MATER DEI HIGH SCHOOL PARKING STRUCTURE AND SCHOOL EXPANSION PROJECT ENVIRONMENTAL IMPACT REPORT

PREPARED FOR:
City of Santa Ana

PREPARED BY:
RBF Consulting
FINAL
ENVIRONMENTAL IMPACT REPORT

MATER DEI HIGH SCHOOL
PARKING STRUCTURE AND SCHOOL
EXPANSION PROJECT

SCH NO. 2012111043

Lead Agency:

CITY OF SANTA ANA
20 Civic Center Plaza
Santa Ana, California 92702
Contact: Mr. Vince Fregoso, AICP
714.667.2700

Prepared by:

RBF CONSULTING
14725 Alton Parkway
Irvine, California 92618-2027
Contacts: Mr. Glenn Lajoie, AICP
Mr. Alan Ashimine
949.472.3505

December 2014
This document is designed for double-sided printing to conserve natural resources.
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1.0 Introduction
1.0 INTRODUCTION

In accordance with the *California Environmental Quality Act Guidelines* (CEQA Guidelines) Section 15088, the City of Santa Ana, as the lead agency, has evaluated the comments received on the Mater Dei High School Parking Structure and School Expansion Project Draft Environmental Impact Report (Draft EIR).

The Draft EIR for the proposed Mater Dei High School Parking Structure and School Expansion Project (herein referenced as the project) was distributed to potential responsible and trustee agencies, interested groups, and organizations. The Draft EIR was made available for public review and comment for a period of 45 days. The public review period for the Draft EIR established by the CEQA Guidelines commenced on October 6, 2014 and ended on November 19, 2014.

The Final EIR consists of the following components:

- Section 1.0 – Introduction
- Section 2.0 – Responses to Comments
- Section 3.0 – Mitigation Monitoring and Reporting Program

Due to its length, the text of the Draft EIR is not included with this document; however, it is included by reference in this Final EIR. None of the clarifications to the Draft EIR identified in this document constitutes “significant new information” pursuant to Section 15088.5 of the CEQA Guidelines. As a result, a recirculation of the Draft EIR is not required.
2.0 Response to Comments
2.0 RESPONSE TO COMMENTS

In accordance with the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15088, the City of Santa Ana, as the lead agency, evaluated the written comments received on the Draft Environmental Impact Report (Draft EIR) (State Clearinghouse No. 2012111043) for the Mater Dei High School Parking Structure and School Expansion Project (herein referenced as the project) and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final EIR for the project in accordance with CEQA Guidelines Section 15132.

A list of public agencies and individuals that provided comments on the Draft EIR is presented below. Each comment has been assigned a letter number. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

<table>
<thead>
<tr>
<th>Commenter</th>
<th>Letter Number</th>
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<tr>
<td><strong>Agencies</strong></td>
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<tr>
<td>State Clearinghouse – Scott Morgan, Director (November 20, 2014)</td>
<td>1</td>
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<td>Orange County Public Works – Laree Brommer (November 13, 2014)</td>
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<td>Airport Land Use Commission – Kari A. Rigoni (November 19, 2014)</td>
<td>3</td>
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<td><strong>Public Meeting</strong></td>
<td></td>
</tr>
<tr>
<td>Public Review Draft Comment Meeting (October 27, 2014)</td>
<td>4</td>
</tr>
</tbody>
</table>
November 20, 2014

Vince Fregoso  
City of Santa Ana  
20 Civic Center Plaza  
Santa Ana, CA 92701

Subject: Mater Dei High School Parking Structure and School Expansion Project  
SCH#: 2012111043

Dear Vince Fregoso:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 19, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Sincerely,

Scott Morgan  
Director, State Clearinghouse
**Document Details Report**
**State Clearinghouse Data Base**

**SCH#** 201211043  
**Project Title** Mater Dei High School Parking Structure and School Expansion Project  
**Lead Agency** Santa Ana, City of

<table>
<thead>
<tr>
<th>Type</th>
<th>Description</th>
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<tbody>
<tr>
<td>EIR</td>
<td>The proposed Mater Dei High School Parking Structure Project involves construction of a three-level parking structure situated immediately east of the existing Mater Dei High School site (located at 1202 West Edinger Avenue), south of the surface parking lot located on Monarch Way and north of St. Andrew Place, as well as a two-story classroom building within the existing school site, located within the City of Santa Ana.</td>
</tr>
</tbody>
</table>

**Lead Agency Contact**

| Name          | Vince Fregoso  
|---------------|----------------|
| Agency        | City of Santa Ana  
| Phone         | 714 667 2713 |
| email         | Fax  
| Address       | 20 Civic Center Plaza  
| City          | Santa Ana  
| State         | CA  
| Zip           | 92701  

**Project Location**

| County        | Orange  
|---------------|--------|
| City          | Santa Ana  
| Region        |  
| Lat / Long    | 33° 43' 29.79" N / 117° 5.13'.8" W  
| Cross Streets | Edinger Avenue and Bristol Street  
| Parcels No.   | Numerous  
| Township      | 6S  
| Range         | 10W  
| Section       | 22  
| Base          | SBB&M  

**Proximity to:**

| Highways | SR-55  
|----------|--------|
| Airports | Yes  
| Railways | Yes  
| Waterways | Santa Ana River  
| Schools | Yes  
| Land Use | The City of Santa Ana General Plan designation for the project site is Institutional (INS) and Low Density Residential (LR7). The City of Santa Ana Zoning Ordinance designation for the site is Open Space (O) and Single Family Residence (R1).  

**Project Issues**

| Agricultural Land; Air Quality; Archaeologic-Historic; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual |

**Reviewing Agencies**

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

**Date Received** 10/06/2014  
**Start of Review** 10/06/2014  
**End of Review** 11/19/2014
1. RESPONSES TO COMMENTS FROM STATE OF CALIFORNIA OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE, NOVEMBER 20, 2014.

1-1 This comment indicates that the State Clearinghouse submitted the Draft EIR to selected State agencies for review and that the comment period for the Draft EIR concluded on November 19, 2014. The comment indicates that the lead agency complied with the public review requirements for draft environmental documents pursuant to CEQA. As such, the comment does not provide specifics regarding information presented in the Draft EIR, and no further response is necessary.
November 13, 2014

Mr. Vince Fregoso, Principal Planner
City of Santa Ana, Planning Division
22 Civic Center Plaza
Santa Ana, California 92701

Subject: Notice of Availability of a Draft Environmental Impact Report for the Mater Dei High School Parking Structure and School Expansion Project

Dear Mr. Fregoso:

The County of Orange has reviewed the Notice of Availability of a Draft Environmental Impact Report for the Mater Dei High School Parking and School Expansion Project and offers the following comments:

Environmental Resources:

1. The assessment of hydrology and water quality states that all project impacts would be less than significant or have no impact; however, a copy of the Preliminary Water Quality Management Plan (WQMP)¹ was not appended to the Draft Environmental Impact Report (EIR), nor were the details of the Preliminary WQMP summarized in sufficient detail in order to determine that the project will not indeed have any long term operational impacts on hydrology or water quality. The Model WQMP (http://ocwatersheds.com/document/wqmp), which was approved by the Santa Ana Regional Water Quality Control Board on May 19, 2011, states the following regarding the role of a conceptual or preliminary WQMP in the California Environmental Quality Act (CEQA) process (Section 7.11-5.1; page 7.11-5-1):

   A Conceptual or Preliminary WQMP supports the CEQA process and provides documentation to support a checklist for an Initial Study and Negative Declaration or Mitigated Negative Declaration, or serves as the basis for the water quality section of and EIR. It should also serving as the basis for the Lead Agency and Responsible Agency to conclude that the Maximum Extent Practicable (MEP) standard is being met, by serving as

¹Footnote 5 in Section 10, Effects Found Not to be significant, indicates that a Preliminary WQMP as in fact prepared for the subject project.
the basis that selected BMPs will not have the potential to cause significant effects and/or that the effects have been mitigated, and “are not significant with mitigation.” The Conceptual or Preliminary WQMP should be circulated with the CEQA document or summarized within the circulated CEQA document. (Emphasis added).

2. Further, Order R8-2009-0030 requires that the following potential impacts are considered during CEQA reviews:

- Potential impact of project construction on storm water runoff;
- Potential impact of project’s post-construction activity on storm water runoff;
- Potential for discharge of storm water pollutants from area of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas. Loading docks or other outdoor work areas;
- Potential for discharge of storm water to affect the beneficial uses of the receiving waters;
- Potential for significant changes in the flow velocity or volume of storm water runoff to cause environmental harm;
- Potential for significant increases in erosion of the project site or surrounding areas;
- Potential decreases in quality and quantity of recharge to groundwater; and
- Potential impact of pollutants in storm water runoff from the project site on any 303(d);

The Draft EIR should include a description of site characteristics, watershed description, BMPs to be incorporated and project performance criteria in the context of the CEQA considerations listed above (and in conformance with the approved Model WQMP), and the Preliminary WQMP.

If you have any questions or need clarification please do not hesitate to contact Jennifer Shook at (714) 955-0671.

Sincerely,

Lance Brommer, Manager, Planning Division
OC Public Works Service Area/OC Development Services
300 North Flower Street
Santa Ana, California 92702-4048
Laree.brommer@ocpw.ocgov.com

cc: Chris Crompton, Manager, OC Public Works/Environmental Resources
2. RESPONSES TO COMMENTS FROM ORANGE COUNTY PUBLIC WORKS, DATED NOVEMBER 13, 2014.

2-1 As discussed in Response 2-10, Best Management Practices (BMPs) proposed in the WQMP were considered in the Initial Study prepared for the proposed project. Impacts pertaining to the CEQA guidelines topic area of hydrology and water quality were determined to be either less than significant or no impact pertaining to the proposed project. During the 30-day Notice of Preparation (NOP) public review period, no comments were received from the public pertaining to hydrology/water quality and this topic area was not further analyzed as part of the Draft EIR. Section 10, Effects Found Not to be Significant, summarizes those findings made in the Initial Study, in the Draft EIR.

As discussed on page 10-12, last paragraph of the Draft EIR, the project would be regulated under the National Pollutant Discharge Elimination System (NPDES) Phase I Municipal Stormwater Permits issued by the Santa Ana Regional Water Quality Control Board (RWQCB) for Orange County. The project would be required to implement the requirements of the Drainage Area Management Plan (DAMP), including the preparation of the NPDES requirements of a WQMP, as enforced through the City’s Municipal Code Section 18-156 (which are reasonably related to the reduction or elimination of pollutants in storm water runoff from the project site). Further, City agencies are required to review the project plans and impose terms, conditions, and requirements on the project, prior to the issuance of the Grading Permit.

As discussed on page 10-13 of the Draft EIR, construction of the proposed project would increase impervious areas beyond existing conditions. Based on preliminary Best Management Practice (BMP) selection documentation for the parking structure, expected pollutants are anticipated to consist of suspended solids/sediments, oil and grease, heavy metals, and trash/debris. The proposed parking structure would utilize treatment control BMPs to minimize potential water quality impacts from the increased impervious area. These treatment control BMPs are expected to include modular wetlands (planter boxes utilized to treat parking structure drainage) and culvert pre-filters, which filter sediment, debris, and free oils prior to off-site drainage.1

As discussed on page 10-13, last paragraph, of the Draft EIR, following compliance with the existing requirements of the NPDES, DAMP, and Water Pollution Regulations, project implementation would not violate any water quality standards or waste discharge requirements associated with long-term operations and implementation of the DAMP requirements would protect the water quality at receiving water bodies and the support of designated beneficial uses. Existing regulations under the NPDES program would ensure that project water quality impacts would be minimized to a level below significance. Prior to project approval, the City would be responsible for ensuring that the WQMP is consistent with the DAMP/NPDES requirements, and that identified BMPs adequately minimize the potential for pollutant runoff.

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1 Preliminary WQMP BMP Selection Criteria and Methodology, Proposed Parking Garage, Mater Dei High School, PENCO Engineering, March 14, 2012.
2-2 The Draft EIR considered project impacts pertaining to stormwater runoff, as analyzed on page 10-14, threshold (c), and page 10-15, thresholds (d) and (e). As discussed in the Draft EIR, impacts in this regard would be less than significant.

2-3 Refer to Response 2-2.

2-4 The Draft EIR considered project impacts pertaining to pollutant discharge during construction, as analyzed on page 10-12 of the Draft EIR. Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP would contain a site map(s) which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP would list Best Management BMPs the discharger would use to protect storm water runoff and the placement of those BMPs. Additionally, the SWPPP would contain: a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Section A of the Construction General Permit describes the elements that must be contained in a SWPPP.

The project’s construction activity would be subject to the State’s General Construction Permit, as discussed above, because it involves clearing, grading, and disturbances to the ground such as stockpiling or excavation, and a construction site with 1.0 acre or greater of soil disturbance. More specifically, as part of the project’s compliance with NPDES requirements, the Project Applicant would be required to prepare a Notice of Intent (NOI) for submittal to the Santa Ana RWQCB providing notification of intent to comply with the General Construction Permit. Additionally, the project applicant is required to prepare a SWPPP, which would be reviewed/approved by the City’s Public Works Director (or designee), for water quality construction activities onsite. A copy of the SWPPP would be made available and implemented at the construction site at all times. The SWPPP is required to outline the erosion, sediment, and non-storm water BMPs, in order to minimize the discharge of pollutants at the construction site. These BMPs would include measures to contain runoff from vehicle washing at the construction site, prevent sediment from disturbed areas from entering the storm drain system using structural controls (i.e., sand bags at inlets), and cover and contain stockpiled materials to prevent sediment and pollutant transport. Implementation of the BMPs would ensure runoff and discharges during the project’s construction phase would not violate any water quality standards. Compliance with NPDES requirements would reduce short-term construction-related impacts to water quality to a less than significant level.
As the project proposes school improvements and a new parking structure, no long-term operational impacts would result from material storage, vehicle or equipment fueling or maintenance, waste handling, hazardous materials handling or storage, and delivery areas, including loading docks or other outdoor work areas.

2-5 Refer to Response 2-1.

2-6 The Draft EIR considered project impacts pertaining to soil erosion and loss of topsoil (including flow velocity or volume of storm water runoff to cause environmental harm) both on-site and in the surrounding area, as analyzed on page 10-7, threshold (b), page 10-12, threshold (a), and page 10-14, threshold (c), of the Draft EIR. As discussed in the Draft EIR, impacts in this regard would be less than significant.

2-7 Refer to Response 2-6.

2-8 The Draft EIR page 10-14, threshold (b), discusses how the proposed project would not decrease the quantity of recharge or the quality to groundwater. Impacts in this regard were determined to be less than significant.

2-9 Refer to Response 2-4.

2-10 Based on the analysis published in the Initial Study prepared for the proposed project, impacts pertaining to the CEQA guidelines topic area of hydrology and water quality were determined to be either less than significant or no impact pertaining to the proposed project. During the 30-day NOP public review period, no comments were received from the public pertaining to this topic area and this topic area was not further analyzed as part of the Draft EIR. Section 10, Effects Found Not to be Significant, summarizes those findings made in the Initial Study. As noted in Response 2-1, existing regulations under the NPDES program would ensure that project water quality impacts would be minimized to a level below significance. Prior to project approval, the City would be responsible for ensuring that the WQMP is consistent with the DAMP/NPDES requirements, and that identified BMPs adequately minimize the potential for pollutant runoff.
November 19, 2014

Vince Fregoso, Principal Planner
City of Santa Ana
Planning Division, M-20
20 Civic Center Plaza, M-20
Santa Ana, CA 92702

Subject: NOA of DEIR for Mater Dei High School Parking Structure Project

Dear Mr. Fregoso:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Mater Dei High School Parking Structure Project. The proposed project is within Federal Aviation Regulation (FAR) Part 77 Notification Area for John Wayne Airport (JWA) but outside the noise contours and FAR Part 77 imaginary surfaces for JWA.

We appreciate that the DEIR states that the proposed project is within FAR Part 77 Notification Area for JWA and discusses that development proposals which include the construction or alteration of a structure more than 200 feet above ground level, require filing with the Federal Aviation Administration (FAA). Projects meeting this threshold must comply with procedures provided by Federal and State law, with the referral requirements of the ALUC, and with all conditions of approval imposed or recommended by the FAA and ALUC including filing a Notice of Proposed Construction or Alteration (FAA Form 7460-1). The DEIR does address these requirements and states that the proposed project will have a maximum building height of 44 feet.

In addition, the DEIR does identify that heliports are not part of the proposed project and emphasizes that the City’s general plan contains policies related to compliance with the Airport Environ Land Use Plans (AELUPs) for JWA and Heliports.

Thank you again for the opportunity to comment on the NOP. Please contact Lea Choum at (949) 252-5123 or via email at lchoum@ocair.com should you have any questions related to the Airport Land Use Commission for Orange County.

Sincerely,

Kari A. Rigoni
Executive Officer
3. **RESPONSES TO COMMENTS FROM AIRPORT LAND USE COMMISSION, DATED NOVEMBER 19, 2014.**

3-1 The commenter confirms that the Draft EIR includes an analysis of the project within Federal Aviation Regulations (FAR) Part 77 Notification Area for John Wayne Airport and that the analysis does address these requirements as the project would only have a maximum building height of 44 feet. No further response is required.

3-2 The commenter states that the Draft EIR does identify that heliports are not part of the proposed project, and that the City’s General Plan contains policies related to the John Wayne Airport AELUP. No further response is required.
October 27, 2014  
Public Review Draft Comment Meeting  
City Council Chambers  
22 Civic Center Plaza, Santa Ana, CA 92701

<table>
<thead>
<tr>
<th>Member of Public</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr. Bravo</td>
<td>Mater Dei employees have been dishonest in purchasing properties affected by the project.</td>
</tr>
<tr>
<td></td>
<td>The commenter noted that Mater Dei has offered up benefits in the past, but have not yet provided them.</td>
</tr>
<tr>
<td></td>
<td>Mater Dei High School is encouraging short sales.</td>
</tr>
<tr>
<td></td>
<td>Can the City provide any assistance to affected homeowners?</td>
</tr>
<tr>
<td>Annette Santoya</td>
<td>Commenter owns the property at 1215 West St. Andrew Place.</td>
</tr>
<tr>
<td>Romero</td>
<td>How will access be affected to the homes?</td>
</tr>
<tr>
<td></td>
<td>Are there any plans for development at the football field?</td>
</tr>
<tr>
<td></td>
<td>Mater Dei High School is not being honest to the neighbors during property negotiations.</td>
</tr>
</tbody>
</table>
4. RESPONSES TO COMMENTS FROM PUBLIC REVIEW DRAFT COMMENT MEETING CONDUCTED ON OCTOBER 27, 2014.

4-1 The commenter states that the Mater Dei employees have been dishonest in purchasing properties affected by the project. The commenter does not raise new environmental information or directly challenge information provided in the Draft EIR, and no further response is necessary.

4-2 The commenter noted that Mater Dei has offered up benefits in the past, but have not yet provided them. The commenter does not raise new environmental information or directly challenge information provided in the Draft EIR, and no further response is necessary.

4-3 The commenter claims that Mater Dei High School is encouraging short sales. The commenter does not raise new environmental information or directly challenge information provided in the Draft EIR, and no further response is necessary.

4-4 The commenter is inquiring if the City is able to provide any assistance to affected homeowners. The commenter does not raise new environmental information or directly challenge information provided in the Draft EIR, and no further response is necessary.

4-5 The commenter states that they are the property owner of 1215 West St. Andrew Place. The commenter does not raise new environmental information or directly challenge information provided in the Draft EIR, and no further response is necessary.

4-6 Access to the commenter’s property at 1215 West St. Andrew Place would not be altered by the project. However, as discussed in the last paragraph of page 3-7 of the Draft EIR, Baker Street, between St. Andrew Place and Berkeley Street, would be vacated, providing access from St. Andrew Place to the parking structure and surface parking lot to the north along a new Monarch Way extension. Additionally, a portion of Occidental Street and Berkeley Street (approximately 250 feet), between Baker Street and the proposed property line, would also be vacated; refer to Exhibit 3-4, Proposed Site Plan, of the Draft EIR. Occidental Street and Berkeley Street are proposed to terminate at the eastern boundary of the parking structure at a new public alley that would allow for adequate fire access and connectivity between the two roadways. As illustrated on Exhibit 3-4, the neighborhood to the east would no longer be accessed along West St. Andrews Place from S. Baker Street.

As discussed throughout Section 5.7, Traffic and Circulation, this change in resident access for the area would not result in any significant impacts, such that traffic-related mitigation is required. Further, as discussed on page 5.7-21, 2nd paragraph, Occidental Street and Berkeley Street are proposed to terminate at the eastern boundary of the parking structure at a new public alley that would allow for adequate fire access and connectivity between the two roadways. The public alley would be gated along the proposed alley, immediately north of Berkeley Street and immediately south of Occidental Street, in order to limit public access to the parking structure and campus. These restrictions would prevent neighborhood pass-through traffic. Thus, the project would not result in significant impacts as a result of pass-through traffic through the residential neighborhood to the east of the project site. Impacts in this regard are less than significant and no mitigation measures are required.
4-7 At this time, there are no plans for development of the football field at Mater Dei High School.

4-8 The commenter claims that Mater Dei High School is not being honest to the neighbors during property negotiations. The commenter does not raise new environmental information or directly challenge information provided in the Draft EIR, and no further response is necessary.
3.0 Mitigation Monitoring and Reporting Program
3.0 MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring program. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring program must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

In compliance with Public Resources Code Section 21081.6, Table 1, Mitigation Monitoring and Reporting Checklist, has been prepared for the Mater Dei High School Parking Structure and School Expansion Project (the proposed project). This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable mitigation measures relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the City of Santa Ana Mater Dei High School Parking Structure and School Expansion Project file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the project, but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the Mitigation Monitoring and Reporting Checklist (Table 1). If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- The City distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the Initial Study, Draft EIR, and Final EIR, which provide general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the City as appropriate.
- Periodic meetings may be held during project implementation to report on compliance of mitigation measures.
• Responsible parties provide the City with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.

• The City prepares a reporting form periodically during the construction phase and an annual report summarizing all project mitigation monitoring efforts.

• Appropriate mitigation measures will be included in construction documents and/or conditions of permits/approvals.

The following subsections of the Draft EIR contain a detailed environmental analysis of the existing conditions, project impacts (including direct and indirect, short-term, long-term, and cumulative impacts), recommended mitigation measures, and unavoidable significant impacts, if any.

Minor changes to the MMRP, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the City. No change will be permitted unless the MMRP continues to satisfy the requirements of Public Resources Code Section 21081.6.
Table 1

MITIGATION MONITORING AND REPORTING CHECKLIST

<table>
<thead>
<tr>
<th>Mitigation Number</th>
<th>Mitigation Measure</th>
<th>Implementation Responsibility</th>
<th>Timing</th>
<th>Monitoring Responsibility</th>
<th>Timing</th>
<th>VERIFICATION OF COMPLIANCE</th>
</tr>
</thead>
<tbody>
<tr>
<td>AES-1</td>
<td>Prior to the issuance of a building permit, the Project Applicant shall submit a Construction Management Plan for review and approval by the City of Santa Ana Planning Division. The Construction Management Plan shall, at a minimum, indicate the equipment and vehicle staging areas, stockpiling of materials, fencing (i.e., temporary fencing with opaque material), and construction haul route(s).</td>
<td>Applicant/Construction Contractor</td>
<td>Prior to Issuance of a Building Permit</td>
<td>City of Santa Ana Planning Division</td>
<td>Prior to Issuance of a Building Permit/Review of Construction Management Plan</td>
<td></td>
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</tbody>
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| AQ-1              | Prior to issuance of any Grading Permit, the City Engineer and the Building Safety Manager shall confirm that the Grading Plan, Building Plans, and specifications stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD’s Rules and Regulations. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:  
  - All active portions of the construction site shall be watered every three hours during daily construction activities and when dust is observed migrating from the project site to prevent excessive amounts of dust.  
  - Pave or apply water every three hours during daily construction activities or | Applicant/Construction Contractor      | Prior to Issuance of a Grading Permit or any Construction Permit | City Engineer/Building Safety Manager/SCAQMD | Prior to Issuance of a Grading Permit/Review of Grading Plan, Building Plans, and Specifications |                              |
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<td>apply non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas. More frequent watering shall occur if dust is observed migrating from the site during site disturbance.</td>
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<td>· Any on-site stockpiles of debris, dirt, or other dusty material shall be enclosed, covered, or watered twice daily, or non-toxic soil binders shall be applied.</td>
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<td>· All grading and excavation operations shall be suspended when wind speeds exceed 25 miles per hour.</td>
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<td>· Disturbed areas shall be replaced with ground cover or paved immediately after construction is completed in the affected area.</td>
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<td>· Track-out devices such as gravel bed track-out aprons (3 inches deep, 25 feet long, 12 feet wide per lane and edged by rock berm or row of stakes) shall be installed to reduce mud/dirt trackout from unpaved truck exit routes. Alternatively a wheel washer shall be used at truck exit routes.</td>
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<td>· On-site vehicle speed shall be limited to 15 miles per hour.</td>
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<td>· All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site.</td>
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<td>· Reroute construction trucks away from congested streets or sensitive receptor areas.</td>
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<td>AQ-2</td>
<td>All trucks that are to haul excavated or graded material on-site shall comply with State Vehicle Code Section 23114 (Spilling Loads on Highways), with special attention to Sections 23114(b)(F), (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads. Prior to the issuance of grading permits, the Applicant shall demonstrate to the City Engineer how the project operations subject to that specification during hauling activities shall comply with the provisions set forth in Sections 23114(b)(F), (e)(4).</td>
<td>Applicant/Construction Contractor</td>
<td>Prior to Issuance of a Grading Permit</td>
<td>City Engineer</td>
<td>Prior to Issuance of a Grading Permit/ During Construction</td>
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<td>AQ-3</td>
<td>Prior to issuance of any Grading Permit, the City Engineer and the Building Safety Manager shall confirm that the Grading Plan, Building Plans, and specifications stipulate that, in compliance with SCAQMD Rule 403, O₃ precursor emissions from construction equipment vehicles shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the City Engineer. Maintenance records shall be provided to the City by the construction contractor on a monthly basis. The City Inspector shall be responsible for ensuring that contractors comply with this measure during construction.</td>
<td>Applicant/Construction Contractor</td>
<td>Prior to Issuance of a Grading Permit/ During Construction</td>
<td>City Engineer/Building Safety Manager/ SCAQMD</td>
<td>Prior to Issuance of a Grading Permit/ Review of Grading Plan, Building Plans, and Specifications</td>
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<td>NOISE</td>
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| N-1              | Prior to Grading Permit issuance, the Project Applicant shall demonstrate, to the satisfaction of the City of Santa Ana Planning Division that the project complies with the following:  
  • Construction contracts specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state required noise attenuation devices. | Applicant/Construction Contractor/ Noise Disturbance Coordinator | Prior to Issuance of a Grading Permit/ During Construction | City of Santa Ana Planning Division/ Building Safety Manager | Prior to Issuance of a Grading Permit/ During Construction |                                |
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<td>• Property owners and occupants located within 500 feet of the project boundary shall be sent a notice, at least 15 days prior to commencement of construction of each phase, regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall also be posted at the project construction site. All notices and signs shall be reviewed and approved by the City of Santa Ana Planning Division, prior to mailing or posting and shall indicate the dates and duration of construction activities, as well as provide a contact name and a telephone number where residents can inquire about the construction process and register complaints.</td>
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<td>• Prior to issuance of any Grading or Building Permit, the Contractor shall provide evidence that a construction staff member will be designated as a Noise Disturbance Coordinator and will be present on-site during construction activities. The Noise Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Noise Disturbance Coordinator shall notify the City within 24-hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the Public Works Executive Director. All notices that are sent to residential units immediately surrounding the construction site and all signs posted at the construction site shall include the</td>
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contact name and the telephone number for the Noise Disturbance Coordinator.

- Prior to issuance of any Grading or Building Permit, the Project Applicant shall demonstrate to the satisfaction of the City's Building Safety Manager that construction noise reduction methods shall be used where feasible. These reduction methods include shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and electric air compressors and similar power tools.

- Construction haul routes shall be designed to avoid noise sensitive uses (e.g., residences, convalescent homes, etc.), to the extent feasible.

- Noise attenuation barriers (temporary barriers or noise curtains) with a sound transmission coefficient (STC) of at least 20 shall be used along the northern, eastern, and western boundaries of the parking structure site adjacent to nearby residential uses during construction activities associated with the parking structure (all phases except for architectural coating), as well as surrounding the proposed classroom building site during construction activities associated with the proposed classroom building (all phases except for architectural coating). Noise attenuation barriers constructed at the property lines to a height of 10 feet with an STC rating

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of at least 20 are capable of reducing noise levels by 7.7 dBA.

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.

- Construction activities shall not take place outside of the allowable hours specified by the City's Municipal Code Section 18-314, Special Provisions (7:00 a.m. and 8:00 p.m. on weekdays and Saturdays; construction activities are not permitted on Sundays or legal holidays).