse and forwarded to the District (Letter No. 7 from California Department of Fish and Wildlife.) The comments contained in the CDFW letter were responded to as part of this Final Supplemental EIR.

The comment is acknowledged.

3.0 REVISIONS TO THE DRAFT SUPPLEMENTAL EIR

In accordance with section 15132 of the State *CEQA Guidelines*, changes have been made to the Draft Supplemental EIR to clarify or amplify its text in response to comments. Such changes are insignificant as the term is used in Section 15088.5(b) of the State *CEQA Guidelines*.

The Draft Supplemental EIR has been revised pursuant to the response to the comments identified in Section 2 of this Final Supplemental EIR. As such, the changes to the revised Draft Supplemental EIR use ~~strikethrough~~ and <u>double underline</u> format (not track changes) to reflect all changes made.

The revised Draft Supplemental EIR is provided as Volume II to this Final Supplemental EIR.

APPENDIX 1.0

Mitigation Monitoring and Reporting Program

Mitigation Monitoring and Reporting Program

Castaic High School

William S. Hart Union School District

(SCH No. 2004031110)

Prepared for:

William S. Hart Union High School District
21830 Centre Point Parkway
Santa Clarita, CA 91350

Prepared by:

Meridian Consultants LLC
860 Hampshire Road, Suite P
Westlake Village, CA 91361

July 2014

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GLOSSARY

Approved Project	Castaic High School Project which was approved with the previously certified EIR
Previously Certified EIR	Environmental Impact Report (State Clearinghouse No. 2004031110) that was approved for the Castaic High School Project on October 17, 2012
Addendum	Addendum to the certified EIR adopted on July 17, 2013 for the Castaic High School Final EIR
Supplemental EIR	Prepared to determine whether the modified Approved Project would result in new or substantially more severe significant environmental impacts since the previously certified EIR; additionally, it discusses minor modifications to clarify existing mitigation measures
School Site	The 198-acre for the location of the campus and related facilities
High School Campus	The 58 acres where the Castaic High School campus will be located within the School site
East Access	Proposed roadway to connect the high school campus to Sloan Canyon Road east of the School Site
Southern Access	Proposed roadway to connect the high school campus to Hillcrest Road south of the School Site

1.0 INTRODUCTION

1.1 OVERVIEW

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to the California Environmental Quality Act (CEQA) and the State *CEQA Guidelines*. It provides for the monitoring of mitigation measures required of the Castaic High School Project (Approved Project) as modified, as set forth in the previously certified Environmental Impact Report (EIR) and the Supplemental EIR.

Section 21081.6 of the *California Public Resources Code* and Sections 15091(d) and 15097 of the State *CEQA Guidelines* require public agencies "to adopt a reporting or monitoring program for changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." An MMRP is required for the Approved Project as modified because the EIR identified potentially significant adverse impacts and identified mitigation measures to reduce some of those impacts to a less-than-significant level.

This MMRP will be adopted by the Board of Education when it approves the modifications to the Approved Project and kept on file at William S. Hart Union High School District, 21380 Centre Pointe Parkway, Santa Clarita, California 91350.

1.2 PURPOSE

This MMRP has been prepared to ensure that all required mitigation measures identified in the previously certified EIR and Supplemental EIR are implemented and completed according to schedule and maintained in a satisfactory manner throughout implementation of the Castaic High School Project. Because impact conclusions for certain impacts depend on the implementation of specific policies and programs of the Castaic High School Project, policies, and programs that are required by the previously certified EIR and the Supplemental EIR to reduce or avoid environmental impacts are also included in the MMRP. The MMRP may be modified by the District in response to changing conditions or circumstances. A summary table (**Table 1.0-1, Summary of Project Impacts, Mitigation Measures, and Residual Impacts**) has been prepared to assist the responsible parties in implementing the MMRP. The table identifies individual mitigation measures and, for each measure, identifies monitoring/mitigation timing, responsible persons/agencies, monitoring procedures, and a record of implementation of the mitigation measures. The numbering of mitigation measures follows the sequence established in the previously certified EIR and Supplemental EIR.

1.3 ROLES AND RESPONSIBILITIES

Unless otherwise specified herein, the Project applicant is responsible for taking all actions necessary to implement the mitigation measures according to the provided specifications and for demonstrating that each action has been successfully completed. The Project applicant, at its discretion, may delegate implementation responsibility or portions thereof to a licensed contractor.

1.4 CHANGES TO MITIGATION MEASURES

Any substantive change to the MMRP shall be documented in writing. Modifications to the mitigation measures may be made by the District subject to one of the following findings and documented by evidence included in the record:

1. The mitigation measure included in the previously certified EIR and/or the Supplemental EIR and the MMRP is no longer required because the significant environmental impact identified in the previously certified EIR and/or the Supplemental EIR has been found not to exist, or to occur at a level that makes the impact less than significant as a result of changes in the Approved Project as modified, changes in conditions of the environment, or other factors.

OR

2. The modified or substituted mitigation measure to be included in the MMRP provides a level of environmental protection equal to or greater than that afforded by the mitigation measure included in the previously certified EIR and/or the Supplemental EIR and the MMRP.

AND

3. The modified or substituted mitigation measures do not have significant adverse effects on the environment in addition to or greater than those that were considered by the District in its decisions regarding the previously certified EIR and/or the Supplemental EIR and the Approved Project as modified.

AND

4. The modified or substituted mitigation measures are feasible, and the District, through measures included in the MMRP or other established District procedures, can ensure their implementation.

Findings and related documentation supporting the findings involving modifications to mitigation measures shall be maintained in the Project file with the MMRP and shall be made available to the public upon request.

Table 1.0-1, Summary of Project Impacts, Mitigation Measures, and Residual Impacts, should guide the District in its evaluation and documentation of the implementation of mitigation measures. The columns identified in the table are described as follows:

- Mitigation Measure: Provides the text of the mitigation measures identified in the EIR.
- Timing/Schedule: Identifies the time frame in which the mitigation will take place.
- Implementation Responsibility: Identifies the entity responsible for complying with mitigation measure requirements.
- Implementation and Verification: These fields are to be completed as the MMRP is implemented. The Action column describes the type of action taken to verify implementation. The Date Completed column is to be dated and initialed by the District based on the documentation provided by qualified contractors, or through personal verification.

Table 1.0-1
Summary of Project Impacts, Mitigation Measures, and Residual Impacts

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
5.1 Aesthetics					
AES-1	During construction, the construction contractor shall locate construction staging areas and store cut-and-fill materials in areas with the least amount of visibility for residents surrounding the site.	District and Construction Contractor	During Construction	District	
AES-2	During construction, the construction contractor shall hydroseed or otherwise reestablish ground cover on the construction site through seeding and watering ~~within 21 days after active operations have ceased~~ after the completion of each construction phase of the Project. Reseeding would occur during the appropriate time of year as determined by a biologist and/or landscape specialist to certify a reasonable probability of seed survival. Hydroseeding, drill seeding, broadcast seeding or an otherwise proven restoration technique shall be utilized for reseeding on all disturbed surfaces using the seed mix as outlined in the Project landscape plan. Plant material shall consist of native plant materials to prevent soil erosion and help preserve the existing landscape character.	District and Construction Contractor	During Construction	District	
AES-3	During project landscape design phase, the School District school facilities project manager or their designee shall draft landscape plans that clearly state:	District and Project landscape designer	During Project landscape design phase	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	• Plantings adjacent to buildings and on engineered slopes shall be fully planted to minimize visual intrusion. Residential views of the buildings, slopes, and athletic fields shall be blocked with strategic placement of plants, trees, and other screening such as planted berms. Naturalized plantings of trees and shrubs shall be planted to break up the steep graded slopes. Additional plantings shall be used along existing residential site lines. • Plantings shall exceed the applicable minimum County Fire Department standards for plantings. Removal of vegetation for building construction shall be minimized to the extent possible, consistent with project needs and fire protection needs. Where feasible, an organic pattern of vegetation removal will be used; removal will be conducted selectively to create irregular/naturalistic edges that are feathered rather than hard or straight edged (e.g., squared openings in the clearings).				
AES-4	During architectural planning phase, the School District school facilities project manager or their designee shall design the buildings to be compatible with and respectful of the natural setting. Building materials, detailing, and colors shall be selected for their ability to enhance the visual character, complement the local surroundings and satisfy the desires of the District and local community.	District and Project architect	During architectural planning phase	District	
AES-5	During grading plan design phase, the School District school facilities project manager or their designee shall minimize cut-and- fill slopes to the extent feasible to reduce the visibility of such features and promote the blending of earthwork with	District and Project engineer	During grading plan design phase	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	the surrounding natural environment. Gradual grade transitions (slope rounding) at hinge and catch points on earthwork slopes and flatter slopes shall be shown on grading plans where feasible. Grading plans shall preserve the existing grade around the base of trees that are to remain so their roots are not affected by earthwork. All provisions of this mitigation measure are subject to approval by the Division of the State Architect.				
AES-6	During the design phase, the School District school facilities project manager or their designee shall minimize the use of retaining walls to the extent possible. Where retaining walls are required, they shall be constructed with natural-looking wall treatments and colors to reduce the visibility of the wall surface and blend it with the surrounding natural environment. These walls shall have low-sheen and no reflective surface materials to reduce glare. All finishes shall be matte and roughened; use of smooth, trowelled surfaces and glossy paint shall be avoided. All provisions of this mitigation measure are subject to approval by the Division of the State Architect.	District and Project engineer	During the design phase	District	
AES-7	The School District or its designee shall schedule evening events based on their typical duration such that they will end by 10 PM. This will allow the lighting levels for competitive sporting events (50 fc) to be extinguished by 10 PM. Reduced field lighting levels may remain on to allow spectators to exit the campus safely.	District	At scheduling of evening events on lit playfields	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
AES-8	Prior to start of project construction, the School District school facilities project manager or their designee shall develop a lighting plan to limit light spillover to no greater than 0.5 fc at property lines where adjoining light-sensitive land uses exist. This plan will specify shielding of luminaires, directional control of field and parking lot lights, optimized heights for sports field lights, establishing appropriate field light settings based on the needs of the use (e.g., maximum output (50 fc) for sporting events, lower lighting levels for non-competitive events).	District and Field Lighting Vendor	Prior to start of Project construction	District	
AES-9	During architectural design, the School District school facilities project manager or their designee shall incorporate the use of non-reflective glass in all buildings.	District and Project Architect	During architectural design	District	
5.2 Air Quality					
AQ-1	Prior to an award of a construction contract, the School District school facilities project manager or their designee shall include all mitigation measures in the construction bid documents. **School Site** • All demolition and grading plans for the School Site (Phase 2) shall clearly show the requirement for United States Environmental Protection Agency (USEPA) Tier 3 ~~or higher emissions standards~~, or best commercially available USEPA Tier 3 certified equipment best commercially available USEPA Tier certified equipment, for construction equipment over ~~50~~ 75 horsepower.	District Project Architect	Prior to award of construction contract	District	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Access Roads (Phases 1, 2A & 2B, and 3) Except as noted herein, a performance standard shall be utilized to limit NO_2 exposures by verifying background concentrations prior to the commencement of daily construction activities for Sloan Canyon East Phase 1) and the Baringer Road/Romero Canyon Road (Phase 3) improvements construction phases. The SCAQMD provides a daily forecast of pollutant concentrations for the Santa Clarita Valley (http://www.aqmd.gov/smog/Forecast.htm); a daily review shall be conducted and background values recorded and compared to the maximum predicted LST analysis concentration. The estimated total daily forecast emissions for the construction equipment inventory for the greater than 75 hp, when combined with the daily forecast, at or below 0.02 ppm (based upon an averaging time adjustment factor of 0.4 to convert a 24 hour to one-hour averaging time); NO_2 impacts would be considered less than significant. Should background concentrations exceed 0.02 ppm, the following options may be implemented to eliminate and/or reduce NO_2 impacts: **For Sloan Canyon Road East (Phase 1):** All demolition and grading plans shall comply with one of the following: Option 1 Reduce the construction fleet which limits active scraper and bulldozer activity to 6 and 4, respectively.				

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Option 2 Utilize heavy construction equipment rated 75 horsepower and above that meet Tier 3 or best commercially available USEPA Tier emission standards. **Canyon Hill Road (Phase 2A and 2B) and Sloan Canyon Road South (Phase 3)** All demolition and grading plans shall comply with one of the following ~~clearly show the requirement for United States Environmental Protection Agency for Tier 3 or higher emissions standards for construction equipment over 50 horsepower~~: Option 1 Comply with all relevant and appropriate provisions of SCAQMD Rule 403. Implementation of best available control measures as outlined in Rule 403 to prevent, reduce, and mitigate fugitive dust emissions. Validation of compliance, which limits disparity in upwind/downwind PM_{10} concentrations to 50 $\mu g/m^3$, shall be achieved by conducting simultaneous daily on site sampling to identify the difference between upwind/downwind samples collected on high-volume particulate matter samplers or other U.S. EPA-approved equivalent methods. Option 2 Utilize heavy construction equipment rated 75 horsepower and above that meet Tier 3 or best commercially available USEPA Tier emission standards.				

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
For Baringer Road/Romero Canyon Road (Phase 3): All demolition and grading plans shall comply with one of the following: Option 1 Reduce the construction fleet which limits active scraper and bulldozer activity to 6 and 4, respectively. Option 2 Utilize heavy construction equipment rated 75 horsepower and above that meet Tier 3 or best commercially available USEPA Tier emission standards.				
AQ-2 During project construction, the construction contractor shall ~~use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 or higher exhaust emission limits~~ provide the following information for equipment over ~~50~~ 75 horsepower which will operate for five or more days (more than 40 hours): • A list of construction equipment by type and model year shall be maintained by the construction contractor on site. • A copy of each unit's certified USEPA Tier specification shall be provided at the time of mobilization of each applicable unit of equipment based on the manufacturer's specifications. • All construction equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations.	Construction Contractor	During Project construction	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	All nonessential idling of construction equipment shall be restricted to five minutes or less in compliance with California Air Resources Board's Rule 2449.				
AQ-3	Prior to start of grading, the construction contractor shall prepare a dust control plan that includes all mitigation measures and South Coast Air Quality Management District Rule 403. The dust control plan shall be submitted annually to SCAQMD for review and approval. During all site preparation, grading trenching, paving and construction activities, the construction contractor shall comply with Rule 403 and the project dust control plan. The plan shall include the following measures: • Nontoxic soil stabilizers/dust suppressants shall be applied to all unpaved roads at the beginning of grading and reapplied a minimum of once per year, during construction activities until roads are paved. Nontoxic soil stabilizers/dust suppressants shall be reapplied more often if necessary to reduce dust. • Reestablish ground cover on the construction site through seeding and watering ~~within 21 days after active operations have ceased~~ after the completion of each construction phase of the Project. Reseeding would occur during the appropriate time of year as determined by a biologist and/or landscape specialist to certify a reasonable probability of seed survival. Hydroseeding, drill seeding, broadcast seeding or an otherwise proven restoration technique shall be utilized for reseeding on all disturbed surfaces using the seed mix as outlined in the	Construction Contractor	During Project construction	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	Project landscape plan. • Sweep streets with Rule 1186-compliant, PM10-efficient vacuum units on a daily basis if silt is carried to adjacent paved public thoroughfares or occurs as a result of hauling. • Maintain a minimum 24-inch freeboard on haul trucks that carry sand, soil, or other loose materials. • Loose materials shall be securely covered in all haul trucks. • Water exposed ground surfaces and disturbed areas on the construction site should be watered a minimum of every three hours or a minimum of three times per day. Recycled water should be used, if available. • Stabilize stockpiled materials. Stockpiles within 300 feet of occupied buildings shall not exceed eight feet in height, must have a road bladed to the top to allow water truck access, or must have an operational water irrigation system that is capable of complete stockpile coverage. • Limit on site vehicle speeds on unpaved roads to no more than 15 miles per hour.				
AQ-4	During application of interior and exterior architectural coatings, the construction contractor shall only use paint with a volatile organic compound (VOC) content of 200 or less (water based or low-VOC paint) to minimize VOC emissions from painting.	Construction Contractor	During Project construction	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
5.3 Biological Resources					
BIO-1	~~If the District chooses to develop the access roads under Option A, before~~ Before the beginning of clearing operations on the School Site and the access roadways, ~~on the alignments of Mandolin Canyon Road or Harp Canyon Road~~, the District shall retain a qualified biologist to ensure that individuals of slender mariposa lily that cannot be avoided by Project construction will be collected prior to site development and deposited with the Rancho Santa Ana Botanical Garden or a similar entity for the preservation of the genetic material of this species.	District and project biologist	Before the beginning of clearing operations on the alignments of Mandolin Canyon Road or Harp Canyon Road	District	
BIO-2	Prior to any construction, a survey for burrowing owls shall be conducted by a qualified biologist within the breeding season prior to ground disturbance, which extends from February 1 to August 31. Burrowing owl surveys shall be conducted following the CDFW staff report on Burrowing Owl Mitigation (dated March 7, 2012). Should burrowing owls be found on site during the preconstruction survey, they should be relocated and mitigated in accordance with the CDFW staff report. Consultation with CDFW should occur for concurrence prior to implementing any relocation measures to ensure no potential "take" of burrowing owls.	Project biologist	Prior to construction	District	
BIO-3	The District's school facilities Project manager or their designee and the Project landscape contractor, under the supervision of the Project biologist, shall replace oak trees removed by the Project at a minimum of a 2 to 1 ratio. All coast live oaks removed shall be replaced with oak trees of the same species. All replacements shall be completed within 1 year after the ~~beginning of site clearing~~ completion of final grading.	District's school facilities project manager or their designee, project landscape contractor, and project biologist	Within one year after the beginning of site cleaning	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
BIO-4	During construction, the District's school facilities project manager or their designee and the Project landscape contractor, under the supervision of the Project biologist, shall plant and monitor replacement trees for any native trees removed or damaged during construction operations. All initial plantings of replacement trees shall be completed by 1 year after the ~~start of construction~~ completion of final grading. Any native trees, with the exception of oaks, that are removed or damaged shall be replaced in kind at a 5:1 ratio. Replacement trees shall be 1-gallon container size. Minimum separations for plantings of the same species shall be 8 feet for arroyo willow (*Salix lasiolepis*), black willow (*Salix goodingii*), sandbar willow (*Salix exigua*), red willow (*Salix laevigata*); 20 feet for sycamore (*Platanus racemosa*), California laurel (*Umbellularia californica*), black walnut (*Juglans californica*), cottonwood (*Populus ssp.*), coast live oak (*Quercus agrifolia*), canyon oak (*Quercus chrysolepis*), and scrub oak (*Quercus berberidifolia*); and 15 feet for white alder (*Alnus rhombifolia*) based on recommendations by the restoration biologist. Plantings shall have a minimum of 80 percent survival, by species, the first year and 90 percent survival after the first year, and/or shall attain 35 percent cover after 3 years and 60 percent cover after 5 years. The plantings shall maintain 60 percent cover after 5 years for the life of the Project. No single species shall constitute more than 50 percent of the vegetative cover. All plants must survive and grow for at least 2 years without irrigation. Weeds shall be controlled in the mitigation sites for 5 years or until plantings are well enough established to prevent detrimental competition between the exotic, invasive species with the revegetation plantings for water, nutrients, light, and space. The percent cover measurements shall be based on native	District's school facilities project manager or their designee, project landscape contractor, and project biologist	During construction	District	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
plant species only. ~~Plantings shall have a minimum of 80 percent survival, by species, the first year and 100 percent survival thereafter, and/or shall attain 75 percent cover after three years. The plantings shall maintain 90 percent cover after five years for the life of the project. The area shall be weeded and maintained clear of trash for the entire restoration period. No single species shall constitute more than 50 percent of the vegetative cover. Replacement trees should reach the following minimum growth at the end of three and five years after planting; the District shall be responsible for replacing trees that do not meet survival or growth targets.~~				
BIO-5 Prior to any ~~During~~ construction on the School Site, the District's school facilities Project manager or their designee and the landscape ~~contractor~~ architect shall provide design documents, as ~~under the supervision of~~ approved by the Project biologist, to ~~shall~~ enhance the drainage channels and swales to be built ~~near the northeast and east site~~ on the School Site in accordance with the revised Habitat Mitigation Plan with 1 acre of soft unvegetated bottom channel and 1 acre of oak/elderberry/coastal sage scrub habitat. Planting of container plants and seeding via hydroseeding shall be used for the creation of habitats. • Weed abatement measures shall begin in October and continue through February 28 to take advantage of the winter rainy season and to avoid the migratory bird nesting season. Removing weeds, either with herbicide or mowing, following germination and before seed set, will reduce the amount of seed added to the seed bank in the soil. Vegetation shall be installed following weed abatement and after the first wetting rains between October 1 and March 1 to take advantage of winter rainy	District's school facilities project manager or their designee, project landscape contractor, and project biologist.	During construction	District	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
season, dormancy of foliage, and the rooting period to ensure optimum survival of plantings. Restoration and enhancement efforts shall commence within 1 year of the ~~start~~ completion of construction. • Seeds collected from Los Angeles County within the watershed, if possible, but no more than 30 miles of the Approved Project Site, shall be supplied by a qualified commercial seed collector/supplier with experience in native seed collections. • All riparian scrub container plants shall be 1 gallon in size. The riparian scrub container plant palette shall consist of a mix of the following species: mule fat, sandbar willow, black willow, red willow, arroyo willow, blue elderberry, and coyote bush. The coastal sage scrub container plant palette shall consist of a mixture of chamise, California sagebrush, and toyon. The oak woodland plantings shall consist of coast live oak, scrub oak, and canyon live oak. • At the discretion of the restoration biologist, the riparian scrub seed mix shall consist of the following species: common yarrow (*Achillea millefolium*), California brome (*Bromus carinatus*), Chinese houses (*Collinsia heterophylla*), California poppy (*Eschscholzia californica*), meadow barley (*Hordeum brachyantherum*), giant wildrye (*Leymus condensatus*), deerweed (*Lotus scoparius*), California melicgrass (*Melica californica*), small-flowered melicgrass (*Melica imperfecta*), deergrass (*Muhlenbergia rigens*), purple needlegrass (*Nassella pulchra*), California beeplant (*Scrophularia californica*), and blue-eyed grass (*Sisyrinchium bellum*).				

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	• At the discretion of the restoration biologist, the coastal sage scrub seed mix shall consist of the following species: chamise, California sagebrush, summer holly (*Comarostaphylis diversifolia*), California buckwheat, golden yarrow (*Eriophyllum confertiflorum*), California poppy, toyon, goldfields (*Lasthenia glabrata*), deerweed, arroyo lupine (*Lupinus succulentus*), white sage (*Salvia apiana*), blue-eyed grass, small fescue (*Vulpia microstachys*), and mission manzanita (*Xylococcus bicolor*).				
BIO-6	Prior to any construction, ~~T~~the District's school facilities Project manager or their designee, ~~the Project construction contractor,~~ and the Project landscape architect ~~contractor, all under the supervision of~~ shall provide design documents, as approved by the Project biologist, ~~shall~~ to create at least 1 acre of stream channel and restore riparian scrub vegetation on the School Site in accordance with the revised Habitat Mitigation Plan ~~along the channel in the northwest corner of the property outside of the project grading footprint~~. The timing and methods of weed abatement and planting, and the plant palettes for container and hydroseeded riparian scrub plants, shall be the same as those specified in **Mitigation Measure BIO-5**. All planting shall be completed within 1 year after the start of site clearing.	District's school facilities project manager or their designee, project landscape contractor, and project biologist.	During construction	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
BIO-7	Prior to any construction, ~~T~~the District's school facilities Project manager or their designee, and the Project landscape architect ~~contractor, and~~ shall provide design documents, as approved by the Project biologist shall preserve and restore or enhance the specified acreages of the following vegetation types ~~in the northwest corner of the property outside of the project grading footprint~~ on the School Site in accordance with the revised Habitat Mitigation Plan. The timing and methods of weed abatement and planting, and the plant palettes for container and hydroseeded riparian scrub plants, shall be the same as those specified in **Mitigation Measure BIO-5**. All planting shall ~~be completed within 1 year after the start of site clearing~~ commence within 1 year of the ~~start~~ completion of construction. The following acreages shall be included in the restoration: • 1 acre of coast live oak woodland • 1 acre of chaparral dominated by chamise • 2.97 acres of coastal sage scrub will be restored or enhanced	District's school facilities project manager or their designee, project landscape contractor, and project biologist.	During construction; timing as specified in Mitigation Measure BIO-5	District	
BIO-8	The Project shall comply with the requirements of the SWPPP during all construction activities. ~~as administered enforced by the Los Angeles County Department of Public Works~~ The District's construction contractor and civil engineer will be responsible for administering, implementing, and ensuring compliance with BMPs addressing soil erosion and specified in the project SWPPP. Further, if grading activities will take place during the rainy season, an Erosion and Sediment Control Plan (ESCP) will be required. Within unincorporated Los Angeles County, compliance with BMPs is enforced by the County of Los Angeles Department of Public Works. A copy of the SWPPP shall be maintained on site.	Project civil engineer and the grading the construction contractor	Prior to the beginning of project construction	District	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
~~Prior to the beginning of project construction, the project civil engineer shall plan and install measures to minimize turbidity/siltation. This may require that the work site be isolated and that stormwater be diverted around the work area by means of a barrier, temporary culvert, new channel, or other means approved by CDFW. Precautions may also include placement of silt fencing, sand bags, and/or the construction of silt catchment basins, so that silt or other harmful materials are not allowed to pass to downstream reaches. The method used to prevent siltation shall be monitored by the project biologist and cleaned/repaired weekly by the operator. The placement of any structure or materials in the stream for this purpose, not included in the original project description or CDFW approved water pollution/water diversion plan shall be coordinated with CDFW.~~				
~~Erosion control measures may include sandbags, silt fencing, slope breakers, trenches, or dissipaters. Erosion control measures shall not contain materials such as hay bales or non-rice straw mulch, etc., that may contaminate the site. These measures preclude the introduction of exotic weedy species into the seed bank of areas with native vegetation. Preparation shall be made so that runoff from steep, erodible surfaces will be diverted into stable areas with little erosion potential. Frequent water checks shall be placed on dirt roads, cat tracks, or other work trails to control erosion. Areas of disturbed soils with slopes toward a stream or lake shall be stabilized to reduce erosion potential. Planting, seeding, and mulching is conditionally acceptable. Where suitable vegetation cannot reasonably be expected to become established, non-erodible materials, such as coconut fiber matting, shall be used for such stabilization. Any~~				

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
~~installation of non-erodible materials not described in the original project description shall be coordinated with the CDFW.~~ ~~The project construction contractor shall construct an effective water velocity dissipation device at any outlet structures to minimize erosion. Rock, rip-rap, or other erosion protection shall be placed in areas where vegetation cannot reasonably be expected to become reestablished. This condition shall be approved by the CDFW prior to project commencement.~~ ~~Drainage and sedimentation control devices shall be routinely cleaned, maintained, and repaired prior to and during the rainy season. Control devices shall be inspected at least monthly. In addition to the monthly inspection, control devices shall be inspected within 24 hours of a significant rain event (0.5 inch of rainfall or greater). All repairs to these systems shall be immediately executed to minimize erosion problems.~~				
BIO-9 During site clearing, vegetation removal, and grading, the District shall have a qualified biological monitor present on site to ensure that all measures required under the Lake or Streambed Alteration Agreement (LSA) to be issued by the CDFW are followed. The biological monitor shall also observe and protect wildlife species to the extent practicable.	District and project biologist	During site clearing, vegetation removal, and grading	District	
BIO-10 Prior to any construction during the raptor nesting season, January 1 to September 1, a qualified biologist shall conduct a site survey for active nests 30 days prior to any scheduled clearing, grading, or construction activities. The survey shall be conducted within all trees, manmade structures, and any other potential raptor nesting habitat.	Project biologist	Prior to any construction during the raptor nesting season, January 1 to September 1	District	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
BIO-11 Prior to any vegetation disturbance between February 1 and August 31 ~~March 1 and September 15~~, a qualified biologist shall conduct a survey for nesting birds in all breeding/nesting habitat within the Project Site and adjacent to the Project Site within 300 feet of disturbance areas. The surveys will be conducted within trees and structures, wherever nesting bird species may be located. Nesting bird surveys shall be conducted no earlier than 30 days prior to the initiation of ground or vegetation disturbance by the Project. If no breeding/nesting birds are observed and concurrence has been received from CDFW, site preparation and construction activities may begin. If breeding activities and/or an active bird nest is located and concurrence has been received from CDFW, the breeding habitat/nest site shall be fenced by the biological monitor a minimum of 300 feet (500 feet for raptors) in all directions, and this area shall not be disturbed until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and/or the young will no longer be impacted by the Project. If the qualified biologist determines that a narrower buffer between the construction activities and the observed active nests is warranted, the biologist may submit a written explanation as to why (e.g., species-specific information; ambient conditions and bird's habituation to them; terrain, vegetation, and birds' lines of sight between the construction activities and the nest and foraging areas) to the District and, upon request, the CDFW. Based on the submitted information, the District, acting as the lead agency (and CDFW, if CDFW requests) will determine whether to allow a narrower buffer. If any threatened or endangered avian species are observed on the Approved Project Site, no work shall occur during the	Project biologist	Prior to any vegetation disturbance between March 1 and September 15	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	breeding season (March 1 and September 15) to avoid direct or indirect (noise) take of listed species. If any formally State or federal listed animal or plant species are observed on the property, then State and/or federal threatened/endangered species permits may be required prior to commencing Project activities.				
BIO-12	During the year prior to construction, a survey shall be conducted by a qualified biologist for bat habitat areas within the Approved Project Site and the roadway alignments between March 1 and September 30. The areas shall be characterized as to their potential for supporting a bat maternal colony or nursery site. The survey shall include all trees and any manmade structures, or other bat habitat areas that could be affected. If bat maternal colony or nursery sites are identified, then these areas shall be avoided by construction during the bat breeding season, from March 1 through September 30. Each tree or structure supporting an active maternity roost will be inspected a week prior to disturbance to determine the presence or absence of roosting bats.	Project biologist	During the year prior to construction	District	
5.4 Cultural Resources					
CUL-1	Prior to the initiation of project-related earthmoving activities and excavation, the School District school facilities project manager or their designee shall retain a County-certified qualified archaeologist. The qualified archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.	District school facilities project manager or their designee shall and county-certified qualified archaeologist			

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
CUL-2	Prior to the initiation of project-related earthmoving activities and excavation, a cultural resource monitoring plan shall be prepared by a qualified archeologist. The cultural resource monitoring plan shall outline when and for how long monitoring shall occur, where on the site monitoring of vegetation clearing and earthmoving activities shall be required, methods of monitoring, types of artifacts anticipated, procedures for temporary stop and redirection of work to permit sampling, identification and evaluation of possible resources, procedures for additional analysis, and accommodation and procedures for Native American monitors, if any.	Qualified archeologist	Prior to the initiation of project-related earthmoving activities and excavation	District	
CUL-3	Prior to the start of ground disturbing activities ~~on the Project Site~~, the School District school facilities project manager or their designee shall ensure that a qualified archaeologist or another mitigation program staff member has conducted cultural resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance. • Construction personnel, including heavy-equipment operators, shall be briefed on procedures to be followed in the event that cultural remains are encountered by earthmoving activities, particularly if archaeological construction monitors are not on site. • Pre-construction training shall include: - Review the types of archaeological resources that might be found - Review of laws and applicable requirements concerning the protection of cultural resources.	School District school facilities project manager or their designee and qualified archaeologist	Prior to the start of ground disturbing activities on the Project Site	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	- Prehistoric or historic cultural resource discovery procedures • The briefing shall be presented to new contractor personnel as necessary. • Names and telephone numbers of the monitor and other mitigation program personnel shall be provided to appropriate construction personnel.				
CUL-4	During project-related earthmoving activities and excavation, the construction manager shall adhere to the stipulations of the cultural resource monitoring plan. The archaeologist shall have the authority to halt any project-related activities adversely impacting potentially significant resources.	Construction manager	During project-related earthmoving activities and excavation	District	
CUL-5	During project-related earthmoving activities and excavation, if cultural resources are uncovered they shall be recovered and analyzed in accordance with CEQA guidelines. A qualified archaeologist shall assess the find(s) and determine if they are of value. If the find(s) are of value then: • Suspension of ground disturbances within a 30-foot radius of the discovery shall not be lifted until the archaeological monitor has evaluated the find to assess whether they are classified as historical resources or unique archaeological sites, pursuant to CEQA. • The construction contractor shall prepare all potential finds in excavated material to the point of identification. • Significant archaeological resources found shall be preserved as determined necessary by the archaeologist. • Excavated finds shall be curated at either the Los Angeles County Natural History Museum or its designee on a first-	Qualified archeologist	During project-related	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	refusal basis. After which finds shall be offered to a local museum or repository willing to accept the resource. • Within 30 days of completion of the end of earth moving activities, the archeologist shall draft report summarizing the finds, and shall include the inspection period, an analysis of any resources found, and identification of the repository. • Any resulting reports shall be filed with the School District or their designee and with the South Central Coastal Information Center at the California State University, Fullerton.				
CUL-6	Prior to the start of any ground disturbing activities that involve either alluvium (Q_{al}) or landslide deposits (Q_{ls}) ~~on the Project Site~~, Native American representatives from the Fernandeño Tataviam Band of Mission Indians (Tribe) shall be notified of the pending activities. The qualified archaeologist shall coordinate with the Tribal representatives during the drafting of the archaeological monitoring plan. During ground disturbing activities that involve either alluvium (Q_{al}) or landslide deposits (Q_{ls}), if there is any evidence of Native American resources (significant or otherwise), the Tribe will be notified and construction activities modified ~~action shall be taken~~ in accordance with the archaeological monitoring plan and Mitigation Measures CUL-1 through CUL-5.	Qualified archaeologist	Prior to the start of any ground disturbing activities on the project site	District	
CUL-7	Prior to the initiation of project-related earthmoving activities and excavation, the School District school facilities project manager or their designee shall retain a qualified paleontologist approved by Los Angeles County and the Natural History Museum of Los Angeles County Vertebrate	School District school facilities project manager or their designee and qualified paleontologist	Prior to the initiation of project-related earthmoving activities and	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	Paleontology Section.		excavation		
CUL-8	Prior to the initiation of project-related earthmoving activities and excavation, a cultural resource monitoring plan shall be prepared by a qualified paleontologist. The cultural resource monitoring plan shall outline when and for how long monitoring shall occur, where on the site and at what depths monitoring of earthmoving activities shall be required, methods of monitoring, types of artifacts anticipated, procedures for temporary stop and redirection of work to permit sampling, identification and evaluation of possible resources, procedures for additional analysis.	Qualified paleontologist	Prior to the initiation of project-related earthmoving activities and excavation	District	
CUL-9	Prior to the initiation of project-related earthmoving activities and excavation, the School District school facilities project manager or their designee shall ensure that a qualified paleontologist or other mitigation program staff member has conducted paleontological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance. • Construction personnel, including heavy-equipment operators, shall be briefed on procedures to be followed in the event that cultural remains are encountered by earthmoving activities, particularly if paleontological construction monitors are not on site. • Pre-construction training shall include: - Review the types of paleontological resources that might be found - Review of laws and applicable requirements concerning the protection of fossil resources.	School District school facilities project manager of their designee and qualified paleontologist, <u>construction contractor</u>	Prior to the initiation of project-related earthmoving activities and excavation	District	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
- Paleontological resource discovery procedures • The briefing shall be presented to new contractor personnel as necessary. • Names and telephone numbers of the monitor and other mitigation program personnel shall be provided to appropriate construction personnel.				
CUL-10 During project-related earthmoving activities and excavation, a qualified paleontologist shall monitor ground-disturbing activities in accordance with the cultural resource monitoring plan. Monitoring shall consist of visually inspecting debris piles and freshly exposed strata to allow for the discovery and recovery of larger fossil remains, and periodically dry test screening rock, sediment, and debris to inspect smaller fossil remains. As soon as practicable, the monitor shall recover all larger vertebrate fossil remains, a representative sample of invertebrate or plant fossil specimens, or any fossiliferous rock or sediment sample that can be recovered easily. If recovery of a large or unusually productive fossil occurrence is warranted, earthmoving activities shall be diverted temporarily around the fossil site and a recovery crew shall be mobilized as necessary to remove the occurrence as quickly as possible. If not on site when a fossil occurrence is uncovered by such activities, the activities shall be diverted temporarily around the fossil site and the monitor called to the site to evaluate and, if warranted, recover the occurrence. If the paleontologist or monitor determines that the fossil site is too unproductive or the fossil remains not worthy of recovery by the monitor, no further action will be taken to preserve the fossil site or remains, and earthmoving activities shall be	Qualified paleontologist	During project-related earthmoving and excavation	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	allowed to proceed through the site immediately. The location and proper geologic context of any recovered fossil occurrence or rock or sediment sample shall be documented.				
CUL-11	During or after project-related earthmoving activities and excavation, all fossil specimens recovered from the area as a result of mitigation, including those from processing rock or sediment samples, will be treated (i.e., prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. Rock or sediment samples shall be submitted to commercial laboratories for microfossil, pollen, radiometric dating, or other analysis, as appropriate.	Qualified paleontologist	During or after project-related earthmoving activities and excavation	District	
CUL-12	During project-related earthmoving activities and excavation, the monitor shall maintain daily monitoring logs that include the particular tasks accomplished, the earthmoving activity monitored, the location where monitoring was conducted, the rock unit(s) encountered, the fossil specimens recovered, and associated specimen data and corresponding geologic and geographic site data.	Qualified paleontologist	During project-related earthmoving and excavation	District	
CUL-13	Within 30 days of completion of the end of earth moving activities, a final technical report of results and findings shall be prepared by the paleontologist in accordance with any County requirement and the cultural resource monitoring plan. • Any resulting reports shall be filed with the School District or their designee and the museum repository.	Qualified paleontologist	Within 30 days of completion of the end of earth moving activities	District	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
5.5 Geology and Soils				
~~**GEO-1** All earthwork and project design shall be performed in compliance with building and safety standards of the District, the California Department of Education, Division of the State Architect, and the state building code.~~	~~Project engineer, project architect, and project construction contractor~~	~~During all project design and earthwork~~	~~District~~	
~~**GEO-2** Prior to start of any earthwork, the District's project geotechnical engineer or engineering geologist shall document all test findings and engineering conclusions in a signed and date-stamped report.~~	~~Project geotechnical engineer or engineering geologist~~	~~Prior to start of any earthwork~~	~~District~~	
~~**GEO-3** Prior to start of any earthwork, the District's project engineer or engineering geologist shall test soil density using a standard penetration test or other method approved by the project geotechnical engineer or engineering geologist, at the site of boring RSA-122 in the northeastern part of the project site. The project geotechnical engineer or engineering geologist shall provide recommendations for minimizing hazards related to seismic settlement near the site of boring 122. Compliance with all recommendations of the project geotechnical engineer or engineering geologist is required.~~	~~Project geotechnical engineer or engineering geologist~~	~~Prior to start of any earthwork~~	~~District~~	
~~**GEO-4** Prior to start of any earthwork, the District's grading contractor shall remove existing soils to a depth of 20 feet over and around the site of boring GWV16 in the south part of the project site. The radius of soil removal shall be determined by the project geotechnical engineer or engineering geologist. The removal bottom – that is, soil~~	~~Project grading contractor and project geotechnical engineer or engineering geologist~~	~~Prior to start of any earthwork~~	~~District~~	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
~~remaining after soil removal – near boring GWV16 shall be thoroughly inspected by the geotechnical engineer or engineering geologist before placement of fill soil begins.~~				
GEO-5 ~~Prior to start of any earthwork, the District's project geotechnical engineer or engineering geologist shall conduct subsurface soil testing in landslide areas in parcels 2 and 3 of the project site.~~ The Project geotechnical engineer or engineering geologist shall monitor grading to ensure that it complies with all commitments and recommendations contained within or associated with the most recent geotechnical reports and cross-sections. The Project geotechnical engineer or engineering geologist shall document site-specific performance standards for landslide removals, remedial grading, and landslide burials to stabilize and remove landslides. Should variable subsurface conditions be encountered during grading and construction, the District's geotechnical engineer shall conduct subsurface soil testing in relevant areas of the Approved Project Site and report the results to the reviewing authority(ies). The Project geotechnical engineer or engineering geologist shall document that the soils will support the improvements planned and provide record of such to the District within 30 days of the completion of grading. ~~In the event that soils in landslide areas in Parcels 2 and 3 cannot be remediated to adequately support planned improvements in those areas, the geotechnical engineer or engineering geologist shall~~	Project geotechnical engineer or engineering geologist	Prior to start of any earthwork	District	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
~~recommend areas where the building of structures or other improvements should be avoided.~~ Compliance with and real-time documentation of all present and future recommendations by the District's geotechnical engineer is required.				
~~**GEO-6** The District's project geotechnical engineer or engineering geologist shall ensure relative compaction of at least 93 percent for fills over 40 feet deep. Lower portions of fills shall be constructed using granular materials to reduce settlement of the fill. Fills over 50 feet deep shall be monitored using methods specified in the geotechnical investigation. The monitoring shall be conducted during excavation and placement of fill, and for a year after placement of engineered fills.~~	~~Project geotechnical engineer or engineering geologist, and project grading contractor~~	~~During excavation and placement of fill, and for a year after placement of engineered fills~~	~~District~~	
GEO-7 ~~Prior to start of any earthwork,~~ tThe District's Project geotechnical engineer or engineering geologist shall conduct additional subsurface soil sampling within ~~in parcels 2 and 3 of~~ the School Site to document susceptibility of soils to hydrocollapse, and shall conduct resistivity, pH, sulfate, and chloride tests to determine the potential of the soils to corrode concrete if there are indications that such unexpected occurrences exist. ~~The geotechnical engineer or engineering geologist shall document site-specific performance standards for removal of existing alluvium to reduce hazards from hydrocollapse and corrosivity.~~ The geotechnical engineer or engineering geologist shall document and verify compliance with the removal criteria set forth in the most recent geotechnical reports ~~that the soils will support the~~	Project geotechnical engineer or engineering geologist	Prior to start of any earthwork	District	

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
~~improvements planned after removal of existing alluvium, and placement of engineered fill soils, to the specified standards~~.				
GEO-8 ~~Prior to start of any earthwork, the District's Project geotechnical engineer or engineering geologist shall conduct subsurface soil testing in Parcels 2 and 3 of project site for expansion potential. The geotechnical engineer or engineering geologist shall document that the soils on finished pad grades will support the improvements planned.~~	~~Project geotechnical engineer or engineering geologist~~	~~Prior to start of any earthwork~~	~~District~~	
GEO-9 The District's geotechnical engineer shall monitor to ensure compliance for relative compaction as stated in the most recent geotechnical reports. Relative compaction shall be based on depth of fill and shall meet the following minimum requirements: • 90 percent minimum relative compaction for fill depths less than 20 feet • 93 percent minimum relative compaction for fill depths greater than 20 feet and less than 80 feet • 95 percent minimum relative compaction for fill depths greater than 80 feet	Project geotechnical engineer or engineering geologist	Prior to start of any earthwork	District	
Noise				
N-1 Prior to award of construction contract, the School District school facilities project manager or their designee shall include all construction-related mitigation measures in bid documents.	The School District school facilities project manager or their designee	Prior to award of construction contract	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
N-2	Prior to start of grading on access roads, the School District school facilities project manager or their designee shall prepare a noise control plan that includes the following measures along with the Los Angeles County Noise Ordinance. The plan shall include the following measures: • All internal combustion engine-driven equipment shall have properly operating mufflers, air intake silencers, and engine shrouds that are appropriate for the equipment and that are no less effective than as originally equipped by the manufacturer. • Properly maintain and tune all construction equipment. • Locate all stationary noise sources (e.g., generators, compressors, staging areas) as far from noise-sensitive receptors as is feasible. • If stationary, noise-generating equipment must be located near existing residential properties, then such equipment shall have temporary acoustical enclosures, blanketing, or barriers to reduce the noise emissions. • Use "quiet-design" air compressors and other stationary noise sources where such technology exists. • Reduce nonessential idling of construction equipment to no more than five minutes. • Designation of a member of the construction team who shall be responsible for responding to any complaints and questions about construction noise. A contact number shall be posted on the school district website.	The School District school facilities project manager or their designee	Prior to start of grading on access roads	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Transportation/Traffic[1]					
T-1	If Scenario 1 is chosen for development of school access roads, at least six months before opening of the school, the District shall request approval by the Los Angeles County Department of Public Works, the District would be responsible for the cost of all of the following improvements. • Sloan Canyon Road at Quail Valley Road - Stripe a second westbound through lane (to transition to a single westbound lane just west of the intersection) - Stripe a second eastbound through lane - Install a traffic signal • Parker Road at Southbound I-5 Ramp - Add an eastbound right-turn lane - Install a traffic signal • Ridge Route Road at Northbound I-5 Ramp - Install a traffic signal • The Old Road at Parker Road - Add a westbound left-turn lane - Add an eastbound left-turn lane	District	At least six months before opening of the school	District	

1 As part of its Findings and as stated in Resolution No. 12/13-18 adopted on October 17, the District determined that Roadway Option 2 presents the preferred option for the District.

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	- Install a traffic signal • Sloan Canyon Road at Parker Road – Stripe a northbound right-turn lane				
T-2	Student enrollment at the campus shall not exceed 1,600 students unless the District has completed one of the following: 1) Widen the pavement and restripe the northern public access route to provide four lanes of travel (two lanes in each direction); or 2) Complete the southern public access route (Scenario 2); or Make a finding that sufficient other roads in the area have been constructed by others and that these roads will provide adequate access and travel capacity to accommodate the ultimate school capacity of 2,600 students. This finding shall be made by the Governing Board at a public meeting based on an analysis of the available road network and traffic conditions at that time.	District	Before school enrollment exceeds 1,600 students	District	
T-3	Student enrollment at the campus shall not exceed 1,600 students unless the District has implemented staggered start times, consisting of three start times with each of the times at least 30 minutes apart. At least 25 percent of the student enrollment shall participate in each of the three start times.	District	Before school enrollment exceeds 1,600 students	District	

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
T-4	If Scenario 2 is chosen for development of school access roads, at least six months before opening of the school, the District shall request approval of the Los Angeles County Department of Public Works for installation of a traffic signal and striping a northbound right-turn lane at the intersection of Sloan Canyon Road and Parker Road.	District	At least six months before opening of school	District	
T-5	If Scenario 2 is chosen for development of school access roads and the school will open prior to opening of the southern access route, at least six months before opening of the school, the District shall request approval of the Los Angeles County Department of Public Works for installation of a traffic signal as described below. This mitigation measure is only necessary if the school opens prior to the completion of the southern access route. If the southern access route is still not completed prior to 1,500 students, an additional requirement is imposed as described below. Upon approval by the Los Angeles County Department of Public Works, the District would be responsible for the cost of all of the following improvements: • The Old Road at Parker Road • Install a traffic signal (at opening) • Add a westbound left-turn lane (prior to 1,500 students) • Add an eastbound left-turn lane (prior to 1,500 students).	District	Before school enrollment exceeds 1,600 students	District	