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ADMINISTRATIVE FINAL
ENVIRONMENTAL IMPACT REPORT

SALINAS UNION HIGH SCHOOL DISTRICT NEW MIDDLE SCHOOL #5 CONSTRUCTION

SCH# 2015081022

STAFF PRELIMINARY WORKING DRAFT-FOR INTERNAL USE ONLY-CA GOVT CODE SECTION 6254(A)

PREPARED FOR

Salinas Union High School District

November 10, 2016

EMC PLANNING GROUP INC.
A LAND USE PLANNING & DESIGN FIRM

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PREPARED FOR
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November 10, 2016

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1.0
INTRODUCTION

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1.1 PURPOSE AND ORGANIZATION

The Salinas Union High School District (hereinafter "the District"), acting as the lead agency, determined that the proposed Salinas Union High School District New Middle School #5 Construction Project (hereinafter "proposed project") might result in significant adverse environmental effects, as defined by the California Environmental Quality Act (CEQA) Guidelines section 15064. Therefore, the District had a draft environmental impact report (Draft EIR) prepared to evaluate the potentially significant adverse environmental impacts of the proposed project. The Draft EIR was circulated for public review between Friday, August 19, 2016 and Monday, October 3, 2016, and public comment was received. CEQA Guidelines section 15200 indicates that the purposes of the public review process include sharing expertise, disclosing agency analysis, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals.

This Final EIR has been prepared to address comments received during the public review period, and, together with the Draft EIR, constitutes the complete Salinas Union High School District New Middle School #5 Construction Project EIR. This Final EIR is organized into the following sections:

- Section 1 contains an introduction to the Final EIR.
- Section 2 contains written comments on the Draft EIR, as well as the responses to those comments.
- Section 3 contains the revisions to the text of the Draft EIR resulting from comments on the Draft EIR.
- Section 4 contains the mitigation monitoring program.

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2.0
COMMENTS ON THE DRAFT EIR

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2.1 CEQA REQUIREMENTS

CEQA Guidelines section 15132(c) requires that the Final EIR contain a list of persons, organizations, and public agencies that have commented on the Draft EIR. A list of the correspondence received during the public review period is presented below.

CEQA Guidelines sections 15132(b) and 15132(d) require that the Final EIR contain the comments and recommendations received on the Draft EIR either verbatim or in summary, and the responses of the Lead Agency to significant environmental points raised in the review and consultation process. A copy of each correspondence received during the public review period for the Draft EIR is presented on the following pages. Numbers along the left-hand margin of each comment letter identify individual comments to which a response is provided. Responses are presented immediately following each letter. Where required, revisions have been made to the text of the Draft EIR based on the responses to comments. These revisions are included in Section 3.0, Changes to the Draft EIR.

2.2 COMMENTS ON THE DRAFT EIR AND RESPONSES

The following correspondence was received during the 45-day public review period on the Draft EIR:

- State of California Department of Transportation (September 29, 2016)
- Monterey Bay Air Resources District (September 30, 2016)
- Transportation Agency for Monterey County (October 6, 2016)
- Ohlone/Costanoan-Esselen Nation (September 30, 2016)
- City of Salinas (October 3, 2016)

DEPARTMENT OF TRANSPORTATION
50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3329
TTY 711
http://www.dot.ca.gov/dist05/

Serious drought
Help save water!

September 29, 2016

MON-101-R91
SCH#2015081022

Ms. Karen Luna
Salinas Union High School District
320 Rose Street
Salinas, CA 93901

Dear Ms. Luna:

COMMENTS ON SALINAS UNION HIGH SCHOOL DISTRICT NEW MIDDLE SCHOOL #5 CONSTRUCTION – DRAFT ENVIONMENTAL IMPACT REPORT (DEIR)

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the above referenced project and offers the following comments in response to your summary of impacts.

1 1. Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development.

2 2. Please be aware that if any work is completed in the State's right-of-way it will require an encroachment permit from Caltrans, and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: http://www.dot.ca.gov/trafficops/ep/index.html.

3 3. Along with any reference to development impact fees, it would also be appropriate to specify applicable regional fees. The Transportation Agency for Monterey County (TAMC) collects development impact fees to help fund transportation projects of regional significance to address project long-range traffic impacts. Caltrans supports payment of the adopted TAMC development impact fees as required to mitigate cumulative impacts of projects associated with the Central Area Specific Plan.

4. Review of specific projects that are located within the Central Area Specific Plan should be consistent with adopted Caltrans facilities system planning documents.

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3282 or email jill.morales@dot.ca.gov.

Sincerely,

JILLIAN MORALES
Transportation Planner
District 5
jill.morales@dot.ca.gov

cc: Orchid Monroy-Ochoa (D5)
Grant Leonard (TAMC)

Response to Comment Letter #1 (Department of Transportation)

1. The comment does not raise an environmental issue and therefore, no response is required.

2. There are no project-related improvements proposed or required within the Caltrans right-of-way. The comment does not raise an environmental issue and therefore, no response is required.

3. Public schools are exempt from paying the TAMC regional impact fee (http://www.tamcmonterey.org/programs/dev-impact-fees/). No further response is required.

4. The comment does not raise an environmental issue and therefore, no response is required.

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Monterey Bay Air
Resources District
Serving Monterey, San Benito, and Santa Cruz Counties

24580 Silver Cloud Court
Monterey, CA 93940
PHONE: (831) 647-9411 • FAX: (831) 647-8501

September 30, 2016

RECEIVED
EMC Planning Group

Mr. Richard James
EMC Planning Group, Inc
301 Lighthouse Avenue
Monterey, CA 93940

Subject: Comments on DEIR for SUHSD New Middle School #5 Construction

Dear Mr. James:

Thank you for inviting the Monterey Bay Air Resources District (Air District) to provide comments on the DEIR for the Middle School #5 Project. The Air District has reviewed the document and has the following comments:

1. Air Quality Mitigation Measures, Construction, Pg. 3-27 – The Air District supports Mitigation Measures AQ-1 and AQ-2 which will minimize fugitive dust and diesel exhaust emissions from the construction activities. We further encourage the School District to make sure they are implemented by monitoring compliance with these conditions in the construction contracts.

2. Suggested Additional Air Quality Mitigation Measure, Pg. 3-27 – As shown in the Existing Condition Section (Figures 1-3), the project site is essentially an island in the middle of active agricultural fields. In order to minimize drift of offsite fugitive dust, diesel exhaust and agricultural pesticides onto the school grounds, the Air District suggests that a buffer/screen be established around the perimeter of the school site to partially mitigate exposure to the sensitive receptors (school children) at the school. This could be a vegetation screen of trees or bushes that don't harbor crop pests, a porous screen, wall or whatever would be acceptable from a design and habitat standpoint. Alternatively, the School District might consider an alternative site where such factors are less prevalent.

3. School District Proposed GHG Reduction Measures, Pg. 3-93 – The Air District commends the School District for including the four measures listed in this section as part of the project. These efficiency measures should not only reduce GHG emissions, but may ultimately save the School District money in the long-run.

4. New District Name, Pg. 3-24 – On a minor note, the name of the Air District has recently been changed and is no longer the Monterey Bay Unified Air Pollution Control District. The new name for the agency is the Monterey Bay Air Resources District (MBARD). We hope this will be less cumbersome for users.

Please let me know if you have any questions. I can be reached at (831) 647-9418 ext. 226 or bnunes@mbard.org.

Best Regards,

Robert Nunes

Robert Nunes
Air Quality Planner

cc: David Frisbey, Planning and Air Monitoring Manager

Response to Comment Letter #2 (Monterey Bay Air Resources District)

1. The air district notes that they support Mitigation Measures AQ-1 and AQ-2 and encourage the school district to make sure the mitigation measures are implemented. The mitigation measures include language requiring contractual conditions between the school district and their contractors.

2. CEQA does not require an evaluation of the existing environment on the proposed project. However, the air district does raise a concern that merits response. The District does not intend to provide a buffer, as suggested, and does not believe this approach would effectively mitigate for drift of dust, diesel exhaust, or pesticides. The District understands that the campus will be located adjacent to agricultural fields for a number of years before development takes place. Dust and diesel exhaust emissions occur very sporadically and do not present an acute health risk. The District's highest concern is in regard to pesticide drift. At the District's other schools that are located near agricultural fields, the District is informed in advance of any pesticide spraying, and coordinates with the applicator to ensure that spraying takes place when the school campus is not occupied. This measure effectively eliminates risk from pesticide drift. Refer also to the response to Comment 11 from the City of Salinas.

3. Comment is acknowledged. The air district commends the school district for including mitigation measures to reduce greenhouse gas emissions. No further response is necessary.

4. The district's name change is noted. It does not raise an environmental issue and therefore, no response is necessary and no changes to the Draft EIR are required.

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TAMC
TRANSPORTATION AGENCY
FOR MONTEREY COUNTY

55-B Plaza Circle, Salinas, CA 93901-2902 • Tel: (831) 775-0903 • Website: www.tamcmonterey.org

October 6, 2016

Richard James
EMC Planning Group
301 Lighthouse Avenue,
Monterey, CA 93940

SUBJECT: Comments on the Subsequent Environmental Impact Report for the Salinas Union High School District New Middle School #5 Construction

Dear Mr. James:

The Transportation Agency for Monterey County is the Regional Transportation Planning and Congestion Management Agency for Monterey County, and agency staff has reviewed the Subsequent Environmental Impact Report for the Salinas Union High School District New Middle School #5 Construction.

The Salinas Union High School District is proposing the construction and operation of a new middle school approximately 1,500 feet northeast of the intersection of Hemingway Drive and Boronda Road, north of the City limits of Salinas ("proposed project" or "project"). The new middle school would accommodate between 800 and 1,000 seventh and eighth grade students. The new middle school is anticipated to have a range of 40-50 employees based on the school district's classroom loading and target student population numbers. The 18-acre project site is located northeast of the corner of Boronda Road and Natividad Road in the City of Salinas ("City") within the County of Monterey ("County").

The Transportation Agency offers the following comments:

Impacts to Local and Regional Roads

1. Both the Project and the Project Alternatives would result in impacts to the local and regional transportation system. The Transportation Agency supports the developer's intention to pay the City of Salinas's traffic impact fees, as well as the Regional Development Impact Fee as mitigation for the project's regional impacts.

1

Safe Routes to School

2. The Transportation Agency supports the project's intention to implement safe routes to schools elements in the design of the project, including that sidewalks would be constructed along all of the project site frontages on K Street, AA Street, and AJ Street. Additionally, the Agency supports that efforts be taken to enhance and

2

connect to the already existing bicycle safe routes to school elements within the City to the project. Specifically, a fully separated bicycle and pedestrian pathway, Class I, or sidewalks and buffered bikeways, Class IV, should be considered as a connection from the project to the City's existing bicycle and pedestrian network.

Alternative Analysis

3. The SEIR concludes that the environmentally superior alternative would be the No Project/No New Middle School alternative. This alternative would also have the fewest transportation and traffic impacts since students and staff would remain at existing facilities within the district.

However, the discussion of the No Project/No New Middle School alternative assumes that no improvements would be made to existing facilities, and, therefore, the project goals, such as reducing overcrowding, would not be met. This assumption, and subsequent analysis, does not consider the district's ability to enhance and remodel existing facilities to achieve the project's goals. Recent examples for other local school districts, such as the Alisal Elementary School District and the Soledad Unified School District, show that remodeling and enhancing existing school facilities can achieve the same goals, such as reducing overcrowding, as building a new facility. 3

Given that the No Project/No New Middle School alternative is listed as having equal or fewer transportation and air quality impacts than the proposed site (as noted in Table 21 on page 6-16), TAMC encourages the district to consider the feasibility of the No Project/No New Middle School alternative to meet the project's goals by enhancing existing facilities to accommodate the student population.

Additionally, to the extent that the No Project/No New Middle School alternative would lead to a potential increase in traffic impacts at existing schools, those impacts could potentially be mitigated through the implementation of ridesharing, busing, and safe routes to schools strategies for existing schools, which TAMC can assist the district with implementing.

Location and Future Growth

4. The project would be located on existing agricultural lands that are included as part of the City of Salinas' Future Growth Area in the General Plan. Due to this designation, the SEIR concludes that the project would not be growth inducing. However, the timeline for development of the Future Growth Area is uncertain and dependent on conditions that are subject to change unexpectedly, such as economic conditions and the demand for new housing within the city. 4

Development of the project prior to development of the Future Growth Area, therefore, has the potential to result in a school that is surrounded by agricultural lands, that is difficult to access for children, parents, and staff who might want to walk or ride a bike to school. This pattern of school development is common in Monterey County and North Salinas, as are the resulting transportation problems. Consequently, development of the project at the proposed location, prior to 5

development of the Future Growth Area, has the potential to result in greater traffic impacts than waiting to be developed in concurrence with the development of the Future Growth Area, or the No Project/No New Middle School alternative. .

Thank you for the opportunity to comment on the proposed project. If you have any questions, please contact Grant Leonard of my staff at 831-775-0903.

Sincerely,

Debra L. Hale
Executive Director

Response to Comment Letter 3 (Transportation Agency for Monterey County)

1. The comment is acknowledged. The District intends to pay the City of Salinas transportation impact fees. The school district is exempt from payment of the TAMC regional impact fee (http://www.tamcmonterey.org/programs/dev-impact-fees/). All project trips would be contained within the attendance boundaries of the school, and none would extend onto regional roads or highways that are part of the TAMC fee program. The proposed project would have no impact on the TAMC fee program road network. Therefore the District does not believe there is a nexus that would require payment of the TAMC impact fees and does not intend to pay those fees.

2. The comment is acknowledged. The Central Area Specific Plan includes Class I bicycle paths on three sides of the project site, and those would be constructed as part of the on-site improvements. Development of off-site improvements would be the responsibility of the Specific Plan developer. In the near-term, before the surrounding land uses are constructed, the only traffic approaching the project site would be project-generated traffic, and volumes would be low.

3. The Draft EIR, incorrectly identified by the commenter as the "SEIR," does conclude that the environmentally superior alternative analyzed in the Draft EIR is the No Project/No New Middle School alternative, as it would have the least amount of adverse environmental impacts. The comment incorrectly states, however, that the Draft EIR concludes that project goals would not be met. Page 6-9 of the Draft EIR concludes that the No Project/No New Middle School alternative would be "partially consistent with the proposed project's objectives." Furthermore, it is beyond the purview of the Draft EIR to determine the feasibility of different growth options for the District. While, conceptually, the District may be able to accommodate future growth by remodeling of existing facilities as opposed to the construction of new facilities, this determination is a financial, technical, and operational determination by the District. For purposes of the Draft EIR, the proposed project objectives as determined by the District would not be met by the No Project/No New Middle School alternative.

4. The commenter states that the Draft EIR, incorrectly identified as the "SEIR," concludes that the proposed project would not be growth inducing based on the project site's location in an area of the City designated for future growth. This comment is confirmed; however, the conclusion that the proposed project would not be growth inducing is furthermore based on the fact that the proposed new middle school would accommodate existing and projected student levels currently and projected for existing middle schools within the greater surrounding area. The proposed school accommodates rather than induces growth.

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5. The commenter states that development of the proposed project prior to the development of the surrounding Future Growth Area has the potential to result in a school that is surrounded by agricultural lands. While exact timing of future development of the immediate surrounding area of the proposed project is not known, and the commenter's statement could have validity based on short-term future conditions, the project site has long been identified as the site of a future school, including in the Salinas General Plan. Future development of the surrounding area has been planned concurrently with the school site, and development of the surrounding area is not within the jurisdiction of the District, nor is the timing for development of this area within the control of the District or the purview of the Draft EIR. Analysis and conclusions in the Draft EIR are reasonably based on existing planning projections for the project area and on the existing land use designation and planning for the site itself. Conversely to the comment regarding difficulty in accessing the site by bicycle, the reduced traffic that would be experienced on the streets leading to the school site could be encouraging to potential bike riders. The street improvements will include sidewalks to facilitate walking, although distances to home may make walking an impractical mode for many.

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Ohlone/Costanoan-Esselen Nation

Previously acknowledged as
The San Carlos Band of
Mission Indians
The Monterey Band
And also known as
O.C.E.N. or Esselen Nation
P.O. Box 1301
Monterey, CA 93942

www.ohlonecostanoanesselennation.org.

September 30, 2016

EMC Planning Group Inc.
Attn.: Richard James
301 Lighthouse Avenue
Monterey, CA 93940

Re: Salinas Union High School District New Middle School #5 Construction

Saleki Atsa,

1 Ohlone/Costanoan-Esselen Nation is an historically documented previously recognized tribe. OCEN is the legal tribal government representative for over 600 enrolled members of Esselen, Carmeleno, Monterey Band, Rumsen, Chalon, Soledad Mission, San Carlos Mission and/or Costanoan Mission Indian descent. Though other indigenous people may have lived in the area, the area is the indigenous homeland of our people. Included with this letter please find a territorial map by Taylor 1856; Levy 1973; and Milliken 1990, indentifying Tribal areas.

2 **Ohlone/Costanoan-Esselen Nation objects to all excavation in known cultural lands, even when they are described as previously disturbed, and of no significant archaeological value.** Please be advised that it is our first priority that our ancestor's remains be protected and undisturbed. We desire that all sacred burial items be left with our ancestors on site or as culturally determined by OCEN. All cultural items returned to Ohlone/Costanoan-Esselen Nation. We ask for the respect that is afforded all of our current day deceased, by no other word these burial sites are cemeteries, respect for our ancestors as you would expect respect for your deceased family members in today's cemeteries. **Our definition of respect is no disturbance.**

3 OCEN's Tribal leadership desires to be provided with archaeological reports/surveys, including subsurface testing, and presence/absence testing. OCEN request to be included in mitigation and recovery programs, reburial of any of our ancestral remains, placement of all cultural items, and that a Native American Monitor of Ohlone/Costanoan-Esselen Nation, approved by the OCEN Tribal Council be used within our aboriginal territory.

We request consultation on projects affecting our aboriginal homelands, which include all ground disturbance. We look forward to hearing more information about this project; please feel free to contact me at (408) 629-5189. Nimasianexelpasaleki. Thank you for your attention to this matter.

Sincerely and Respectfully Yours,

Louise J. Miranda Ramirez, Chairperson
Ohlone/Costanoan-Esselen Nation
(408) 629-5189

Cc: OCEN Tribal Council

NOTICE OF AVAILABILITY OF A DRAFT EIR

Project Title: Salinas Union High School District New Middle School #5 Construction

Project Location (Specific): The 18-acre project site is located northeast of the intersection of Boronda Road and Natividad Road, APNs 153-091-006 and 153-091-007, in the northeastern portion of the City of Salinas.

Project Location (City): City of Salinas **Project Location (County)**: Monterey

Description of Nature, Purpose, and Beneficiaries of Project: The proposed project is the construction of a new 800 to 1,000-student middle school. The beneficiaries are the students with the school district.

Lead Agency: Salinas Union High School District

Address Where Copy of Draft Subsequent EIR is Available: The Draft EIR is available for public review during regular hours at the following locations: **Salinas Union High School District**, 431 East Alisal Street, Salinas, (Monday-Friday); the **John Steinbeck Library**, 350 Lincoln Avenue, Salinas (Monday-Sundat); **Monterey County Libraries Buena Vista Branch**, 18250 Tara Drive, Salinas (Tuesday-Saturday)

Review Period: The 45-day public review period starts on **Friday, August 19, 2016** and ends on **Monday, October 3, 2016**. Any written comments pertaining to this document must be received no later than 5:00 p.m. on Monday, October 3, 2016 at EMC Planning Group Inc., Attention: Richard James, 301 Lighthouse Avenue, Monterey, CA 93940, fax: 831-649-8399.

Contact Persons: Richard James or Bryce Ternet, EMC Planning Group. **Phone** (831) 549-1799

Public Hearing: The Salinas Union High School District will hold a public hearing on the proposed project on **Tuesday, September 13, 2016 at 7:00 p.m.** The meeting will be held in the District Office Board Room, 431 E. Alisal Street, Salinas, CA 93901.

Distribution of Ohlone/Costanoan-Esselen Nation Tribal Rancherias, Districts, Landgrants and Historic Landmarks

OCEN DIRECT LINEAL DESCENT

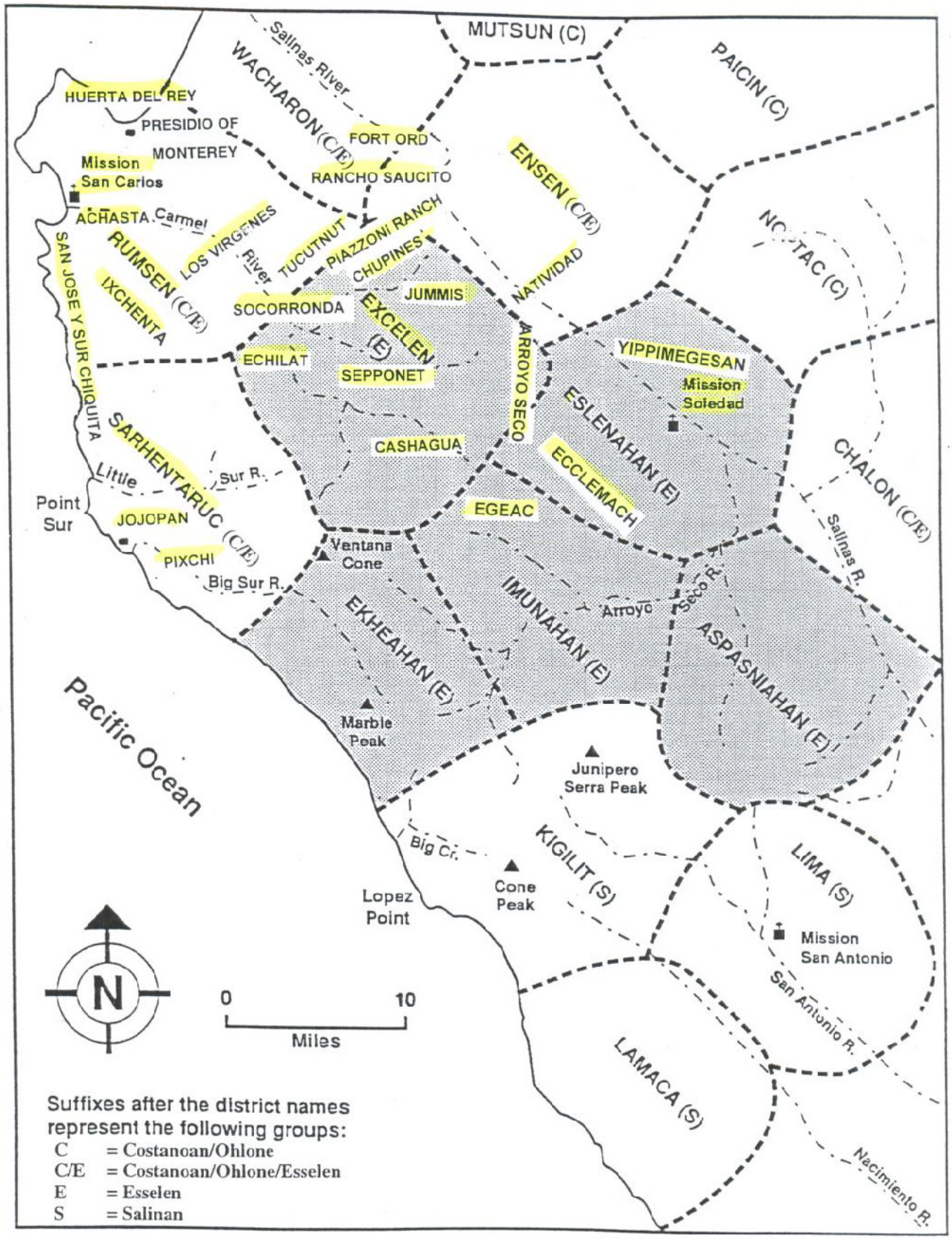
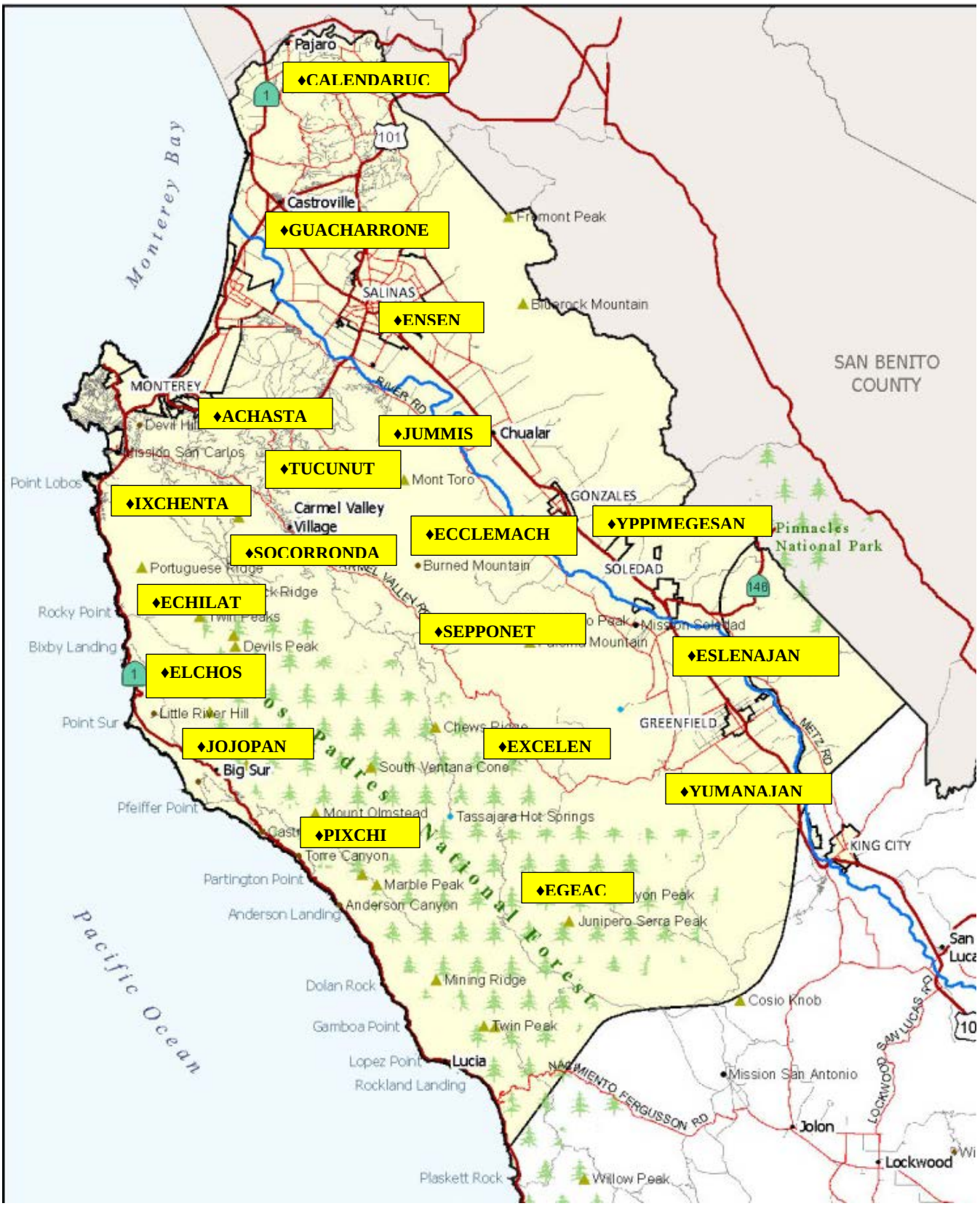


Figure 2:

Map after Taylor 1856; Levy 1973; Hester 1978; Milliken 1990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Pfeiffer Point
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Tassajara Hot Springs
KING CITY
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Anderson Landing
Junipero Serra Peak
Pacific Ocean
Dolan Rock
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Cosio Knob
Gamboa Point
Twin Peak
Lopez Point
Lucia
Rockland Landing
Mission San Antonio
Jolon
Lockwood
Plaskett Rock
Willow Peak
Monterey Bay
Los Padres National Forest
RIVER RD
METZ RD
NACIMIENTO FERGUSSON RD
LOCKWOOD SAN LUCAS RD

Response to Comment Letter 4 (Ohlone/Costanoan-Esselen Nation)

1. The commenter explains the Ohlone/Coastanoan-Esselen Nation's interest in the project area. This comment does not raise an environmental issue and therefore, no response is necessary.

2. While it is recognized that the commenter is opposed to additional ground disturbance occurring on the project site beyond the historical use of the site for agricultural purposes, Mitigation Measure CR-3 is identified within the Draft EIR to address concerns for the potential disturbance of human remains including the potential for human remains to be of Native American heritage should they be encountered during grading activities,. This mitigation measure will require that in the case that human remains are found during construction activities on the site, there will be no further excavation or disturbance of the site or any nearby area until procedures have been followed, including the notification of the Native American Heritage Commission if the coroner determines the remains to be of Native American heritage. Therefore, the potential impact is considered to be sufficiently addressed and no further mitigation or changes to the draft EIR are required.

3. The District received a letter from the Ohlone/Costanoan-Esselen Nation, dated June 28, 2015, requesting formal notification of proposed projects within the Ohlone/Costanoan-Esselen Nation's geographic area of traditional and cultural affiliation, which includes the service area of the District. In compliance with this request, the representative of the Ohlone/Costanoan-Esselen Nation was sent both the Notice of Preparation in August 2015 and the Notice of Availability in August 2016. No contact or correspondence was received by the District from the Ohlone/Costanoan-Esselen Nation after the publication of the Notice of Preparation. The Draft EIR comment letter was received on September 30, 2016. The September 30th comment letter, and this specific comment in particular, requests that the Tribe be provided with available documentation and consultation for proposed projects within the Ohlone/Costanoan-Esselen Nation's geographic area of traditional and cultural affiliation. The September 30th comment letter does not provide comments on the cultural resources analysis in the Draft EIR. By providing notification documents to the Ohlone/Costanoan-Esselen Nation throughout the proposed project's EIR process, the District has provided and offered consultation on the proposed project. The District is available to discuss the specific proposed project with representatives of the Ohlone/Costanoan-Esselen Nation upon request. However, as the September 30th letter does not provide comments on the cultural resources analysis in the Draft EIR, and as general impact analysis determinations provided in the letter are addressed in the response to Comment 2, no further response is required and no changes to the Draft EIR are necessary.

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City of Salinas
COMMUNITY DEVELOPMENT DEPARTMENT
65 W. Alisal Street, 2nd Floor • Salinas, California 93901
(831) 758-7387 • (831) 775-4258 (Fax) • www.ci.salinas.ca.us

October 3, 2016

Richard James
EMC Planning Group, Inc.,
301 Lighthouse Avenue
Monterey, CA 93940

RE: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE CONSTRUCTION OF SALINAS UNION HIGH SCHOOL DISTRICT'S (SUHSD) NEW MIDDLE SCHOOL #5 WITHIN THE CENTRAL AREA SPECIFIC PLAN (CASP)

Introduction

The SUHSD is proposing the construction and operation of a new middle school approximately 1,500 feet northeast of the intersection of Hemingway Drive and Boronda Road, within the CASP portion of the City's Future Growth Area (FGA) ("proposed project" or "project"). The new middle school would accommodate between 800 and 1,000 seventh and eighth grade students and is anticipated to have a range of 40-50 employees based on the school district's classroom loading and target student population numbers.

The middle school is expected to have approximately 29 standard classrooms, 12 special use rooms, six science classrooms, an administration building, a gymnasium, a multi-use building with kitchen, a media center with computer lab, locker rooms, courtyard, and restrooms, totaling approximately 75,750 square feet. Outdoor areas are expected to include sports fields for soccer, football, baseball and softball, basketball courts, an all-weather track, parking lots and drop-off area, and a storage area for bicycles and skateboards. Project design will include construction of on-site landscaping and storm water management facilities such as a retention pond, swales, and landscaping.

The project site is currently zoned as New Urbanism Interim (NI).

The school district anticipates breaking ground for the project in mid-2017 and opening the school in the fall of 2019.

Background

Based on the Lead Agency's (School District) decision to prepare an EIR, a Notice of Preparation (NOP) was prepared and distributed for a 30-day comment period from

Wednesday, August 12, 2015 to Thursday, September 10, 2015 in accordance with CEQA Guidelines section 15082. The City provided comments on the NOP. Per the requirements of the CEQA, a 45-day pubic review period is required for comments on a draft EIR. The 45-day pubic review period on the draft EIR commenced on Friday, August 19, 2016 and ends on Monday, October 3, 2016. The Salinas Union High School District held a public hearing on the proposed project on Tuesday, September 13, 2016 at the district office board room located at 431 E. Alisal Street.

The City of Salinas hereby provides the following comments on the draft EIR:

Community Development Department

Community/Neighborhood Fit

As indicated in the introduction section above, the proposed middle school is located within the CASP which is a Master Plan development that would ultimately allow the construction of between 3,419 and 3,983 new homes and apartments. Three school sites, including the project site are proposed within the CASP on three parcels for a combined 48 acres. Among other land uses proposed are an approximately 22,000 square foot library on 2 net acres of land and a fire station on 1.5 net acres of land. 1

Although the proposed school site is being developed ahead of other future, proposed land uses, it is important for the EIR to consider that the school site would be bordered on the west by the Village Center which would include both commercial and high density residential uses, on the north by medium and high density residential uses, on the east by medium and low density residential uses, and on the south by medium and high density residential uses. To that end, school outdoor areas and activities must be designed to be sensitive to these land uses.

Additionally, the use of lighting should strongly consider the neighborhood fit concept and should be designed and used with the entire CASP in mind. Lighting, if used, should be of an intensity that would not create undue intrusion into the residential areas and should be shielded as necessary.

As the CASP is being designed under the New Urbanism principles, the proposed school site, to the extent possible, should embrace and demonstrate the New Urbanism concept in the design in the orientation of its buildings, parking areas and other related infrastructure.

Lastly, the school site fronts the Southerly Greenway Street, which is a major pedestrian connector and open space linkage within the CASP. The CASP has advocated limiting access such as driveways, curb cuts and other intrusions into this area unless waived by the CASP. The design of the school and its infrastructure will be held to these standards unless waived in the CASP.

Orientation of Hemingway Drive

The orientation of Hemingway Drive has been mentioned in past correspondence with the school district and its representatives. The preferred alignment of Hemingway Drive is an "S" configuration from Boronda Road to the Southerly Greenway Street. Other iterations of submitted maps have represented Hemingway Drive as a straight roadway from Boronda Road to the Southerly Greenway Street. The City views this particular alignment as troublesome because it creates a "T" intersection at the Southerly Greenway Street followed by another "T" 2

intersection with the street providing access to the Village Center. This pattern of successive "T" intersections poses a problem in the future when other land uses are active because it represents repeated traffic stops within a short distance in an area that is anticipated to generate a substantial amount of traffic. The City has requested a justification for the "T" alignment to be substantiated with a current traffic study prior to project approval.

Noise

Section 3.9 of the draft EIR discusses project Noise Assessment as prepared by Illingworth & Rodkin (October 2015). Based on this analysis, the draft EIR concludes that project noise impacts are less than significant.

In reviewing the impacts on permanent noise level increase from project traffic and operation, the draft EIR concludes that schools are considered to be compatible with residential land uses. However, there are numerous instances where the location of schools in proximity to residential
3 uses have resulted in increased morning and afternoon traffic, contributing to significant traffic jams, and increase in noise beyond the ambient levels from sporting and other activities occurring on school grounds. This issue is even amplified as one reads in the traffic analysis of this draft EIR that existing intersection on Boronda Road at Natividad Road, and Boronda Road at Hemingway Drive during AM peak hour and School PM peak hour operate at LOS F, which is below the City threshold of LOS D. The draft EIR attributes these deficiencies primarily to the school traffic from Everett Alvarez High School during the AM peak hour and school PM peak hour. Everett Alvarez High School is located in Creekbridge, a predominantly residential area.

The draft EIR failed to study the noise impacts of the proposed middle school as it relates to the CASP especially since the proposed school site is located in an area where future residential development borders the school site to the north, east, and south, with the mixed-use shopping center uses to the west.

4

This issue is a sensitive one because similar assumptions were made with the construction of the SUHSD's high school site at Russell Road and Rogge Road. The City's requests to consider the community fit of the high school with surrounding neighborhoods were ignored, and noise and light impacts were treated as if the school is an isolated island rather part of a future neighborhood with mostly residential uses surrounding it.

It is easier to address these issues now than in the future when, with surrounding development, the school scrambles for ways to resolve the concerns of home owners. The City therefore goes on record through these comments that adequate mitigation measures have not been provided to address the school's anticipated land use compatibility issues.

Other Comments

On Page 3-152, it is stated that the project site is zoned by the City as "New Urbanism Interim: and that the proposed project would be an allowable use within this Zoning District. Per Zoning Code Section 37-30.430, Table 37-30.190, "Schools – Public/Private" may be considered in New Urbanism (NU) districts through the Conditional Use Permit (CUP) process. However,
5 school district boards may, and typically do exempt public schools from this requirement. Buildings and architectural elements should be designed to enhance the public realm providing a human scale and architectural interest to the streetscape. Per Zoning Code Section 37-30.210, Footnote E, structures shall not intercept a 45-degree inclined plane inward from a height of 10-feet above existing grade at a residentially-zoned district boundary

line. Parking areas needed for the school should not dominate the site's street frontages, and should be screened from public view with landscaping. The parking lot should also show 15-foot visibility triangles at driveways, parking space dimensions, and other minor details need to be shown on the plans. Outdoor lighting should be designed to conform to the City's Zoning regulations to minimize light and glare impacts on adjoining residential properties. Per Zoning Code Section 37-50.360, the off-street parking requirements for schools consisting of Kindergarten through Eighth-grade is 3 spaces per classroom; plus, an off-street bus and passenger loading area. Recycling and solid waste disposal provisions should conform with Zoning Code Section 37-50.200, which addresses recycling and solid waste enclosure location, design, and materials.

6 On Page 3-53, a Dr. Bradley Schaffer from the University of California – Long Beach is identified in the Environmental Effects section of the EIR. Staff is not aware of a UC Long Beach (there is a Cal State Long Beach) and this should be verified as a part of the EIR.

Impact Fees

7 The School District will be required to pay all City impact fees to mitigate impacts to sanitary sewer, storm drain, street tree, fire apparatus and traffic (including the payment of TAMC regional traffic impact fees) and impact fees for required FGA facilities (e.g. police substation, fire station and library) associated with the proposed facility at the time of building permit issuance by the state, or will be collected with the first encroachment permit issuance by the City of Salinas.

Public Works Department

Review Comments (1st Review):

The following comments from the NOP review letter, dated September 10, 2015 were not addressed in the Draft EIR, dated August 19, 2016.

8
1. Section 3.2 "Agricultural Resources", did not address and/or provide mitigation for impacts identified by the City of Salinas.
    a. Farm equipment tracking dirt, debris and mud onto public street system.
    b. DEIR mitigation AG-2 does not clearly address the "clear zone" or "agriculture buffer" suggestion nor how these measures would be maintained.

9
2. Section 3.3 "Air Quality", did not address and/or provide mitigation for impacts onto the proposed site by adjacent farming activities.

10
3. Section 3.10 "Traffic", did not analyze traffic movements at the Boronda Road/Hemingway Drive intersection with the addition of acceleration and deceleration lanes. The DEIR did not analyze a new traffic signal at the Boronda Road/Hemingway Drive intersection.

11
4. City staff identified concern regarding the driveway crossing the southerly greenway (intersection #5 per the Traffic Impact Analysis). The TIA does not indicate if alternative drop-off configurations were analyzed?

12 The following comments were noted as part of the Draft EIR review.

1. S.2 & 2.1 - Update APNs to 153-091-014 and 153-091-016.

13
2. S.2 - Project description should be revised to identify project "within the City of Salinas, as annexed in 2008..."

14
3. S.3 - Mitigation HYD-1 should include "in addition to requirements at the time of

permitting."

4. 1.4 - Include FEMA in abbreviations.
5. Figure 6 roadway configuration of Hemingway Drive extension does not coincide with Figure 9.
6. 2.3 Phasing for Student Attendance, suggests that "portables could be removed from existing schools..." Would this happen following construction or at full buildout based on the City General Plan?
7. 2.3 Public Service, include "communication services".
8. 2.3 Public Services, current design does not extend the sewer lines through Hemingway Drive.
9. 2.4 add:
    a. City of Salinas
        - Approval – City Engineer for engineering/design of streets for public use.
        - Approval – NPDES permit compliance. Final storm water control plan, improvement plans and inspection for NPDES permit compliance of storm water related site improvements. A maintenance declaration shall be recorded and agreement to allow annual LID measures inspections.
        - Approval – SWPPP documents.
10. 3.8 NOP response letter also required the project to comply with the requirements of the City's NPDES permit and Storm Water Development Standards (SWDS)
11. 3.8 Preliminary Storm Water Control Plan – the following comments should be addressed by the PSWCP.
    a. The PSWCP and DEIR identify the basins both as infiltration and bio-filtration basins. Retention is required as part of the NPDES permit. The PSWCP and DEIR should be revised to identify and analyze any post construction LID measure as a bio-retention area/basin.
    b. The basins as specified do not meet the City's minimum requirements for depth of bio-retention soil media for bio-retention and do not contain drain rock as required.
    c. The design does not demonstrate hydraulically decentralized storm water controls. Two basins are identified to be an end-of-pipe treatment solution. Additional DMAs should be specified with additional landscape areas designated for treatment and retention.
    d. There is concern about the long-term storage in landscape retention areas that exceed 72 hours. Additional details will be required in the Final SWCP to identify the appropriate vector control measures for areas where the drawdown time exceeds 72 hours.
    e. The basin depth of 5.4' is not recommended as safe at a school site. The basin depth should be reduced. The SWCP should discuss student safety features.
12. 3.8 Standards of Significance – the EIR should address the following:
    a. Potential impact of project construction on storm water runoff?
    b. Potential impact of project post-construction activity on storm water runoff?
    c. Potential for discharge of storm water from material storage areas, vehicles or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials, handling or storage delivery areas or load docks, or other outdoor work areas?
    d. Potential for discharge of storm water to impair the beneficial uses of the receiving waters or areas that provide water quality benefit?
    e. Potential for the discharge of storm water to cause significant harm on the

biological integrity of the waterways and water bodies?

f. Potential for significant changes in the flow velocity or volume of storm water runoff that can cause environmental harm?
g. Potential for significant increases in erosion of the project site or surrounding areas?
h. Could this proposed project result in an increase in pollutant discharges to receiving waters? Consider water quality parameters such as temperature, dissolved oxygen, turbidity, and other typical Storm water pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash).
i. Could the proposed project result in a decrease in treatment and retention capacity for the site's Storm water run-on?
j. Could the proposed project result in significant alteration of receiving water quality during or following construction?
k. Could the proposed project result in increased impervious surfaces and associated increased urban runoff?
l. Could the proposed project create a significant adverse environmental impact to drainage patterns due to changes in urban runoff flow rate and/or volumes?
m. Could the proposed project result in increased erosion downstream?
n. Could the proposed project alter the natural ranges of sediment supply and transport to receiving waters?
o. Is the project tributary to an already impaired water body, as listed on the CWA Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?
p. Could the proposed project have a potentially significant environmental impact on surface water quality, to either marine, fresh, or wetland waters?
q. Could the proposed project result in decreased baseflow quantities to receiving surface waterbodies?
r. Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?
s. Does the proposed project adversely impact the hydrologic or water quality of the 100-year floodplain area?
t. Does the proposed project site layout adhere to the Permittee's waterbody setback requirements?
u. Can the proposed project impact aquatic, wetland, or riparian habitat?

13. 3.8 - Page 3-114, general comment: Reference discussion to the current NPDES requirements which supersede the General Plan. Decentralized LID controls required.
14. 3.8 - Page 3-114 discussion should include:"...treat and prevent..."
15. 3.8 - Page 3-114, delete the phrase, "exceeding minimum design requirements." As specified, the basins do not meet the current minimum design requirements.
16. 3.8 - Page 3-115, revise: "...from the project's preliminary storm water control plan shall be incorporated into the final storm water control plan for the project which will be reviewed by the City for compliance with the SWDS and..."
17. 3.10 - Page 3-128, revise to remove repetitious description of Constitution Boulevard.
18. 3.10 - Page 3-142 - If the LOS of intersection #2 Independence Blvd/Boronda Rd decrease in the PM peak, why is this not identified as significant?
19. 3-10 – Page 3-142 – Why is the decrease in the AM peak for Constitution Blvd not identified or discussed as significant?
20. 3.10 - A signalized intersection at Hemingway Drive/Boronda Rd intersection is not

identified as a mitigation measure. Interim offsite design plans indicate a 4-way stop. What will trigger signalization of this intersection?

32 21. 3.10, T-1 – Indicated that signals at Independence Blvd/Boronda Rd will be required to be synchronized with the change in timing cycles at Natividad Rd/Boronda Rd intersection.

33 22. 3.10, Student Drop-Off and Pick-Up Operations – The analysis did not discuss left turn movement from intersection #5 at full built-out. Egress should be limited to right turn only for the drop off.

34 23. 3.10, Student Drop-Off and Pick-Up Operations – the DEIR omitted discussion of the significant impact of the #5 intersection (TIA page 26).

35 24. 3.10, Safe Routes to School Assessment – The TIA does not discuss the street intersection between intersections #5 and #6.

36 25. 3.10, Mitigation Measures – DEIR omitted TIA recommendation for bicycle and pedestrian elements. References within these discussions to Mitigation Measure T-2 are incorrect.

37 26. 3.10, Mitigation Measures – Identify impact #3 for the interim conditions.

38 27. 4.3, Hydrology/Water Quality – Identify the NPDES permit as the "City's NPDES" permit.

39 Thank you for the opportunity to comment on the draft EIR, and please include the City in any future meetings or discussion related to this EIR or project.

Sincerely,

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Response to Comment Letter 5 (City of Salinas)

1. This comment addresses the location of the proposed project within the area designated as the Central Area Specific Plan in the future growth area of the City of Salinas. The proposed project has been designed in consideration of the proposed school site's location within the city's planning area.

2. The District is fitting its school project within the context of the larger Central Area Specific Plan, which is being privately developed through the City permitting process. Future alignment of this segment of roadway is not located on the project site and is not under the jurisdiction of the District. However, the City's objection to current Central Area Specific Plan designs is noted. The future segment of Hemingway Drive was shown as an "S" curve in earlier iterations of the Central Area specific Plan, but is now a straight alignment. Some Draft EIR figures show the alignment inconsistently. The discrepancy between figures in the Draft EIR related to the design of Hemingway Drive has been identified by the District, and changes are being made to the figures and related text of the Draft EIR to achieve consistency. See changes to text in Section 3.0 Changes to the Draft EIR, which corrects textual references around Hemmingway Drive. Figure 6, Proposed Central Area Specific Plan in the Draft EIR incorrectly displays a segment of Hemingway Drive extending northeastward from East Boronda Road in an "S" curve alignment, as this was the original alignment projection for this future segment of roadway in the Central Area Specific Plan area (correctly displayed in Figure 9, Offsite Improvements in the Draft EIR). Therefore, Figure 6, Proposed Central Area Specific Plan, is amended to reflect current design plans for the extension of Hemingway Drive, as displayed in Section 3.0 Changes to the Draft EIR.

3. Illingworth & Rodkin, the preparer of the project's noise assessment, is a respected noise consulting firm in the CEQA compliance industry and they have prepared noise assessments for CEQA documentation since 1987. Therefore, it is believed that the conclusions in the project's noise assessment, and as they are reflected in the analysis and conclusions of the Draft EIR, are well-founded. In regard to the City's statement regarding LOS F traffic conditions, it should be noted that the proposed middle school would generate significantly fewer trips than residential use of the 18-acre site, and thus generate less traffic noise.

4. The project site is identified as a school site in the draft Central Area Specific Plan, provided by the property owner and applicant to the City for review and consideration of the specific plan. Other school sites are also identified, and all of these designated school sites are expected to be surrounded by predominately residential development in the

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future. The School District has designed the middle school with an understanding of the designated development areas surrounding the project site. In order to adversely affect residents, noise levels from school operations would need, at the very least, to exceed the City's residential noise standard of 60 dBA Ldn. According to the noise report, the proposed project would not generate noise in excess of 60 dBA Ldn at future residential uses. Construction noise levels would be higher than operational noise levels, but because construction of the school is likely to occur before any houses are built, this noise source will not adversely affect residents within the Central Area Specific Plan. Additionally, CEQA requires an EIR to evaluate proposed project's impacts on the existing environment; not on the future environment. Therefore, the District believes the assessment of potential noise impacts per CEQA is adequately addressed in the Draft EIR.

5. The Draft EIR reference to City zoning for the project site as "New Urbanism Interim" is provided for informational purposes to demonstrate that the proposed project is considered an allowable use per the City's zoning for the site. It is acknowledged that school district boards may, and typically do exempt public schools from zoning requirements. However, the commenter's design recommendations for the proposed project will be considered during the project's final design.

6. The Draft EIR incorrectly identified Mr. Schaffer's affiliation as the University of California – Long Beach, instead of the correct California State University – Long Beach. Mr. Schaffer is now affiliated with the University of California Los Angeles. See changes to text in Section 3.0 Changes to the Draft EIR, which corrects this text in the Draft EIR.

7. It is recognized that the proposed project will be subject to certain City impact fees associated with the proposed project (City traffic and agricultural mitigation fees) which will be collected either at the time of plan approval by the state or with the first encroachment permit issuance by the City.

   The school district is exempt from payment of the TAMC regional impact fee (http://www.tamcmonterey.org/programs/dev-impact-fees/).

8. The commenter suggests that the School District would be responsible for farm equipment to track dirt, debris, and mud on the public street system and claims that the Draft EIR failed to address this potential impact. However, it is unclear how the proposed project, a middle school, would be responsible for the potential impacts of farm equipment in surrounding areas to public roadways.

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The commenter also suggests that language in Mitigation Measure AG-2 does not provide a clear enough definition for the future establishment of agricultural buffers around the project site. However, the wording of Mitigation Measure AG-2 states that "fencing and building placement shall be established prior to approval by the Division of the State Architect." Therefore, the definition of establishment of agricultural buffer zones has been described and the timing for these buffers on the site is defined as occurring prior to final site approval, indicating prior to final site design approval. Therefore, the Draft EIR addresses these comments and no changes are necessary.

9. Although the project site is currently surrounded by agricultural uses, the project site is identified as the location of a school in the City's Central Area Specific Plan. Therefore, it must be considered that the project site has long been considered for school development, with full knowledge that the area is currently used for agricultural uses. Furthermore, it is unlikely that the entire Central Area Specific Plan, even once through its own approval process, would be developed uniformly across the entire specific plan area. Therefore, for an intervening period of time, potential land use conflicts should be expected to be encountered while this area of the City is developed in accordance with the land use designations which have been assigned to it. The recent California Superior Court ruling in *California Building Industry Association v. Bay Area Air Quality Management District* established that a CEQA review should not consider the effects of the environment (i.e. in this case existing farming activities) on a project. Therefore, air quality impacts are adequately addressed in the Draft EIR and no changes are required.

10. Analysis of a signal light at Intersection 3 was not requested. The Traffic Impact Analysis determined that the proposed project would require installation of a signal light at Intersection 3 under project conditions, and the analysis includes this signal light. The signal light will be installed by the Central Area Specific Plan project developer. With the signal light, delays at Intersection 3 would decrease, and therefore, there is a less-than-significant impact. Because there is not a significant impact, additional lanes at this location were not studied.

11. The Central Area Specific Plan land use diagram used in the Draft EIR indicates only the primary greenway that runs adjacent to the project site's southern boundary. This same version of the Central Area Specific Plan land use diagram was presented in the Notice of Preparation, and no commenters indicated that a newer version of the map was available. A new version of the map was provided following the close of the public review period. This map shows an additional smaller greenway running on the northern and eastern boundaries of the project site, leaving only the western boundary of the project site without an adjacent greenway. Any access to the school from Boronda Road must cross this greenway at some point. Inbound access to the drop-off area at

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Intersection 5 would cross the greenway on the street along the eastern side of the project site, and exiting traffic would cross within the school site at Intersection 6. Students approaching the school from either the north or the west would reach the school grounds before crossing either of these locations. Students approaching from the east or south may need to cross the exit driveway. Virtually all schools have locations where pedestrian and vehicular traffic paths cross, and the proposed arrangement does not result in usually high hazards in this regard. The District's Board of Education considered several alternative site plans for the school, which included variations on the locations of access driveways and drop-off areas.

12. The comment is noted. See changes to text in Section 3.0 Changes to the Draft EIR, which corrects this text in the Draft EIR.

13. The comment is noted. See changes to text in Section 3.0 Changes to the Draft EIR, which corrects this text in the Draft EIR.

14. The commenter suggests a wording addition to the mitigation measure summary for Mitigation Measure HYD-1. However, as the table is identified as a mitigation measure summary, the proposed additional wording within this table is not viewed as necessary. However, the full text of the mitigation measure has been augment to accommodate this working addition request. See changes to text in Section 3.0 Changes to the Draft EIR, which corrects this text in the Draft EIR.

15. The comment does not raise an environmental issue and therefore, no response is required.

16. See response number three above. Figure 6, Proposed Central Area Specific Plan, is amended to reflect current design plans for the extension of Hemingway Drive, as displayed in Section 3.0 Changes to the Draft EIR.

17. The exact timing and phasing for the future removal of portable classrooms at District middle schools in response to a reallocation of students to the proposed new middle school is beyond the scope of the Draft EIR. The project description acknowledges that some students would shift from existing schools to the proposed project. This comment does not raise an environmental issue and therefore, no further response is necessary.

18. See changes to text in Section 3.0 Changes to the Draft EIR, which adds this text in the Draft EIR.

19. The comment is noted. However, it does not raise an environmental issue and therefore, no response is necessary.

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20. See changes to text in Section 3.0 Changes to the Draft EIR, which adds this text in the Draft EIR.

21. It appears that the School District would be subject to the City's NPDES permit and Storm Water Development Standards. The School District is not identified in the Statewide Phase II permit as a non-traditional MS4 (some school districts are), so the provisions in the Phase II Statewide Permit (Order No. 2013-0001-DWQ) do not apply (See Section F and Appendix B of the Phase II Permit). The linkage of the project to the environmental planning for the future growth areas provides the nexus that causes the project to be subject to the City's Storm Water Development Standards and the specific provisions of the City's NPDES permit for the future growth areas.

22. The following responses are provided concerning the Preliminary SWCP for the proposed project. Although some changes will be reflected in the Final SWCP for the proposed project, no changes to the Draft EIR are required.

    a. As described in Section 3.1 of the City's Storm Water Development Standards, "typical projects include measures to retain runoff on-site, generally by employing infiltration BMPs." Use of infiltration BMPs is a means to meet the runoff retention requirement of the NPDES permit. Retaining and infiltrating runoff can satisfy both the treatment and flow reduction requirements of the NPDES permit. Within the industry, there are inconsistent definitions and applications of the terms biofiltration, bioretention, and similar systems and this can lead to confusion. However, the City's Storm Water Development Standards include definitions that distinguish between biofiltration and bioretention such that the term "biofiltration" is used when an underdrain is included and "bioretention" is used when an underdrain is not included. As defined in the Storm Water Development Standards, treated runoff can discharge from biofiltration systems into the storm drain system. However, treated runoff from bioretention systems infiltrates into the underlying soil. This terminology is consistent with the wording in the NPDES permit as can be shown by reviewing Section J.4.g.iii.2.b. Additionally, it is appropriate and consistent with the Storm Water Development Standards to refer to the proposed storm water management practice as an infiltration basin, as indicated in the PSWCP for the proposed project.

    b. Section J.4.g.iii provides the "Final Treatment Numeric Requirements" for Priority Development Projects. The NPDES permit states, "The Permittee shall only permit a project applicant to use the measures in Section J.4.g.iii.2 (Non-Retention Based Treatment Systems) if the project applicant can demonstrate that LID measures are infeasible…" It has been determined that infiltration is feasible for the proposed project, therefore, Section J.4.g.iii.1 applies. Section J.4.g.iii.1 states, "LID Systems – Implement harvesting and re-use, infiltration, evapotranspiration, or bioretention BMPs that

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collectively achieve the hydraulic sizing criteria for LID systems listed below." Use of infiltration was selected for the proposed project. The minimum depth of soil media and the drain rock requirement are listed in Section J.4.g.iii.2.b, which only applies for non-retention based systems. Therefore this requirement does not apply.

c. Section J.4.e.i of the City's NPDES permit uses, but does not define, the term "uniformly decentralized controls." It states, "the Permittee shall require all applicable projects in Future Growth Areas to manage rainfall at the source using uniformly distributed decentralized controls, natural treatment, and volume reduction BMPs (e.g., bioretention, vegetated swales, filter strips) as first means of compliance for meeting the numeric criteria for storm water management." An infiltration basin is a type of volume reduction BMP. Use of the other listed approaches is optional.

The Preliminary SWCP for the proposed project meets the requirements of the NPDES permit to comply using onsite controls based on the wording of Section J.4.h, Offsite Compliance Alternative. Section J.4.h states, "The Permittee shall require project applicants meet the SWDS using onsite flow control and treatment BMPs. The Permittee shall only permit a project applicant to use offsite compliance alternatives if the project applicant can demonstrate that onsite controls are infeasible per Section J.4.h.ii (Alternative Compliance Justification). A project applicant successfully uses onsite controls when all source control, treatment, and flow control collectively result in the SWDS being met at the project site, in accordance with Section J.4.e.i (Uniformly Decentralized Controls)." By using a system that prevents any discharge from the site during any water quality event, the applicant demonstrates successful use of onsite controls to meet all of the requirements.

Section J of the NPDES permit is titled, "Parcel-Scale Development." The language in the permit is consistent with an interpretation that "uniform decentralized controls" requires each parcel separately comply with the numeric treatment and flow control requirements without reliance on regional systems that receive runoff from multiple parcels, as originally proposed for the future growth areas.

If the City were to require that the proposed project include additional measures dispersed throughout the site (such as permeable pavement), the result would be additional construction and maintenance costs with no change to storm water quality. In fact, the infiltration basins can be considered better than permeable pavement because spill containment and groundwater protection is more practical for infiltration basins that include easily accessible filter media that can be easily removed and replaced in the event of contamination.

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d. A more detailed evaluation and discussion of inundation durations will be provided in the Final SWCP for the proposed project. This discussion will demonstrate how the inundation duration is not an issue for water quality events. Measures for vector control for infrequent major storm events will be identified.

e. The Final SWCP for the proposed project will include appropriate measures will be included to address safety during the rare occurrences of significant inundation.

23. The Draft EIR uses the questions in the initial study checklist, CEQA Guidelines Appendix G, throughout the Draft EIR to evaluate potential environmental impacts. Potential impacts from storm water runoff are addressed in Section 3.8 Hydrology and Water Quality of the Draft EIR and are additionally addressed in the Preliminary Stormwater Control Plan prepared for the proposed project, which was included as Appendix H of the Draft EIR. Potential project impacts to surface or groundwater sources are addressed in Section 3.8 Hydrology and Water Quality of the Draft EIR. Potential flooding impacts are addressed in Section 3.8 Hydrology and Water Quality of the Draft EIR. Potential impacts to wetlands or riparian habitat are discussed in Section 3.4 Biological Resources.

24. Please see response to comment 24. The proposed project is not requesting approval for use of offsite compliance. By meeting the storm water requirements onsite, the project complies with the language of the City's NPDES permit. Other interpretations, such as that which might be met by using pervious pavement in a couple of locations and a swale for another area, would be arbitrary, would result in additional costs, and would not provide additional protection to receiving waters.

25. The commenter requests that the analysis of storm water runoff (page 3-114) address "…treat and prevent…" but what they are requesting the school district to do in the final EIR is unclear. It's not clear whether an environmental issue was raised.

26. The proposed basins meet the treatment and flow reduction requirements as presented in the City's SWDS. Please see response to comment 24.

27. See changes to text in Section 3.0 Changes to the Draft EIR, which adds this text in the Draft EIR.

28. See changes to text in Section 3.0 Changes to the Draft EIR, which adds this text in the Draft EIR.

29. During the PM peak hour the drop at Intersection 2 is from LOS C to LOS D, which remains within the acceptable level of service standard. No changes to the Draft EIR are necessary.

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30. During the AM peak hour the drop at Intersection 4 is from LOS B to LOS C, which remains within the acceptable level of service standard. No changes to the Draft EIR are necessary.

31. The Traffic Impact Analysis analyzes Intersection 3 as signalized under both project and cumulative conditions. Signal warrant analysis is included in the Traffic Impact Analysis' appendix. The signal light is assumed to be installed prior to opening of the school. No changes to the Draft EIR are necessary.

32. The comment is a correct statement, but does not raise an environmental issue that requires a response.

33. Intersection 5 operates at LOS A under the cumulative build-out scenario, so left turns should not be problematic. A concern that left turning vehicles could queue on the street to beyond the adjacent intersection has been mitigated by Mitigation Measure T-2 which requires an all-way stop at that location. No changes to the Draft EIR are necessary.

34. The issue of pedestrian safety at the intersections near the drop-off entrance (Intersection 5) is discussed on pages 3-147 through 3-150, and Mitigation Measure T-2 is presented on page 3-150 to reduce the impact to a less-than-significant level, consistent with the recommendations of the Traffic Impact Analysis. No changes to the Draft EIR are necessary.

35. The statement is correct because analysis of this intersection is not necessary. Analysis of Intersection 5 and Intersection 6 indicates that both of these intersections would operate at LOS A during Peak AM and Peak PM hours with delays of 0.1 seconds. Traffic volumes at the intervening intersection would be similar, and there is no possibility that traffic operations at this intervening intersection would degrade below LOS D. No changes to the Draft EIR are necessary.

36. Mitigation Measure T-2 requires the installation of an all-way stop control which will make crossing safer for bicyclists and pedestrians.

37. The comment is not clear.

38. See changes to text in Section 3.0 Changes to the Draft EIR, which adds this text in the Draft EIR.

39. The comment is noted. The comment does not raise environmental issues and therefore, no response is required.

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3.0
CHANGES TO THE DRAFT EIR

STATE PRELIMINARY / WORKING DRAFT FOR INTERNAL USE ONLY, CA GOVT CODE SECTION 6254(A)

3.1 CEQA REQUIREMENTS

CEQA Guidelines section 15132 requires that a Final EIR contain either the Draft EIR or a revision of the Draft EIR. This Final EIR incorporates the Draft EIR by reference and includes the revisions to the Draft EIR, as presented on the following pages.

3.2 CHANGES MADE

This section contains text, tables, and/or graphics from the Draft EIR with changes indicated. Additions to the text are shown with underlined text (underline) and deletions are shown with strikethrough text (~~strikethrough~~). Explanatory notes in italic text (*italic*) precede each revision.

Page S-1, Summary. (The following change in text has been made to Page S-1 of the Draft EIR.)

The project site includes portions of assessor's parcel numbers ~~153-091-006~~ 153-091-014 and ~~153-091-007~~ 153-091-016.

Page S-1, Summary. (The following change in text has been made to Page S-1 of the Draft EIR.)

…Hemingway Drive and Boronda Road, ~~north of the City limits of Salinas~~ within the City of Salinas, as annexed in 2008…

Page 1-7, Introduction. (The following change in text has been made to Page 1-7 of the Draft EIR.)

~~MBUAPCD Monterey Bay Unified Air Pollution Control District~~

MBARD Monterey Bay Air Resources District

Page 2-13, Project Description. (The following change in figures has been made to page 2-13 of the Draft EIR.)

Figure 6, Proposed Central Area Specific Plan included in the Draft EIR has been replaced with the following Figure 6, Proposed Central Area Specific Plan, presented below.

Page 2-26, Project Description. (The following additional text has been added to Page 2-26 of the Draft EIR.)

…on to existing facilities within/on East Boronda Road. Communication services to the project site could be provided by a range of providers, including Comcast or AT&T.

Page 2-26, Project Description. (The following additional text has been added to Page 2-26 of the Draft EIR under the subheading of "City of Salinas.")

- Approval – City Engineer for engineering design of streets for public use.
- Approval – NPDES permit compliance. Final storm water control plan, improvement plans and inspection for NPDES permit compliance of stormwater related site improvements. A maintenance declaration shall be recorded to allow annual LID measures inspections.
- Approval – SWPPP documents.

Page 3-12, Environmental Effects. (The following change in text has been made to Page 3-12 of the Draft EIR.)

Monitoring of the air basin is the responsibility of the ~~Monterey Bay Unified Air Pollution Control District~~ Monterey Bay Air Resources District ("air district").

Page 3-28, Environmental Effects. (The following change in Mitigation Measure AQ-2 has been made to Page 3-28 of the Draft EIR.)

AQ-2. Prior to commencement of earth-disturbing activities, the Salinas Union High School District and the selected construction company will prepare and implement a Construction Emissions Reduction Plan per Monterey Bay Unified Air Pollution Control District guidelines to reduce construction-generated fugitive and mobile-source emissions. The Construction Emissions Reduction Plan shall include, but not be limited to, the following:

a. Installation of temporary electrical service whenever possible to avoid the need for independently powered equipment (e.g. compressors);

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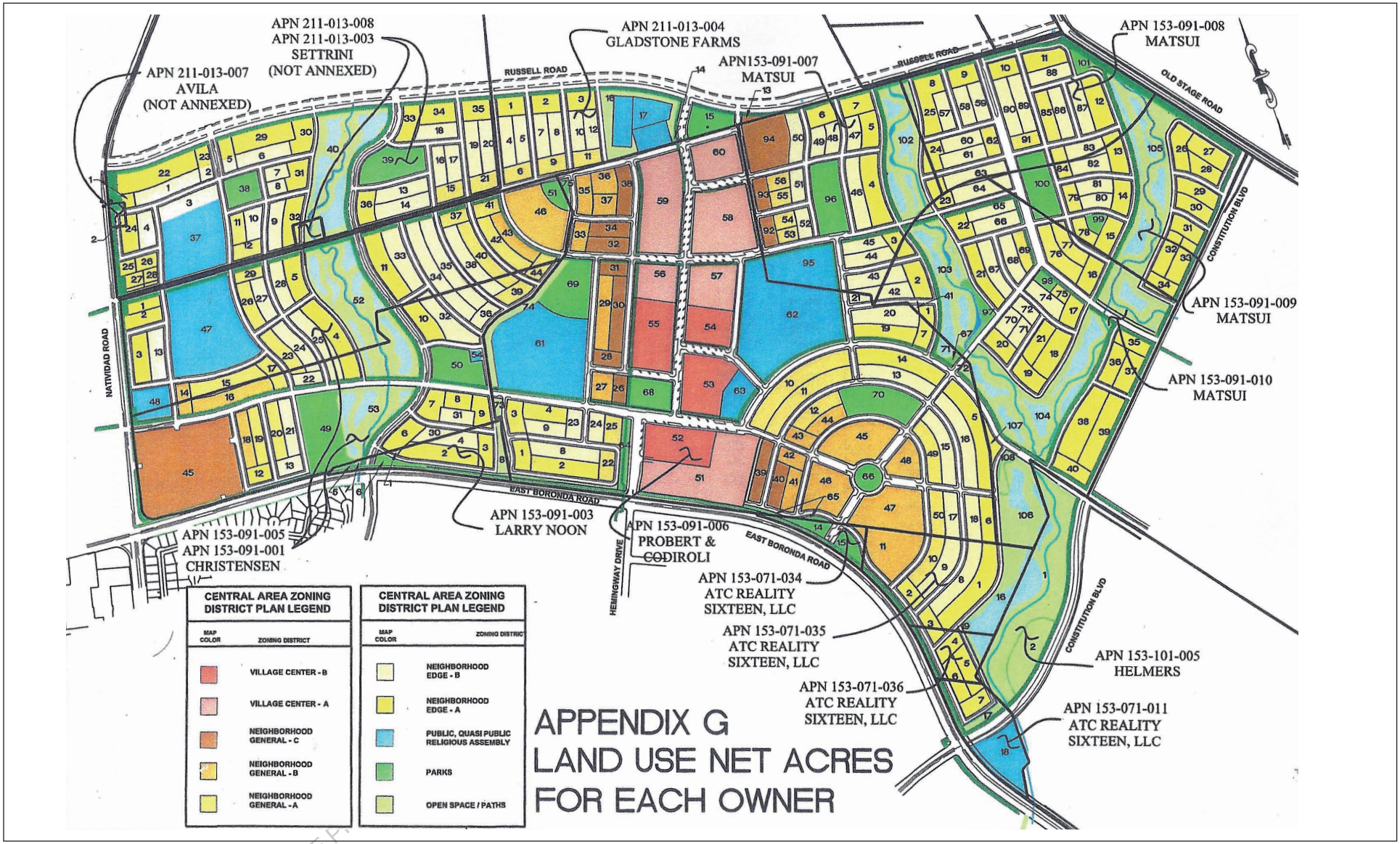

Not to scale

Source: City of Salinas Planning 2015

Figure 6
Proposed Central Area Specific Plan
SUHSD New Middle School #5 Construction EIR

E M C

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b. Diesel equipment standing idle for more than two minutes shall be turned off. This would include trucks waiting to deliver or receive soil, aggregate or other bulk materials. Rotating drum concrete trucks could keep their engines running continuously as long as they were onsite and staged away from residential areas;

c. Properly tune and maintain equipment for low emissions; and

d. Stage large diesel powered equipment at least 200 feet from any active land uses (e.g., residences).

~~Actions contained in the Construction Emissions Reduction Plan shall be included as contractual conditions by and between the proponent and any contractors, and by and between any other party who may construct commercial buildings and the contractors of those parties for the purpose of reducing diesel emissions during site preparation and construction.~~

Page 3-53, Environmental Effects. (The following change in text has been made to Page 3-53 of the Draft EIR.)

Dr. Bradley Schaffer, an evolutionary biologist with the ~~University of California – Long Beach~~ California State University – Long Beach (now with University of California at Los Angeles).

Page 3-112, Environmental Effects (the following change in text has been made to Mitigation Measure HYD-1 on Page 3-112 of the Draft EIR.)

HYD-1. All recommendations from the project's Preliminary Storm Water Control Plan prepared by Wood Rodgers, Inc. (November 2015) shall be incorporated into a final storm water control plan for the project (project site and off-site improvements) prior to commencement of grading or building in addition to requirements at the time of permitting.

Page 3-115, Environmental Effects. (The following additional text has been added to Page 3-115 of the Draft EIR.)

Implementation of Mitigation Measure HYD-1, requiring implementation of all recommendations from the project's storm water control plan shall be incorporated into the final storm water control plan for the project, which will be reviewed by the City for compliance with the City's storm water development standards, and would reduce potential impacts…

Page 3-128, Environmental Effects. (The following change in text has been made to Page 3-128 of the Draft EIR.)

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The posted speed limit is 30 miles per hour. ~~Constitution Boulevard is a north-south minor arterial that extends from East Boronda Road to the north and East Laurel Drive to the south. There are two travel lanes in each direction and the roadway serves residential uses. The posted speed limit is 45 miles per hour.~~

Page 3-149, Environmental Effects (The following change in text has been made to Page 3-149 of the Draft EIR.)

Regardless of the final design review and bussing plan, Mitigation Measure ~~T-3~~, requiring the installation of an all-way stop sign at the T-intersection immediately south of intersection #5 in the project's traffic impact assessment on AJ Street, would apply to the proposed project and would ensure potential impacts would be reduced to a less-than-significant level.

Regardless of the final design review and bussing plan, Mitigation Measure T-2, requiring the installation of an all-way stop sign at the T-intersection immediately south of intersection #5 in the project's traffic impact assessment on AJ Street, would apply to the proposed project and would ensure potential impacts would be reduced to a less-than-significant level.

Page 4-6, Cumulative Impacts. (The following change in text has been made to Page 4-6 of the Draft EIR.)

…in accordance with the <u>City's</u> National Pollution Discharge Elimination Storm Water Permit, as well as...

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4.0
MITIGATION MONITORING AND REPORTING PROGRAM

STAFF PRELIMINARY WORKING DRAFT-FOR INTERNAL USE ONLY-CA GOVT CODE SECTION 6254(A)

4.1 INTRODUCTION

CEQA Guidelines section 15097 requires public agencies to adopt reporting or monitoring programs when they approve projects subject to an environmental impact report or a negative declaration that includes mitigation measures to avoid significant adverse environmental effects. The reporting or monitoring program is to be designed to ensure compliance with conditions of project approval during project implementation in order to avoid significant adverse environmental effects.

In addition, monitoring ensures that mitigation measures are implemented and thereby provides a mechanism to evaluate the effectiveness of the mitigation measures.

A definitive set of project conditions would include enough detailed information and enforcement procedures to ensure the measure's compliance. This monitoring program is designed to provide a mechanism to ensure that mitigation measures and subsequent conditions of project approval are implemented.

4.2 MONITORING PROGRAM

The basis for this monitoring program is the mitigation measures included in the project EIR. These mitigation measures are designed to eliminate or reduce significant adverse environmental effects to less than significant levels. These mitigation measures become conditions of project approval, which the project proponent is required to complete during and after implementation of the proposed project.

The attached monitoring program, which begins on the following page, is proposed for monitoring the implementation of the mitigation measures. This monitoring program contains all appropriate mitigation measures in the EIR.

4.3 Monitoring Program Procedures

The Salinas Union High School District (the District) is responsible for coordination of the monitoring program. The District is responsible for completing the monitoring program and distributing the monitoring program to the responsible individuals or agencies for their use in monitoring the mitigation measures.

Each listed responsible individual or agency is responsible for determining whether compliance with mitigation measures contained in the monitoring program has occurred. Once all mitigation measures have been complied with, the responsible individual or agency should submit a copy of the monitoring program with evidence of compliance to the District to be placed in the project file. If the mitigation measure has not been complied with, the monitoring program should not be returned to the District.

The District will review the monitoring program to ensure that appropriate mitigation measures and additional conditions of project approval included in the monitoring program have been complied with at the appropriate time. Compliance with mitigation measures is required for project approvals, permit issuance, and/or permit sign-off.

If a responsible individual or agency determines that non-compliance has occurred, a written notice should be delivered by certified mail to the project proponent within 10 days, with a copy to the District, describing the non-compliance and requiring compliance within a specified period of time.

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MITIGATION MONITORING AND REPORTING PROGRAM
DATE: November 2016
PROJECT: SUSHD New Middle School #5 Construction

Mitigation Measure	Implementation	Responsibility	Timing and Monitoring
3.1 Aesthetics			
AES-1. The Salinas Union High School District will prepare a lighting study evaluating the future proposed school facilities. The lighting study will identify methods for reducing potential lighting impacts to neighbors, motorists, and nighttime views while maintaining safety and the objectives of the school facility. The study will consider, but not be limited to, recommending the following measures that may serve to minimize light intrusion: the use of energy efficient lights and/or low- or high-pressure sodium lights; exclusion of mercury vapor lights; light shielding and direction away from off-site locations; limitations on light pole height; and, limitations on hours of lighting. All economically feasible recommendations in the lighting study that do not compromise school programs will be implemented prior to occupancy of the school, or prior to use of lighting for nighttime visibility during school activities, whichever comes first.	Required as Condition of Approval	Salinas Union High School District	Prior to occupancy of the school, or prior to use of lighting for nighttime visibility Ensure recommended measures are incorporated into project plans Monitoring after construction
3.2 Agricultural Resources			
AG-1. To contribute toward mitigating the conversion of 18 acres comprised of land classified as Prime Farmland and Farmland of Statewide Importance, the Salinas Union High School District will pay a mitigation fee of $13,500 to the Monterey County Office of the Agricultural Commissioner.	Required as a Condition of Approval	Salinas Union High School District	Prior to site grading or construction
AG-2. To minimize potential conflicts with adjacent agricultural operations, the Salinas Union High School District shall ensure that a barrier between the edge of the project site and adjacent agricultural areas is established through building placement and on-site and off-site fencing. Fencing and building placement shall be established prior to approval by the Division of the State Architect.	Required as a Condition of Approval	Salinas Union High School District	Prior to approval by the Division of the State Architect

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3.2 Air Quality			
AQ-1. The following mitigation measures will be implemented during construction activities, and included as contractual conditions by and between the Salinas Union High School District and the selected construction company, for the purpose of reducing PM_{10} emissions during site preparation and construction, as well as related improvements, of the new middle school: a. Best management practices for dust control will be implemented, included, but not limited to, watering the site as necessary to minimize dust, visible emissions and off-site drift; b. When possible, perform grading activities during morning hours when winds are generally calmer, and prohibit grading activities during periods of high wind speed (over 15 mph); c. All trucks hauling dirt, sand, or loose materials shall be covered; d. Post a publicly visible sign that specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the Monterey Bay Unified Air Pollution Control District shall be visible to ensure compliance with Rule 402 (Nuisance);	Required as a Condition of Approval	Salinas Union High School District and Project Contractor	Ensure these measures are incorporated into project plans Monitoring during site preparation, construction, and any related site improvement activity
AQ-2. Prior to commencement of earth-disturbing activities, the Salinas Union High School District and the selected construction company will prepare and implement a Construction Emissions Reduction Plan per Monterey Bay Unified Air Pollution Control District guidelines to reduce construction-generated fugitive and mobile-source emissions. The Construction Emissions Reduction Plan shall include, but not be limited to, the following:	Required as a Condition of Approval	Salinas Union High School District	Ensure these measures are incorporated into project plans Monitoring during site preparation and during construction

SUBJECT PRELIMINARY WORKING DRAFT - FOR INTERNAL USE ONLY-CA GOVT CODE SECTION 6254.5(e)

a. Installation of temporary electrical service whenever possible to avoid the need for independently powered equipment (e.g. compressors); b. Diesel equipment standing idle for more than two minutes shall be turned off. This would include trucks waiting to deliver or receive soil, aggregate or other bulk materials. Rotating drum concrete trucks could keep their engines running continuously as long as they were onsite and staged away from residential areas; c. Properly tune and maintain equipment for low emissions; and d. Stage large diesel powered equipment at least 200 feet from any active land uses (e.g., residences).			
3.3 Biological Resources			
BIO-1. To assess whether the on-site ditch is jurisdictional, the school district will retain a qualified biologist/wetland regulatory specialist to initiate informal discussions with the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (regional board), and California Department of Fish and Wildlife (CDFW) for this purpose. If the drainage ditch is not determined to be jurisdictional by any of the agencies, no further action is necessary. If found to be jurisdictional, the school district will initiate the appropriate permitting process(s) with the agency(s) taking jurisdiction. This may include retaining a qualified biologist/wetland regulatory specialist to conduct a jurisdictional wetland/waterway delineation to quantify project impacts to jurisdictional waters and submitting the delineation to the USACE for verification. If jurisdictional features are present, prior to commencement of earth-disturbing activity, approval of a Section 404 permit from the USACE and a Section 401 permit from the regional board may be required. If CDFW also takes jurisdiction, a Streambed Alteration Agreement from the CDFW	Required as a Condition of Approval	Salinas Union High School District	Prior to site grading

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may also be required prior to approval of a grading permit. These permits could include compensatory mitigation and storm water protection measures. The school district would be responsible for implementation of this mitigation measure.			
BIO-2. If project construction occurs after August 2021, to protect potentially occurring special-status plant species, the presence/absence of Congdon's tarplant in all non-native grassland and ruderal (weedy) habitats on the project site and off-site improvement areas shall be determined prior to construction activities. A qualified biologist shall conduct a focused plant survey for this species during its peak blooming period (typically August to September). If the survey concludes that the species is not present, then no further mitigation is required. If the survey area is mapped as experiencing exceptional drought conditions according to the U.S. Drought Monitor, blooming reference populations of the species should be first identified in the project vicinity to verify that the species is observable. If reference populations are observed in peak bloom, then the project site can be surveyed. If this species is found to occur, then appropriate mitigation shall be developed and implemented. Mitigation may include, but not be limited to, the school district contracting with a qualified biologist or native plant specialist to collect seed from the annual Congdon's tarplant individuals within the impact area prior to initiation of ground disturbance activities. The school district would then oversee selection of an appropriate mitigation area in the project vicinity that is already preserved or shall be protected in perpetuity through a conservation easement. Collected seed would be installed at the mitigation area at the optimal time. Topsoil from the project site would be salvaged (where practical) for use in the mitigation area.	Required as a Condition of Approval	Qualified Biologist and Salinas Union High School District	Ensure these measures are incorporated into project plans Monitoring prior to and during construction

STAFF PRELIMINARY WORKING DRAFT-FOR INTERNAL USE ONLY-CA GOVT CODE SECTION 6254(A)

BIO-3. If construction commences during the bird nesting season (February 1 through September 15), a qualified biologist shall conduct a pre-construction survey for nesting birds to ensure that no nests would be disturbed during project construction. This survey shall be conducted no more than seven days prior to the initiation of disturbance activities. If no active nests are present within 250 feet of construction activities, then activities can proceed as scheduled. However, if an active nest is detected during the survey within 250 feet of proposed construction, then the establishment of a protective construction-free buffer zone from each active nest (typically 250 feet for raptors and 50-100 feet for other species) shall be clearly delineated or fenced until the juvenile bird(s) have fledged (left the nest), unless the biologist determines that construction would not disturb the active nest. Monitoring Action: If grading activities start outside of the bird breeding season, no monitoring activities are necessary. However, if grading activities start during the bird breeding season, prior to the start of grading activities, the contractor shall document the conclusions of the pre-construction surveys and submit a report to the school district.	Required as a Condition of Approval	Qualified Biologist and Project Contractor	Ensure these measures are incorporated into project plans Monitoring prior to and during construction
BIO-4. To avoid possible impacts to California red-legged frog and California tiger salamander, initial site clearing and grading will be conducted and completed only during the dry season, which typically extends from April 15 to November 15. Site clearing and grading shall halt if significant rainfall, defined as greater than 0.5 inches per 24 hours within a local watershed, is either forecasted or observed to avoid environmental conditions when California red-legged frog and California tiger salamander would have the potential to be active.	Required as a Condition of Approval	Qualified Biologist and Project Contractor	Ensure these measures are incorporated into project plans Monitoring prior to and during construction

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The access route and main project site shall be fenced with wildlife fencing that will prevent California red-legged frog and California tiger salamander from entering construction areas. Fencing at least three feet tall shall be installed in such a manner that water does not collect within folds of the fence material, or Ertec fencing may be used. This fence shall be inspected weekly by a biologist qualified to assess and monitor California red-legged frog and California tiger salamander and any holes or tears that could allow frogs or salamanders to pass into the work area shall be repaired within 24 hours. In addition, the fence and the site shall be inspected by a qualified biologist after significant rain events to ensure that no frogs or salamanders are sheltering along the fence or attempting to walk around it. In the unforeseen event that California red-legged frog or California tiger salamander are encountered, the biologist shall contact the USFWS and/or CDFW immediately to determine the best course of action. At a minimum, all construction activities shall cease until the frog or salamander leaves the work area. To the extent that avoidance of the California red-legged frog/California tiger salamander is not possible, then mitigation shall be provided for the project following consultation with USFWS and CDFW. Mitigation may include, but not be limited to, species salvage and relocation, habitat enhancement, or compensatory mitigation. Before construction-associated activities begin at the project site, the qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training would include a description of California red-legged frog and California tiger salamander and their habitats, general measures that are being implemented to conserve California red-legged frog and California tiger salamander as they relate to the project, and the boundaries within which the project occurs. Informational handouts with photographs clearly illustrating the species' appearances shall be used in the training session. All new construction			

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personnel shall undergo this mandatory environmental awareness training. The contractor shall avoid the use of monofilament netting on the project site including in temporary and permanent erosion control materials (fiber rolls and blankets). The contractor shall document the implementation of these mitigation measures and submit monthly reports to the school district.			
3.4 Cultural Resources			
CR-1. Due to the possibility that significant buried cultural resources might be found during construction, and in accordance with CEQA Guidelines section 15064.5, the Salinas Union High School District will ensure that the following language is included in all construction contracts and plans: If archaeological resources or human remains are accidentally discovered during construction, work shall be halted within 50 meters (165 feet) of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, appropriate mitigation measures shall be formulated and implemented. Mitigation shall include, at a minimum, recovery of significant cultural materials and professional analysis based on the types and quantities of those materials recovered, which might include analysis of lithic artifacts and materials, radiocarbon dating of shell fragments, bead analysis, faunal analysis, etc. Cultural materials recovered during monitoring and/or mitigation, other than those directly associated with Native American burials, should be curated in the public domain at a suitable research facility.	Required as a Condition of Approval	Salinas Union High School District	Prior to site grading Ensure these measures are incorporated into project plans Monitoring during grading and construction
CR-2. The Salinas Union High School District will ensure the following language is included in all construction contracts and plans: In the event that any previously undiscovered paleontological resources are discovered, all work shall be halted within 50 meters (165 feet) of the find, and a qualified paleontologist retained to examine the find and make appropriate	Required as a Condition of Approval	Salinas Union High School District	Prior to site grading Ensure these measures are incorporated into project plans

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recommendations, including, if necessary, feasible mitigation measures to reduce impacts to a less than significant level. The district shall then implement the identified mitigation measures for the protection of paleontological resources.			Monitoring during grading and construction

CR-3. The Salinas Union High School District will ensure that the following language is included is included in all construction contracts and plans in accordance with CEQA Guidelines section 15064.5(e): If human remains are found during construction there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of Monterey County is contacted to determine that no investigation of the cause of death is required. If the coroner determines the remains to be Native American the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD may then make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and associated grave goods as provided in Public Resources Code Section 5097.98. The landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance if: a) the Native American Heritage Commission is unable to identify a MLD or the MLD failed to make a recommendation within 24 hours after being notified by the commission; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.	Required as a Condition of Approval	Salinas Union High School District	Prior to site grading Ensure these measures are incorporated into project plans Monitoring during grading and construction

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MITIGATION MONITORING AND REPORTING PROGRAM
DATE: November 2016
PROJECT: SUSHD New Middle School #5 Construction

3.7 Hazards			
HAZ-1. Pursuant to Ed. Code §17213.2(e), if a previously unidentified release or threatened release of a hazardous material or the presence of a naturally occurring hazardous material is discovered anytime during construction at the site, the Salinas Union High School District will cease all construction activities at the site and notify the Department of Toxic Substances Control. Additional assessment, investigation or cleanup may be required, based on direction provided by the Department of Toxic Substances Control.	Required as a Condition of Approval	Salinas Union High School District	Monitoring during grading and construction
3.8 Hydrology and Water Quality			
HYD-1. All recommendations from the project's Preliminary Storm Water Control Plan prepared by Wood Rodgers, Inc. (November 2015) shall be incorporated into a final storm water control plan for the project (project site and off-site improvements) prior to commencement of grading or building in addition to requirements at the time of permitting.	Required as a Condition of Approval	Salinas Union High School District	Prior to site grading or construction
HYD-2. Project plans shall provide evidence of a 20 percent reduced water demand for the project site compared to a business as usual water demand for a middle school of similar size. This may be achieved through a combination of measures to increase water efficiency on the site, such as installation of low-flow fixtures, use of drought-tolerant landscaping, etc., as long as the goal of a 20 percent reduction is demonstrated on project plans for the project.	Required as a Condition of Approval	Salinas Union High School District	Prior to site grading or construction Ensure these measures are incorporated into project plans
3.10 Traffic			
T-1. Prior to opening the school, the Salinas Union High School District shall, in conjunction with the City of Salinas, optimize the coordinated cycle lengths along East Boronda Road to 133 second cycles. The intersection of Natividad Road and East Boronda Road is coordinated with adjacent signals through InSync wiring, as indicated by the City.	Required as a Condition of Approval	Salinas Union High School District and City of Salinas Public Works Department	Prior to school opening Ensure this measure is incorporated into project plans
T-2. Prior to the school opening, the Salinas Union High School District shall ensure that the T-intersection immediately south of intersection #5 in the project's Traffic Impact Assessment on AJ Street has an all-way stop sign installed.	Required as a Condition of Approval	Salinas Union High School District	Prior to school opening Ensure this measure is incorporated into project plans

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