Planning for Success.

FINAL SUBSEQUENT EIR

SUHSD New High School #5 Construction

State Clearinghouse Number 2005081011

PREPARED FOR

Salinas Union High School District

April 25, 2012

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

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SUHSD New High School #5 Construction

Final Subsequent EIR

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PREPARED FOR

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TABLE OF CONTENTS

Tables

Appendices

1.0
INTRODUCTION

1.1 PURPOSE AND ORGANIZATION

The Salinas Union High School District (hereinafter "School District"), acting as the lead agency, determined that the proposed SUHSD New High School #5 Construction (hereinafter "proposed project") might result in significant adverse environmental effects, as defined by the California Environmental Quality Act (CEQA) Guidelines section 15064. Therefore, the School District has a draft subsequent environmental impact report (Draft SEIR) prepared to evaluate the potentially significant adverse environmental impacts of the proposed project that were not addressed in the Acquisition EIR. The Draft SEIR was circulated for public review between Monday, October 24 and Wednesday, December 7, 2011, 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 SEIR, constitutes the complete SUHSD New High School #5 Construction SEIR. This Final EIR is organized into the following sections:

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

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2.0
COMMENTS ON THE DRAFT EIR

2.1 CEQA REQUIREMENTS

CEQA Guidelines section 15132(c) requires that a final EIR contain a list of persons, organizations, and public agencies that have commented on a draft EIR. The SUHSD New High School #5 Construction Draft SEIR was circulated for public review between Monday, October 24 and Wednesday, December 7, 2011, and public comment was received. A list of the correspondence received during the public review period, including that received at the November 8, 2011 School Board meeting is presented below.

CEQA Guidelines sections 15132(b) and 15132(d) require that a final EIR contain the comments that raise significant environmental points in the review and consultation process, and written response to those comments. A copy of each correspondence received during the public review period for the Draft SEIR is presented on the following pages. Numbers along the right-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 SEIR 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

Comments on the Draft SEIR were received at the November 8, 2011 School District Board of Trustee meeting. The minutes from the meeting, as well as the responses to those comments are included below.

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

- Monterey County Water Resources Agency (November 30, 2011)
- Ohlone/Costanoan-Esselen Nation (December 4, 2011)
- Department of Toxic Substances Control (December 5, 2011)
- Brian Finegan (December 5, 2011)
- Transportation Agency for Monterey County (December 6, 2011)
- Monterey Bay Unified Air Pollution Control District (December 7, 2011)
- City of Salinas Community and Economic Development Department (December 7, 2011)
- City of Salinas Fire Department (December 7, 2011)
- City of Salinas Engineering and Transportation (December 7, 2011)

The following correspondence was received after the 45-day public review period on the Draft SEIR:

- Monterey County Public Works, Monterey County Sheriff's Department (December 8, 2011)
- Monterey County Environmental Health Bureau (December 8, 2011)
- Global Investment & Development (December 12, 2011)

Table 1 summarizes the significant environmental comments received in each comment letter.

Table 1 Commenting Agencies and Environmental Issues

	Comments from the Board of Trustees 11/8/11 meeting	Monterey County Water Resources Agency	Ohlone/Costanoan-Esselen Nation	Department of Toxic Substance Control	Brian Finegan	TAMC	MBUAPCD	City of Salinas	City of Salinas Fire Department	City of Salinas Public Works Department	Monterey County Public Works and Sheriff's Department	Monterey County Environmental Health Bureau	Global Investment & Development
Aesthetics	✓				✓			✓		✓			✓
Air Quality							✓						
Cultural Resources			✓										
Greenhouse Gas Emissions						✓	✓	✓					
Hazards and Hazardous Materials				✓	✓			✓	✓	✓		✓	✓
Hydrology and Water Quality	✓	✓			✓			✓		✓			✓
Land use and Planning	✓				✓			✓					✓
Noise				✓	✓			✓					✓
Transportation				✓	✓	✓	✓	✓		✓	✓	✓	
Utilities								✓	✓	✓		✓	

Source: EMC Planning Group 2012

ADOPTED
SALINAS UNION HIGH SCHOOL DISTRICT
Board of Trustees
MINUTES

REGULAR BOARD MEETING — November 8, 2011

CALL TO ORDER/ OPEN SESSION

The Regular Board meeting of the Salinas Union High School District Board of Trustees was called to order at 6:01 p.m. by President Patty Saénz at the District Office Board Room, 431 West Alisal Street, Salinas. The meeting convened into Closed Session at 6:02 p.m.

RECONVENED INTO OPEN SESSION

7:05 p.m.

TRUSTEES PRESENT:

Patty Saénz, President
Cheryl Larison, Vice President (left at 7:43 p.m.)
Lila Cann, Clerk
Evamarie Martinez (left at 7:00 p.m.)
Kathryn Ramirez
James Reavis
Phillip Tabera

GUESTS:

Dr. Shelley Lapkoff, Lapkoff & Gobalet
Teri Wissler Adams, EMC Planning Group

OTHERS PRESENT:

James A. Earhart, Superintendent
Tim Vanoli, Associate Superintendent, Instructional Services
Diane Hendricks, Interim Associate Superintendent, Human Resources
Cindy Fellows, Manager, Business Services/CBO
Dr. Bob Martinez, Director, Research/Assessment/Accountability

PLEDGE OF ALLEGIANCE

Led by **Trustee Larison.**

ADOPTION OF AGENDA

On a motion by **Trustee Ramirez,** seconded by **Trustee Larison**, and a vote of 6-0 (Trustee Martinez absent), the Board adopted the agenda as presented.

REPORT OF ACTION TAKEN IN CLOSED SESSION

On a motion by **Trustee Reavis,** seconded by **Trustee Cann,** and a vote of 6-0 (Trustee Martinez absent), the Board took action on Student Expulsions/Readmissions for Students #11-12-40 through #11-12-46 as presented. Please see the attached Regular Board Meeting Minutes for Student Expulsions (Attachment #1).

DISTRICT COMMUNICATIONS: STUDENT REPRESENTATIVES

Jenna Garden and **Gino Gonzales, Washington Middle School**, reported on the academic and general activities at their school. 1) Parent Club is fundraising with Eco Bags to raise money for field trips and supplies. 2) The Teacher Training & Levels of Student Engagement workshop was a success. 3) iPass group meets at lunch to work and assist students in danger of failing math. 4) 7th grade Saturday school is in full swing, 8th grade Saturday School begins in January. 6) Red Ribbon Week was held on October 24-28.

Cristy Rodriguez and **Ruby Torres, Mount Toro High School**, reported on the academic and general activities at their school. 1) MTHS's API for 2011 is 636, a growth of 65 points. 2) 195 graduates for the 2010-11 school year--the highest number of graduates ever. 3) Mock Interviews were held on October 26. 4) Red Ribbon Week was October 24-28. 5) On November 9, MTHS will celebrate the 3rd Annual Veterans Day Flag Raising Ceremony. 6) Students toured DeVry University.

PRESENTATIONS

REDISTRICTING PLAN

Karen Luna, Manager, Maintenance/Facilities/Planning, indicated that the Redistricting Committee consisted of 7 members with 2 alternates. She introduced members of the Redistricting Committee in the audience: Devon Tompkins and Phil Moore. Mrs. Luna thanked them for their participation. She felt the committee worked very well together.

Dr. Shelley Lapkoff, Lapkoff & Gobalet Demographic Research, Inc., presented the Redistricting Plan (Attachment #2). She pointed out the large number of residents in Area 5 (deviation of 4,770). The Redistricting Committee recommended Plan 3, which balances the population, maintains Hispanic voting strength, keeps one trustee per trustee area, eliminates almost all irregular boundary lines, and does a good job of respecting communities of interest. Dr. Lapkoff compared Plan 3 to the current trustee areas. The Board was pleased with Plan 3.

DRAFT ENVIRONMENTAL IMPACT REPORT FOR HIGH SCHOOL #5

Mrs. Luna introduced the item**.** She indicated that right now the District is eligible to build a new high school (over 2200 students). She introduced **Teri Wissler Adams, EMC Planning Group**, who explained that the District hired the company to prepare a draft Environmental Impact Report (EIR) for high school #5. She introduced Christine Bradley, associate, who gave an overview of the draft EIR (Attachment #3). (Trustee Larison left at 7:43 p.m.) Ms. Adams indicated that at the end of the public comments regarding the draft, the final EIR will come back to Board for approval.

Questions ensued by the Board.

EMPLOYEE ORGANIZATIONS

Lucy Vega, CSEA President, indicated that 1) a grievance has been filed regarding custodial overtime. 2) She wished everyone a happy Thanksgiving.

Steve McDougall, SVFT President, wished the Board a happy Thanksgiving.

BOARD MEMBER REPORTS

Trustee Tabera referred to the letter from S. Joseph Simitian, State Senator, Eleventh District, and would like discussion on the proposed resolution in support of Senate Constitutional Amendment (SCA) 5. It was mentioned that a resolution would be placed on the December 13 agenda.

SUPERINTENDENT'S REPORT

Mr. Earhart reported that they will be replacing the windows in the Board Room and Steinbeck Room over the Thanksgiving Break. 2) The November 14 Special Board Meeting Agenda will be mailed to the Board.

WHAT'S RIGHT

Ms. Hendricks reported on What's Right in the SUHSD**:**

Greg Dinsmore, Program Manager, Hope Services Monterey District, for partnering with the District to collect e-waste and performing labor needed to lay down wood chips/mulch for the Salinas Education Center.

Carole King, retired SAS Parent Education Coordinator, for volunteering to manage the Family Garden at the Salinas Education Center.

Andrew Tuckman, Vision Recycling, for donating and delivering over 50 yards of wood chips/mulch for the Salinas Education Center Garden.

Leslie Ochinang, Dental Assisting Teacher/ROP, for being presented with the KSBW Crystal Apple Award.

INDIVIDUALS DESIRING TO ADDRESS THE BOARD

None

PUBLIC HEARING(S)

TRUSTEE BOUNDARY REDISTRICTING

Trustee Saénz opened the Public Hearing at 8:00 p.m. to receive input on the proposed Board of Trustee Boundary Redistricting.

There being no further input the Public Hearing was closed at 8:01 p.m.

DRAFT EIR – HIGH SCHOOL #5

Trustee Saénz opened the Public Hearing at 8:02 p.m. to receive input on the Draft Environmental Impact Report for High School #5.

Brian Finnegan, representing owners of the west area in proposed high school site, mentioned three major concerns: 1) Conflict of this plan with proposed extension of El Dorado Drive, 2) Storm water plan, and 3) Orientation of the school itself. They would like to see the high school as the centerpiece of the future growth area. Their objective is to have a walkable community. Mr. Finnegan indicated that they do not want to be in a fight with the high school district, but want to work cooperatively.

Trevor Smith with Kleinfelder made comments about the Draft EIR for High School #5. He wants the school to face out to the planning area since the west area is the most active group. They really want the school and want it facing them. A few concerns included the parking lot up against fences of existing

neighbors, and light and glare from stadium. Mr. Smith indicted that they want to work with the district.

6 **Tara Hullinger with the City of Salinas** echoed future growth developers concerns and would like to see it developed into the new Urbanism Plan.

John McPherson, Trustee Area 2 for MCOE, introduced himself (ran unopposed—area held by Barbara Cornett).

There being no further input the Public Hearing was closed at 8:16 p.m.

ACTION ITEMS:

REDISTRICTING PLAN

On a motion by **Trustee Tabera,** seconded by **Trustee Ramirez,** and a vote of 5-0 (Trustees Larison and Martinez absent), the Board approved the report from the Redistricting Committee and adopted the new Board of Trustees Boundaries, Plan 3, as recommended by the Redistricting Committee.

INFORMATION ITEMS:

BENCHMARK 1 TEST RESULTS

Mr. Vanoli presented the Benchmark 1 Test Results. His report included the percent of students scoring in each performance level over a three-year period for each benchmark test. **Mr. Vanoli** updated the Board on Common Core Standards. He indicated that there is new pacing for English Language Arts grade 9-10, and teachers did a phenomenal job.

FIRST QUARTER WILLIAMS REPORT

Mr. Vanoli presented the First Quarter Williams Report. Several sites received "exemplary" on their School Facilities Reports. He reported that no complaints were filed during the first quarter.

FIRST READING OF BOARD POLICIES

Mr. Vanoli presented the following Board Policies for first reading:

Student Policies
BP 5131.62 – Tobacco

Instruction Policies
BP 6173.1 – Education for Foster Youth

CONSENT AGENDA:

It is intended that all matters listed under the Consent Agenda be enacted by one motion. Board Members may request discussion on any of these items, which may then be considered for individual vote.

1. APPROVAL OF MINUTES OF PREVIOUS MEETING(S)

   a. Approved Minutes for Regular Board Meeting of October 25, 2011.

2. CURRICULUM

   a. Approved Interdistrict Transfer Requests for 2011-12.

b. Approved English Learners Reclassification Criteria.

c. Approved Physical Education Waivers for Students #90188 and #120838.

d. Approve out-of-country field trip for Everett Alvarez High School's Japanese Club to Japan on March 31 – April 8, 2012.

3. ADMINISTRATION

a. None

4. PERSONNEL

a. Ratified changes in certificated personnel.

b. Ratified changes in classified personnel.

5. BUSINESS

a. Ratified paid warrants for the period ending October 2011:

Warrants #12891097 – 12891150	$ 763,619.86
Warrants #12891877 – 12891878	1,000.00
Warrants #12892560 – 12892634	426,235.75
Warrants #12893966 – 12894010	677,334.43
Warrants #12895846 – 12895910	341,908.70
TOTAL	$2,210,098.74

b. Accepted donations, as contained in the support material provided to the Board.

c. Approved Architect Agreement with NTD Architects for the Classroom Project at Everett Alvarez and North Salinas High Schools.

d. Rejected Claim #11-08.

e. Approved the consulting agreement with California Consulting, LLC.

f. Authorized Administration to discard obsolete textbooks.

On a motion by **Trustee Ramirez,** seconded by **Trustee Reavis** on a vote of 5-0 (Trustees Larison and Martinez absent), the Consent Agenda was approved as presented.

FUTURE AGENDA ITEMS

1. Resolution regarding support of Senate Constitutional Amendment #5 (Trustee Tabera)

Superintendent Earhart asked Board members to fill out the Trustee Request Form to submit requests for items to be placed on the agenda so that he can review them with Board President Saénz. He pointed out that the December 13 meeting is packed and will get to their requests as soon as possible.

NEXT MEETINGS

A Special Board Meeting is scheduled for Tuesday, November 14, at 5:00 p.m. regarding Superintendent position interviews.

The next regularly scheduled Board Meeting will be held on Tuesday, December 13, Closed Session at 5:30 p.m., Open Session at 7:00 p.m., at the District Board Room, 431 West Alisal Street, Salinas.

ADJOURNMENT

On a motion by **Trustee Reavis,** seconded by **Trustee Tabera,** and a vote of 5-0 (Trustees Larison and Martinez absent), the meeting was adjourned at 8:27 p.m.

Patty Saénz	James A. Earhart
President	Superintendent

Comments From Board of Trustees meeting minutes (November 8, 2011)

1. Brian Finegan, who spoke on behalf of the landowners and developers of the Future Growth Area, expressed concerns that the proposed site plan conflicted with the future extension of El Dorado Drive. However, at this time, there is no adopted specific plan of that area that shows proposed El Dorado extension adjacent to the project site. According to the City of Salinas 2006 General Plan Land Use and Circulation Map (included as Figure 5 in the Draft SEIR), the proposed El Dorado Drive extension would not be located adjacent to the project site. This issue was discussed in the Draft SEIR, Section 2.6, Land Use. The proposed project does not include any improvements to El Dorado Drive and would not conflict with the future El Dorado Drive extension as presented in the City's general plan.

2. Mr. Finegan commented on the issue of storm water runoff and expressed concern over the lack of infiltration/percolation testing done in order to support the recommendation in the storm water control plan. The *Stormwater Control Plan for Salinas Union High School District High School #5* (hereinafter "project's stormwater control plan" included as Appendix E to the Draft EIR) does rely heavily on infiltration and final design would require infiltration testing. If necessary, additional capacity can be added under the football field and/or within the pervious pavement sections to meet the design objectives based on tested infiltration rates. Unlike some of the Future Growth Area, the site is primarily underlain with hydrologic soil type B, which can be expected to provide reasonable infiltration rates. Infiltration testing is required per mitigation measure HY-2. See Section 3.0, Changes to the Draft SEIR, for revisions to this mitigation measure HY-2 to clarify that the infiltration testing would result in a design that meets required standards.

   The commenter expressed concern that the proposed project be consistent with the City of Salinas draft National Pollutant Discharge Elimination System (NPDES) permit. At the time of the preparation of this document (April 2012), the Central Coast Regional Water Quality Control Board had not yet adopted the City of Salinas draft NPDES permit, which is anticipated to be approved in May 2012. However, the distributed Low Impact Development approach described in the project's stormwater control plan is consistent with the provisions of the City's draft NPDES permit. The following discussion outlines exactly how the proposed project's plan is consistent with the City's draft permit.

   The draft permit (dated Jan 10, 2012) Section J.4.c states, "the Permittee shall apply LID [Low Impact Development] design principles to all Priority Development Projects." The project proposes a large infiltration underdrain system under the football field, pervious parking areas, a bioretention system and vegetated swales that are consistent with the Low Impact Development principles listed in the draft permit. The project implements

measures to limit directly connected impervious area through the section of paving materials and directs runoff into vegetated areas and through infiltrative surfaces.

The draft permit requires that the conditions and performance standards of the City of Salinas' current Storm Water Development Standards be met until final flow control and treatment requirements are in effect 12 months after adoption of the Order (Permit). The proposed plan not only complies with the flow control numeric criteria in the Storm Water Development Standards as demonstrated through the application of long duration simulation per Storm Water Development Standards Section 1.5.3 paragraph 4.A, the analysis demonstrates compliance with the more stringent requirement and performance standards of the 2007 *Final Supplement for the Salinas General Plan Final Program EIR* "so that 'no net increase in runoff' occurs as a result of the proposed project." Furthermore, as stated on page 8 of the project's stormwater control plan, "because numeric criteria 4.A from the Storm Water Development Standards states, 'Demonstrate post-project runoff peaks and durations do not exceed pre-development runoff peaks and durations…,' and the stated intent of the Central Coast Regional Water Quality Control Board is to base evaluations on predevelopment, and not pre-project conditions; pre-development runoff was based on shrub ground cover, not compacted, plastic covered agricultural cover. Therefore, the proposed Low Impact Development measures are sized to mitigate to pre-development conditions for the project site, and they would actually be expected to reduce runoff when compared to the existing pre-project conditions. Therefore, the proposed project is consistent with the City of Salinas draft NPDES permit.

3. Mr Finegan expressed concerns over the orientation of the school and how it does not make the school a part of the community and potentially conflicts with some of the City's general plan policies.

   The proposed project does not conflict with the City of Salinas' general plan policies and regulations. Page 2-50 of the Draft SEIR addresses the location of the proposed high school and how it complies with traditional neighborhood characteristics (TND) presented in the general plan and is consistent with City general plan policies and zoning code regarding New Urbanism.

   Additionally, an EIR is required to include a description of the physical environmental conditions in the vicinity of the project as they exist at the time the notice of preparation is published. This environmental setting constitutes the baseline physical conditions by which a lead agency determines whether an impact is significant (14 Cal. Code Regs. §15125(a)).

   An EIR must focus on impacts to the existing environment, not hypothetical situations. (*Communities for a Better Environment v. South Coast Air Management Dist.* (2010) 48 Cal.4th

310; *Sunnyvale West Neighborhood Assn. v. City of Sunnyvale City Council* (2010) 190 Cal.App.4th 1351; *City of Carmel-by-the-Sea v. Board of Supervisors* (1986) 183 Cal.App.3d 229, 246-247; *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 352-355; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 955.) It is only against this baseline that any significant environmental effects can be determined (Sunnyvale West Neighborhood Assn., supra; 14 Cal. Code Regs. §§15125, 15126.2(a)).

The Salinas Union High School District ("School District") understands that there is no specific plan that has been submitted to the City of Salinas for public review, environmental review, and subsequent approval, and it not aware of any plans for such actions. As required by CEQA Guidelines section 15125 and section 15126, the Draft SEIR evaluates the impacts of the proposed project on the existing environmental setting, which is the baseline by which environmental impacts are assessed. CEQA does not require the evaluation of a project's impacts on future development scenarios.

The EIR is also required to discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. (14 Cal. Code Regs. §15125(d)) However, a plan that is in draft form cannot be said to be legally applicable, or enforceable, as to a particular project and is therefore not required to be considered as part of the EIR's discussion of environmental impacts of the proposed project (*Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, fn 7).

There are no adopted specific plans in place which would apply to the School District's project. The "West Area Specific Plan" referenced in the public comments is a draft specific plan map and no draft specific plan has even been filed with the City. Build-out of the City's Future Growth Area, for which no specific plans have been adopted, is therefore not required to be analyzed for consistency with the project. Rather, uncertain but foreseeable future development is properly considered with regard to cumulative impacts, as required by CEQA (14 Cal. Code Regs. §15130). The School District considered the potential for future build-out in its analysis of cumulative impacts.

With regard to the City's adopted general plan, the Draft SEIR contains a comprehensive analysis relating to the proposed project's consistency with the City's general plan, including future build-out, as required by CEQA Guidelines. The general plan mandates traditional neighborhood characteristics, that is, a balanced mix of housing, workplaces, shopping, recreational opportunities, and institutional uses. The project promotes this goal by providing a high school campus within an area accessible to existing residential neighborhoods on Rogge Road and also adjacent to future residential uses to the south and east. The City and other public commenter's contend that the proposed project is inconsistent with general plan principles because the school would be faced away from

future neighborhoods to the south and east. However, there are no adopted plans for such residential development, and even if there were, the fact that the school faces one direction or another does not make it significantly less accessible to all residential communities adjacent to the site. There is no reason that future students residing to the south or east of the school would be any less willing and able to access the school by means of bicycle or on foot. Although the proposed site plan faces the school towards Rogge Road, the proposed school would still be a part of the Future Growth Area community.

Page 2-51 of the Draft SEIR addresses the issue of future pedestrian access from the south and the east. If and when development occurs to the south and the east, the School District is open to installing access points, wrought iron fencing with gates, and pathways.

Therefore, the proposed project does not conflict with the City of Salinas' general plan policies and regulations regarding New Urbanism.

4. Trevor Smith, also representing an adjacent property owner, commented that the school should face the Future Growth Area since that was the community it was being built to serve. Although it is likely that the high school would serve some students within the Future Growth Area, the high school is needed now, to serve existing students within the School District, including those in the existing neighborhood immediately to the west, with access to Rogge Road. This was discussed in the Draft EIR, Section 1.3, Project Description, as well as throughout the Draft EIR. In addition, see response to comment #3 above.

5. Mr. Smith also expressed concern over the location of the parking lot along the west side of the project site and any potential impacts on the adjacent existing neighbors, and the light and glare from the proposed stadium. Page 2-58 of the Draft SEIR addresses the issue of project-generated noise from the western parking lot on the adjacent, existing residential development. The Draft SEIR concluded that the noise from the parking lot traffic would be in compliance with the City of Salinas Noise Element and the Monterey County Safety Element standards and would not add to the background noise environment. See Appendix A, Noise Report Addendum, of this document for further analysis of potential noise impact from the parking lot existing adjacent residences to the west. This additional information does not change the impacts and mitigation conclusions in the Draft EIR. Page 2-4 and 2-58 of the Draft SEIR address the potential light and noise impacts of the proposed stadium and conclude that the impacts would be less than significant.

6. Tara Hullinger with the City of Salinas echoed Brian Finegan's comments about the orientation of the proposed school and that the City would like to see the site developed using the principles of New Urbanism. See the response to comment #3 above for further discussion.

Letter #1

Teri Wissler Adam

Subject: FW: SEIR - Rogge Road HS

From: **Quezada, Manuel Ext.4874** <quezadam@co.monterey.ca.us>
Date: Wed, Nov 30, 2011 at 12:33 PM
Subject: SEIR - Rogge Road HS
To: "karen.luna@salinasuhsd.org" <karen.luna@salinasuhsd.org>
Cc: "Buche, Brent Ext.8982" <bucheb@co.monterey.ca.us>, "Boyer, Rich Ext.4894" <boyerr@co.monterey.ca.us>, Dave Foote <dfoote@swsv.com>, "Moss, Tom Ext.4968" <mosst@co.monterey.ca.us>, "Bodensteiner, Jennifer M. x4970" <BodensteinerJM@co.monterey.ca.us>

Karen:

In reference to the subject project, I understand that today is the final day to submit comments.

MCWRA maintains stormwater facilities downstream of the proposed project which eventually drains into the Reclamation Ditch and ultimately into Moss Landing Harbor. A MCWRA drainage study was recently completed identifying deficiencies throughout the Ditch system to safely convey current and future stormwater runoff from growth areas planned within the City.

1 Our concerns are the following: Has additional runoff and volumes created from new impervious surfacing been mitigated for a 100-yr flow; a wider ditch is proposed along the western property line which will concentrate flows from ag fields upstream and from the project, and; what are the impacts from this widen ditch when it outlets into a smaller ag ditch increasing the potential of flooding, erosion and sedimentation.

2 We understand that future development may minimize these impacts to a certain extent depending upon the rate of development. The cumulative impacts from the entire future growth area needs to be considered and not on a project-by-project basis. Thank you for this opportunity to comment.

Manuel L. QuezadaSenior Water Resources Engineer

Monterey County Water
Resources Agency

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LETTER 1 – Monterey County Water Resource Agency (November 30, 2011)

1. Storm water issues are addressed in Section 2.5, Hydrology and Water Quality, of the Draft SEIR. There is no drainage ditch proposed along the western property line. The proposed project does include required improvements to the existing drainage ditch along the eastern edge of the project to ensure there would be no increase or concentrate flows. It would continue to convey flows originating off site across the site and has enough capacity to meet the City's design standards. The existing ditch experiences a significant amount of bank erosion that would be significantly reduced by the proposed condition. As stated on page 15 of the project's stormwater control plan: "Though the proposed channel is large enough to permit significant vegetation while still providing adequate capacity, allowing too much vegetation in the ditch could cause flow velocities to be much lower than those under current conditions. Lowering the velocities somewhat would be advantageous because there are currently undesirable erosive conditions. However, if too much vegetation is allowed to develop, sediment delivered to the site from upstream may deposit in the channel which would reduce channel capacity. Therefore, it is recommended that vegetation be permitted in the channel and it should be mowed periodically to prevent the flow velocities from dropping too much."

   Therefore, the Draft SEIR concluded that the proposed wider, vegetated ditch would not have a negative impact on flooding, erosion or sedimentation.

2. The comment requests that cumulative impacts from the entire Future Growth Area need to be considered and not on a project by project basis. As stated on page 8 of the project's stormwater control plan:

   "The hydrologic soil group and ground cover factor into how much rainfall becomes runoff. Currently, the site is in agricultural use with row crops running north-south and has one single family residence, as shown in Photograph 7. Much of the western portion of the project site is covered by plastic sheeting. However, because numeric criteria 4.A from the Storm Water Development Standards states, "demonstrate post-project runoff peaks and durations do not exceed pre-development runoff peaks and durations…", and the stated intent of the Central Coast Regional Water Quality Control Board is to base evaluations on pre-development, and not pre-project conditions; pre-development runoff was based on shrub ground cover, not compacted, plastic covered agricultural cover. Therefore, the proposed Low Impact Development measures are sized to mitigate to pre-development conditions for the project site, and they would actually be expected to reduce runoff when compared to the existing pre-project conditions."

The 30-year hydrologic simulation based on hourly rainfall performed for the project's stormwater control plan shows post-project flows to be significantly lower than pre-development flows which would be significantly less than existing condition flows. Therefore, the proposed project is expected to reduce runoff from existing conditions and not increase discharge rates or volumes into the regional drainage system. Because this project would be designed to not have an incremental impact, cumulative impacts do not need to be considered. However, the City of Salinas did consider cumulative storm water impacts from buildout of the Future Growth Area in Section 5.4, Storm Water Drainage, in the *Final Supplement for the Salinas General Plan Final Program EIR*. The high school Draft SEIR summarized these cumulative impacts on page 3-6.

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.

December 4, 2011

Teri Wissler Adam
EMC Planning Group Inc.
301 Lighthouse Ave., Suite C
Monterey, CA 93942

Re: Salinas Union High School District New High School #5 Construction SEIR-
Public Review Draft. State Clearinghouse Number 2005081011

Saleki Atsa,

I am the Tribal Chairperson for the Ohlone Costanoan Esselen Nation. I also represent the tribe to the Native American Heritage Commission and I act as the Most Likely Descendant for OCEN. As Most Likely Descendant I represent the OCEN Tribal Council's decisions regarding the treatment of ancestral Native American human remains and/or cultural resources that are often disturbed or encountered. I am the legal spokesperson for the OCEN Tribe and the Tribal Council. I may also be contacted for information for consultation, and reviewing planned projects for potential adverse impacts and reviewing predictive models that might negatively impact our Tribe's ancestral cemeteries, villages, ceremonial and processing sites.

As the aboriginal, historic and previously Federally Recognized Tribe of the Greater Monterey Bay Region/County, whose status has never been terminated by any Act of Congress from our relationship with the Federal Government, we insist that our legal and religious rights be respected and request that we are kept fully apprised of the activities of your office specifically as they relate to our ancestral, historical and cultural properties. Ohlone/Costanoan Esselen Nation has had a history of land-use throughout the Greater Monterey County.

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.

This area identified as Bolsa Knolls is also known by our Tribal families as the "Santa Rita area." This area is surrounded by cultural sites used by our people that have lived in this area all of their lives. We have stories of cemetery and burial sites as well as gathering areas for religious ceremonies. Ohlone/Costanoan-Esselen Nation opposes any plan that allows for the disturbance of our sacred and cultural sites. Our sites have been disturbed in the name of progress and balancing budgets way too long.

Please be advised that it is our first priority that our ancestor's remains be protected and undisturbed. We desire that all cultural and sacred items be left with our ancestors on site or where they are discovered. 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.**

1 We request that Ohlone/Costanoan-Esselen Nation be consulted as to any planned projects that might adversely impact known or predicted cultural resources and sacred sites within our aboriginal territory.

Furthermore, the Tribal leadership desires to be contacted with: 1) surveys, 2) subsurface testing, 3) presence/absence testing, 4) mitigation and recovery programs, 5) reburial of any of our ancestral remains, 6) placement of all cultural items, and 7) that a Native American Monitor of Ohlone/Costanoan-Esselen Nation, approved by the OCEN Tribal Council be used within our aboriginal territory.

2 We request that a sacred lands search be processed with the Northwest Information Center, Sonoma State University, Ms. Leigh Jordan can be contacted at (707) 664-0880 or at leigh.jordan@sonomaedu and the Native American Heritage Commission in Sacramento, CA. At this time we are unable to provide you with cultural resource information but ask that OCEN be contacted upon any findings on this project.

We seek to be partners in the protection of our sacred sites. We request a copy of your findings regarding this project. 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
File

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

OCEN DIRECT LINEAL DESCENT

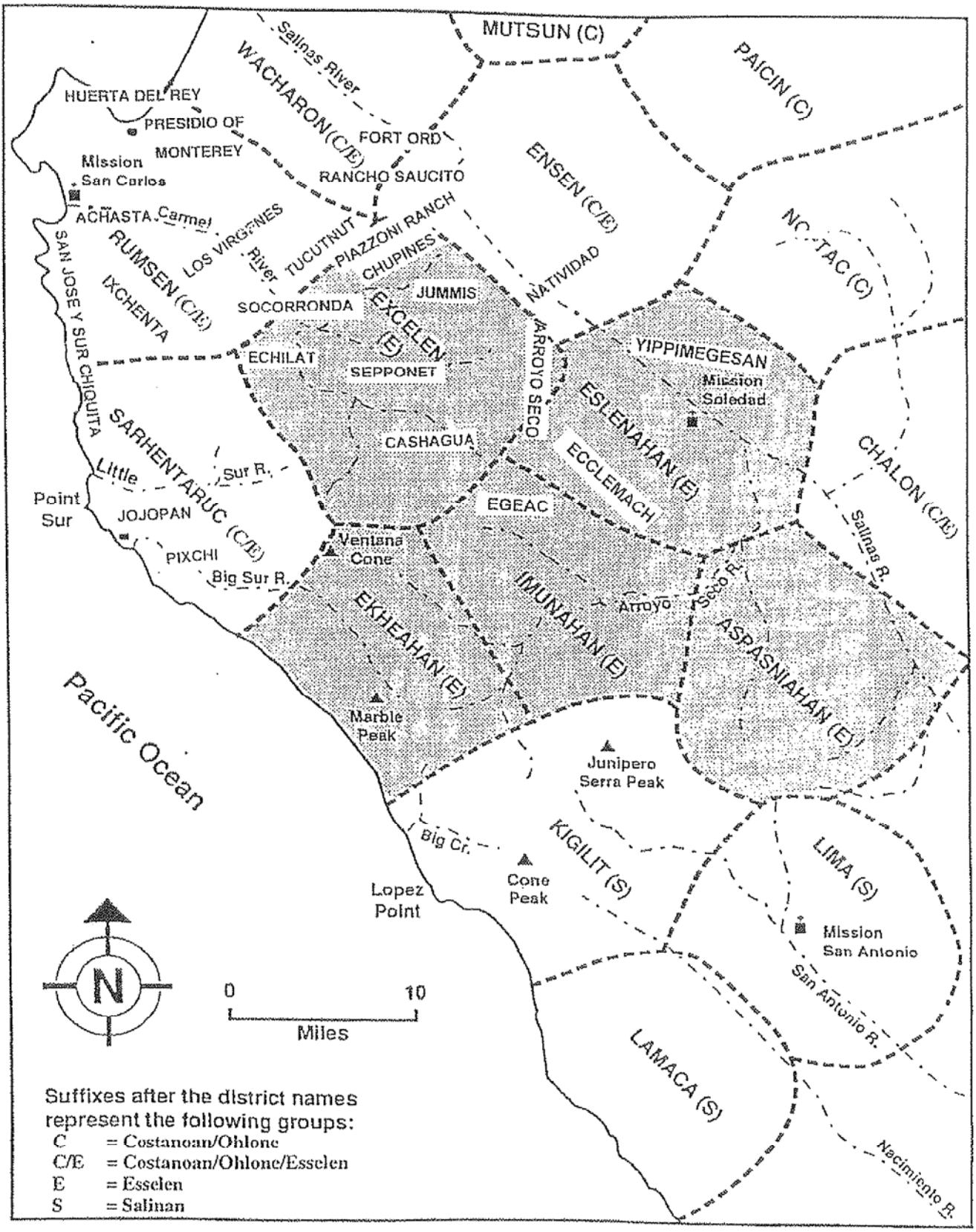

Figure 2:

Map after Taylor 1856; Levy 1973; Hester 1978; Milliken 1990

LETTER 2 – Ohlone/Costanoan-Esselen Nation (December 4, 2011)

1. The comment requests that the Ohlone/Costanoan-Esslen Nation be consulted as to any planned projects that might adversely impact known or predicted cultural resources within their aboriginal territory.

2. A records search was conducted through the Northwest Information Center and a field reconnaissance was conducted by Archaeological Consulting in 2006 as part of the Acquisition EIR. According to the record search and field reconnaissance, it was determined that the project area contains no surface evidence of significant archaeological resources. There were no recorded archaeological sites located on, or within one kilometer of, the project site, and no historic resources were found. A copy of that report has been forwarded to the commenter.

Letter #3

Matt Rodriquez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Deborah O. Raphael
Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

December 5, 2011

Ms. Karen Luna
Manager of Maintenance, Facilities and Planning
Salinas Union High School District
320 Rose Street
Salinas, CA 93901

DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR SALINAS UNION HIGH SCHOOL DISTRICT HIGH SCHOOL #5 CONSTRUCTION PROJECT, SALINAS, MONTEREY COUNTY (SCH 2005081011)

Dear Ms. Luna:

The Department of Toxic Substances Control (DTSC) has reviewed the Salinas Union High School District (District) High School #5 Construction Project Draft Subsequent Environmental Impact Report (Draft SEIR) dated October 18, 2011 for the subject project located at 1100 Rogge Road in Salinas, Monterey County (Site). The due date to submit comments is December 5, 2011.

The proposed high school site encompasses approximately 39 acres of land most recently used for agricultural and a single residence. The land was undeveloped until its conversion to agricultural use sometime before 1956. A Preliminary Environmental Assessment (PEA - Kleinfelder, Inc., March 20, 2007) indicated minor waste oil impacts in stained soil around a waste oil drum. In addition, chlordane and dieldrin around site structures was reported above California Human Health Screening Levels (CHHSLs). On April 4, 2007, DTSC approved the PEA report with a further action determination. The Salinas Union High School District (District) entered into a School Cleanup Agreement (Docket Number HSA-SCA 07/08-021) with DTSC on August 27, 2007 for oversight of environmental investigation and cleanup activities.

The environmental investigation and mitigation and/or removal, if deemed necessary, should continue to be conducted under DTSC oversight. The Draft SEIR, requires an analysis of the potential public health and environmental impacts associated with the proposed response action, pursuant to requirements of the California Environmental Quality Act (Pub. Resources Code, div. 13, §21000 et seq.), and its implementing Guidelines (Cal. Code Regs., title14, §15000 et seq.), prior to approval or adoption of

the Draft SEIR for the project. A discussion of the mitigation and/or removal actions, and associated cumulative impacts to the Site and the surrounding environment, should be included in the Draft SEIR. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to the Site and the surrounding environment, are not available for inclusion in the Draft SEIR, then an Addendum or Supplement to the Draft SEIR may be required.

Based on a review of the Draft SEIR, DTSC offers the following comments:

1. The discussion presented in Section 2.4 (Hazards and Hazardous Materials) of the Draft SEIR does not provide the detail necessary to meet the above requirements. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to the site and the surrounding environment, are not available for inclusion in the Draft SEIR, then an Addendum or Supplement to the Draft SEIR may be required.

   Specifically, please include within Section 2.4 an estimate for both the volume of material to be removed as well the volume of the clean import to be imported to the site as part of the proposed mitigation/removal actions (including the number of trucks to be used). DTSC recommends that all fill material imported to the Site be evaluated in concurrence with DTSC's 2001 Clean Fill Advisory. The hazardous waste disposal facility that is planned to be used for the OCP-impacted soils proposed to be removed from the Site should also be identified. If it's not known for certain which facility will be used, several potential facilities with adequate capacity should be identified. In addition, there was only one PEA conducted under DTSC's oversight, the approved report for which was dated March 20, 2007. Please verify the statements in the first paragraph of the Background in Section 2.4 that two PEAs were developed for the site, and revise the Draft SEIR as necessary.

2. For Section 2.8 (Traffic and Transportation), the route that is to be taken for mitigation/removal action activities should be at least tentatively identified on a map.

3. For Section 2.7 (Noise), if the Acquisition EIR did not include an evaluation of the contribution of mitigation/removal action activities to noise for the Site then this evaluation should be included in the Draft SEIR.

4. If the District plans to use State funds for the project, then the District shall comply with the requirements of Education Code sections 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268.

If you would like to discuss this matter further, please contact me at (916) 255-3695, or via e-mail at BDuke@dtsc.ca.gov.

Sincerely,

Harold (Bud) Duke, PG
Senior Engineering Geologist
Northern California Schools
Brownfields and Environmental Restoration Program

cc: via e-mail

State Clearinghouse
Office of Planning and Research
State.clearinghouse@opr.ca.gov

Mr. Michael O'Neill
Department of Education – Sacramento Office
MOneill@cde.ca.gov

Ms. Nancy Ritter
DTSC CEQA Tracking Center – HQ
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Schools Reading File – Sacramento Office

CEQA Reading File - Chatsworth

LETTER 3 – Department of Toxic Substances Control (December 5, 2011)

1. In addition to this Draft SEIR addressing hazards associated with developing a school adjacent to active farmland, the Acquisition EIR evaluated the impacts associated with on-site existing hazardous materials in the soil and discussed the Department of Toxic Substance Control clean-up process the School District has undertaken. This is explained in the Draft SEIR on page 2-34, Background, in Section 2.4, Hazards and Hazardous Materials.

   While the extent of organochlorine pesticides in soil near the residence, near Storage Building B, and near the demolished structure has not been established, organochlorine pesticides concentrations in soil at these locations appear to become weaker with depth. The actual amount of soil to be excavated from these locations and disposed of offsite would be determined once a thorough assessment is performed, with state Department of Toxic Substances Control oversight, anticipated to be through a Supplemental Site Investigation prior to the removal action. Once the Supplemental Site Investigation is complete, the process of excavation and offsite disposal of the soil identified as containing concentrations of organochlorine pesticidess that exceed their action levels would be outlined in a Removal Action Workplan. Based on the data provided in the March 20, 2007 Preliminary Environmental Assessment, and compared to similar sites, the volume of material to be removed from the site is roughly estimated to range from one to ten truckloads. However, the actual number may be more or less, and would be dependent on the findings of the Supplemental Site Investigation. Fill material for the proposed mitigation is expected to come from onsite. However, if offsite sources are considered necessary, the School District is expected to evaluate fill material imported to the site using Department of Toxic Substances Control's 2001 Clean Fill Advisory prior to transport to the site.

   The appropriate waste disposal facility has not been identified. However, it is anticipated that potentially hazardous materials would be shipped to (if open) WM Kettleman Hills, California facility or US Ecology's Beatty, Nevada facility.

   Although several drafts were prepared, only one final PEA, prepared by Kleinfelder, dated March 20, 2007, was developed for the site. No changes to the Draft SEIR are necessary.

2. The transportation route for mitigation/removal action activities has not been determined, and would be identified and approved by Department of Toxic Substances Control and others as part of the RAW. Tentatively, the route would avoid heavily populated areas and could go east on Rogge Road from the site to Natividad Road, north to San Juan Grade Road and northwest on Crazy Horse Canyon Road to U.S. Highway 101. The anticipated number of trucks, from one to ten, would not constitute a substantial increase in vicinity or regional traffic. No changes to the Draft SEIR are necessary.

3. The equipment required for the mitigation/removal action activities has not been determined, and would be identified and approved by Department of Toxic Substances Control and others as part of the Removal Action Workplan. Generally, the equipment used is expected to be similar to normal heavy construction equipment used during construction of a new school campus, and may include backhoe (or excavator), bulldozer, compactor, and dump truck. Noise associated with mitigation/removal action would be similar to noise generated during construction activities anticipated for the site. The construction noise mitigation measure, N-2 requires limiting the hours of all construction activities and use of heavy equipment. This mitigation is applicable to all construction activities, including demolition and soil removal. No changes to the Draft SEIR are necessary.

4. The School District has had Department of Toxic Substances Control involvement in the process to date, and intends to comply with the requirements of Education Code sections 17213.1 and 17213.2 unless specifically exempted. No changes to the Draft SEIR are necessary.

Letter #4

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December 5, 2011

EMC Planning Group, Inc.
301 Lighthouse Avenue
Monterey, California 93940

Attention: Teri Wissler Adam

Re: SUHSD New High School #5 Construction Draft SEIR

Dear Ms. Wissler Adam:

This letter contains comments on the SUHSD New High School #5 Construction Draft SEIR submitted on behalf of landowners and developers in the City of Salinas North of Boronda Future Growth Area (FGA).

The FGA considers this proposed high school as an integral part of the FGA community, and the landowners and developers of the FGA have hoped to participate with the District in bringing about a community high school that would be a centerpiece for the City's newest residential area. Unfortunately, that vision has not been realized up to this point. We are hopeful that this SEIR will serve as a vehicle for a project redesign that will achieve the high expectations all parties share for this important facility.

1 **A. General Comment.**

In May of 2010, the District adopted the Salinas Union High School District High School Education Specifications. The document states that it is "relative to the District's Master Plan". The specifications declare: "The District is committed to fostering a partnership with the community and making schools an integral part of the community." My clients' over-arching concern about this SEIR is that it appears to evaluate the impacts of this high school project as if the high school were not an integral component of the FGA community (which it most clearly is), and as if little or nothing were known about the development of the FGA community. It is no secret that the North of Boronda FGA will produce over 12,000 residential units. The West Area of the FGA (in which the

proposed high school is located) will alone generate 4,340 residential units and ±853 high school students.[1] Yet the proposed high school is faced away from the FGA, is fenced off from the FGA and completely ignores the street system that will provide first-class vehicular, pedestrian and bicycle access to the site from the FGA.

Although the District has the power to exempt its projects from City zoning, it does not have the power to exempt its projects from the requirements of CEQA and the CEQA requirement to avoid conflicts with general plans and land use plans. By adoption of the Salinas Union High School District High School Education Specifications quoted above, the District has committed itself to make its high schools "an integral part of the community". That community clearly includes the City of Salinas generally and the FGA specifically.

The Draft SEIR needs to be revised to more thoroughly analyze the impacts of the proposed design of this high school on the community that it is committed to serve as reflected in the draft West Area Specific Plan.

B. Land Use.

CEQA requires that the SEIR evaluate any conflicts with adopted general plans. It is clear that the Salinas General Plan designates the entirety of the FGA for development embodying the principles of the New Urbanism (also known as Traditional Neighborhood Development).[2] Those principles, as articulated in the General Plan (and cited in the SEIR), include that schools should lie within the neighborhood and be easily accessible and within walking distance. The District's Site Acquisition EIR for the acquisition of this site commits the District to implementing those principles:

> *"CUM-AE-2. To the extent financially feasible and in alignment with educational programs and facilities, the SUHSD shall design the high school with "Traditional Neighborhood Development" characteristics. The SUHSD should consult with the City of Salinas regarding the city's design standards."*

2 This mitigation measure is omitted from the current SEIR, and it is clear from the written comments received from the City of Salinas that the District has not complied
3 with this mitigation measure. The school is not "within the neighborhood", but is oriented away from, and fenced off from, the FGA community it is intended to serve. Because of its reversed orientation, it is not conveniently walkable for the 853 students who will come from the FGA, and the SEIR is wrong in concluding that it is (see SEIR, p. 2-50).

---

[1] Although the SEIR is technically correct in stating that no formal applications for residential development within the FGA have been submitted, the District is well aware that there has been an intensive, ongoing planning process for the FGA underway with the City for several years, including the preparation of draft Specific Plans that have been submitted for preliminary review. A copy of the Land Use Map for the draft West Area Specific Plan is attached to this comment letter.

[2] The SEIR concedes that the school site is located within the New Urbanism zoning district.

3 "Walkability" is generally defined in terms of being within a distance of 3,000 feet. The SEIR finds that the proposed design is "walkable" because it is accessible to the existing residential neighborhoods on Rogge Road. But it is turned away from, and fenced off from, the FGA that will have more than nine times as many homes within 3,000 feet of the school compared to those in the existing neighborhoods within 3,000 feet (300 units vs. 2,795 units).[3]

4 There is no evidence in the record to suggest that a plan facing the new high school to the FGA is not financially feasible. Indeed, the SEIR analyzes at least one alternative designs that does present the new school "within the neighborhood." Because CEQA mandates that alternatives examined in an EIR be feasible, it must be assumed that the alternative is financially feasible.

C. Aesthetics.

5 The plan proposes to place the lighted football stadium ±200 feet away from 74 units of medium density residential development immediately to the east in the FGA. The SEIR, and the Lighting Plan included as Appendix "C" to the SEIR, state that the light poles for the stadium will be 85 feet above the playing field level. The SEIR says that the Lighting Plan summarizes the City's exterior lighting standards, and the Lighting Plan says, "Design will comply with light pole maximum heights." Yet Section 37-50.480 of the Salinas Zoning Code provides that the maximum height for light poles in the City is 25 feet.

6 Similarly, the SEIR states that the intensity of the light from these 85-foot towers at the playing field level will be 50 foot-candles. The maximum intensity of exterior light allowed in any Salinas zoning district is 15 foot-candles at ground level (Section 37-50.480 of the Salinas Zoning Code).

Such large exceedances of City standards are bound to create a significant impact on the adjacent residential development within the FGA.

There is a simple way to mitigate the impact on the FGA: Revise the plan to move the stadium to the northerly portion of the site, adjacent to Rogge Road, where there are no adjacent homes to be impacted by the noise and light from the stadium (see Site Redesign "A" and "B").

D. Traffic.

7 The SEIR assumes that El Dorado Drive will not be extended north past Russell Road (see SEIR, p. 3-8, #15). In fact, El Dorado is planned as a two-lane arterial with a 13-foot parking/bike lane along the high school site frontage, culminating in a four-way

[3] Using a student generation rate of 0.15 students per household, only 45 students would be within walking distance from the existing developed areas, while 420 students would be able to walk from the FGA homes.

stop at Rogge Road (cf. SEIR p. 2-67). The intersection of El Dorado and Rogge would be less than 100 feet from where the current high school plan proposes a driveway to
8 accommodate event parking for the stadium. The current high school plan fails to provide the required right-of-way for El Dorado Drive. That deficiency could be accommodated by Site Redesign "B" that moves the stadium and the event parking to the central part of the site.

9 The SEIR proposes a "mitigated site and access plan" in the Mitigated Access Plan Analysis (Appendix "H"). However both the text and the exhibits in that appendix are incorrect and render the report unintelligible. The key insert on each of the exhibits incorrectly locates the driveways. For example, Intersection circle-14 should not be above the stadium but should be located at the easterly entrance/exit for the student parking lot; and Intersection circle-12 should be located at the bus-only exit immediately east of Intersection circle-14.

The text of Appendix H is also incorrect. On page 2 (Mitigated Driveway Configuration), Driveway 1 is stated to include "ingress only for school buses". In fact, the ingress only for school buses is located at Driveway 3 (Intersection #13).

Importantly, the mitigated site and access plan's discussion of stadium capacity events (page 6) fails to provide an LOS analysis, or any other meaningful analysis to support its conclusions, and fails to address at all the impacts of vehicles entering and exiting the event parking driveway in such close proximity to the Rogge/El Dorado intersection.

Finally, Table 3 in the Mitigated Access Plan Analysis fails to include analysis of General Plan + Phase 1, which is a clearly foreseeable event.

These faults lead one to question the accuracy of the conclusions contained in this appendix.

However, the traffic section of the SEIR and the Mitigated Access Plan Analysis do convey a clear impression of the folly of placing all five of the driveways for this high school on Rogge Road, where the significant impacts are many and the mitigations few.

E. Hydrology/Stormwater.

10 The SEIR's analysis of stormwater impacts is based upon the RBF Stormwater Control Plan (SCP) dated in March of 2011 (Appendix "E" to this SEIR). The analysis in the SCP is based upon the City of Salinas Stormwater Development Standards adopted in April of 2010 (SCP, p. 1). In September of 2011, the Regional Water Quality Control Board issued a new draft NPDES permit for the City of Salinas that is proposed for adoption in February of 2012. The SEIR needs to analyze the feasibility and effectiveness of the SCP and proposed mitigation measures HY-1 and HY-2, in the context of the new NPDES permit.

11 It is impossible for the reader to meaningfully evaluate the analysis of the SCP and the SEIR without the benefit of an exhibit showing the locations of the seven drainage areas and the five nodes referred to in the SCP. Please provide such an exhibit, and allow opportunity for the public to comment further on the stormwater impacts.

12 The SCP relies heavily on infiltration of stormwater to size the proposed detention facility in the southwest corner of the site, and to prevent increased off-site stormwater flows. It does not appear that any infiltration/percolation testing was done in order to support the recommendations of the SCP. The SEIR and the SCP note that such testing must be completed to provide a basis for design of the infiltration system on which the SCP relies. Infiltration/percolation testing done by FGA landowners/ developers show that infiltration/percolation rates in the FGA are very low, presenting challenges for the sizing and design of detention/retention facilities. The SCP's and the SEIR's conclusions about the effectiveness of the stormwater management facilities proposed for the new high school are suspect unless and until such testing is done and the results analyzed.

13 The SCP proposes reconstruction of an existing drainage ditch along the eastern boundary of the site. It appears from Exhibit 6 to the SCP that the "engineered channel" (the reconstructed ditch) is located outside the boundaries of the site, on the Mortensen property. If this is the case, the widening and deepening of the ditch cannot be
14 accomplished without the permission of the Mortensens. Furthermore, the SEIR needs to analyze the impact of the "engineered channel" on the proposed El Dorado Drive improvements along the east side of the school site.

F. ALTERNATIVES.

15 The SEIR includes an alternative project design (Alternative 4 – Site Redesign B) that would avoid or reduce to less-than-significant many of the impacts that are of concern to the FGA owners/developers and the City of Salinas. The two-story classroom building would face into the new FGA community, and could thus be considered "within the
16 community." The redesign would accommodate easy pedestrian access from both El Dorado Drive and Russell Road, key FGA streets, thus achieving "walkability."

17 Alternative 4 would eliminate the tangle of five conflicting driveways onto Rogge Road, reducing the access points to one driveway on Rogge Road and one driveway on El Dorado.

18 Alternative 4 increases the amount of on-site parking from 453 to 485 spaces. It is the only redesign alternative that places the façades of the classroom building facing
19 FGA streets without any parking obstructing the view of the buildings. The layout allows for significant street-front landscaping to enhance the community view of the campus facilities.

20 Alternative 4 moves the light and noise impacts of the stadium away from the designated residential areas of the FGA to the Rogge Road frontage, adjacent to the farmland north of Rogge Road.

21 Alternative 4 allows the 100-foot power line buffer to be used effectively for landscaping that will enhance the view of the school from El Dorado Drive.[4]

22 Ideally, the new high school would front on Russell Road, a major arterial street with a 130-foot right-of-way, four traffic lanes, a 22-foot landscaped median, 8-foot sidewalks and wide parkways. However, of the alternatives presented in the SEIR, Alternative 4 presents the best opportunity for achieving the New Urbanist objectives of the FGA.

G. CONCLUSION.

The FGA owners and developers appreciate the opportunity to comment on this SEIR. They look forward to the opportunity to work closely with the District in achieving a design that mitigates all identified environmental impacts and produces a high school campus that will be a centerpiece for the FGA community and a landmark school for the District and its students.

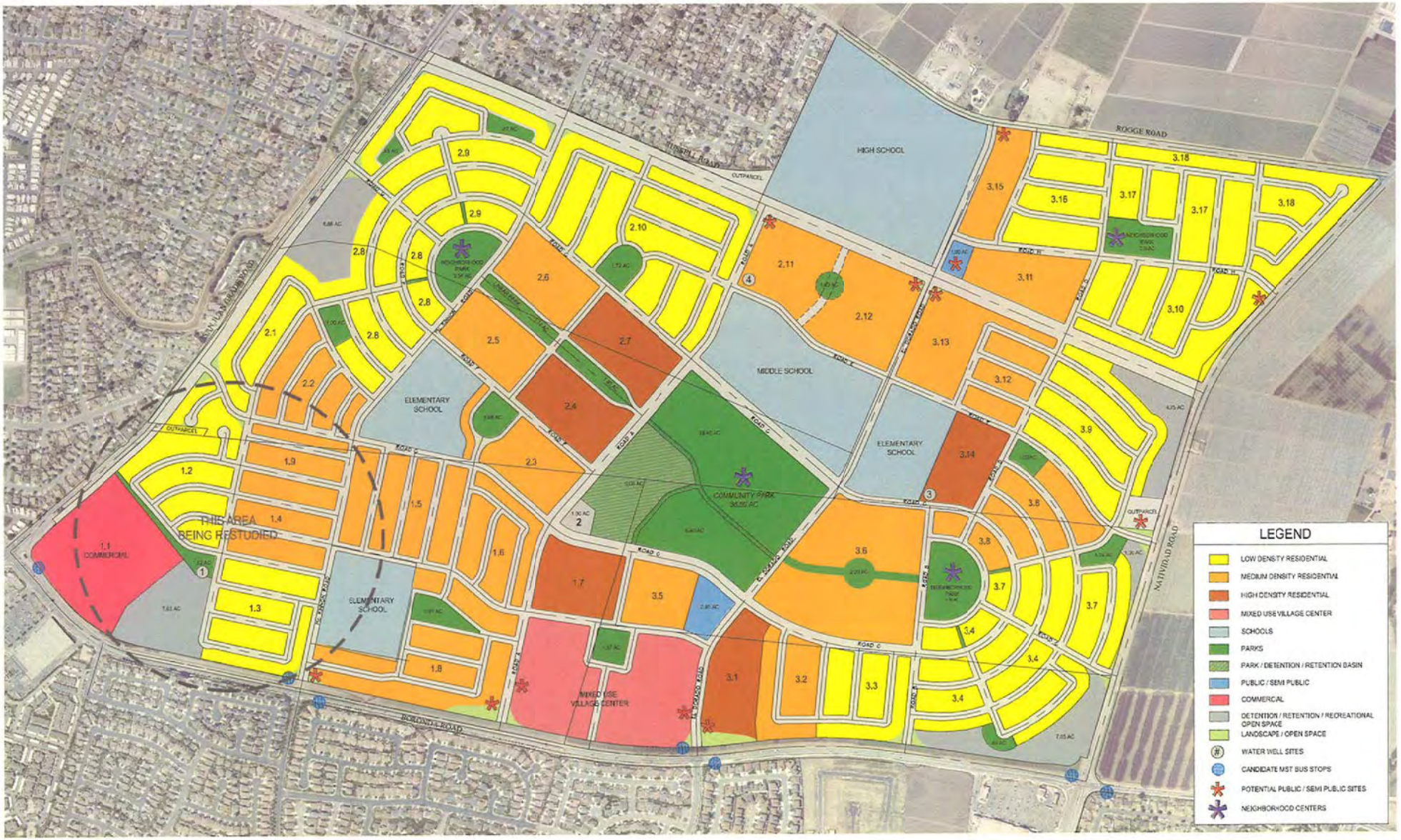
Very truly yours,

Brian Finegan

Brian Finegan

cc: FGA Owners/Developers
Karen Luna, SUHSD
SUHSD Board of Trustees
Tara Hullinger, City of Salinas

[4] The location, voltage, ownership and use of the power line calling for this setback or "buffer" needs to be confirmed. It is likely that this line can be relocated, abandoned or placed underground with development of the high school or the FGA.



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WEST AREA SPECIFIC PLAN
CITY OF SALINAS

SPECIFIC PLAN MAP

JULY 07, 2008

0 300 600 1200

LETTER 4 – Brian Finegan (December 5, 2011)

1. The comment states that the proposed project is not consistent with the City's general plan and land use plans, and contends that the proposed project is not a "part of the community" and is fenced off from the FGA. If and when development occurs to the south and the east, the School District is open to installing access points, wrought iron fencing with gates, and pathways. See Board of Trustees meeting comments, response #3 above for a detailed response to the proposed project's consistency with the City's zoning and general plan policies and for a discussion on the project having to analyze the impacts of the proposed design on the community as reflected in the draft specific plan map.

2 Mitigation measure CUM-AE-2 from the Acquisition EIR has not been omitted, and is included in Table S-1, page S-6, of the Draft SEIR. No revisions to the Draft SEIR are necessary.

3. The comment states that the proposed school is not "within the neighborhood" or walkable and is fenced off from the community it intends to serve. Page 2-50 of the Draft SEIR addresses the location of the proposed high school and how it complies with traditional neighborhood characteristics (TND) and is consistent with City general plan policies and zoning code regarding New Urbanism. The proposed high school would be located "within the community" regardless of orientation of the school. Although the Future Growth Area is within the School District boundaries, it is important to understand that the School District serves all of the children within the district boundaries, including the children in the existing neighborhood immediately west of the project site. The proposed project would be accessible to all residential neighborhoods adjacent to the project site. See Board of Trustees meeting comments, response #3 for more discussion on how the proposed project is consistent with the City's general plan policies, including the City's design standards and traditional neighborhood development characteristics. No revisions to the Draft SEIR are necessary.

4. Although other alternatives may be financially feasible, based on the School District's goals and its analysis of the environmental impacts, the proposed site design is the preferred option.

5. The comment states that the 85-foot stadium lighting poles conflict with the 25-foot maximum outlined in the City of Salinas Zoning Code section 37.50.480. The 25-foot maximum height in the cited City code applies to building-mounted and freestanding parking lot lights and is not applicable to the stadium lighting for the proposed high school. In addition, the comment states that there are "74 units of medium density residential development immediately to the east in the FGA." This is not true. As depicted in

Figure 3, Aerial Photograph, in the Draft SEIR, only undeveloped agricultural land is located east of the project site. Section 15126.2 of the CEQA Guidelines states that "in assessing the impact of a proposed project on the environment, the lead agency should normally limit the examination to changes in the existing physical condition in the affected area as they exist at the time the notice of preparation is published." At the time of the publication of the notice of preparation, the property to the east and south were in agricultural production and still are. The Draft SEIR appropriately evaluated the proposed high school's impact on the existing environment. See Board of Trustees meeting comments, response #3 for a further discussion on this issue.

However, in accordance with CEQA Guidelines section 15130, the Draft SEIR did include a discussion of the cumulative impacts of the project. The cumulative impacts discussion is required to evaluate the project's contribution to the cumulative project scenario, which included projections in the general plan for the Future Growth Area. Therefore, the cumulative impact analysis evaluated the project's contribution to the cumulative impact scenario. See Section 3.0, Cumulative Impacts, of the Draft SEIR. No revisions to the Draft SEIR are necessary.

6. The comment states that the proposed 50-foot footcandles conflict with the 15 footcandle maximum outlined in the City of Salinas Zoning Code section 37.50.480. The 15 footcandle maximum cited in that City code section applies only to the industrial-general commercial (IGC) district and is not applicable to the proposed project. Page 2-4 and 2-5 of the Draft SEIR includes a discussion of the lighting impacts of the proposed project. A lighting plan has been prepared for the proposed project and the impacts of the stadium lighting would be less than significant. The stadium lighting would be consistent with the stadium lighting used at the other high schools in the City of Salinas. No revisions to the Draft SEIR are necessary.

   In regards to the proposed project creating a significant impact on the adjacent residential development within the FGA, the Draft SEIR appropriately evaluated the proposed high school's impact on the existing environment. See Board of Trustees meeting comments, response #3 for a further discussion on this issue. See response #5 above for a discussion on the analysis of the cumulative impacts of the project. No revisions to the Draft SEIR are necessary.

7. Comment acknowledged. There was a typo in the traffic impact analysis. The sentence should have read, "Extension of El Dorado Drive as a 2-lane collector between Boronda Road and Rogge Road." See Section 3.0, Changes to the Draft SEIR, for edits to page 3-8 of the Draft SEIR. No additional revisions to the Draft SEIR are necessary.

8. The proposed project does not include improvements to El Dorado Drive. As presented in Figure 5 in the Draft SEIR, the City of Salinas 2006 General Plan Land Use and Circulation Map does not show El Dorado Drive adjacent to the school. No information is available on the spacing of the school driveways and the proposed El Dorado Street. However, when a specific plan for this portion of the Future Growth Area is considered by the City of Salinas, if the intersections are closely spaced, and they are both signalized, the City of Salinas presumably would interconnect the two signals and signal timing plans developed to facilitate the travel demand. No revisions to the Draft SEIR are necessary.

9. The figures in the "Mitigated Site Access Plan" study, Appendix H, indicate and describe new driveways and access configurations on the alternative site plan background to indicate the relative comparison between the originally-proposed driveway locations and the mitigated driveway locations. The mitigated site plan driveways/access from Rogge Road is conceptually indicated on Figure 15 in the Draft SEIR. These driveways correspond with Appendix H.

   The special event parking has a capacity for approximately 100 vehicles. The driveway would operate at acceptable conditions as indicted in the Draft SEIR Appendix H. During special events, the trips are primarily inbound before the start of the game, and primarily outbound at the end. It can be expected that more than 100 vehicles could enter/exit the stadium parking area during special events due to drop-offs occurring. The majority of event parking would occur in the student parking lot and school buses would use the school bus parking lot. School buses and other vehicles would continue to use driveways 3 and 4 to the site. During special events at schools, levels of service standards are expected to exceed the standards, which is common. Page 6 of Appendix H, Mitigated Access Plan Analysis, of the Draft SEIR includes a discussion of the vehicles entering and exiting the event parking lot driveway. The analysis concludes that the "signal at driveway #4 will generate gaps for vehicles to exit the site. In addition, the westbound left turn pocket at driveway #4 will extend past the stadium driveway and provide left turn storage." The analysis concludes that a traffic officer would not be required to manage traffic operations at this driveway. See response #8 above for a discussion on issue of the proximity of the project driveways to the future proposed Rogge Road and El Dorado Drive intersection.

   It is incorrect to assume that the Phase 1 traffic would continue with general plan buildout, or that Phase 2 traffic would build out with Existing Conditions. The traffic analysis analyzes the correct development scenarios that can reasonably be expected and addresses all CEQA requirements for existing and cumulative conditions analysis. Land uses and travel patterns would shift as presented in Phase 2 with general plan buildout. Impacts and mitigations are indicted for Phase 1 and Phase 2. The additional improvements that would be required with Phase 2 are indicted in the Draft SEIR, in the section regarding cumulative analysis.

No faults have been quantified in the comment letter, only a misunderstanding of the project and the mitigations. As indicated in the Appendix (Appendix H, page 3), the driveways would operate at acceptable LOS and all anticipated impacts would be mitigated for both Phase 1 and Phase 2 planning scenarios. No revisions to the Draft SEIR are necessary.

10. At the time of the preparation of this document (April 2012), the Central Coast Regional Water Quality Control Board had not yet adopted the City of Salinas' new National Pollutant Discharge Elimination System (NPDES) permit, which is anticipated to be approved in May 2012. However, the distributed Low Impact Development approach described in the project's stormwater control plan is expected to be consistent with the provisions of the City NPDES permit. See Board of Trustees meeting comments, response #2 for a discussion on how exactly the plan is consistent with the draft NPDES permit. No revisions to the Draft SEIR are necessary.

11. The comment requests that an exhibit be provided showing the seven drainage areas and the five nodes referred to in the project's stormwater control plan. Exhibit 2 in the project's stormwater control plan (Appendix E of the Draft SEIR) shows the drainage areas and nodes. No revisions to the Draft SEIR are necessary.

12. The comment expresses concern over the lack of infiltration/percolation testing done in order to support the recommendation in the project's stormwater control plan. The project's stormwater control plan does rely heavily on infiltration and final design would require infiltration testing. If necessary, additional capacity can be added under the football field and/or within the pervious pavement sections to meet the design objectives based on tested infiltration rates. Unlike some of the Future Growth Area, the site is primarily underlain with hydrologic soil type B, which can be expected to provide reasonable infiltration rates. By promoting infiltration in wide shallow areas, the design concept does not have the same issues as identified by the commenter. Infiltration testing is required per mitigation measure HY-2. See Section 3.0, Changes to the Draft SEIR, for revisions to this mitigation measure to clarify that the infiltration testing would result in a design that meets required standards.

13. The comment states that engineered channel is located on the Mortensen property, therefore the widening and deepening of the ditch cannot be accomplished without the permission of the Mortensen's. The limits of the engineered channel are planned within the School Districts property, based upon recent property surveys. No revisions to the Draft SEIR are necessary.

14. The comment states that the SEIR needs to analyze the impact of the engineered channel on the proposed El Dorado Drive improvements along the east side of the school site. As

stated in the conclusion of the project's stormwater control plan, "Final design of the channel will require detailed survey along the project edge to refine the grading to match edge conditions." See response to comment #8 regarding El Dorado Drive. No revisions to the Draft SEIR are necessary.

15. The comment states that Alternative 4, Site Redesign B, would avoid or reduce to a less than significant level many of the impacts that are of concern to the Future Growth Area community and the City of Salinas. The School District compared the pros and cons of the proposed site plan and each of the alternatives listed in the Draft SEIR. Environmental, educational, and financial benefits of the proposed site plan include the following:

- The proposed site plan positions the athletic fields along the southern boundary of the site; therefore noise generated by practices and games would not adversely affect the existing residential neighborhood to the west;
- The proposed site plan allows greater solar access for the courtyard and outdoor dining area due to the location of the two-story classroom building and the shadows it casts;
- Since it is unknown at this time if and when the areas to the south and the east of the project site would be developed, the proposed site plan places the main classroom building farther away from active agricultural land and potential adverse impacts from pesticide use and production activities;
- The proposed site plan utilizes all acreage the School District purchased, including the area within the power line setback, and provides for safe and efficient traffic flow and ample parking distributed around the building;
- Locating the buildings on the corner of the proposed future Russell Road extension and a future north-south road would require the School District to develop those roadways. The proposed site plan would not require the construction of these new roads;
- Storm water run off flows toward the southeast corner of the project site. The project's stormwater control plan provides for a landscaped and engineered channel along the east of the project site and a retention basin at the base of the baseball diamond. The plan also provides engineered swales to accommodate the storm water run off from the site on the west and south perimeter. The proposed site plan places the main classroom building in the upper northwest corner and out of the flow of storm water;

- Page 2-50 of the Draft SEIR addresses the location of the proposed high school and how it complies with traditional neighborhood characteristics (TND) and is consistent with City general plan policies and zoning code. The proposed high school would be located "within the community" regardless of orientation of the school. The proposed site plan does not preclude a walkable community;

- The lighting plan prepared for the proposed project would reduce all potential lighting impacts to a less than significant level. Lighting to illuminate the staff parking area and the exterior of the building would be constructed at the edge of the parking lot along the adjacent neighbors' fences, enabling the lights to face the parking area and not the neighbors' backyards or into their homes;

- The proposed site plan locates the school closer to existing utility connections; and

- Alternative 4, Site Redesign B indicates two closely spaced (300 feet), in-and-out driveways. The close spacing does not allow for adequate left turn storage and acceleration lanes for vehicles entering and exiting the site. Dual left turn lanes would have to be provided, which would require right-of way take on the north side of Rogge Road. In addition, this layout would result in traffic flow congestion on the site, which would in turn result in unwanted drop-offs pick-ups of students along both sides of Rogge Road in the bicycle lane.

As evidenced by the list above, the proposed site plan best achieves the School District's educational objectives, as well as achieving financial and environmental benefits, as compared to the other alternative analyzed in the Draft SEIR, Section 4.4, Alternatives Analysis. No revisions to the Draft SEIR are necessary.

16. See response to comment #3 above for a discussion on the walkability of the proposed site plan. No revisions to the Draft SEIR are necessary.

17. Although Site Redesign B would result in fewer driveways on to Rogge Road, the implementation of the mitigated site and access plans for the proposed design would reduce impacts to a less than significant level. Also, Site Redesign B was concluded to present greater impacts in the areas of hazards and noise. No revisions to the Draft SEIR are necessary.

18. Although Site Redesign B would result in an additional 32 parking spaces, parking is not an issue for the project and additional parking is not needed. School District staff is proposing that locating the classrooms buildings away from existing agricultural production would result in a superior educational atmosphere. Therefore, although placing the classrooms buildings facing the Future Growth Area streets would provide an unobstructed view of the school buildings for people in the Future Growth Area, until the

time if and when development occurs in the Future Growth Area, it would place the classrooms immediately adjacent to existing agricultural fields. After the cumulative scenario of buildout of the Future Growth Area, the classroom building would be adjacent to the noise and distractions of Russell Road, which would result in a reduced educational environmental for the students. No revisions to the Draft SEIR are necessary.

19. The proposed site plan allows for sufficient street-front landscaping, while achieving the School District's education objectives. No revisions to the Draft SEIR are necessary.

20. See response to comment #5 above. No revisions to the Draft SEIR are necessary.

21. The Acquisition EIR (page 2-43) states that the power lines along the eastern boundary of the project site are 60 kilo volts and are owned by PG&E. A school siting condition requires a school to be setback at least 100 feet from an easement for a 50 to 133 kV power transmission line. The Acquisition EIR states that in consideration of this easement, the 100-foot setback line could be accommodated in all phases of school design. The 100-foot setback has been accommodated in the project site plan and both of the alternative site plans.

22. The commenter's preference is noted. Based on the School District goals and its analysis of the environmental impacts, the proposed site design is superior. This includes placing the classroom building away from the existing farmland immediately south of the project site, where the future Russell Road extension is planned by the City. See a more in-depth discussion of this in the response to comment #15 above. Alternative 4 does not achieve the School District's educational objectives as well as the proposed site plan. Page 2-50 and 2-51 of the Draft SEIR describe how the proposed project achieves New Urbanism objectives.

TAMC
TRANSPORTATION AGENCY
FOR MONTEREY COUNTY

Regional Transportation Planning Agency • Congestion Management Planning
Local Transportation Commission • Monterey County Service Authority for Freeways & Expressways

December 6, 2011

Ms. Teri Wissler Adam
EMC Planning Group Inc.
301 Lighthouse Avenue
Monterey, CA 93940

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

Dear Ms. Wissler Adam:

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

The proposed project includes the construction of a new 1,500-student high school located on the sought side of Rogge Road, with San Juan Grade Road to the west and Natividad Road to the east.

The Transportation Agency offers the following comments:

Regional Roads & Highways

1. The proposed project is estimated to generate 1,661 net new daily trips, with an additional 1,107 daily trips added with the build-out of the Salinas Future Growth Area. The Transportation Agency supports and considers payment of the Regional Development Impact Fees as sufficient mitigation of impacts to regional highways. The regional fee provides an exemption for government facilities, such as public schools; however, the responsibility to mitigate cumulative impacts is not waived. Mitigation Measure CUM-T-1 states that the School District is responsible to pay fees to the appropriate agencies (the City of Salinas and County of Monterey); however, the County of Monterey has yet to establish a traffic impact fee program. If it elects, the School District may contribute towards the regional fee and satisfy mitigations for cumulative impacts, otherwise pro-rata fair share contributions to the roadway segments and intersections listed in the environmental document will be required.

2. Site-specific impacts will still need to be addressed, and our agency supports the funding of circulation infrastructure improvements through fair-share payments to the City of Salinas' traffic impact fee program.

3. Considering the rural nature of the proposed school location, interactions between passenger vehicles, bicyclists, and pedestrians with the existing agricultural equipment and freight traffic currently using the roadways in the immediate vicinity could pose potential safety issues. As a means of controlling the flow of vehicle traffic, particularly in a school zone, our agency recommends that traffic calming measures be included as a mitigation measures for impacts to local streets and roads, particularly on Rogge Road. Our agency recommends that this mitigation be made mandatory and include curb bulb-outs at intersections to reduce the length of pedestrian crossings; allow for on-street parking to slow the flow of cars and create a pedestrian-vehicle buffer; and the use of speed humps, tables, or raised crosswalks to control vehicle speeds.

4. Caltrans has at several instances recommended that the City establish a special zone or assessment district to cover the Future Growth Area that allows transportation projects identified in the environmental documents to be funded through a per-unit or square foot fee. It is our agency's understanding that several of the transportation improvements identified as mitigations in the environmental document that are not currently covered by the City's traffic impact fee will be added to the program to ensure those impacts are properly mitigated. Our agency echo's Caltrans recommendation that as part of the process of adding these projects to the City's fee program that the level of the fees be evaluated to ensure that sufficient fee revenues are collected to serve as mitigation for the impacts of this development and others in the Future Growth Area.

Bicycle, Pedestrian, & Transit Facilities

5. The Transportation Agency supports accommodation of alternative forms of transportation both through the design of transportation facilities and through the design and orientation of land uses. Our agency appreciates the development's intention to encourage the use of alternative forms of transportation among the employees, students and residents accessing the proposed project. To facilitate this goal, our agency recommends the following:

    a. Considering the amount of internal bicycle and pedestrian usage that the school site will likely receive, a premium should be placed on safe and accessible access to the site from intersections and crosswalks, sidewalks, and bicycle facilities. Direct access should be provided to project site entrances to avoid the need for travel through parking lots. Consideration should also be given to including intelligent

crosswalks, which provide flashing notification lights when a pedestrian enters the crosswalk to increase visibility and alert drivers of their presence. The development should be required to be designed with American Disability Act-compliant sidewalks that connect to external facilities and provides access to transit stops.

b. The Transportation Agency strongly recommends that the installation of public bicycle racks and lockers be included. Adequate lighting at these locations to improve safety and visibility should be provided by the development. The Transportation Agency encourages project developers to apply for our Bicycle Protection Program, which provides grant funding for bicycle parking facilities (racks and lockers) for local businesses, governments, and school districts.

c. Our agency supports that the development will be required to extend and enhance the bike path and sidewalks on Rogge Road. The Class 3 facility on Rogge Road that the development is proposing to construct is inconsistent with the Transportation Agency Bicycle and Pedestrian Master Plan, which calls for a Class 2 along the extent of Rogge Road from San Juan Grade to Natividad. As such, the mitigation measure T-3b should be revised to provide for a Class 2 bike route on both the north and south sides of Rogge Road. In addition, the proposed Class 1 trail from the development entrance to Jade Drive should connect with the planned Class 2 facilities on Rogge Road.

SB 375 & Greenhouse Gas Emissions

6. Senate Bill 375 requires the Metropolitan Planning Organization to develop a Sustainable Communities Strategies as a comprehensive approach to addressing greenhouse gas emissions at a regional level by linking land use and transportation planning decisions. Our agency encourages the School District's coordination with the Association of Monterey Bay Area Governments in the development of the region's Sustainable Communities Strategy and for developments to be consistent with the plan once it is completed.

7. Our agency supports the use of light-colored pavement for pedestrian areas to cut down on the heat island effect. In addition, the development should explore the use of gray granite pavement for parking areas and roadways, which has the benefit over traditional blacktop of increasing nighttime visibility and is permeable to aid in the control of on-site water run-off.

8. Where appropriate, light-emitting diode (LED) lighting should be used for external lighting to reduce the site's electricity consumption.

9. Consideration should be given to including preferred parking spaces for carpools, alternative fuel vehicles and electric vehicle charging stations. The

Monterey Bay Electric Vehicle Alliance has received grants for charging stations to be installed throughout the county. This provides the opportunity for new developments to plan to include charging stations at potentially reduced costs.

Thank you for the opportunity to review this document. If you have any questions, please contact Michael Zeller of my staff at 831-775-0903.

Sincerely,

FOR Debra L. Hale
Executive Director

CC: Paul Greenway, County of Monterey Public Works
Richard Steadman, Monterey Bay Unified Air Pollution Control District
Brandy Rider, California Department of Transportation (Caltrans) District 5
Carl Sedoryk, Monterey-Salinas Transit
Les White, AMBAG

LETTER 5 – Transportation Agency for Monterey County (December 6, 2011)

1. Comment acknowledged. The School District is committed to paying their fair share contribution to improvements required to mitigate this project's contribution to the cumulative impacts to the roadway segments and intersections documented in the Draft SEIR.

2. Comment acknowledged. Page 3-14 and 3-15 of the Draft SEIR outline the improvements funded by the City of Salinas traffic impact fee program in the immediate vicinity of the project. Mitigation measure CUM-T-1 states that the "School District will be responsible for paying their appropriate fair share of the transportation improvements to the appropriate agencies (Monterey County and City of Salinas)."

3. Rogge Road is an arterial road, designed to carry traffic at a higher speed than local, residential streets. It is not common practice to install traffic calming measures on arterials, especially speed bumps and other vertical constraints. Traffic calming measures are typically installed on residential streets when operating speeds should be 25 miles per hour or less. In front of the school, traffic speeds may vary between 35 and 45 miles per hour during non-school traffic hours and the roadway would be signed for 25 miles per hour when children are present. Manual on Uniform Traffic Control Devices required signage would be installed to warn drivers of the school zone. In addition, crosswalks would be marked and striped for school traffic conditions. On-street parking is not recommended, because it would become a drop-off zone for parents, result in reduced safety for road users and students, and result in road congestion. To improve safety at the intersection of Rogge Road and Bollenbacher Drive, a bulbout will be constructed to shorten the crossing distance across Rogge Road. This language has been added to mitigation measure T-3. See Section 3.0, Changes to the Draft SEIR.

4. This comment is noted. As presented in the Draft SEIR and in response to comment #1 above, the School District is committed to paying their fair share contribution to improvements required to mitigate their traffic impacts.

5. (a) The School District is designing the school for bicycle, pedestrian, automobile, and school bus access. Bicycle facilities on the site would be provided per state guidelines. ADA requirements would be utilized in the design per the appropriate standards and guidelines. Appropriate signals and warnings per Manual on Uniform Traffic Control Devices standards would be included in the design of pedestrian and bicycle access.

   (b) Bicycle facilities on the site would be provided per state guidelines. The School District appreciates the invitation to apply for the Bicycle Protection Program grant funding.

(c) The School District and their transportation consultants spent considerable time addressing the bike lane issues on Rogge Road. They are aware of the plans calling for a Class II bike route and have been discussing the issues with the County of Monterey Resource Management Agency, Department of Public Works. The Department of Public Works is currently in the process of improving access to the Bolsa Knolls Middle School, operated by the Santa Rita Union School District, just northwest of the project site on Rogge Road. These improvements would eliminate the option of providing Class II bike lanes along the middle school frontage permanently. On-street parking is currently provided along the south side of Rogge Road adjacent to the Bolsa Knolls Neighborhood and if Class II bike lanes are striped, the parking would have to be removed, which was deemed infeasible by the County. The School District plans to improve the segment in front of the proposed high school and from the high school site to the west along Rogge Road. These improvements include the Class I bike/pedestrian path in front of the school; a traffic signal at the easterly full access; crosswalks with ADA access across Bollenbacher Drive, Jasper Way, and Jade Drive; crosswalk with ADA access across Rogge Road just east of Bollenbacher from homes and the elementary school to the middle school; and a stripped bike lane across Rogge Road immediately east of Jade Drive to provide bike access in the westbound direction. The roadway would include Class III facilities on both the south and the north side. See Appendix B of this FEIR for a figure showing the proposed improvements. No revisions to the Draft SEIR are necessary.

6. Comment noted.

7. Comment acknowledged. Page 2-30 of the Draft SEIR includes a list of greenhouse gas (GHG) reducing measures that the School District would include in the design of the proposed project. The School District would consider these additional measures if funding is available.

   It is well known that funding for California school districts has been reduced substantially in recent years, and is rapidly dwindling. According to the California Teachers Association, schools and colleges have been cut more than $20 billion in the last four years, with the state ranked 46th in per-pupil funding. Salinas Union High School District is no exception to this budget crisis. The State has cut the School District's ongoing funding by 20.6 percent through the 2011-2012 school year, which cut is scheduled to increase to over 21.6 percent for 2012-2013. As a result, the School District is expected to be forced into deficit spending in each of the next three years. Any additional burden on its general fund would serve to increase the deficit spending and require cuts to other parts of the budget, which would mean cutting employees and/or educational programs. The School District's budget is a publicly available document which can be reviewed at the School District office at 431 West Alisal Street, in the City of Salinas, California. The following is a list of budget and program cuts the School District is currently experiencing:

- Implementation of five furlough days for all employees;
- Elimination of four district level resource teachers'
- Cutting of three counselors
- Elimination of summer school at middle school and the reduction of summer school to remedial at the high schools;
- Cutting of the budget for instructional materials by 10 percent;
- Providing of retiree incentives by the School District for classified employees, of which 27 individuals retired and 19 of those positions were not replaces
- Providing of retiree incentives for adult school teachers, of which 14 teachers retired and were not replaced; and
- Cutting of the adult school programs budget by $3 million.

The School District maintains a reserve as required by statute, however, these funds cannot be spent on construction since doing so would result in the School District dropping below the minimum statutory amount. Undesignated funds over the reserve amount are currently offsetting the deficit spending necessary to maintain personnel and educational programs.

The following example illustrates the relationship between the budget deficit and certain of the proposed mitigation measures. Comments from the public (Letter #6, comment #1) contend that an insufficient number of buses would be provided to reduce vehicle emissions. However, transportation already constitutes an encroachment into the general fund of $2,524,356 per year, meaning that the School District must pay over $2.5 million to subsidize its transportation program since available funding for this purpose does not cover the full cost of providing the transportation. Of that more than $2.5 million, approximately $1.4 million is required for transportation of Special Education students, which is legally required and therefore cannot be cut. Even if buses could somehow be added for free, the added costs of maintenance and labor would still serve to increase the encroachment into the general fund, forcing cuts to necessary educational programs or personnel.

The School District is also committed to seeking other funding sources for proposed mitigation measures, but such sources are generally scarce or non-existent. As an example, in City of *San Diego v. Board of Trustees of the California State University* (2011) 201 Cal.App.4th 1134, the court concluded that the College should have considered alternative funding sources, other than the State, to mitigate off-site traffic impacts of its project. The

court specifically referenced tuition, student fees, revenue bonds, parking fees, and private donations. In contrast to California State University, the School District is a high school district, which is legally prohibited from charging tuition and fees. The California Constitution provides that each student is entitled to a free education. (Cal. Const., art. IX, §5, "The Legislature shall provide for a system of common schools by which a free school shall be kept up and supported in each district at least six months in every year, after the first year in which a school has been established.") The free education requirement is reiterated in the Code of Regulations, stating that a pupil enrolled in a school shall not be required to pay any fee, deposit, or other charge not specifically authorized by law. (5 Cal. Code Regs. §350.) The California Supreme Court has recognized that school districts are forced to operate under difficult financial constraints given the free education guarantee combined with legal limitations on taxation and spending. (*Hartnell v. Connell* (1984) 35 Cal.3d 899, 912.) The School District has no power to tax. As far as private donations, also referenced by the Court in *City of San Diego v. Board of Trustees of California State University*, while the School District may legally accept them, they are required to be completely voluntary in the light of the free education requirements, therefore, they are sporadic and uncertain at best. Likewise, use of revenue bonds is infeasible since the School District would be seeking to pass a bond to fund the construction of the school and other critical district facility projects, and existing bonding capacity is set aside for this purpose.

The School District is wholly committed to fulfilling its CEQA requirements, and mitigating any and all significant impacts resulting from its project to the extent feasible. However, CEQA does not require analysis of every imaginable alternative or mitigation measure. Rather, its concern is with feasible means of reducing environmental effects. (*Concerned Citizens of South Central Los Angeles v. Los Angeles Unified School District* (1994) 24 Cal.App.4th 826; *Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal.App.4th 351, 376.) "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. (*Concerned Citizens, supra*; Pub Res Code §21061.1; 14 Cal Code Regs §15634.) The statute does not demand what is not realistically possible, given the limitation of time, energy and funds. (*Concerned Citizens, supra.*) Potential measures involving significant expenditure by the School District, which expenditure the School District can only make by eliminating necessary employees or cutting valuable educational programs, are not feasible. However, as mentioned above, the School District would consider these additional GHG reducting measures if funding is available.

8. The proposed design of the school includes LED lights for exterior lighting and for some interior lighting, including classrooms.

9. The School District would set aside special parking for hybrid fuel vehicles. The School District would consider these additional measures if funding is available. See response #7 above for further discussion on this matter.

MBUAPCD
Monterey Bay Unified Air Pollution Control District
Serving Monterey, San Benito, and Santa Cruz Counties

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December 7, 2011

Terri Wissler Adam
EMC Planning Group
301 Lighthouse Avenue
Monterey, CA 93940

Sent Electronically to:
Wissler@emcplanning.com

Original Sent by First Class Mail

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

Dear Ms. Wissler Adam:

Thank you for providing the Monterey Bay Unified Air Pollution Control District (Air District) the opportunity to comment on the above-referenced document. The comments contained in this letter are intended as guidance for the Lead Agency and should be incorporated into the final document, as appropriate.

The Subsequent Environmental Impact Report (SEIR) concluded that the impact from greenhouse gas (GHG) emissions would be significant and unavoidable. Therefore, the Air District is concerned that all feasible mitigation measures be implemented to reduce the potentially significant impact. For example, the Lead Agency could consider transportation-related measures to reduce GHG emissions. Also, the Air District would like more discussion as to why the four additional GHG emissions reduction measures listed on pages 2-30 to 2-31 were deemed not feasible.

Project Design

Salinas Union High School District (SUHSD) should consider modifications to the project design to accommodate additional bus service, better bike access, and potential alternative energy sources. The following comments address the project design in terms of transportation measures and GHG reduction measures.

Transportation

The SEIR must evaluate transportation measures that could have the benefit of reducing GHG emissions. These measures could include additional transit options for the students and better bike routes to encourage students to bike to school.

1 Project Level Transit Systems on Page 2-77

It appears that an insufficient number of buses will be provided to reduce vehicle emissions. On page 2-77 it states that 6 buses will be provided. Assuming 72 students per bus (an overestimate of actual usage) then only 432 students can be accommodated by bus transportation. This will leave over 70% of the students requiring transportation to the school by either walking, biking, or driving. Therefore, the Air District recommends increasing the number of buses to transport students which would reduce vehicle trips and GHG emissions.

2 Mitigation Measure T-3 on Page 2-89.
SUHSD should ensure that the bike routes to the school are designed to provide students, faculty, and staff safe access to the school. A Class III bike route is proposed on page 2-89 along the north and south sides of Rogge Road from Jade Drive. SUHSD also proposed on page 2-30 to support alternative transportation which includes biking. Therefore, building a Class II bicycle lane along Rogge Lane would demonstrate the commitment to bike use as an alternative transportation option. Providing students, faculty, and staff with safe bike access and secure bike storage could increase bike ridership, reduce daily vehicle trips, resulting in reduced GHG emissions.

3 **Proposed Greenhouse Gas Emission Reduction Measures**
The SEIR must have a stronger commitment to mitigation measures to reduce the significant impact from GHG emissions and provide assurance that these measures can be funded. The SEIR concludes that the project would need to reduce its GHG emissions by an additional 214 metric tons per year to be considered less than significant. This deficit could be nearly eliminated if additional, feasible measures, such as solar energy generation, were more thoroughly evaluated.

Proposed GHG Emission Reduction Measures on Page 2-30.
A commitment to implement and fund alternative energy as a GHG mitigation measure is needed. A commitment based on "funding availability" is not adequate. The payback period for many energy efficiency and generation options are only a few years and would provide savings for many years to come.

It is not clear why SUHSD concluded that the additional measures listed on page 2-30 are not feasible. Per the CEQA Guidelines §15091(c), the specific reasons a mitigation measure was rejected shall be described. Therefore, the SEIR should present specific reasons why the additional measures presented on page 2-30, such as solar power generation, are considered not feasible on page 2-33. The additional information could include potential GHG reductions or costs of the measures.

4 The Air District recommends reviewing the California Department of General Services Grid Neutral Schools Program Guidebook for recommendations of potential funding sources associated with the additional measures identified (e.g. solar power generation). The grid neutral concept is included in the voluntary measures of the California Green Building Code (CCR, Title 24, Part 11).

Clarification of Emissions Estimates
The following comments address the project analysis of emissions.

5 Direct Stationary Source Emissions on Page 2-12 and page 2-13.
Typically, project impacts are evaluated by adding the direct and indirect emissions and then comparing the total emissions to the Air District thresholds. While stationary source emissions may be included in the Air Quality Management Plan, the emission sources must still be described and considered in the context of total project emissions compared to the Air District thresholds.

The Air District recommends that the impact statement on page 2-13 be revised to state that the operational emissions impact statement from the Acquisition EIR would not change with inclusion of direct stationary source emissions.

6 Determining Significance of a Project Specific Climate Change Impacts on Page 2-22.
Please review the threshold used to evaluate GHG emissions. Page 2-22 states, "Therefore, if project-based GHG emissions cannot be reduced by 30 percent to be consistent with AB 32, the proposed project would conflict with the applicable GHG gas reduction plan and project impacts would be significant." and page 2-15 states, "However, the Scoping Plan identifies that local agencies should strive to reduce GHG emissions within their boundaries by 15 percent from 2008 levels by 2020 to help achieve emissions reductions needed to meet AB 32 goals." Please also review the California Air Resources Board (ARB) "Status of Scoping Plan Recommended Measures" dated July 2011 which shows an adjustment to the 2020 Scoping Plan Business-As-Usual Baseline and corresponding approximate 22% reduction needed to reach the 2020 emissions target.

7 GHG Emissions Inventory on Page 2-26.
The Air District recommends using the CalEEMod model to calculate GHG emissions associated with construction and operation of the high school. The factors used in the SEIR differ from the factors used by the CalEEMod model. For example, the 20 kWh per square-foot of building area used for the electricity consumption is much higher than the energy use factors used by CalEEMod. The CalEEMod model also includes a variety of GHG mitigation measures that can be selected to quantify the emissions benefit of the measures.

8 Mobile Source and Area Source GHG Emissions on Page 2-26.
Please review the project schedule and confirm the analysis year for evaluating operational mobile and area source emissions. The URBEMIS2007 output in Appendix D shows the analysis year as 2012. The emissions should be estimated for the buildout year for the school.

9 Mobile Source and Area Source GHG Emissions on Page 2-26.
The text states, "Using the URBEMIS2007 model, mobile source emissions in the form of CO_2 from the proposed project are estimated to be 2,496.54, or approximately 2,265 metric tons using a conversion factor of 0.907 metric tons per short ton." Please re-word the sentence to include the time unit for the emissions, such as, "metric tons per year".

10 Table 5 GHG Emissions from Electricity Generation on Page 2-29.
If the intention of the GHG emissions analysis is to estimate business-as-usual emissions and show the reduction from business-as-usual to evaluate significance, then the electricity emissions should be based on an emission factor consistent with business-as-usual. Using the PG&E emission factor for 2011 includes PG&E's current energy mix which is made up of approximately 16% renewable sources and may not represent a business-as-usual case. Please consider whether a different emission factor should be used to estimate business-as-usual emissions from electricity generation.

11 Table 6 Total Operational GHG Emissions (metric tons CO_2e/year) on Page 2-29.
Delete the term "Volume" from the second column in the table heading and replace with term "(metric tons CO2e/year)" from the table title.

12 Construction Phase GHG Emissions on Page 2-29.
The construction emission estimates need to be based on the anticipated years for constructing the project. The URBEMIS2007 output in Appendix D shows construction occurring in the years 2007 and 2008. Please evaluate the project construction emissions to be consistent with the anticipated construction schedule.

13 Climate Change-Cumulative on Page 5-3.
The GHG emissions reported on page 5-3 do not match the values reported on pages 2-26 through 2-29. Please update values in Chapter 5 to be consistent with values reported in Section 2.3.

Thank you again for the opportunity to comment on the above referenced document. A stronger commitment to reducing the significant GHG emissions impact seems imperative. Please consider the transportation measures, such as providing more bus service, and energy-related measures, such as solar power generation, discussed in these comments.

Please contact me at (831) 647-9418 ext. 226 if you have questions regarding these comments. Also, please provide the Air District with written responses to all comments contained herein prior to the certifying the Final Environmental Impact Report (per Public Resources Code Section 21092.5).

Best regards,

Robert Nunes
Air Quality Planner

Cc: David Craft, MBUAPCD Air Quality Engineer
Amy Clymo, MBUAPCD Air Quality Planner

LETTER 6 – Monterey Bay Unified Air Pollution District (December 7, 2011)

1. Comment acknowledged. Page 2-77 of the Draft SEIR states that the School District only provides bus service to students living outside of 2½ miles of the high school and states that the exact number of students that would be bused to and from the school is uncertain. This is a School District policy decision based upon lack of transportation funding. It is anticipated that high school students living with 2½ miles could either walk or ride a bicycle. Students outside the 2½ mile radius have the option of taking the school bus. However, the School District cannot dictate the transportation method chosen by each student and/or their parents. The School District would consider increasing the number of busses if necessary and funding is available. See Letter #5, response to comment #7 for a more in depth response regarding funding and the School District.

2. See Letter #5, response to comment #5(c).

3. The School District is not "rejecting" mitigation measures. Although the School District will pursue funding opportunities to implement these measures, as stated on page 2-30 of the Draft SEIR, at this time it is unknown if funding would be available. Page 2-30 includes a list of measures that the School District is proposing to include in the design of the school. In addition, LED lights for exterior lighting and for some interior lighting, including classrooms are part of the proposed design of the school and the School District plans to set aside special parking for hybrid fuel vehicles. The School District will also install a conduit under the parking lot in anticipation of solar power in the future. However, the School District would consider additional greenhouse gas reduction measures if funding is available. See Letter #5, response to comment #7 for a more in depth response regarding funding and the School District.

   The School District has already looked into potential funding sources. The State School Facility Program (SFP) has a High Performance Incentive Grant that is available as an augmentation to a new construction or modernization project. The grant is designed to provide funding to incorporate high performance design features into schools, many of which are designed to reduce greenhouse gases (i.e., Energy efficiency, Alternative Energy, Transportation, Water Conservation, etc.). The regular SFP new construction and modernization grants can also be used towards some of these design features as they are eligible costs. It is important to remember that the funding is a per-pupil grant designed to fund 50 percent of all the design and building related costs associated with that student. Using the grant towards these types of design elements reduces the amount of the grant that is available towards other needed design features in the school.

There also may be funding available through other State agencies such as the California Public Utilities Commission (CPUC) and/or the California Energy Commission (CEC). Funding through these agencies varies and can be sporadic based on supply and demand. Incentive and rebate programs may also be available through local utilities. All opportunities are of course subject to the availability of funds at the time of project implementation. In the case of the SFP, the funding is dependant on the availability of funding through State voter approved general obligation bond measures. For other State agencies and local utilities, the availability is dependant on current program offerings and demand on those programs at the time of the project.

The School District would be required to make the appropriate findings as required by CEQA Guidelines 15091(c).

4. Comment acknowledged. The proposed project requires approval by the California Department of General Services, Division of the State Architect and will consider these recommendations of potential funding sources, consistent with the discussion in the Draft SEIR, pages 2-30 and 2-31. See Letter #5, response to comment #7 for a more in depth response regarding funding and the School District.

5. Comment acknowledged. See Section 3.0, Changes to the Draft SEIR, for edits to the impact statement on page 2-13.

6. It is common practice among consultants to use AB 32 for guidance in the absence of an approved local climate action plan. Neither the School District, the Air District, the City of Salinas, nor the County of Monterey have adopted climate action plans; therefore it is up to the School District as its own lead agency to choose the method to evaluate greenhouse gas (GHG) emissions. According to the 2011 case *Citizens for Responsible Equitable Environmental Development v City of Chula Vista,* the court observed that there is no "universally accepted" significance threshold for climate change impacts, and it emphasized that the CEQA lead agency retained discretion on what threshold to use.

   The Draft SEIR does discuss the Scoping Plan and the identified 15 percent emission reduction goal from 2008 levels by 2020 that local agencies should strive to achieve to meet AB 32 goals. This goal is mentioned in the document as background information; however the analysis in the Draft SEIR compares the proposed project's emissions to the Business-as-Usual scenario, which are the projected emissions pre-AB 32, and not the more efficient 2008 emission levels.

   The Draft SEIR analysis compares the proposed project emission reductions to the Business-as-Usual scenario, which requires a 30 percent reduction to be consistent with AB 32.

The California Air Resources Board "Status of the Scoping Plan Recommended Measures" dated July 2011 shows an adjustment to the Scoping Plan Business-as-Usual baseline and corresponding approximate 22 percent reduction (instead of a 30 percent reduction) needed to reach the 2020 emissions target. This is noted, however the analysis method used in the Draft SEIR remains unchanged. Changes to the Draft SEIR are not required.

7. Comment acknowledged. However, at the time the air quality and GHG analyses were conducted, the EIR consultant was informed by Jean Getchell at the Air District that the URBEMIS model would be the appropriate tool.

8. The school would be built all at once in one phase, with construction occurring between 2014 and 2016. The school would open in fall of 2016 with only the freshman and sophomore classes and would not operate with all four classes (freshman, sophomore, junior and senior) until the fall of 2018. Although the school would be operating with all four classes in 2018, it would only accommodate the existing 900 students who currently attend other overcrowded schools in the district. The emissions from these 900 students are already being generated within the School District boundaries and are not considered new emissions (see Discussion of "New" Project Emissions on page 2-25 of the Draft SEIR).

   The proposed high school would not operate at its full capacity of 1,500 students until some portion of the Future Growth Area is developed. Therefore, at full student occupancy, approximately 600 new students would be generating emissions within the School District. Due to uncertainties in the economy, there is no known schedule for when development within the Future Growth Area will occur. Therefore, the URBEMIS modeling was rerun to analyze operational and area source emissions of these new 600 students in 2025, the anticipated buildout year in the City of Salinas General Plan. A copy of the revised URBEMIS modeling run in included as Appendix C of this document.

   According to the revised run, mobile source emissions in the form of CO_2 from the proposed project are estimated to be 994.56, or approximately 902 metric tons using a conversion factor of 0.907 metric tons per short ton. This is approximately 4 metric tons less than the amount calculated in the Draft SEIR using the analysis year of 2012. This reduction reflects the fact that vehicles in 2025 will be more efficient than those in 2012.

   According to the revised run, area source emissions in the form of CO_2 from the proposed project are estimated to be 117.11, or approximately 106 metric tons using a conversion factor of 0.907 metric tons per short ton, which is an approximately one metric ton reduction from what was calculated in the Draft SEIR using the incorrect analysis year of 2012. This reduction reflects the fact that operations will be more efficient in 2025 than in 2012.

Although the revised URBEMIS runs reflecting the correct analysis year result in lower mobile and area source emissions, the proposed project would still result in a significant and unavoidable greenhouse gas emissions impact. Changes to the Draft SEIR are not required.

9. Comment acknowledged. See Section 3.0, Changes to the Draft SEIR, for edits to page 2-26 of the document.

10. The intention of the GHG analysis was not to estimate business-as-usual emissions and show the reduction from business-as-usual to evaluate significance. The PG&E emissions factors used in Table 5 are only to estimate the indirect emissions created by the proposed project, which are then added to the estimated mobile and area source emissions for an estimated total project emissions amount. State- and project-specific reduction measures are then applied to this amount and the percent reduction is compared to the 30 percent reduction consistent with AB 32. See Section 3.0, Changes to the Draft SEIR, for changes to clarify the impact statement on page 2-33.

11. Comment acknowledged. See Section 3.0, Changes to the Draft SEIR, for edits to page 2-29 of the document.

12. Comment acknowledged. The URBEMIS modeling was rerun to evaluate construction-related impacts occurring between 2014 and 2016. This resulted in a decrease of construction-related GHG emissions from 278 metric tons per year to 259.8 tons or 235.6 metric per year. See Section 3.0, Changes to the Draft SEIR, for edits to pages 2-30 reflecting this change. A copy of the revised URBEMIS modeling run is included as Appendix C of this document.

13. Comment acknowledged. See Section 3.0, Changes to the Draft SEIR, for edits to page 5-3 of the document.

CITY OF SALINAS
Community and Economic Development Department •
65 West Alisal Street • Salinas, California 93901 • (831) 758-7206 • Fax (831) 775-4258

December 7, 2011

Ms. Teri Wissler Adam
EMC Planning Group, Inc.
301 Lighthouse Avenue,
Monterey, Ca 93940

Re: Notice of Availability of a Draft Subsequent EIR for the Construction of Proposed High School #5 located on Rogge Road.

Dear Ms. Adam:

On October 14, 2011, the Community and Economic Development Department received the above-referenced Notice of Availability for the construction of a new high school facility located on Rogge Road. While the City greatly appreciates the opportunity to review and comment on the document, it is disappointing to note that many of the concerns and potential adverse impacts previously raised and identified by the City in regard to design of the school and other related issues have generally been dismissed in the proposed Draft Subsequent EIR (SEIR). These concerns (further discussed below) were initially raised by City over seven years ago during the public comment period for the Rogge Road High School Site Acquisition EIR and have been reiterated over the course of the last two years both at meetings with the school district staff and in writing as part of the City's comment on the NOP which were submitted to the school district on April 13, 2011.

As currently proposed, the design of the school facility does not incorporate the New Urbanist design principles mandated under the City's General Plan for development in the North of Boronda Future Growth Area (FGA) and generally does not consider the significant planning efforts undertaken to date for the area. Instead, the school has generally been designed as an auto-oriented stand-alone facility which generally rejects the tenants of New Urbanism and does not consider the land uses that will be located to the east and south of the site. As such, the City believes that the proposed SEIR fails to adequately acknowledge the inconsistency of the proposed school design with the City's General Plan land use plan, policies and regulations applicable to the subject site/area and does not adequately identify or mitigate potentially significant impacts that may ultimately occur as a result as required in accordance the requirements of California Environmental Quality Act.

Staff's specific comments on the document are as follows:

1) Page S-2, Location and Page 1-1, Project Location: The project site is located within the North of Boronda Road Future Growth Area (FGA) of the City which has specific General Plan requirements applicable to the site. This should be noted in this section of the SEIR. It should also be clarified that Rogge Road (along the frontage of the site) was not annexed into the City and is still located within the County of Monterey. The City is responsible for maintenance of the roadway pursuant to a maintenance agreement with the County.

2) Page S-2, Project Background (Second Paragraph): This section discusses that the original EIR could not fully address impacts associated with "aesthetics and lighting, air quality, land use, noise, hydrology and traffic and circulation because the development of a site plan and construction of the school was not anticipated for several years." At the time of the school district's consideration of the original EIR, the City submitted a comment letter (see attached letter from the City of Salinas dated August 18, 2005) indicating that the City did not oppose the site acquisition for a future high school but further clarified that "As a site plan and architectural elevations of the proposed facility were not presented, the Planning Commission communicates to the Salinas Union High School district the City's concern that a new high school is planned and designed to implement the City's New Urbanist principles which are embedded through the City's General Plan – that the buildings and architectural elements enhance the public realm providing human scale and architectural interest to the streetscape and that the large parking areas needed for the school not dominate the sites street frontages." The City did not oppose the proposed acquisition of the school site given the understanding that the school district and the City would work together on the proposed design of the school to ensure consistency with the City's General Plan objectives for this area.

Since the time of the approval of the original EIR, the City has reiterated the need for the school to be designed to incorporate these principles during meetings with the school district regarding the preliminary design of the proposed school facility. While the ultimate design of the site plan for the school was not know at the time of the school site acquisition, the school district has been aware that the City requested that the design of the school incorporate the New Urbanist design principles called out in the City's General Plan.

The original EIR was approved prior to the annexation of the site to the City. As such, this section should reference the annexation of the site and approximate 2,400 acres of the FGA in September of 2008. In accordance with the Salinas General Plan, this area, including the site, is subject to the preparation of Specific Plans which incorporate the New Urbanist design principles referenced above. The background should clarify that the subject site is part of a greater planning area which is subject to the preparation of such plans. Additionally, there is also no discussion of the City's planning efforts which have occurred in regard to the proposed West Area Specific Plan where the site is located. Although the Specific Plan has not been formally adopted, significant planning efforts have been undertaken to date regarding the proposed land uses, proposed street network and other design considerations for the subject area. As such, this section fails to clarify the location of the project in relation to the entire FGA and the requirements of the Salinas General Plan that are specific to that area.

3) Page S-2 and S-3, Proposed Project: The last sentence in this section states that "proposed project would include improvements to Rogge Road ..." While Rogge Road is an existing roadway that currently provides access to site, the Salinas General Plan and prior planning efforts undertaken to date for the FGA also call for Russell Road to be extended along the southern boundary of the proposed site and for El Dorado Drive to be extended from its current location (south of E. Boronda Road) to Rogge Road. There is no mention of either of these roadways in the section or the need for the improvement of these roadways.

The general alignment of these roads through the FGA is shown on the General Plan Land Use and Circulation Policy map and has been subject to refinement as part of the Specific Plan approval process. The land use plan developed to date for the proposed West Area Specific Plan (which was shared with the School District over two years ago) shows the alignment of El Dorado Drive extending along the eastern boundary of the high school site. The alignment of the road has not been reflected on the proposed site plan. Bicycle lanes will also be required along this street frontage and should be denoted.

These street sections should be shown on the site plan for the project (and also acknowledged in this section). The extension of these roads will ultimately be required along the frontages of the subject site to ensure adequate vehicular circulation (including emergency access) is provided. Please see the attached comments from the Salinas Fire Department and from the City's Public Works Department further addressing issues related to proposed street network.

4) Page S-3, Summary of Environmental Impacts: The City's comments related to the project's environmental impacts are provided within the applicable sections of the SEIR analysis as provided below. In this regard, please see the City's comments regarding the project's inconsistency with the City's General Plan in regard to proposed design of the high school and the proposed circulation network. Also, please see the comments related to noise and lighting/glare impacts (in regard to the location of the proposed stadium) which will impact the adjacent residential uses proposed for the West Area Specific Plan area.

5) Page S-3, Less than Significant Project Impacts with Implementation of Mitigation Measures: The City Engineer has raised concerns regarding the adequacy of the traffic analysis. Please refer to his comments which are attached. Given there are outstanding issues which need to be addressed before the SEIR conclusions can be fully evaluated, the impacts related to traffic should not be considered to be mitigated to less than significant levels at this time.

The City's adoption of the 2002 General Plan update anticipated the proposed school campus and designated a site on the General Plan Land Use and Circulation Policy Map to accommodate the facility. However, the designation of the site on the land use map, does

not, in and of itself, imply consistency with the City's General Plan. A proposed use must also be consistent with the objectives of the General Plan's Land Use, Community Design, Conservation, Circulation, Noise and Safety Elements.

Prior to the development of any land within the FGA, the General Plan requires the approval of Specific Plans to ensure the planning and design of the neighborhoods in this area incorporate the New Urbanism design principles envisioned under the General Plan. In accordance with these principles, civic and public facilities (such as that being proposed), commercial and institutional uses are to be incorporated and integrated into surrounding neighborhoods to promote walkability and accessibility to adjacent residents. The City does not believe that the proposed school is consistent with the City's General Plan and zoning for development in the FGA As such, the SEIR should identify the proposed project's inconsistency with the City's General Plan/Land Use and Planning as a significant adverse impact. Staff believes that many of these impacts could be mitigated by redesigning the proposed school site as contemplated under Alternative 4, Site Redesign B.

6) Page S-4, Areas of Controversy: This section does not address the fact the proposal is inconsistent with the New Urbanist design principles of the City's General Plan. It merely indicates that the City wants the project re-oriented to the south and east in the direction of the City's FGA. The subject site is located in the FGA and as such is subject to the requirements of the General Plan for this area. It also does not discuss Russell Road and El Dorado Drive which are called out on the City's General Plan Land Use and Circulation Policy Map but have not been addressed as part of the project.

7) Page S-4, Project Alternatives Considered: The City believes that Alternative 4: Site Redesign B is the alternative most consistent with the City's General Plan requirements and provides the fewest environmental impacts associated with the proposal. This issue is further addressed below.

8) Page 1-2, Project Site Existing Conditions: This section indicates that "school facilities within 100 feet of the easement could potentially pose a significant health risk to exposed pupils." The City will require these power lines to either be undergrounded or relocated as part of the development of the subject area. Given this fact, it is likely that the size of the easement will be reduced or eliminated in the future and pose little health risk to future students.

9) Page 1-13, Project Vicinity: The Salinas General Plan requires Specific Plans to be prepared prior to any development in the FGA. The land uses shown on the land use plan are conceptual and subject to refinement as part of the Specific Plan. A copy of the proposed Land Use Plan for the West Area Specific Plan has been previously provided to the school district.

This plan proposes medium and high density residential uses to the east and south of the project site. This should be noted.

10) Page 1-13, Project Background: Although the Specific Plans for the FGA have not been approved to date, significant planning efforts have being undertaken in regard to the planning of the area. In this regard, the Specific Plan requirement was intended to apply to all development in the Future Growth Area to ensure a coordinated planning effort for all development not just "private development" as indicated in this section. Although the Specific Plan requirement cannot be mandated by the City for school districts under State law, the City was hopeful based on prior correspondence provided to the school district at the time of the school site acquisition and during subsequent meetings with school district staff, that the district would elect to participate in and complement these planning efforts. This unfortunately has not occurred. Instead, the proposed school has been designed to address the short-term needs of the school district and serve students who will likely primarily access the site via automobile rather the giving consideration to the future land uses surrounding the site and the future FGA students that will attend the school. Given this fact, the design of the school disregards the long-range planning goals of the City's General Plan and specific planning efforts being undertaken for the area. Both the short-term objectives of the school district (eliminate student over-crowding at two high schools) and the long-term planning objectives of the City (e.g. New Urbanist design principles, promoting walkability, etc.) can be satisfied if Alternative 4: Site Redesign B is chosen as the proposed site design for the school instead of the current proposal.

11) Figure 6, Site Plan: In reviewing the proposed site plan, it appears that the second story of the classroom building may create a line of sight into the rear yards of the homes located to the west of the project boundary. Is a masonry wall or other features proposed in this area to screen views of this area? Such a wall could also serve to buffer these uses from the car noise and light glare associated with cars and service vehicles utilizing the parking area located to the west of the proposed school buildings. These issues do not appear to be discussed in the SEIR. The SEIR also alludes to some potential development to the north of the project site across Rogge Road as a part of the justification for orienting the school site in that direction. The same could be said for orienting the school site in the opposite direction, facing the FGA, as that area is more likely to see more intense residential development than across Rogge Road.

School district representatives, County staff, FGA representatives, and City staff met on May 17, 2010 to discuss a preliminary site plan for the proposed high school. At that time, concerns were expressed by staff and others regarding the proposed siting of the school buildings and related sports facilities. It was requested that the school district relocate the proposed school buildings so that they would potentially front or have primary access from El

Dorado Drive with associated parking areas located to the side or rear of the buildings. The need for pedestrian connections and other issues were also discussed. These modifications were requested to promote land use compatibility with the future West Area Specific Plan (FGA) residential neighborhoods, facilitate pedestrian accessibility and reduce the potential for traffic related issues in the area.

In reviewing Figure 6 of the SEIR, it appears that the proposed site plan is similar to the one proposed in April of last year (circulated as part of the NOP) and also reviewed two years ago (May 2009) in a meeting with staff, FGA representatives and the school district on the preliminary design of the school. Staff concerns previously raised related to the subject design have not been incorporated into the proposed design. Staff's primary concern with the site plan continues to be that the proposed high school does not consider the FGA neighborhood context in which it will be situated. The site plan is primarily automobile-oriented in nature with parking lots and vehicular "drop-off" areas generally dominating the Rogge Road street frontage. The buildings and architectural elements of the proposed school, which, in accordance with New Urbanism principles should enhance the public realm and provide human scale and architectural interest to the streetscape, are pushed back from street behind parking lots and will be visually and physically separated from the future surrounding FGA neighborhoods. Although the proposed school may serve students from outside the FGA area, it is part of and is located in the FGA. As such, its design should be compatible and complementary with the New Urbanism design principles required under the General Plan for development in the FGA and relate to the future residential uses to the south and east of the site.

Additionally, the siting of the proposed school buildings (in the extreme northern portion of the site) generally does not lend itself to being accessible to future residents in the FGA or to emergency responders (police and fire). In this regard, please see the attached letter from the Fire Department. Pedestrian linkages need to be provided to the school buildings and facilities. It is unclear how these pedestrian linkages would be achieved since the site will be fenced.

The City also has significant concerns about the location of the stadium. High and medium density residential uses will be located directly to the east and south of the stadium. Potential impacts from noise and glare will likely impact these uses. These impacts can be reduced to less than significant levels by relocating the stadium as shown on Alternative 4: Site Redesign B.

The site plan also does not shown the location of El Dorado Drive or Rogge Road which are both roadways whose alignments will be located long the eastern and southern portions of the site, respectively. The alignment of Russell Road currently is shown as an O.P.L running

through the project site. The realignment of the Russell Road and the location of El Dorado Drive should be shown on the site plan.

12) Page 1-19, Access: As indicated previously, other roadways (Rogge Road and El Dorado Drive) are also shown on the General Plan and will be required to serve the area, which are not shown on the proposed site plan. Significant planning efforts have been undertaken for the West Area Specific Plan which shows the locations of these streets along the southerly and eastern portions of the site. Staff has previously provided plans showing the locations of these streets and other planning infrastructure to the school district staff. The purpose of Specific Plans is to ensure that the land use and infrastructure planning efforts are coordinated and address the "big picture". As such it is not premature for the school district to consider these plans as part of the design of the proposed school to ensure the design is consistent with the future land use and infrastructure plans for this area as indicated in this section.

13) Page 1-20, Structures and Recreational Amenities: The City mandates a maximum lighting level of .5 foot candles at a residentially zoned property line and requires shielding to reduce light trespass on public rights of way and other public areas. Under the West Area land use plan, the zoning districts will be residential to the east and south of the site. As such, this lighting standard that should be applied to the west (the existing residential), east and southerly property lines. Additionally, no restrictions or limitations on the hours or days of use of the lights or facilities are discussed. The City cannot fully evaluate the potential impacts (including nuisance impacts) to existing and future adjacent uses without this information. Given the location of the existing and proposed housing in the subject area, limitations need to be imposed on the hours of usage and illumination levels to ensure no adverse impacts on these sensitive uses. As currently proposed, these facilities could be utilized on a nightly basis (every day and all night long) with no consideration given to the adverse impacts on the adjacent sensitive uses. Lighting levels exceeding the City's standards for residentially zoned properties should be considered significant (in regard to light and glare impacts).

14) Page 1-20, Parking: The 81-space special events parking lot along the eastern side of the property is contrary to the City's General Plan policy to foster a pedestrian-oriented streetscapes and locate parking lots away from view of street frontages.

15) Page 1-23, Site Preparation: A demolition permit(s) will be required from the City of Salinas to demolish the existing structures located on the property. Additionally, the following text should be added to this section of the SEIR: "The demolition of the existing house and associated structures would require a demolition permit from the Monterey Bay Unified Air Quality Management District and the City of Salinas. The demolition of the septic system would require a septic tank demolition permit from the Monterey County Environmental Health Division. Wells that are necessary for irrigating adjacent agricultural fields will be

maintained for irrigation purposes, and may also be utilized for irrigation the high school athletic fields until connections can be made to lines provided for the City's water purveyor who will provide water service for the West Area Specific Plan." In regard to the preceding sentence, please clarify who will responsible for maintaining the wells. Additionally, the City will require a reciprocal rights agreement for the water wells for irrigation purposes.

16) Page 1-23, Low Impact Development: The section should be revised to read the "Central Coast Regional Water Quality Control Board." Please see additional comments from the Public Works Department in regard to these sections.

17) Page 1-24, Proposed Approvals: This sections states "as well as approvals by other local, regional, and state agencies listed below." There are no local, regional or state agencies listed in this section.

18) Figure 8, Rogge Road Preliminary Design: Does this cross-section show the ultimate improvements to be constructed to mitigate the impacts from the proposed project?

19) Figure 9, Utility Plan: The detention basin needs to be designed to ensure that the water drains quickly enough so that vectors, including mosquitoes, are not given an opportunity to develop in conformance with the City's Stormwater Development Standards. The basin also to be designed and landscaped to have natural water feature appearance consistent with the design of other basins in the FGA to ensure no adverse aesthetic impact.

20) Figure 11, Landscape Site Plan: All landscaping for LID features and the basin should be in accordance with the plant list in Appendix G of the City's Stormwater Development Standards. All on-site landscaping shall be owned and maintained by the applicant. Street parkways shall be maintained by the applicant until such time that a landscape and lighting assessment district (LLD) is formed to maintain such areas in the FGA. All landscaped areas shall be landscaped/irrigated per City Zoning Code and Water Conservation Ordinance requirements and shall include the use of drought-tolerant plants and water-minimizing irrigation system (low-flow systems are encouraged). As such the final landscaping and irrigation plans for these areas should be reviewed and approved by the City's Public Works Department to ensure the improvements meet the City's requirements for acceptance into the LLD.

21) Page 1-32, Determination to Prepare a Subsequent Environmental Impact Report: The City of Salinas submitted its comments on the NOP on April 13, 2011 not on April 31, 2011 as indicated in this section. The City did not receive the document until March 14, 2011 and was therefore given until April 13, 2011 (a full 30 days) to submit its comments on the document.

22) Page 1-34, Local Agencies: The City does not operate a water system and thus would not be approving a connection to the water system as stated in this section.

23) Page 2-3 and 2-4, Visual Impact on the Site and Surrounding Areas: Reference is made on Page 2-3 to the school being visible over the back fences of the homes which abuts the project site. It is not noted; however, that the rear yards of the homes will also potentially be visible from the second floor of the school classroom building. There is no discussion of mitigation measures to protect the privacy of these residents. If the school was relocated as proposed under Alternative 4, Site Redesign B, this issue would be eliminated.

This section discusses that the site is consistent with the City of Salinas General Plan land designation for the site. This is only partially true. Consistency with the General Plan is not limited to the land use designation alone. It is also determined based on a project's consistency with the policies and measures contained in the General Plan. At the time of the annexation, the City anticipated that the proposed site would be developed in a manner which would be consistent with the General Plan and the proposed West Area Specific Plan. The proposed location of a stadium and parking lot along the El Dorado Drive and the proposed orientation of the school are not consistent with the General Plan New Urbanist policies and thus is not what the City anticipated for the subject site. In this regard, the City sent the school district a letter in 2005 stressing the City's desire to ensure the high school is designed to reflect New Urbanism design concepts.

The City annexed the subject property on September 8, 2008 and will authorize development through the Specific Plan approval process as required under the General Plan. It should be noted that the "planned" land uses to the east and south of the site will be residential. As previously indicated, the FGA area surrounding the school will be designed to reflect New Urbanism design principles. The event parking located along the eastern boundary of the site and the proposed siting of the school buildings located away from the future neighborhoods do support these principles. The facility should be designed to enhance the public realm and provide human scale and architectural interest along the streetscape rather than being pushed back from the street behind parking lots and being visually/physically separated from the future neighborhoods in the FGA. The City agrees that the annexation concluded that it would be converted from Ag to a public and semi public use for a school but that was with the assumption that the school would be developed in accordance with the New Urbanist design principles established for the area under the General Plan. The proposed school design does not support that assumption. Given this fact, the potential impacts related to visual character will be significant.

24) Page 2-4, Light and Glare: The proposed location of the stadium will create light and glare impacts that will significantly impact the adjacent residential uses planned for the West Area

Specific Plan. The areas are planned to be developed with high and medium density residential uses. Under the City's zoning, illumination levels cannot exceed a maximum of .5 foot candles at any residentially zoned property line. It does not appear the lighting will meet this standard. Given the proposed residential density in the area to the east and the south, many residents will be impacted by light and glare associated with the proposed stadium lighting. This is likely to lead to nuisance complaints regarding lighting impacts and land use conflicts which will impact City services. The potential impacts to both the existing and future residential uses from the stadium lighting could be significantly reduced or eliminated through the relocation of the stadium as shown under Alternative 4, Site Redesign B along Rogge Road and the incorporation of appropriate screening and through the orientation and screening of the lighting for the sports facilities.

25) Page 2-5, Light and Glare: In the second paragraph the statement is made: "Therefore it is unknown what specific kinds of projects and project designs could eventually be constructed adjacent to the school." This is not an accurate statement. A significant amount of planning has already taken place for the FGA and the City has an approved General Plan land use map which identifies the type of eventual land uses in this area. These uses have been further refined as part of the West Area Specific Plan. The West Area Specific Plan proposes medium and high density residential uses for that area. These will be sensitive uses. This information was previously provided to the school district for consideration in designing the proposed school. Regardless of the status of the specific plan, the City has planned for certain uses to be developed in this area and that needs to be taken into consideration and it has not been in this SEIR.

26) Page 2-5, Impacts and Mitigation Measures: In speaking to the potential effects of light and glare, again, the focus appears to be on the existing uses around the project site, but for the most part ignores the potential impact on future uses. The City understands that impacts on potential future uses are not required to be analyzed, however, they should not be ignored—especially in the context of cumulative impacts—and planning should be for the future as well as the present.

27) Page 2-12, Direct Stationary Source Emissions: Jean Getchell is referenced, but she should be identified as the former Supervising Air Quality Planner as she no longer works for the District.

28) Page 2-31, Proposed Greenhouse Gas Emission Reduction Measures: In the section on Proposed Greenhouse Gas Reduction Measures, the SEIR states "However, because implementation of the measures is uncertain..." It is not clear why implementation of the measures would be uncertain. What is the intent of this statement? Additionally, the EIR should evaluate what the impacts would be if these measures were incorporated into the

project.

29) Page 2-39, HZ-2: This mitigation indicates that "Fencing and landscaping may be modified upon urban development of adjacent agricultural fields." As previously indicated, the use of such fences does not promote walkability as envisioned under the New Urbanist principles mandated under the General Plan for this area and thus the "may" should be replaced with "will".

30) Page 2-40, Background Information: "The Monterey Regional Water Pollution Control Agency would provide sewer service" but so too will the City as it is the City's system. That should be made clear here.

31) Page 2-42, City of Salinas Drainage Criteria: The proposed stormwater plan currently appears to be generally consistent with the City's Stormwater Development Standards; however, new storm water requirements are scheduled to be implemented in February 2012. The school district will be required to comply with these new standards. Given this fact, the information and the analysis set out in the SEIR may be insufficient.

32) Page 2-45, Mitigation Measures, HY-1: The reference to "meets design standards" should be revised so it is more specific: "meets City of Salinas design standards".

33) Page 2-47, Background: As previously indicated, the City requested in its written comment provided in 2005 on the Acquisition EIR, that the design of the school reflect the New Urbanist principles mandated under the General Plan for the FGA. Although there is not an existing community located to the east and south of the site, significant planning has been undertaken to create one as part of the Specific Plan process.

As such, the proposed high school should be designed to serve as a neighborhood center for the proposed West Area Specific Plan area and create a sense of place for the future residents in the area. Given the school will be located within walking distance of many of the approximate 45,000 residents who will live in the surrounding area, the opportunity exists to promote a healthier and more sustainable lifestyle by encouraging future students to walk, bike or take transit to school. As designed, the proposed school buildings have been located and focused away from the FGA. The school buildings will be further separated by fences and the stadium and special-event parking lot that are proposed to be located on the east site of the project site. The proposed design serves to separate the proposed school from the rest of the Specific Plan area and divide rather than promoting synergy between the school and the surrounding uses. Alternative 4: Site Redesign B proposes an alternative design which addresses many of the City's concerns. This alternative design would serve to support the City General Plan goals and provide the desired connectivity between school and the proposed

FGA.

34) Page 2-47, Regulatory Setting: As previously indicated, as part of the Specific Plan process, the location of land uses and the street circulation network have been refined. The location of El Dorado Drive is proposed to be located along the eastern perimeter of the site not within the mixed use area discussed in this section. This roadway alignment has previously been provided to the school district. Russell Road is planned along the southern boundary of the site. Both of these roadways should be shown on the site plan for the school.

35) Page 2-50, Policy Consistency: This section indicates that the school will "be easily accessible and walkable to the existing residents to the west and to potential future residents to the east and south." The City strongly disagrees. Students living to east and south will have to walk some distance around the school property or will more likely be driven to Rogge Road to have access to the school buildings under the current proposal. Given the site will be fenced, it is not clear how pedestrian access could or would be provided in the future as suggested in the document.

The General Plan requires schools to lie within the neighborhood and be easily accessible and within walking distance. As designed, the school will not function as part of the FGA neighborhood. Instead, it has been designed to focus it orientation to Rogge Road away from the FGA. This section further states that the land use plans for this area are not known. This is not correct. Significant planning efforts have been undertaken to date and the City has provided this information to the school district. The general location of proposed streets and infrastructure and the nature of the surrounding uses are known.

As such, the City does not believe that the proposed school design is consistent with the City's General Plan land use plans, policies or zoning regulations adopted for the purpose of avoiding or mitigating an environmental impact and that the project would have a significant impact in this regard. The City would also note, however, that these impacts could be reduced to less than significant levels, if the school district would choose Alternative 4, Site Redesign B as the proposed design for the school instead of the current proposal. Site Redesign B better addresses the concerns of the City in regard to consistency with the General Plan and would not result in the significant impacts that would be created under the current proposal.

36) Page 2-51, Impact and Mitigation Measures: The second full paragraph includes the statement: "The proposed project would be consistent with the design principles of both traditional neighborhood development and New Urbanism and would comply with the City of Salinas General Plan policies and zoning code." The City does not believe sufficient evidence has been provided to support this conclusion.

The proposed design of the school is not consistent with the City's New Urbanist policies which are expressly applicable to the FGA. As previously indicated School district representatives, County staff, FGA representatives, and City staff met on May 17, 2010 to discuss a preliminary site plan for the proposed high school. At that time, concerns were expressed by staff and others regarding the proposed siting of the school buildings and related sports facilities. It was requested that the school district relocate the proposed school buildings so that they would potentially front or have primary access from El Dorado Drive with associated parking areas located to the side or rear of the buildings. The need for pedestrian connections and other issues were also discussed. These modifications were requested to promote land use compatibility with the future West Area Specific Plan (FGA) residential neighborhoods, facilitate pedestrian accessibility and reduce the potential for traffic related issues in the area.

In reviewing Figure 6 of the SEIR, it appears that the proposed site plan is similar to the one proposed in April of last year (circulated as part of the NOP) and also reviewed two years ago (May 2009) in a meeting with staff, the FGA and the school district on the preliminary design of the school. Staff concerns that were previously raised related to the subject design have not been incorporated into the proposed design (being considered by the school district) rather they have been incorporated as part of an alternative design which is not being pursued by the school district at this time. In this regard, staff's primary concern with the site plan continues to be that the proposed high school does not consider the FGA neighborhood context in which it will be situated. The site plan is primarily automobile-oriented in nature with parking lots and vehicular "drop-off" areas generally dominating the Rogge Road street frontage. The buildings and architectural elements of the proposed school, which, in accordance with New Urbanism principles should enhance the public realm and provide human scale and architectural interest to the streetscape, are pushed back from street behind parking lots and will be visually and physically separated from the future surrounding FGA neighborhoods. Although the proposed school may serve students from outside the FGA area, it is part of and is located in the FGA. As such, its design should be compatible and complementary with the New Urbanism design principles required under the General Plan for development in the FGA and relate to the future residential uses to the south and east of the site.

Additionally, the siting of the proposed school buildings (in the extreme northern portion of the site) generally does not lend itself to being accessible to future residents in the FGA or to emergency responders (police and fire). In this regard, please see the attached letter from the Salinas Fire Department. Pedestrian linkages need to be provided to the school buildings and facilities. Since the site will be fenced it is unclear how pedestrian linkages would be achieved. The City also has significant concerns about the location of the stadium. High and Medium density residential uses will be located directly to the east and south of the stadium. Potential impact associated with noise and glare from the use of the stadium and Marching

Band practice area will impact these sensitive uses. It appears; however, that these impacts can be reduced to less than significant levels by relocating the stadium as shown on Alternative 4: Site Redesign B. The site plan also does not shown the location of El Dorado Drive or Rogge Road which are both roadways whose alignments will be located long the southern and eastern portions of the site.

Given these factors, the City believes the subject proposal is not consistent with the City's General Plan and would have a significant impact on the environment as currently designed.

37) Page 2-58, Football Game Noise, and Marching Band: This section notes that the noise levels from Football games and the Marching Band at the eastern and southern property lines would be within 70 db DNL limit of the City of Salinas for industrial uses. First it should be noted that the City uses "CNEL" not "DNL" as the standard. Second, residential uses will be located within this area not industrial uses. As such, the proposed noise levels will exceed the maximum noise limits permitted under the General Plan and Zoning for residential zones/uses (which is 60 CNEL). These noise levels should be considered significant impacts since they are inconsistent with the City's maximum noise levels for residential uses.

38) Page 2-70, Project Analysis: "The school is being built to support 900 students in existing neighborhoods located within the Santa Rita Union School District boundaries." The project is also expected to serve students from the FGA. The document acknowledges that the enrollment boundaries for this school can be changed at any time, which could mean that the boundaries could also get changed to encompass the FGA to the exclusion of the homes to the west of the project site.

39) Page 2-82, Project Access and Internal Circulation: "Police traffic control at the driveway intersection with Rogge Road is recommended..." This statement should not be included. The Salinas Police Department has not committed, and should not be committed in this document, to providing traffic control for football games at this proposed school site.

40) Page 2-89, Mitigation Measure T-3.a: There should be a Class I bike lane shown on both sides of Rogge Road rather than just along the project frontage. Also, further on in that same section there is the statement "All improvements within the public right of way will be subject to review and approval by the Monterey County Department of Public Works." Given the site is within the City of Salinas and will require an encroachment permit; the improvements should also be subject to the review and approval of the City.

41) Page 2-90, Mitigation Measure T-4: Under what scenario has this mitigation measure been developed? With the 900 students from the existing residential neighborhoods or full build out of the school, which is being designed and built for 1,500 students? The analysis should

be for the full build out of the school.

42) Page 3-10, Project Trip Distribution and Assignment: "Under the Phase I scenario, 80 percent..." This statement lends itself to a reorientation of the site to face the FGA. It does not appear that an adequate discussion of the cumulative impacts on the El Dorado Road has been included here and should be.

43) Page 4-1, et seq, Section 4.0: It appears that the proposed alternative to reorient the site to face the FGA (Alternative 4: Redesign B), according to the analysis set forth in this section, is the environmentally superior alternative, particularly because it is most consistent with the City's General Plan which is required by CEQA Guidelines section 15125 while the other alternatives are not. While there are some residences located to the west of the proposed school site, the majority of residential development will be located to the south and east. By reorienting the site as proposed under the Alternative 4, the school would face these significantly higher density residential developments and promote walkability consistent with the goals and the policies of the General Plan. It would also make the traffic impacts less significant in the long term as more roadways would ultimately serve the site as build-out of the FGA occurs and bicycle and transit would provide alternative means of transportation to the school. The argument against the alternative regarding hazards (the pesticides on the agricultural fields) is without validity given there will be marginal differences in the distances between the locations of the school buildings under the various site plan scenarios. Additionally, it should be noted that the existing elementary school located to the south is completely surrounded by agricultural fields and Everett Alvarez High School was built directly across the street from agricultural fields.

44) Other Comments: Please find additional comments from the City's Public Works Department and Fire Department (attached).

45) General Comments:

Public Services and Facilities – 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. It should also be noted that under the General Plan, a Fiscal Impact Analysis is typically required prior to the approval of a Specific Plan/development in the FGA to determine the financial impacts of new development and identify appropriate fees and financing mechanisms to address necessary roads, water, sewer, storm water, public safety, library, and other facility needs to serve the school. As part of the City's annexation of the FGA, a Public Services and Public Facilities Financing Plan was prepared which provided a

financing plan for ongoing municipal services and maintenance functions as well as construction or enhancement of infrastructure and provision of facilities to support the FGA development in accordance with the service levels standards established in the General Plan.

The Salinas Police Department has indicated that the proposed school is located in the Salinas Police Department 1 beat area of responsibility. This area is staffed with only one officer per shift. This area contains several elementary schools and one middle school, as well as commercial and large residential areas. A new police substation will be required in the FGA to maintain service levels. Please refer to the attached comments from the Fire Department.

Thank you for the opportunity to comment on the subject document. Please include the City in any future meetings or other meetings related to the environmental document or project and include the City on any mailing lists for notices and other correspondence related to this project. The City has previously expressed its desire to work with the school district to resolve issues related to the proposed school facility and would reiterate our desire to continue to do this. Please feel free to contact me with any questions at 831-758-7407 or tarah@ci.salinas.ca.us.

Sincerely,

Tara Hullinger
Principal Planner

C: Jeff Weir, Community and Economic Development Director
Alan Stumpf, Assistant Community and Economic Development Director
Rob Russell, City Engineer
Chris Callihan, Assistant City Attorney
Gary Petersen, Public Works Director
Brian Finegan, Esq.

Attachments:
City of Salinas Letter to the School district dated August 18, 2005
Fire Department Development Review Comments
Public Works Department (Engineering Division Comments)

City of Salinas

DEPARTMENT OF DEVELOPMENT AND ENGINEERING SERVICES
200 Lincoln Avenue Salinas, California 93901 (831) 758-7241

August 18, 2005

Roger C. Anton, Jr., Superintendent
SALINAS UNION HIGH SCHOOL DISTRICT
431 West Alisal Street
Salinas, CA 93901

SUBJECT: SALINAS PLANNING COMMISSION INVESTIGATION OF PROPOSED SITE ACQUISITION FOR A NEW HIGH SCHOOL FACILITY ON ROGGE ROAD IN THE CITY'S FUTURE GROWTH AREA

Dear Mr. Anton:

At its meeting of August 17, 2005, the Salinas Planning Commission conducted an investigation of the Salinas Union High School District's proposed acquisition of approximately 50 acres located adjacent Rogge Road west of Natividad Road (Mortensen Ranch) for the future development of a high school campus.

The proposed high school site has been included on the Salinas General Plan Land Use and Circulation Policy Map. However, consistency with the City's land use and development policies could not be established as the necessary planning processes to demonstrate General Plan consistency have yet to be completed.

The Planning Commission did, however, conclude that sufficient planning has been accomplished to demonstrate that the intent of the state legislation: to promote the safety of pupils and comprehensive community planning has been achieved to warrant the acquisition of the site by the Salinas Union High School District.

This conclusion is supported as the City of Salinas is currently preparing applications for a Sphere of Influence Amendment and Annexation including Plans for Providing Public Services and Public Facilities including a Fiscal Impact Analysis to incorporate the property into the city limits. Additionally, a Specific Plan is being developed for the westerly portion of the City's Future Growth Area that incorporates the proposed high school site into the structure of the new planned community. Maps of the proposed Specific Plan are attached.

It is, however, noted that the land acquisition proposal for only the Mortensen property does compromise the land planning that has been done to incorporate the high school site into the proposed Specific Plan. The Specific Plan, prepared by P&D Consultants after consultation with the District's Manager of Facilities and Planning, Karen Luna, incorporates approximately five additional acres of the Madolora property to extend the site's Russell Road frontage.

This additional frontage appears to be appropriate for the overall design of the facility and necessary should access to the school be desired from the Russell Road frontage as an extension of El Dorado Drive. A map illustrating this frontage/ownership condition is attached.

The Planning Commission's conclusions were made with the understanding the City will have the opportunity to comment further on the new high school through the environmental impact report process. As a site plan and architectural elevations of the proposed facility were not presented, the Planning Commission communicates to the Salinas Union High School District the City's concern that the new high school is planned and designed to implement the City's New Urbanist principles which are embedded throughout the City's General Plan -- that the buildings and architectural elements enhance the public realm providing a human scale and architectural interest to the streetscape and that the large parking areas needed for school not dominate the sites street frontages.

Please do not hesitate to contact me with any questions regarding this matter.

Sincerely,

ROBERT RICHELIEU

Planning Manager

Enclosures: Maps (3)

Cc: Mayor and City Council

Planning Commission

Via Email to: Dave Mora, City Manager; Rob Russell, Deputy City Manager/City Engineer; Courtney Grossman, Planning Manager; Chris Callihan, Deputy City Attorney; Gary Wood, P&D Consultants; Peter Kasavan, Architect; Brian Finegan, Esq.; Al Mortensen

LETTER 7 – City of Salinas Community and Economic Development Department (December 7, 2011)

1. The comment letter asserts that the proposed project is not consistent with the City's general plan land use plan, policies, and regulations and is an auto-oriented stand-alone facility. See the Board of Trustee meeting responses, response #3 for a detailed response to these comments. In regard to the summary description of the project location in the summary of the Draft SEIR, a more detailed description of the project location and vicinity existing conditions are given on pages 1-1 through 1-13 of the Draft SEIR. This section clearly explains that the project site is within the City's Future Growth Area. The District acknowledges that Rogge Road has not been annexed to the City and is still located within the County of Monterey; however the City maintains the road. Page 1-34 states that an encroachment permit for work on Rogge Road is required from the City. See Section 3.0, Changes to the Draft SEIR, for changes to page 1-34.

2. This comment is regarding the summary project background in the summary of the Draft SEIR. A more detailed description of the project background is included on pages 1-13 through 1-14 of the Draft SEIR. Issues about the project's consistency with the City's general plan are addressed in Section 2.6, Land Use. The comment states that the proposed project is not consistent with the City's general plan policies, including the New Urbanism design principles. See the Board of Trustee meeting responses, response #3 for a detailed response to this comment. The School District acknowledges that planning efforts have been underway for the development of the Future Growth Area and that several meetings were held between the School District, the City, and property owners and developers of the Future Growth Area to discuss design of the high school. However, the purported West Area Specific Plan referenced in the comment letter is not a public document, has not been submitted to the City of Salinas for processing, and has not been adopted. Therefore it is not considered regarding the project impacts. The School District compared several the pros and cons of the proposed site plan and each of the alternatives evaluated in the Draft SEIR. Please see Letter #4, response to comment #15 for a more in-depth discussion as to why the proposed site plan is the preferred plan. Changes to the Draft SEIR are not required.

3. This comment is regarding the summary project description in the summary of the Draft SEIR. Extending Russell Road and El Dorado Drive are not part of the proposed project and are therefore not included in the project description in the Draft SEIR. The School District is not opposed to the City of Salinas and/or the adjacent property owners developing these roadways adjacent to the high school. However, the purported West Area Specific Plan referenced in the comment letter is not a public document, has not been

submitted to the City of Salinas for processing, and has not been adopted. Therefore it is not considered regarding the project impacts. See the Board of Trustee meeting responses, response #3 for a detailed discussion on this issue. Comments received from the Salinas Fire Department are addressed later in this document after comment letter #8, which is the response letter from the Salinas Fire Department. Comments received from the Salinas Public Works Department are addressed later in this document after comment letter #9.

4. Comment noted.

5. Comment received from the City Engineer regarding the adequacy of the traffic report are addressed later in this document after comment letter #9, which is the response letter from the City Public Works Department. Page 2-50 and 2-51 of the Draft SEIR provide a consistency analysis describing how the proposed project is consistent with the principles of New Urbanism and includes traditional neighborhood development (TND) characteristics, and is therefore consistent with the City's general plan policies and zoning code. See the Board of Trustee meeting responses, response #3 for a detailed discussion on this issue. See Letter #4, response to comment #15 for reasons why the School District proposing the proposed site plan over Site Redesign B.

6. See comment #5 above for a response regarding the proposed project and its consistency with the principles of New Urbanism. See comment #3 above regarding Russell Road and El Dorado Drive.

7. See Letter #4, response to comment #15 for reasons why the School District is proposing the proposed site plan over Site Redesign B. Based on the District's goals and its analysis of the environmental impacts, the proposed site design is the superior option.

8. The proposed site plan does not place any structures within the 100-foot power line easement; therefore the power lines do not pose a significant health risk to students. See Letter #4, response to comment #21 for a more extensive response.

9. Comment noted. However, the purported West Area Specific Plan referenced in the comment letter has not been adopted and therefore is not considered regarding the project impacts. See the Board of Trustee meeting responses, response #3 for a more thorough discussion of this issue, as well for a discussion on the baseline used in the analysis.

10. As mentioned in the letter, the School District cannot be mandated to comply with the Specific Plan requirement by law. The School District did not disregard the long-range planning goals of the City. The fact that the school faces one direction or another does not make it significantly less accessible to all residential communities adjacent to the site. There is no reason that students residing to the south or east of the school would be any less willing and able to access the school by means of car, bicycle, or on foot. Although the

proposed site plan faces the school towards Rogge Road, the proposed school would still be a part of the Future Growth Area community. See Letter #4, response to comment #15 for reasons why the School District is proposing the proposed site plan over Site Redesign B.

11. The comment about the line of sight is acknowledged. The issue does not fit within any of the environmental factors or issues identified in CEQA. Potential impacts on the neighbor's privacy are not expressly recognized by CEQA as an environmental impact, and there is no clear legal authority that would require it to be considered. Therefore, the views from the second story of the classroom building creating a line of sight into the rear yards of the homes located to the west of the project boundary would not result in any environmental impacts.

    To the extent that privacy concerns remain, those concerns would be resolved by the School District's plan to install obscure or translucent glass on the lower panes of the second floor windows along the side of the building that faces the adjacent existing neighborhood. As a result, views of the adjacent homes would be obscured from the second story windows. The obscure glass would not only protect the privacy of adjacent neighbors, but is also for the benefit of the students by encouraging their attentiveness and participation in class, while still allowing unobscured natural light to come in through the upper panes.

    The commenter also asks, in regard to Figure 6, Site Plan, if a masonry wall or other feature is proposed in this area to screen views of the area, and buffer noise and light. The issue of views is addressed above. Lighting issues were addressed in Section 2.1, Aesthetics, of the Draft SEIR and noise issues were addressed in Section 2.7, Noise, of the Draft SEIR. The Draft SEIR concluded that the proposed site plan would not result in any significant light or noise impacts to the existing residences to the west and therefore would not require any kind of a buffer. Although the noise analysis was conducted, and the conclusions with a table presenting the noise data were included in the noise report and in the Draft SEIR, the textual description of the parking lot noise was inadvertently omitted from the noise report. See Appendix A, Noise Report Addendum, to this Final SEIR for the missing text regarding noise impacts from the parking lot along the western boundary. However, the conclusion of the analysis does not change and the impact is still less than significant.

    The Draft SEIR does not mention any potential development to the north of the project site across Rogge Road as a means to justify orienting the school site in that direction. It's not clear what the commenter is referring to in this comment.

See the Board of Trustee meeting responses, response #3 for a discussion on the proposed project's consistency the City's general plan policies regarding New Urbanism. See Letter #4, response to comment #15 for reasons why the School District is proposing the proposed site plan over the project alternatives. See Letter #4, response to comment #3 for a discussion on the walkability and accessibility of the proposed site plan.

Section 15126.2 of the CEQA Guidelines states that "in assessing the impact of a proposed project on the environment, the lead agency should normally limit the examination to changes in the existing physical condition in the affected area as they exist at the time the notice of preparation is published." At the time of the publication of the notice of preparation, lands to the east and south were in agricultural production, and still are. The Draft SEIR analyzed the adjacent properties to the south and east as agricultural uses and not as high and medium density residential. See the Board of Trustee meeting responses, response #3 for a more thorough discussion of this issue. The proposed project would be accessible to all residential neighborhoods adjacent to the project site.

Additionally, all issues pertaining to City of Salinas Fire Department comments are addressed in the responses to the Fire Department letter, Letter #8.

The commenter states that there are concerns regarding the location of the stadium and potential noise and light impacts. The lighting plan prepared for the proposed project would reduce all lighting impacts to a less than significant level. The proposed project includes detailed specifications to ensure that stadium lighting would not result in substantial light or glare that would adversely affect day or nighttime views in the area. The stadium lighting would be consistent with stadium lighting at other high school located within residential neighborhoods in the City of Salinas. See Letter #4, response to comment #15 for reasons why the School District is proposing the proposed site plan over Site Redesign B.

Extending El Dorado Drive and Russell Road are not part of the proposed project. Therefore, these two roadways were not shown on the site plan. The project site is no longer in the unincorporated County and the City's general plan land use map identifies future Russell Road alignment along the southern boundary of the project site. Improvements proposed to Rogge Road would be constructed in compliance with an encroachment permit, expected to be issued by the City of Salinas.

12. The proposed high school is proposed to be accessed via Rogge Road. The School District is not proposing to extend El Dorado Drive; however, the School District is not opposed to the City extending El Dorado Drive along the eastern boundary of the project site. The proposed project is consistent with the City's general plan and no specific plan has been filed or adopted that would be applicable to the proposed project. See the Board of Trustee meeting responses, response #3 for a more thorough discussion of this issue.

13. See response 11 above. Lighting issues were addressed in Section 2.1, Aesthetics, of the Draft SEIR of the Draft SEIR. The Draft SEIR concluded that the proposed site plan would not result in any significant light impacts.

14. Figure 11, Landscape Site Plan, in the Draft SEIR shows that the southern and eastern perimeters of the special event parking lot would be landscaped reducing the impact of the view of the parking lot from adjacent properties.

15. The air district's name has been corrected. The School District is not required to get a demolition permit from the City of Salinas. Page 1-34 of the Draft SEIR states that the School District will obtain a septic tank demolition from the Monterey County Environmental Health Division. The well necessary for irrigating adjacent agricultural fields will be maintained for irrigation purposes, in accordance with the School District lease agreement with the farmer, and is not planned to be utilized for irrigating the high school athletic fields. See Section 3.0, Changes to the Draft SEIR for changes to page 1-23.

16. Comment noted. The designation of "Central Coast" is implied as the "Central Coast Regional Water Quality Control Board" is the only Regional Water Quality Control Board with jurisdiction over this area of California. No changes to the Draft SEIR are necessary.

17. A complete list of local, regional, and state agencies whose approval is required for the project can be found on page 1-34 and 1-35 at the end of Section 1.0.

18. The ultimate improvements to mitigate the proposed project impacts can be found in Figure 14, Mitigated Site Plan, and Figure 15, Mitigated Access Plan, of the Draft SEIR.

19. The detention basin is planned to be only 1.5 feet deep in an area where the soil maps indicate hydrologic soil group B soils which infers that an adequate infiltration rate to percolate the runoff within 72 hours is expected. An infiltration test would be performed as part of the design process. Final design will be in compliance with the City's Stormwater Development Standards. See Section 3.0, Changes to the Draft SEIR, for revisions to this mitigation measure HY-1 and HY-2 to clarify that the infiltration testing would result in a design that meets required standards.

20. Comment acknowledged. The School District will utilize the City's plant list for Low Impact Development features. This comment appears to be intended for private residential or business use. The School District has no intention of selling the on-site landscaping for someone else to own or maintain. Street parkways are not included in the proposed project; therefore, the comment regarding the landscape and lighting district is not applicable. The School District will comply with all applicable local and state laws.

21. Comment acknowledged. The City's letter was dated and received on April 13, 2011. This typo has been corrected. See Section 3.0, Changes to the Draft SEIR, for edits to page 1-32.

22. Comment acknowledged. Cal Water Service Company would provide water to the proposed project and the School District would obtain a Will Serve letter from Cal Water. See Section 3.0, Changes to the Draft SEIR, for edits to pages 1-34 and 2-90 clarifying that Cal Water would be the entity to provide water to the proposed project.

23. See response #11 above regarding environmental impacts associated with views from the second story of the classroom building into the rear yards of the adjacent residences.

    Page 2-50 and 2-51 of the Draft SEIR provide a consistency analysis describing how the proposed project is consistent with the principles of New Urbanism in the City's general plan and includes traditional neighborhood development (TND) characteristics, and is therefore consistent with the City's general plan policies and zoning code. See the Board of Trustee meeting responses, response #3 for a more thorough discussion of this issue, as well for a discussion on the baseline used in the analysis.

24. See response #11 above for a discussion on why the proposed project would not result in any significant light or glare impacts and why the School District is proposing the proposed site plan over Site Redesign B. See the Board of Trustee meeting responses, response #3 and response to comment 23 above regarding the baseline.

25. See response #11 above and the Board of Trustee meeting responses, response #3 for a discussion regarding the baseline. The School District acknowledges that the City and developers of the FGA have been planning development in this area for at least five years. However, if and when development actually occurs east and south of the project site is speculative due to the economic downturn. The School District understands that no specific plan has been submitted to the City of Salinas for public review, environmental review, and subsequent approval, and it not aware of any plans for such actions.

26. See response #11. The lighting plan specifications were developed to ensure that the proposed project would not have a significant light impact on adjacent land uses. See also response to comment #23 above regarding the baseline. Regarding cumulative impacts, please see Section 3.0, for a discussion of the proposed project's contribution to the cumulative impacts of buildout of the FGA.

27. Jean Getchell was the acting Supervising Air Quality Planner when the Draft SEIR was prepared. No changes to the Draft SEIR are necessary.

28. The School District is a public agency with limited funding. As mentioned on page 2-30, these measures have been identified by the School District as additional measures that could be incorporated into the proposed project contingent on the availability of funding. Therefore, although the School District would like to see these measures implemented at the project site, it is unknown at this time if adequate funding will be available. See Letter #5, response to comment #7 for a more in depth response regarding funding and the School District.

    The School District understands that every additional mitigation measure would likely incrementally decrease the greenhouse gas emissions associated with the proposed high school. However, CEQA does not require analysis of every imaginable mitigation measure. Per Section 15064.4 of the CEQA Guidelines section 15064.4, the School District made a "good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from the project" in the Draft EIR. In an effort to address the questions raised in this letter about what the impacts would be if these additional measures were implemented, the School District made a variety of assumptions about these possible measures and evaluated the possible decrease in emissions resulting from those measures. See Appendix D of this Final EIR for a memo summarizing the assumptions and estimated emissions reductions that could occur from the implementation of the GHG reduction measures listed on pages 2-30 and 2-31 of the Draft SEIR. The following discussion summarizes the potential emission reductions that could occur if these measures were implemented.

    The memo summarizes potential emission reductions that could occur from four types of measures: solar photovoltaic panels, wind turbines, solar water heaters, and purchasing green energy. It is difficult to estimate the energy that could be produced with a solar water heater system without having specifics of the system that would be used and it is too early at this time to know what type, if any, solar water heating system would be installed. Therefore, the proposed emission reductions from solar water heaters were not included in the following discussion. The emission reductions associated with the purchasing green energy are completely dependent on how much green energy is purchased, and, as discussed in the memo, the process of being approved to purchase green energy involves a competitive lottery and cannot be guaranteed. For these reasons, the potential reductions associated with the purchasing of green energy were also not included in the discussion below. However, the emission reductions associated with solar photovoltaics and wind turbines can be estimated, although a more in-depth technical analysis would need to occur at a later time if the decision, and funding, occurred to implement these measures. These potential emissions reductions are discussed below.

According to the memo, solar panels at the project site could result in approximately 94.6, 302, or 380 metric tons carbon dioxide equivalent (MT CO_2e)/year, depending on the different methodologies presented in the memo. A wind turbine could result in a reduction of approximately 6.3 MT CO_2e/year. The following table outlines the total potential emission reductions from both solar photovoltaic and wind turbines, and what percentage those reductions would be in comparison to the total MT CO_2e that would be produced by the proposed project. According to Table 6 on page 2-29 of the Draft SEIR, the proposed project would result in a total of 1,864 MT CO_2e.

Table 2 Potential Emissions Reduction from Solar Photovoltaic and Wind Turbine

Reductions from solar Photovoltaic and wind turbine (MT CO_2e)	Total emissions reductions (MT CO_2e)	Percent reduction from the total project emissions (1,864 MT CO_2e)
94.6 + 6.3	100.9	5.4 %
302.0 + 6.3	308.3	16.5 %
380.0 + 6.3	386.3	20.7 %

Source: EMC Planning Group 2011, 2012

According to page 2-32 of the Draft SEIR, the reduction measures both proposed by the School District and mandated by the State of California, would result in a reduction of 345 MT CO_2e, bringing the project emissions down to 1,519 MT CO_2e/year. The following table summarized how the emissions reductions from solar photovoltaic and a wind turbine may further reduce the proposed project's greenhouse gas emissions.

Therefore, the implementation of these additional measures could result in a reduction of GHG emissions, potentially to a less than significant level. However, as stated in the memo, at this time without a more in-depth technical analysis and more information about the sizing and specifications of each of the measures, the exact emissions reduction and impact is uncertain. As such, the impact remains potential significant and unavoidable, consistent with the determination in the Draft EIR.

29. As discussed in the Board of Trustee meeting responses, response #3, it is unknown at this time what development would occur to the south and the east of the project site and whether it would be appropriate to modify fencing and landscaping. However, if and when development occurs to the south and the east, the School District is open to installing access points, wrought iron fencing with gates, and pathways. No changes to the Draft SEIR are necessary.

Table 3 Additional Potential Percent Reduction of Emissions from Solar Photovoltaic and Wind Turbine.

	Emissions ($MT CO_2e$)	Percent reduction in total emissions
Total GHG emissions (unmitigated)	1,864	
Proposed mitigation measures	345	18%
Total project emissions (mitigated)	1,519	
Range of reductions from additional measures (if funding available)	101 – 386	5.4% – 20.7%
Total percent emissions reductions	1418 – 1,133	23.4% - 38.7%

Source: EMC Planning Group 2011, 2012

30. Comment acknowledged. See Section 3.0, Changes to the Draft SEIR, for edits to page 2-40.

31. At the time of the preparation of this document (April 2012), the Central Coast Regional Water Quality Control Board had not yet adopted the City of Salinas; new National Pollutant Discharge Elimination System (NPDES) permit, which is anticipated to be approved in May 2012. However, the distributed Low Impact Development approach described in the project's stormwater control plan is expected to be consistent with the provisions of the City NPDES permit. See Board of Trustees meeting comments, response #2 for a discussion on how exactly the plan is consistent with the draft NPDES permit.

32. Comment acknowledged. See Section 3.0, Changes to the Draft SEIR, for edits to page 2-45.

33. See Letter #4, response to comment #3 for a discussion on how the proposed project is walkable and consistent with New Urbanism principles in the City's general plan. See Letter #4, response to comment #15 for a discussion on why the proposed site plan better achieves the School District's educational objectives than Site Redesign B. See the Board of Trustee meeting responses, response #3 for a more thorough discussion of this issue. Also, if and when development occurs to the south and the east, the School District is open to installing access points, wrought iron fencing with gates, and pathways if feasible and legally allowed.

34. Improvements to the future extensions of Russell Road and El Dorado Drive are not a part of the proposed project and therefore are not shown on the site plan.

35. See response Letter #4, response to comment #3 for a discussion on how the proposed project is walkable and consistent with New Urbanism principles in the City's general plan. See the Board of Trustee meeting responses, response #3 for a more thorough discussion of this issue. See Letter #4, response to comment #15 for a discussion on why the proposed site plan better achieves the School District's educational objectives than Site Redesign B.

36. See response Letter #4, response to comment #3 for a discussion on how the proposed project is walkable and consistent with New Urbanism principles in the City's general plan. See Letter #4, response to comment #15 for a discussion on why the proposed site plan better achieves the School District's educational objectives than Site Redesign B. See the Board of Trustee meeting responses, response #3 for a more thorough discussion of this issue.

    Comments from the Salinas Fire Department are addressed in comment Letter #8. Also, if and when development occurs to the south and the east, the School District is open to installing access points, wrought iron fencing with gates, and pathways.

    The lighting plan prepared for the proposed project would reduce all lighting impacts to a less than significant level. The proposed project includes detailed specifications to ensure that stadium lighting would not result in substantial light or glare that would adversely affect day or nighttime views in the area. The proposed project would not result in any significant noise related impacts. See the Board of Trustee meeting responses, response #3 for a discussion on the baseline used in the analysis. Extending Russell Road and El Dorado Drive are not a part of the proposed project and therefore are not shown on the site plan. The proposed site plan also best achieves the School District's educational objectives.

37. See Appendix A, Noise Report Addendum, for a revised analysis using the City's preferred CNEL standard instead of the DNL standard. Even using the CNEL standard, the noise exposures remain within the limits of the standards resulting in less than significant noise impacts. Section 15126.2 of the CEQA Guidelines states that "in assessing the impact of a proposed project on the environment, the lead agency should normally limit the examination to changes in the existing physical condition in the affected area as they exist at the time the notice of preparation is published." At the time of the publication of the notice of preparation, the properties to the east and south were, and still are, in agricultural production. See the Board of Trustee meeting responses, response #3 for a discussion on the baseline used in the analysis. Table N-3 of the City of Salinas general plan identifies the

noise standard for both industrial/manufacturing/utilities/agricultural uses as 70 CNEL. The noise levels at the eastern and southern property lines would be less than the 70 CNEL limit stated in the general plan. The noise limit at the property line to the north at the harvesting and packing business across Rogge Road would also be less than 70 CNEL limit stated in the general plan, and the impacts would be less than significant.

38. Comment noted. However, a boundary change for this high school that would exclude the neighborhood to the west would require construction of another new high school to accommodate those students, in which case further environmental review would be required. Boundary changes are required to be adopted by the Board of Trustees after a public process. The School District typically has not changed boundaries unless it has opened a new high school.

39. The School District did not intend to commit the Salinas Police Department to such action by recommending it in the Draft SEIR. See Section 3.0, Changes to the Draft SEIR, for edits to page 2-82.

40. See response to Letter #5, comment #5(c).

41. Mitigation measure T-4 has been developed for Phase 1 conditions. As discussed on page 2-82 of the Draft SEIR, the Traffic and Transportation section generally addresses only the project's first phase of 900 students. Impacts associated with the high school's capacity of 1,500 students are addressed in Section 3.0, Cumulative Impacts, of the Draft SEIR.

42. As stated in the Draft SEIR on page 3-10, buildout of the Future Growth Area would include the construction of the Future Growth Area road network that includes extensions of Russell Road, McKinnon Street, and El Dorado Drive, which would alter patterns for motorists traveling to and from the school. This would shift the arrival/distribution pattern from a predominately westerly orientation to a predominately easterly orientation. This means that more vehicles may arrive and leave the school to the east, but does not lead to the conclusion of a reorientation of the site to face the Future Growth. Page 3-11 of the Draft SEIR states that the Rogge Road/El Dorado Drive intersection would operate at LOS D during the AM peak hour and LOS C during the midway and PM peak hours with signal traffic control and certain lane configuration. Page 3-15 of the Draft SEIR lists the El Dorado Drive extension between Boronda Road and Russell Road as an improvement to be funded by City of Salinas traffic impact fees. The Draft SEIR concludes that the improvements listed will mitigate cumulative project impacts. Mitigation measure CUM-T-1 states that the School District will be responsible for paying their appropriate fair share of the transportation improvements to the appropriate agencies, including the City of Salinas. Therefore, the Draft SEIR includes an adequate discussion of the cumulative impacts on El Dorado Drive.

43. The alternatives are evaluated in Section 4.0, and the analysis is summarized in Table 15, Project Alternatives Summary. Although the analysis shows that the alternative site plans have fewer access impacts than does the proposed project, the access impacts from the proposed project will be mitigated to a less than significant level. The alternative site plans would have greater impacts in the area of hazards (placing the classrooms immediately adjacent to active farmland – pesticides), and noise impacts to the residents to the west - outside of the Future Growth Area. It is acknowledged that if and when the area to the south and east of the project site develop with residential uses, the hazard impacts will cease. The noise impacts to the existing residents to the west, however, will continue.

    See Letter #4, response to comment #3 for a discussion on how the proposed project is walkable and consistent with New Urbanism principles. See the Board of Trustee meeting responses, response #3 for a more thorough discussion of this issue. See Letter #4, response to comment #15 for a discussion on why the proposed site plan better achieves the School District's educational objectives than Site Redesign B. The proposed site plan better achieves the School District's education objectives, including locating the main classroom building farther away from busy roadways, and, even if just temporarily, from agricultural activities and potential pesticide exposure. The Draft SEIR includes mitigation measures that reduce all traffic related impacts to a less than significant level.

44. Comment acknowledged. Comments from the Salinas Fire Department and the City of Salinas Public Works Department are addressed as comment Letters #8 and #9, respectively.

45. The School District will pay its fair share of fees to the extent legally required. Regarding the issue of police officers, a sworn law enforcement officer, contracted through the County Sheriff's Department, will be located at the high school during school hours, which is the School District's policy for all District high schools. Therefore, a new police station will not be required solely for the new high school in order for the Salinas Police Department to maintain acceptable service levels.

CITY OF SALINAS
FIRE DEPARTMENT
DEVELOPMENT REVIEW COMMENTS

DATE: November 15, 2011

ADDRESS: 1100 Rogge Road

PERMIT #: ER2011-007 EIR New High School (#35) In Future Growth Area

THE FOLLOWING ITEMS SHALL BE INCORPORATED INTO THE DESIGN SUBMITTAL. ALL REQUIREMENTS SHALL BE ADDRESSED BY COMMENT(S), AND/OR PLAN DETAIL(S), AND/OR ATTACHMENT(S).

- All plans shall conform to 2010 CBC, 2010 CFC and the most current NFPA standards required by currently adopted codes.

FIRE DEPARTMENT COMMENTS

- Carry over items from Notice of Preparation of a Draft Supplemental EIR letter dated April 13, 2011 as they relate to the fire department.

1. "Public Services and Facilities - The School District will be required to pay all fire impact fees to mitigate impacts to fire apparatus, and impact fees for required FGA Fire Station 7 associated with the proposed facility. It should be noted that under the General Plan, a Fiscal Impact Analysis is typically required prior to the financial impacts of new development and identify appropriate fees and financing mechanisms to address necessary roads, water, public safety, and other facility needs to serve the school. As part of the City's annexations of the FGA, a Public Services and Public Facilities Financing Plan was prepared which provided a financing plan for ongoing municipal services and maintenance functions as well construction enhancement of infrastructure and provision of facilities to support the FGA development in accordance with the levels of service levels standards established in the General Plan."

2. SFD Fire Stations 5 and 6 currently serve this site until FGA Fire Station 7 is constructed. According to the "GIS Emergency Services Response Capabilities Analysis", conducted by IAFF and the Salinas Firefighters dated April 26, 2011, the proposed school site is outside the "6 minute emergency response" capabilities of 1st in Fire Station 6. The construction and manning of Fire Station 7 will put this facility well within the "6 minute response time", and maintain and ensure consistency with the General Plan service level in the FGA.

3. The Russell Road and the El Dorado Drive extension are required to ensure adequate emergency access to the school and the surrounding areas.

4. Fire hydrants shall be provided in accordance with **CFC Appendix C - Fire Hydrant Locations and Distribution** for the protection of buildings, or portions of buildings, hereafter constructed. Fire hydrants shall be provided along required fire apparatus access roads and adjacent public streets. The average spacing of the fire hydrants will be 450-500, and not exceed the requirement in CFC Table C105.1. (see attachment)

- **Department of the State Architect shall review the construction plans for Fire and Life Safety. Salinas Fire Department (SFD) construction review shall include Fire Access & Water as follows:**

1 SFD shall review elevators to ensure medical emergency service cab size is as follows:

A Where elevators are provided in buildings four or more *stories* above, or four or more *stories* below, *grade plane*, at least one elevator shall be provided for fire department emergency access to all floors. The elevator car shall be of such a size and arrangement to accommodate an ambulance stretcher 24 inches by 84 inches (610 mm by 2134 mm) with not less than 5-inch (127 mm) radius corners, in the horizontal, open position and shall be identified by the international symbol for emergency medical services (star of life). The symbol shall not be less than 3 inches (76 mm) high and shall be placed inside on both sides of the hoistway door frame. **CBC 3002.4 Elevator car to accommodate ambulance stretcher.**

2 SFD shall review for vehicle access, fire lane markings, and gate entrances as follows:

A *Approved* fire apparatus access roads shall be provided for every facility, building or portion of a building hereafter constructed or moved into or within the jurisdiction. The fire apparatus access road shall comply with the requirements the appropriate sections of 2010 California Fire Code and shall extend to within 150 feet (45 720 mm) of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an *approved* route around the exterior of the building or facility. **CFC 503.1.1 Buildings and facilities**

B. More than one fire apparatus access road based is required on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access. **CFC 503.1.2 Additional access.**

1) Electric gate operators, where provided across fire apparatus access roads, trails or other accessways, shall be *listed* in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed and installed to comply with the requirements of ASTM F 2200. **CFC 503.5 Required gates or barricades.**
2) School grounds may be fenced and gates therein may be equipped with locks, provided that safe dispersal areas based on 3 square feet (0.28 m^2) per occupant are located between the school and the fence. Such required safe dispersal areas shall not be located less than 50 feet (15 240 mm) from school buildings.

Every public and private school shall conform with Section 32020 of the Education Code, which states:

The governing board of every public school district, and the governing authority of every private school, which maintains any building used for the instruction or housing of school pupils on land entirely enclosed (except for building walls) by fences of walls, shall, through cooperation with the local law enforcement and fire-protection agencies having jurisdiction of the area, make provision for the erection of gates in such fences or walls. The gates shall be of sufficient size to permit the entrance of the ambulances, police equipment and fire-fighting apparatus used by the law enforcement and fire-protection agencies. There shall be no less than one such access gate and there shall be as many such gates as needed to assure access to all major buildings and ground areas. If such gates are to be equipped with locks, the locking devices shall be designed to permit ready entrance by the use of the chain or bolt-cutting devices with which the local law enforcement and fire-protection agencies may be equipped. **CFC 503.5.2 Fences and gates.**

11 C. SFD shall review Fire Flow as follows:

1) Provide SFD with current fire flow from local water purveyor. An *approved* water supply capable of supplying the required fire flow for fire protection shall be provided to premises upon which facilities, buildings or portions of buildings are hereafter constructed or moved into or within the jurisdiction. **507.1 Required water supply.**

12 2) Fire flow requirements for buildings or portions of buildings and facilities shall be determined by an *approved* method *or CFC Appendix BB*. **CFC 507.3 Fire flow.**

13 3) Fire hydrant location and distribution shall be provided. Fire hydrant systems shall comply with CFC Sections 507.5.1 through 507.5.6 *and Appendix CC*. **CFC 507.5 Fire hydrant systems.**

14 D. SFD shall review Automatic Fire Sprinkler Systems as follows:

1) Provide SFD the location(s) of proposed post indicator valves (PIV) and fire department connection (FDC). With respect to hydrants, driveways, buildings and landscaping, fire department connections shall be so located that fire apparatus and hose connected to supply the system will not obstruct access to the buildings for other fire apparatus. The location of fire department connections shall be *approved* by the fire chief. **912.2 Location.**

15 2) Provide SFD location of the detector check valve assembly (DCVA)/backflow preventer and other valves impacting local fire authority emergency response. The potable water supply to automatic sprinkler and standpipe systems shall be protected against backflow as required by *Health and Safety Code Section 13114.7*. **CFC 912.5 Backflow protection.**

If you have any questions, you may contact me weekdays at ph: (831) 758-7422 or email: ronym@ci.salinas.ca.us.

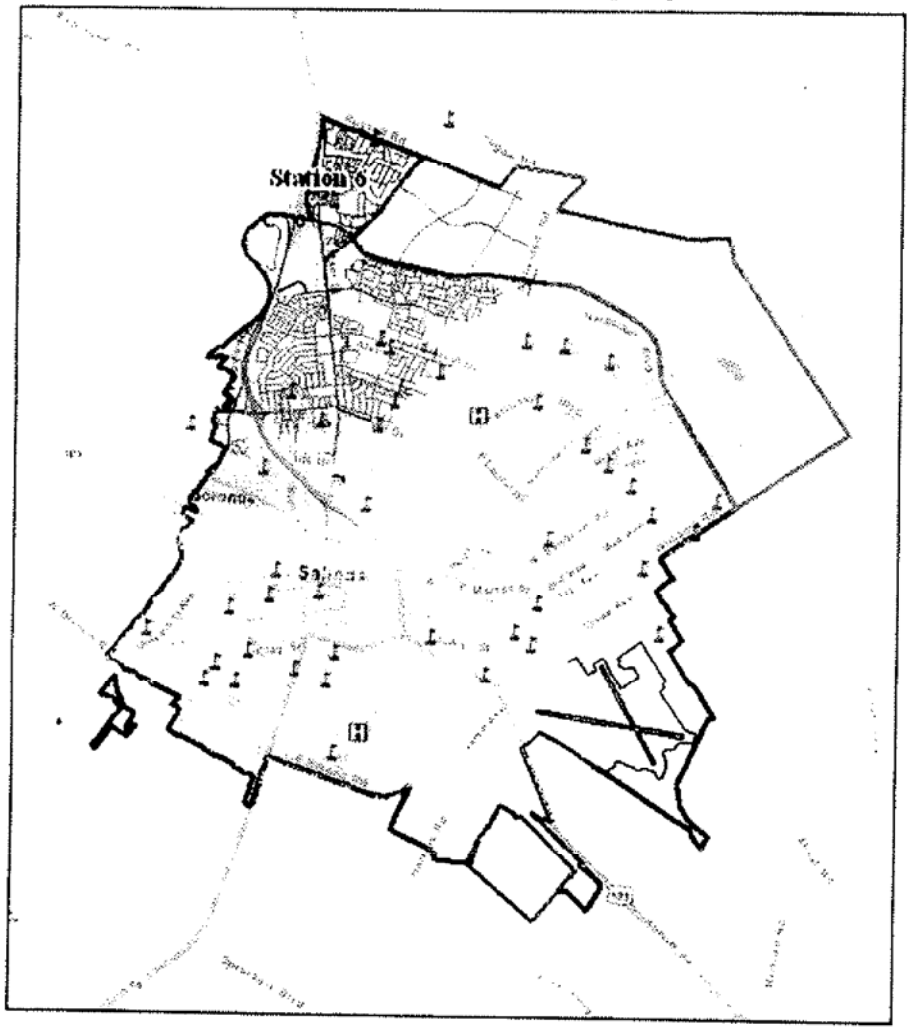
Thank You,

Rony Musones
Fire Inspector/
Fire Plan Checker

MAP 9

ALS ME-5316 Response Times

As depicted, total response times include two minutes for dispatch and turnout.
Maps assume apparatus is staffed and available as requested immediately upon dispatch.



Station 6
Hospitals
Schools
5.8% of roads covered within 4 minutes
49.1% of roads covered within 6 minutes
Road Network
Airport
Landmarks
Parks
Uni-Coal Project
Future Growth Area
City of Salinas

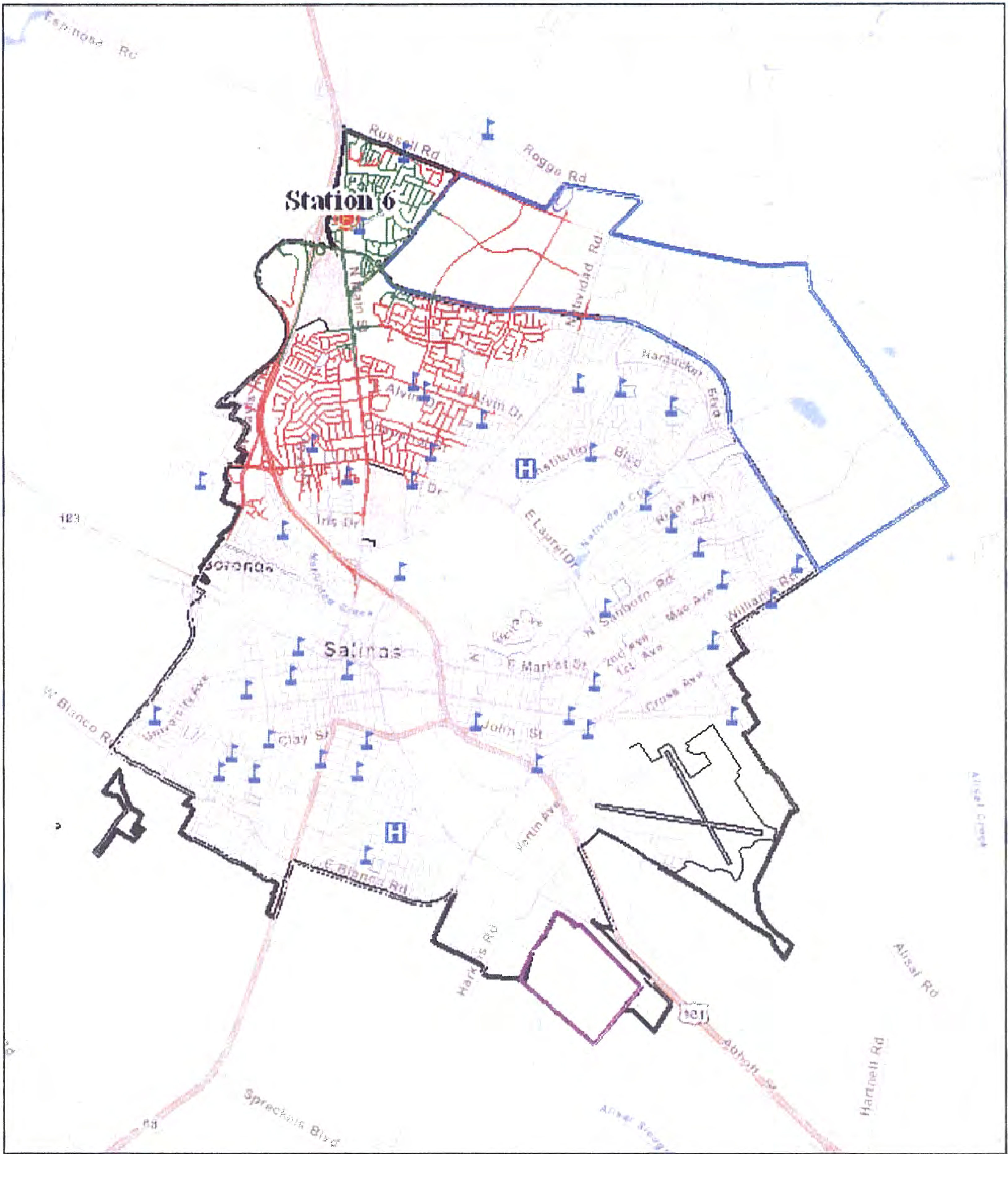
Map 9

LETTER 8 – City of Salinas Fire Department (December 7, 2011)

1. The School District will pay its fair share of fees to the extent legally required.

2. The City of Salinas Fire Department states that the proposed project site would be outside of the six-minute emergency response capabilities of both Fire Station 5 and 6 until buildout of the Future Growth Area occurs (Rony Musones, Fire Inspector/Fire Plan Check, Salinas Fire Department, telephone conversation with consultant, January 17, 2012). According to the Salinas General Plan, Page LU-43, the City has a service standard to arrive on scene within six minutes of 911 calls at least 90 percent of the time. The figure on the following page was provided by the City of Salinas and shows the six-minute response time area for Fire Station 6. The figure estimates that when the proposed future extension of Russell Road is constructed, fire trucks coming from Fire Station 6 could reach the southern boundary of the project site within six minutes. Under existing conditions, without the extension of Russell Road, fire trucks would continue north on San Juan Grade Road to Rogge Road. It can be estimated that fire trucks would have to drive approximately 1,300 feet further to reach the entrance to the project site off of Rogge Road. Therefore, the project site is just outside of the six-minute response time area.

   The majority of the high school buildings would be constructed with non-combustible materials, including structural steel framing and floor decking with concrete topping, concrete masonry, steel studs, metal siding, metal roofing, aluminum window frames, and metal door frames. Exterior doors would be steel or aluminum and interior doors would include wood doors which would be rated along all corridors. The largest building is a two-story classroom building which is entirely of non-combustible construction. The smaller buildings have the same finishes and structural steel wall and roof framing with some wood framing as well. All buildings would be separated from each other by a minimum of 60 feet and all buildings are fully fire–sprinkled and provided with fire-alarm systems throughout. The local Fire Marshall would be consulted to secure approval of the fire hydrant locations and the emergency access paths around all structures to suit City equipment and fire suppression methods. All buildings would be certified as fully code compliant by the Department of the State Architect before construction begins. The project site is just outside of the City's six-minute response time area and the project design features presented in this discussion ensures that, in the event of a fire emergency, the response time from the fire department should be sufficient. Therefore, the proposed project is consistent with the City's service standard, and would not require construction of Fire Station 7 at this time. Therefore, the proposed project would not result in an environmental impact associated with the provision of fire protection services.


Station 6
Espinosa Rd
Russell Rd
Rogge Rd
Natividad Rd
N Main St
Hartnucker Blvd
Alvin Dr
Constitution Blvd
E Laurel Dr
Rider Ave
N Sanborn Rd
Williams Rd
Salinas
E Market St
John St
Clay St
University Ave
W Blanco Rd
E Blanco Rd
Harkins Rd
Abbott St
Alisal Rd
Hartnell Rd
Spreckels Blvd
183
68
101

3. The City of Salinas Fire Department acknowledges that access to the project site from Fire Station 5 and 6 would be via Rogge Road until buildout of the Future Growth Area (Rony Musones, Fire Inspector/Fire Plan Check, Salinas Fire Department, telephone conversation with consultant, January 17, 2012). Buildout of the Future Growth Area would include the extension of El Dorado Drive and Russell Road, which would provide additional access to the proposed school and the surrounding areas. Until such time, access to the project site will be from Rogge Road.

4. Comment acknowledged. Fire hydrants shall be provided in accordance with California Fire Code.

5. Comment acknowledged. The proposed project does not include any buildings greater than two stories.

6. Comment acknowledged.

7. Comment acknowledged.

8. Comment acknowledged.

9. Comment acknowledged.

10. Comment acknowledged.

11. Comment acknowledged.

12. Comment acknowledged.

13. Comment acknowledged.

14. Comment acknowledged.

15. Comment acknowledged.

City of Salinas
Engineering and Transportation, Public Works Department
200 Lincoln Avenue • Salinas, California 93901 • (831) 758-7241 • Fax: (831) 758-7935

MEMORANDUM

DATE: November 29, 2011

TO: Tara Hullinger, Senior Planner; Community & Economic Development Dept. (Advance Planning)

FROM: Robert C. Russell, P.E.; City Engineer/P.W. Deputy Director; Public Works Dept., Engineering Division

SUBJECT: SUHSD New High School #5 Construction Subsequent E.I.R. (SEIR) (Rogge Road, e/o Jade Drive)

This memorandum provides combined comments pertaining to the SUHSD New High School #5 Subsequent EIR (SEIR) for a new High School in Salinas. The site is more specifically located on Rogge Road, roughly 100 feet east of Jade Drive on land annexed into the City in 2008. These comments reflect those generated by my review of said SEIR, as well as those of Senior Civil Engineer Walter Grant of the Permit Center.

We appreciate the opportunity to review said document, but it appears as though many comments provided at initial meetings with the School Districts team to discuss the high school project have not been addressed in this document or the site plan, including:

1. The need to construct Russell Road and El Dorado Drive street improvements along the south and east site boundaries, respectively. Improvements to include curb, gutter, sidewalk, half street improvements, undergrounding overhead utilities, street lighting (per FGA standards) – a street light should be installed near all access points to clarify said points at nighttime, street trees, frontage landscaping, and related frontage improvements per City of Salinas Resolution No. 12963 (N.C.S.). There is an existing Russell-Rogge Official Plan Line that shows said extension running through this property. The SEIR document needs to address how/why this alignment is no longer necessary and actions required to officially remove this Official Plan Line (OPL), if acceptable to the County, who adopted the OPL. The City's General Plan SEIR may provide necessary documentation in this regard, utilizing a more southerly Russell Road extension as an alternative street system/network as a substitute. With the additional traffic loads on Rogge Road, construction may need to include an asphalt overlay over reinforcing fabric to provide sufficient strength on Rogge Road to accommodate the additional traffic loads (delivery vehicles, school buses, etc.).

2. The City originally requested that the site layout be designed to better interface with the West Specific Plan Future Growth Area to promote walking trips to/from this High School and future, nearby residential land uses. We were also interested in a layout that would relieve some of the traffic demands on Rogge Road after ultimate Future Growth Buildout, which could be done utilizing El Dorado Drive along this site's easterly boundary as an access to the school. This would also reduce traffic demand and limit traffic queues along Rogge Road to some degree, and reducing impacts on Bolsa Knolls residents near the Jade/Topaz intersection. (The City Engineer believes Site Redesign B, Figure 17, better addresses these City desires);

3. Analysis of the City's Sanitary Sewer system to determine if the system and Santa Rita Pump Station have the capacity to handle the additional sewer discharges expected from the site. Also, as discussed at an early consultation meeting, the Rogge Sanitary Sewer System that runs along San Juan Grade Road and then up Rogge Road was installed by the Santa Rita Elementary School District via Special Sanitary Sewer District approved by the Salinas City Council and MRWPCA. This District allowed only certain properties to connect to said sewer mainline. This property will need to annex into that District, and pay all applicable fees associated thereto. Public Works Department's Engineering Division would be glad to assist in identifying a scope of work for the analysis and helping determine loads for the SUHSD consultant's sub-consultant or our Sewer Master Plan consultant (which would need to be paid by the School District).

   The Sanitary Sewer System analysis shall extend from Rogge/Jade to Rogge/San Juan Grade, then southerly along San Juan Grade Road into and through the Northridge Estates development area in north Salinas, through the Santa Rita Lift Station, and down North Main Street. Said Study must be undertaken, completed, and accepted by the City prior to SUHSD's consideration of this High School #5 SEIR.

SEIR SPECIFIC COMMENTS

The following are more detailed comments related to information/analysis contained in the High School #5 SEIR:

3.5 (Pages S-2 & S-3, Proposed Project Description): As denoted in item 1 on Page 1 of this memo, the school construction shall include the construction of Rogge Road, El Dorado Drive, and Russell Road street frontages. Frontage improvements shall comply with City Resolution # 12963 (N.C.S.) The plan shall also include specific treatments to be included at Topaz Way and Jade Drive to limit traffic queuing and parking problems experienced at other High Schools and Middle Schools in the Salinas area during arrival and dismissal times. (The proposed site plan, and its

interface with adjacent development are similar to parking/traffic conditions at Washington Middle School in Central Salinas, which has been difficult to address/alleviate.).

4. The SEIR Text should be revised in pertinent areas to indicate that the City does not own/operate the potable water system. This area (Bolsa Knolls) is generally served by the California Water Service Co.

5. Salinas Traffic staff would like to meet with the SEIR consultant, Traffic sub-consultants, and School District development team to discuss concerns related to the traffic impact analysis, specifically:

    i. Pedestrian crossing measures to identify "preferred crossing" locations and treatments along the Rogge corridor that best serves all schools and students attending those schools along the Rogge corridor, and all ages using those crossings;
    ii. The preferred bicycle facilities to be provided along the Rogge corridor. My preference is for Class II facilities (bike lanes) in each direction, in lieu of the 10-foot wide proposed sidewalk. The bike lanes would ultimately connect lanes on San Juan Grade Road with future bike lanes on Natividad Road. I question whether sufficient right of way and/or easements exist along the adjacent single family home to the west to upgrade the 4-foot wide sidewalk to a 10-foot sidewalk.
    iii. Accessible path of travel from the public sidewalk to the on-site school buildings shall be shown on the site plan..
    iv. Ownership of new facilities, along with maintenance obligations thereof.
    v. City staff is disappointed that the SEIR is written so as to equate installing a crosswalk with pedestrian safety, which is not necessarily the case (Page 2-78, 1st and 3rd paragraphs);
    vi. The school shall install all applicable School and traffic signs along street frontages to comply with expected MUTCD requirements as part of the project;
    vii. (Page 2-81, para. 3): The City is currently unable to commit toward any funding toward San Juan Grade/Rogge intersection left turn extension/lengthening to address existing deficiencies. Further please clarify the deficient left turn movement.

6. (Page 1-23, Off-Site Improvements) In the first paragraph, the required on-site lift station serves the school, and shall be owned/operated and maintained by the SUHSD;

7. (Page 1-23, Low Impact development and Page 2-42, NPDES): All BMPs and LID features shall be owned/operated and maintained by the SUHSD under a recorded maintenance agreement (standard City requirement, per our NPDES permit and Stormwater Development Standards);

8. (Page 1-34, Local Agencies): The City is responsible for approving all connections to City mainlines, acceptance of the site into the Santa Rite Special Santa Rita Sanitary Sewer District, and the Salinas Fire Department will approve emergency access into/through the site and hydrant locations to ensure appropriate fire protection features during the life of the project.

9. (Page 2-3, Local Environmental Setting, para. 2): overhead utilities shall be installed underground as part of the project, and utility poles removed;

10. (Page 2-5, para. 2): Landscape treatments along the eastern and southern boundaries of the school site as visible from development in the FGA should be clearly defined at this time, and not a future negotiation for the future;

11. (Page 2-37, para. 1): Agriculture buffer zones should be shown on the site plan, clearly identified, and referenced/tied down so the final easement can be formally described by grant deed;

12. Section 2.5: The Senior Civil Engineer recently reviewed a copy of the Stormwater Control Plan. The City is pleased that the High School District's EIR consultant has selected a Hydrology sub-consultant who is knowledgeable with the Salinas NPDES Permit requirements and local hydrology nuances of the Greater Salinas area. This will help determine the most appropriate measures to include in the plan. However, a source knowledgeable with the Future Growth Area has informed us that the drainage ditch the site will connect to is not a public facility and the downstream property owner is not conducive to receiving any more runoff. The SUHSD should verify the ditch is available for use and amend the Storm Water Control Plan accordingly. The SUHSD shall also verify percolation rates for those areas where infiltration is proposed;

13. (Page 2-42, NPDES Drainage Criteria): Eliminate "which create or disturb impervious surface areas greater than 5,000 square feet" from the end of the first sentence;

14. The City expects that the development will pay the standard City and Regional Development Impact (TAMC) fees in existence 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.

These are the primary comments and concerns from the Engineering Divisions of the Public Works Department and Economic and Community Development Department/Permit Center.

We look forward to discussing our concerns with the School District team and EIR consultants with the hopes of resolving many of these issues before the SEIR is scheduled for District Board consideration. Any questions pertaining to this memo should be directed to Robert Russell at 758-7241.

Sincerely,

Robert C. Russell, P.E.
City Engineer

Enc: City Resolution No. 12963 (N.C.S.)

LETTER 9 – City of Salinas Public Works Department (December 7, 2011)

1. The School District is not proposing to extend Russell Road or El Dorado Drive as part of the project; however, the School District is not opposed to the City or future developers constructing these roadway extensions adjacent to, or in the vicinity of, the high school. The School District understands that Monterey County's official plan line became obsolete when the City of Salinas annexed the property. The City's general plan land use map identifies future Russell Road alignment along the southern boundary of the project site. Improvements proposed to Rogge Road would be constructed in compliance with an encroachment permit, expected to be issued by the City of Salinas.

2. The proposed project would be walkable to existing and future residential neighborhoods. See Letter #4, response to comment #3 for a discussion on how the proposed project is walkable and consistent with New Urbanism principles. See Board of Trustees meeting comments, response #3 for further discussion. The Draft SEIR includes mitigation measures to reduce traffic-related impacts to a less than significant level. Further, the School District is not required to resolve traffic issues which may or may not result from proposed future development. See Letter #4, response to comment #15 for a discussion on why the proposed site plan best achieves the School District's objectives.

3. The City indicated at a May 19, 2011 meeting that there is adequate capacity at the pump station for the proposed high school. The existing sanitary sewer service on Rogge Road to the west of the project site is part of a Special Service District, serving the Santa Rita School District and portions of the Bolsa Knolls neighborhood. The existing single-family residences located within the sanitary district are currently not connected to the system and therefore add no load. There is enough capacity under the current condition to serve the school.

   The School District will work with the City of Salinas Public Works Department to annex the project site to the Special Sanitary Sewer District and to conduct a Sanitary Sewer System analysis as described in the comment letter.

3.5 Regarding the extension of Russell Road and El Dorado Drive, please see response to comment #1 above. Improvements to Rogge Road are discussed in the Draft SEIR project description and further clarified in this Final SEIR, Appendix C.

   The comment regarding specific treatments at Topaz Way and Jade Drive is acknowledged. The School District would obtain an encroachment permit from the City of Salinas for improvements on Rogge Road.

4. Comment acknowledged. The School District would obtain a Will Serve letter from Cal Water. See Section 3.0, Changes to the Draft SEIR, for edits to pages 1-34 and 2-90 clarifying that Cal Water would provide water to the proposed project. Refer to Letter #7, comment #22 for more discussion on this issue.

5. The City of Salinas traffic staff requested to meet with the School District and their consultant to discuss concerns related to the traffic impact analysis. A meeting between the School District, the City of Salinas, the County of Monterey, and the City's consultants was held on February 21, 2012 at the School District's office to discuss these issues. The School District will continue to work with the City of Salinas staff regarding all of these issues.

   i. See Letter #5, response to comment #7 for a discussion on the proposed pedestrian crossings.

   ii. See Letter #5, response to comment #7 for a discussion on the proposed bicycle and pedestrian facilities.

   iii. Comment noted. If and when development occurs to the south and the east, the School District is open to installing access points, wrought iron fencing with gates, and pathways.

   iv. The School District will maintain their own facilities, including the landscaping to the curb until such a time as the City's Landscape Assessment is implemented on the Future Growth Area.

   v. Comment noted. See Section 3.0 Changes to the Draft SEIR for changes to page 2-78.

   vi. The School District will install all applicable school and traffic signs along the street frontage. All signs would be designed to Manual on Uniform Traffic Control Devices (MUTCD) standards.

   vii. The City has acknowledged that this comment is regarding the Natividad Road and Rogge Road intersection, and not the intersection of San Juan Grade Road and Rogge Road. As identified in mitigation measure T-4 of the Draft SEIR, the School District will implement the improvement to the degree that it mitigates the School District's fair share of the cumulative impact.

6. Comment acknowledged. See Section 3.0, Changes to the Draft SEIR, for edits to page 1-23.

7. Comment acknowledged. See Section 3.0, Changes to the Draft SEIR, for edits to page 1-23. The School District will enter into agreements that are required by the State Water Resources Control Board associated with the NPDES permit.

8. Comment acknowledged.

9. The undergrounding of electrical lines and the removal of utility poles is not part of the proposed project. No utility poles are located on the School District property.

10. The School District does not see the value in landscaping the southern and eastern project boundaries, which are adjacent to existing, active agricultural land. The School District is willing to discuss landscaping treatments of these area should adjacent development be proposed, approved, and implemented in the future.

11. The comment states that agricultural buffers should be shown and clearly identified on the site plan. The City of Salinas does not require agricultural buffer zones within the city limits. See the Draft SEIR Section 2.4, Hazards and Hazardous Materials, for a complete discussion on the hazards from pesticides associated with adjacent farming activities.

12. The proposed drainage ditch improvements would not direct more runoff to the downstream property than would occur in the existing conditions. Rather, the ditch is intended to convey existing flows at lower velocities to reduce erosion on site and reduce sediment transport to the downstream property.

13. Comment acknowledged. See Section 3.0, Changes to the Draft SEIR, for edits to page 2-42.

14. Comment acknowledged. The School District would pay its fair share of fees to the extent legally required.

Letter #10

MONTEREY COUNTY

PLANNING DEPARTMENT
Mailing: 168 W. ALISAL ST., 2nd FLOOR, SALINAS, CA 93901
PERMIT CENTER LOCATIONS:
☑ SALINAS OFFICE: 168 WEST ALISAL ST., 2nd FLOOR, SALINAS, CA 93901; FAX: (831) 757-9516; PHONE:(831) 755-5025
☐ COASTAL OFFICE: 2620 FIRST AVE., MARINA, CA 93933; FAX: (831) 384-3261; PHONE: (831) 883-7500
☐ KING CITY OFFICE: 522-NORTH SECOND ST., KING CITY, CA 93930; FAX: (831) 385-8387; PHONE: (831) 385-8315
http://www.co.monterey.ca.us/pbi/

December 8, 2011

Salinas Union High School District
Attn: Karen Luna, Manager of Maintenance, Facilities and Planning
P.O. Box 80900
Salinas, CA 93912

RE: County of Monterey comments on the Draft Subsequent EIR for the Salinas Union High School District New High School proposed on APN: 211-011-011-000, in the northeastern portion of the City of Salinas (County of Monterey, Reference No. REF110060)

Dear Ms. Luna:

Thank you for the opportunity to review the Draft Subsequent EIR for the Salinas Union High School District New High School proposed on APN 211-011-011-000, located within the City of Salinas jurisdiction.

The Draft Subsequent EIR was processed thorough the County of Monterey Clearinghouse and the following County of Monterey agencies have commented on the document:

- Public Works
- Sheriff's Department
- Environmental Health Bureau

Department comments and staff contact information are listed below:

Department of Public Works
Staff: Raul Martinez, Assistant Engineer
Ph. (831) 755-4628; email: martinezrr@co.monterey.ca.us

We have reviewed the Subsequent Environmental Impact Report (SDEIR) for the High school #5 construction project specifically, Appendix G which is the Traffic Impact Analysis prepared by Hatch Mott MacDonald, dated July 21, 2011 and Appendix H which is the Mitigated Access Plan Analysis prepared by RBF consulting dated October 18, 2011 and in general concur with the traffic analysis and proposed project's specific

on-site and off-site mitigations measures. None the less there is still details that need fine-tuning such as:

1 • Once the traffic signals are installed for phase 1 at San Juan Grade/ Penzance Street and San Juan Grade / Rogge and Rogge Road/ School driveway, the School needs to enter a traffic signal maintenance agreement with the County.

2 • The project/ school needs to dedicate to the County the necessary Right-of-Way to implement the project's frontage improvements along Rogge Road such as left turn lanes and meandering sidewalk. Please be reminded that prior to any work in County's Right-of-Way an encroachment permit needs to be obtained from our office.

3 • CEQA requires that for full disclosure the project needs to analyze background and background plus project scenarios that are currently approved such as the Lowe's shopping center and the Prunedale Improvement project to determine potential impacts. Please include in traffic analysis.

We appreciate your willingness to allow your consultant RBF, to continue to work with County staff to fine tune frontage improvements and determine the traffic signal's final location at school driveway.

Sheriff's Department
Staff: David B. Crozier, Crime Prevention Unit
Ph. (831) 759-6675; email: crozierd@co.monterey.ca.us

The Monterey County Sheriff's Office has conducted a through review of the Draft Subsequent EIR for the Salinas Union High School District project (REF110060).

Review of the noise assessment reveals no impact.

4 Overflow of parking capacity is not addressed (special events) and traffic impact may increase demand of services. Request this issue receive attention.

No other impacts were discovered.

Environmental Health Bureau
Staff: Patrick Treffry, Registered Environmental Health Specialist
Ph. (831) 755-4556; email: treffrypt@co.monterey.ca.us

Please see attached Environmental Health Bureau Memo dated November 30, 2011 with attachments.
********** (end of comments).

Again, thank you for the opportunity to comment on the Salinas Union High School District Draft Subsequent EIR. If you need additional clarification or information regarding specific department's comments, please feel free to contact the above staff or

you may contact me directly at the Resource Management Agency- Planning Department at (831) 755-5114.

Sincerely,

Nadia Amador, Associate Planner
amadorn@co.monterey.ca.us

Attachments:
Memo dated November 30, 2011, Environmental Health Bureau with the following attachments:

- DTSC: Interim Guidance for Sampling Agricultural Fields (2nd Revision)
- CAL-EPA: Use of California Health Screening Levels (CHHSL's)

cc: County File No. REF110060
Teri Wissler Adam, EMC Planning Group

LETTER 10 – Monterey County Planning Department (December 8, 2011)

1. A signal at San Juan Grade/Penzance Street is only required if Mitigation Measure T-1, which requires a school starting time before 7:45 am or after 8:30 am, is not implemented (see page 20 of the traffic impact analysis, Appendix G of the Draft SEIR). This conclusion was inadvertently omitted from the discussion in the Draft SEIR. See Section 3.0, Changes to the Draft SEIR, for edits to page 2-79 and page 2-83.

2. Comment acknowledged. The School District will obtain the required permits for construction.

3. As required by CEQA Guidelines section 15125 and section 15126, the Draft SEIR evaluates the impacts of the proposed project on the existing environmental setting, which is the baseline by which environmental impacts are assessed. The Prunedale Improvement Project, buildout of the Future Growth Area, and other related road network improvements are included in the Cumulative Impacts analysis as indicted on page 26 of the Traffic Impact Study, and Section 3.0, Cumulative Impacts, of the Draft SEIR.

4. For certain high attendance events, the parking required would exceed the parking provided on-site. These could include once-a-year events such as graduation and back-to-school night. Parking for these once-a-year events can be expected to intrude into the adjacent neighborhood. Some attendees can be expected to park on Rogge Road, which will marked for no parking along the project frontage. that the School District expects to provide traffic/parking control for these high attendance events.

   For full attendance stadium events such as football games (2,000 bleacher seats filled, plus other support staff and participants), the parking demand could meet or exceed the number of spaces provided on-site based on various measures of parking demand that are documented in previous prepared parking studies. Parking on Rogge Road would be an issue that could require enforcement.

   The parking demand for a full attendance event in the gymnasium (1,534 maximum occupancy) would not exceed the on-site parking spaces provided. Likewise for full attendance events in the smaller gym and theater. However, if events were held in these facilities concurrently, the total parking demand could exceed the spaces provided on-site. During these high attendance events, the School District will open up the turf and open space areas on campus for parking overflow.

Letter #11

COUNTY OF MONTEREY
HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH BUREAU

Date: November 30, 2011
To: Anna Quenga, Monterey County Project Planner
From: Patrick Treffry, REHS
Subject: REF110060 – (Draft SEIR Salinas Union High School District – Rogge Road)

Thank you for providing the Environmental Health Bureau (EHB) an opportunity to provide comments on the above-mentioned Draft Subsequent EIR.

Water Supply

1 It is EHB's understanding the proposed site is within the California Water Service service area, and as such, supports the proposed public utility water purveyor for this project.

Wastewater

2 EHB understands the existing sewer main will need to be extended from its' current location on Rogge Road to the subject site. As the existing Bolsa Knolls residential subdivision(s) utilizes onsite septic systems for wastewater treatment and disposal, EHB would be supportive of the efforts of the city of Salinas to include additional capacity to accommodate the Bolsa Knolls residential wastewater flows.

Soils

3 The Salinas Union High School District should be aware of potential soil contamination at sites previously utilized for production agriculture. The Hazardous Materials Management Service (HMMS) of EHB requires that prior to any conversion of agricultural land to residential use, or for use as a school site, the property must be sampled and tested for Contaminants of Potential Concern (COPC) according to the protocols developed by the Department of Toxic Substances Control (DTSC). COPC's can include organo-chlorine pesticides such as DDT, as well as arsenic and other heavy metals.

In general, if the COPC's are measured at non-detect concentrations, or at amounts lower than California Human Health Screening Levels (CHHSL's) the land would be suitable for conversion. If COPC's are measured at higher concentrations, then removal, clean-up and/or remediation would be necessary, under the supervision of either DTSC or the HMMS. For your review I am attaching two documents from DTSC and CAL-EPA.

1270 Natividad Rd., Salinas, CA 93906 (831) 755-4507 (831) 796-8680 FAX

If you have any questions regarding the soils matters, please contact Mr. Bruce Welden, Supervisor of HMMS, at (831) 755-4680 or weldenb@co.monterey.ca.us.

Additional questions/concerns relating to the water and wastewater components can be directed to Mr. Pat Treffry at (831) 755-4556 or treffrypt@co.monterey.ca.us.

Sincerely,

Patrick Treffry
Environmental Health Bureau

cc: Roger Van Horn, REHS

Attachments: DTSC: Interim Guidance for Sampling Agricultural Fields (2nd Revision)
CAL-EPA: Use of California Human Health Screening Levels (CHHSL's)

LETTER 11 – Monterey County Health Department (December 8, 2011)

1. Comment acknowledged. Cal Water Service Company is the water purveyor for the project site. Letter #7, response to comment #22 for more discussion.

2. Comment acknowledged.

3. A Preliminary Environmental Assessment (PEA) prepared for the project site in March 2007 indicated the presence of minor waste oil around an on-site drum, as well as chlordane and dieldrin around the project site at levels above the California Human Health Screening Levels. The Department of Toxic Substances Control (DTSC) approved a PEA in April 2007 with a further action determination. In August 2007, the School District entered into a School Cleanup Agreement (Docket Number HAS-SCA 07/08-021) for oversight of an environmental investigation and cleanup activities. The environmental investigation and mitigation and/or removal, if deemed necessary, would continue to be conducted under the DTSC oversight.

Rec 12/12/11

Letter #12

GLOBAL
INVESTMENT & DEVELOPMENT

December 2, 2011

EMC Planning Group Inc.
Attention: Teri Wissler Adam
301 Lighthouse Avenue
Monterey, CA 93940

Subject: Comments on the Salinas Union High School District New High School #5 Construction Draft Subsequent Environmental Impact Report (EIR), Dated October 18, 2011

Mrs. Teri Wissler Adam:

As you are aware, the proposed High School #5 site is located in the City of Salinas Future Growth Area; and more specifically, within the West Area Specific Plan boundaries. As a developer in the West Area Specific Plan, my company, Global Investment & Development, LLC (Global), currently has the 108-acre Madolora property under contract. Global and the Salinas Union High School District (District) share a common boundary, the High School #5 site's southeastern corner and Madolora's northwestern corner.

Global is currently participating with other landowners in the West Area Specific Plan to move entitlements forward. The entitlement efforts related to the New High School #5 (i.e., EIR) are obviously in front of the West Area Specific Plan. As a developer, Global understands the value of an asset like a new high school and the benefits it will bring to an area. We support the idea of building a high school on this parcel and look forward to working with the District in the future to help this school become a reality.

While Global is fairly new to the West Area group of landowners, the existing group has been preparing a Specific Plan for this area for years. I'm aware that the District has not been involved in this planning effort; however, the City of Salinas General Plan provided a detailed "land use plan" of the type of planning desired in this area. It's the West Area's opinion, in which Global shares, that certain infrastructure items related to the road network and design elements related to the school layout fails to recognize any of the new urbanism concepts outlined in the City of Salinas General Plan. There are certain concerns about pedestrian access points and edge treatments (i.e., fence lines) that I focus on in our comments below. I've broken up our comment letter into both General and Specific comments related to the proposed high school and associated EIR.

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GENERAL COMMENTS

The proposed school was viewed as a "marquee" element of the West Area Specific Plan by the landowner group. However, now that the preferred plan positions the buildings toward Rogge Road and ignores any future infrastructure along the site's southern and eastern boundaries, the school site now appears to be disconnected from the West Area Specific Plan. We have the following general comments related to pedestrian access; aesthetics along the southern and eastern boundaries; circulation; and drainage:

1 Pedestrian Access. No secondary access points (pedestrian only) are shown along the southern and eastern boundaries. It is presumed that the southern and eastern boundaries would be fenced. The Draft Subsequent EIR makes the statement in several areas that a plan for the West Area Specific Plan has not been submitted to the City of Salinas thus it is "premature to address such access at this time." However, in other areas of the document (i.e., Land Use Chapter), the Draft Subsequent EIR concludes, "The proposed high school campus is located in an area that is easily accessible and walkable to the existing residents to the west, and to potential future residents to the east and south." If a southern pedestrian access point was identified at this time, the conclusion of the former sentence that the proposed project is "easily accessible and walkable to potential future residents to the east and south" would be more believable.

The City of Salinas General Plan clearly shows Russell Road would be extended along the school site's southern boundary. It seems reasonable and not premature to identify a pedestrian access point along the southern boundary under the preferred plan. Planning efforts by the West Area Specific Plan group could then determine the location of pedestrian corridors and be sure they complement the school access point. It would appear that under the preferred plan that a formal pedestrian access point should be located between the two baseball diamonds near the southwest corner of the site. This would provide direct access onto a paved walkway that leads due north into the campus buildings. We'd like to see this access point be more than just a common gate with a lock; we'd like to see some architectural thought to be placed in its design that creates a sense of identity and place.

2 Aesthetics. What type of fencing would be planned along the southern and eastern boundaries? We'd like to see more than just a chain link fence. The appearance of these boundaries will be critical to the West Area Specific Plan owners. Noise from the fields are not a concern since the width of Russell Road and El Dorado Drive; as well as noise walls on the opposing side and/or sound reducing building materials would mitigate potential impacts to future residential uses. Thus aesthetics are more important and the use of a rot iron type fence with columns would be preferred. Landscaping at this time would not be critical, because once

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the full right of way of Russell Road is extended along the High School #5 site, part of that right-of-way would include extensive landscaping.

3 Circulation. I'd like to point out that the preferred plan disregards the future right-way-needed for the extensions of Russell Road and El Dorado Drive. This now pushes the entire future intersection of Russell Road and El Dorado Drive onto the Madolora property.

4 Hydrology and Drainage. Certain assumptions regarding how the site will control storm water raise concerns as an adjacent neighbor that is positioned "downstream" of your project. It is our understanding that you'll employ several Low Impact Development features over 7 different drainage areas to control storm water volumes and flow. Features or Integrated Management Practices (IMPs) include pervious pavement; depressed landscaping with under drains; self-retaining area in the football stadium; vegetated swales; infiltration/detention basin; and shallow bioretention swale with under drains to treat runoff into the drainage channel on the eastern boundary of the project site.

The *Stormwater Control Plan for Salinas Union High School District, High School #5*, dated March 2011 and prepared by RBF Consulting, concludes that "the specific IMP configurations presented in this report were developed for planning purposes and not design. Infiltration rate test results and a detailed grading plan will be required to perform design level analysis." Our concern is more about the long-term success of the subsurface treatment IMPs (i.e., parking areas and under the football field). If efficiency of the IMP to infiltrate the water was to degrade over time, and storm water by-passed the system, would it overwhelm the small infiltration/detention basin in the southwest corner and the proposed channel along the eastern boundary? What safety measures are being put in place to ensure downstream properties that long-term operation of the stormwater control system won't compromise the small agricultural ditch that will receive stormwater from the High School #5 site should IMPs not function properly?

SPECIFIC EIR COMMENTS

The following are specific comments related to the EIR. As noted above we support the concept of a new High School being built on this parcel. However, we want project related impacts to be fully disclosed and mitigated to our satisfaction.

1.1 Project Description

Page 1-19, Access

5 We disagree with the conclusion that it is "premature" to discuss access along the southern boundary of the project site. The City of Salinas General Plan and a phone call to Brian Finegan (West Area's representative) or the City of Salinas would confirm the West Area's

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intent to bring Russell Road along the High School #5's southern boundary. Mr. Finegan and the City would also confirm the intention to bring El Dorado Drive north, along the eastern boundary of the school site. As noted above, there appears to be one logical location for a formal pedestrian entrance along the southern boundary (between the two baseball diamonds).

2.1 Aesthetics

Page 2-3, Project Analysis, Visual Impact on the Site and Surrounding Areas, 2nd Paragraph

6 The second and third sentences read, "The homes immediately adjacent in the residential neighborhood to the west back up to the school. Therefore, the school would only be visible over the back fences of these homes and at the terminus of Topaz Way." The aesthetic chapter does conclude that the project will cause a "significant and unavoidable impact" related to the substantial degradation of the existing visual character or quality of the site. However, to just state "the school would only be visible over the back fences" of the adjacent existing homes to the west seems to misrepresent the magnitude of the impact. A two story high school will be placed 90 feet from this back fence. Will students and faculty on the second floor be able to view the backyards and rear of the residents? Will the building cast a shadow or glare on the adjacent residents? Will the residents view light standards in the parking lot and will they remain on all night for security reasons (see additional comment below regarding lighting)?

Page 2-4, Light and Glare

7 The Draft Subsequent EIR only focuses on the football stadium lighting. The document fails to discuss potential impacts of parking lot lighting. Special attention should be given to the "staff" parking lot along the project site's western boundary. This lot is located immediately adjacent to existing residents. Will it contain light standards and will they be lit the entire night? In addition, the main building is located only 90 feet from these same residents and no discussion regarding security lighting associated with the building is noted in the EIR and how that lighting will be mitigated, if necessary.

8 The Impacts and Mitigation Measures section on Page 2-5 only discusses the Stadium Lighting and no other impacts associated with other campus exterior lighting, like the parking lot areas or campus buildings. For clarity, the EIR chapter should reflect information in the Lighting Plan, including the "list of design measures that proposed project would implement to reduce the impact of light emitted from the proposed project on the surrounding area." This last sentence is taken from Page 2-4. What "impact" is this statement referring to? Why is there no mitigation measures identified if a potential impact is present? Or, list the design measures and identify them as part of the project design; thus the project is self-mitigating.

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Page 2-5, 2nd Paragraph

9 Through review of the City of Salinas General plan, it is identified that residential uses will be located to the south and east of the school site. As discussed above, as an adjacent neighbor we'd like to see a formal pedestrian access point identified along the southern boundary of the
10 high school site and an aesthetically pleasing fence line created. As noted above, because the school site is not accommodating any rights-of-ways for future streets along the southern and eastern boundaries, the need for landscaping in the short term is not required and will be met in the long term with the future rights-of-ways that will include a landscape strip. At a minimum, the school district should provide an aesthetically pleasing fence.

2.4 Hazards and Hazardous Materials

Page 2-39, Mitigation Measure HZ-2

11 Mitigation Measure HZ-2 should be modified per discussions above under the General Comments regarding pedestrian access. Basically, the measure is being offered to restrict access from the school to the adjacent agricultural fields that exist today. We have no issues with that concept and encourage the need for that control while agricultural activities continue. However, as noted above, landscaping would not be necessary now since the future extension of roadways adjacent to the school will incorporate landscaping in their rights-of-ways when they are constructed. Also, we'd prefer to see an aesthetically pleasing fence be proposed along the eastern and southern boundaries. In addition, a formal pedestrian entrance could be located now along the southern boundary, but locked until development in the West Area Specific Plan replaces the adjacent agricultural uses.

2.5 Hydrology and Water Quality

Please refer to the General Comments above regarding concerns associated with the Stormwater Control Plan.

2.6 Land Use

Pages 2-50 and 2-51, Policy Consistency and Impacts and Mitigation Measures

12 Without identifying a pedestrian access point along the southern boundary of the school, it is unreasonable to conclude, "The proposed high school campus is located in an area that is easily accessible and walkable to the existing residents to the west, and to potential future residents to the east and south." City of Salinas Policy CD-3.1 aims to create distinct, identifiable neighborhoods that have traditional neighborhood development characteristics by siting schools within neighborhoods so that they are easily accessible and with walking

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distance. To say it's premature to address access at this time because no formal plan has been submitted is unacceptable. You are turning a blind eye to the City of Salinas General Plan and deferring potential mitigation into the future. What assurances are there that the School District would be willing to address these aesthetic and land use issues by putting in landscaping and an access point in the future? There is no mitigation measure identified in the document that would solidify the district's commitment in the text to provide such improvements.

2.7 Noise

Appendix F, Noise Assessment and Chapter 2.7, Noise

13 The Noise Assessment contained in Appendix F of the Draft Subsequent EIR discusses impacts related to construction noise (page 38). It also lists mitigation measures to reduce the identified temporary significant impact related to construction noise on pages 42 and 43 or the Noise Assessment. However, the Draft Subsequent EIR Noise chapter fails to identify this impact and related mitigation measures that would reduce impacts to less than significant. Is there a reason for not identifying this impact and related mitigation measures?

Page 2-58, Project-Generated Noise Impacts, Project-Generated Traffic Noise (2nd Paragraph)

14 The paragraph concludes that the parking lot traffic would be in compliance with City and County standards and would not add to the background noise environment at the respective receptor locations, the closest receptor being the residents adjacent to the site's western boundary. The staff parking lot is proposed to be located immediately adjacent to the rear of the existing residents to the west. The Noise Assessment only address "traffic" noise within the parking lot. What about car doors closing; pedestrians talking; and audio noise from the building like alarms and bells between classes? A host of potential nuisance noises appears to be overlooked.

15 On page 2-54 of the Draft Subsequent EIR, it is stated that the Noise Assessment utilized 3 different thresholds of significance. The second bullet states, "causing the DNL in existing residential areas to increase by 3 dB or more and, thereby, exceed 60 dB DNL." In reviewing Table VII, School Parking Lot Noise, on page 24 of the Noise Assessment, it appears that the upper range of the Future DNL, shown as 70 dB is 3 dB greater than the existing conditions upper end of range; and exceeds 60 dB DNL. Why is this not reported in the Draft Subsequent EIR and mitigation measures recommended to reduce this significant impact to less than significant levels under cumulative conditions (assuming "Future" is referring to buildout conditions of the Salinas General Plan)? Also, please provide a source for the data within Table VII of the Noise Assessment; it is unclear where it was generated from.

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3.0 Cumulative Impacts

Page 3-6, Land Use and Planning

16 By not showing a commitment to an access point and nicely designed fence line along the project site's southern boundary, I don't believe you can come to the conclusion that the project is "consistent with the policies and measures of the City of Salinas General Plan and zoning code."

4.0 Alternatives

Page 4-15, Alternative 3, Site Redesign A, Hazards and Hazardous Materials

17 Wouldn't the application of Mitigation Measure HZ-1 reduce potential impacts related to pesticide use?

Page 4-16, Alternative 3, Site Redesign A, Land Use and Planning

18 At a minimum, as demonstrated in the Salinas General Plan, Russell Road would be extended along the site's southern boundary and as stated above, it is our opinion that it would not be unreasonable to identify a pedestrian access point at this time. Obviously, while parcels to the east and south are under agricultural operations, that access point would remain locked.

Page 4-23, Alternative 4, Site Redesign B, Hazards and Hazardous Materials

19 Wouldn't the application of Mitigation Measure HZ-1 reduce potential impacts related to pesticide use?

Page 4-23, Alternative 4, Site Redesign B, Land Use and Planning

20 At a minimum, as demonstrated in the Salinas General Plan, Russell Road would be extended along the site's southern boundary and as stated above, it is our opinion that it would not be unreasonable to identify a pedestrian access point at this time. Obviously, while parcels to the east and south are under agricultural operations, that access point would remain locked.

Conclusion

Thank you for this opportunity to express both our support and concerns related to the Salinas Union High School District High School #5 project site and associated Draft Subsequent EIR. We'd hope you can appreciate our concerns related to how you treat the southern and eastern boundaries of your project site. By identifying an access point at this time along the southern

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boundary of the preferred plan, and committing to an aesthetically pleasing fence line, the preferred plan can go much farther at complementing future planning efforts in the area.

Sincerely

Joseph Rivani
Global Investment & Development, LLC

LETTER 12 – Global Investment & Development letter (December 12, 2011)

1. Comment acknowledged. See Board of Trustees meeting comments, response #3, and Letter #4, response to comment #3. If and when development occurs to the south and the east, the School District is open to installing access points, wrought iron fencing with gates, and pathways

2. Comment acknowledged. Again, if and when development occurs to the south and the east, the School District is open to installing access points, wrought iron fencing with gates, and pathways.

3. Extending Russell Road and El Dorado Drive is not part of the proposed project and therefore is not shown on the site plan. According to the 2006 General Plan Land Use and Circulation Policy Map, both future extensions of Russell Road and El Dorado Road are not located on the project site.

4. As with any Low Impact Development practice, proper monitoring and maintenances would be required to achieve long term water quality and discharge objectives. Final design would be based on infiltration rates that can reasonably be expected to be maintainable based on test results. A specific monitoring and maintenance plan for the facilities has not yet been developed, but could include periodic vacuum-sweeping of pervious pavement and post-storm monitoring of how quickly water levels drop in the various Integrated Management Practices. It should be noted that the design evaluation of Integrated Management Practices will anticipate some degradation over time and it is typical to design for half the measured infiltration rate. There is added protection from impacts to downstream properties because the project is being evaluated to mitigate to pre-development conditions and not pre-project conditions.

5. See response #1 above.

6. See Letter #7, response to comment #11 for a discussion on environmental issues related to views from the classroom building into adjacent yards.

   A shadow path study was prepared by Kasavan Architects in February 2012 to evaluate the shadow impacts of the proposed project buildings, specifically to determine the effects on the existing adjacent homes west of the project site. A copy of the shadow path study can be found in Appendix E of this document. The following times and months were modeled in the shadow path study:

Winter Solstice – Shortest Day of the Year

- December 21, 8:20 am
- December 21, 9:10 am

Vernal Equinox – When Day and Night are the Same Length

- March 21, 8:10 am
- March 21, 8:40 am

Summer Solstice – Longest Day of the Year

- June 21, 6:50 am
- June 21, 7:10 am

Autumnal Equinox - When Day and Night are the Same Length

- September 21, 8:10 am
- September 21, 8:40 am

According to the modeling results, the two-story classroom building would shade four to five of the adjacent homes for short periods of time depending upon the time of year. The time of year with the longest period of shading is around the winter solstice (December 21st), when the maximum shading period affecting five homes would be about 50 minutes beginning at 8:20 a.m. Each successive day before and after December 21st the shading period and extent of the shading would be shortened.

On the summer solstice (June 21st), the classroom building would shade four homes at 6:50 a.m. for about 20 minutes. For each successive day before and after June 21st, the shading period and extent of the shading would be shortened.

For the vernal and autumnal equinoxes (March 21st and September 21st), the classroom building would shade only a portion of four homes at 8:10 a.m. for about 30 minutes. For each successive day before and after March 21st and September 21st, the shading period and the extent of the shading would be shortened.

Therefore, because the shadow effect from the two-story classroom building only affects four to five homes for very short periods of time, this visual impact is less than significant.

Regarding the comment about the lighting standards in the parking lot, the lighting plan described in the Draft SEIR includes specifications that were developed to ensure that the proposed project would not have a significant light impact on adjacent properties.

7. The lighting plan prepared for the proposed project would reduce all potential lighting impacts to a less than significant level. The lighting plan described in the Draft SEIR includes specifications that were developed to ensure that the proposed project would not have a significant light impact on adjacent properties. Lighting to illuminate the staff parking area and the exterior of the building would be constructed at the edge of the parking lot along the adjacent neighbors' fence, enabling the lights to face the parking area and not the neighbors' backyards or into their homes. See Letter #7, response to comment #11 for more discussion.

8. Page 2-4 of the Draft SEIR summarizes the lighting plan that was prepared for the proposed project, which can be found in Appendix C of the document. The lighting plan includes lighting requirements for all general and exterior lighting, as well as the stadium lighting. The lighting plan summarizes the state, city, and industry standards and requirements for campus exterior and stadium lighting, and includes design measures that the proposed project would implement to reduce light emitted from the proposed project on the surrounding area. The inclusion of the lighting plan makes the project self-mitigating. The implementation of the lighting plan would reduce the impact of all lighting associated with the high school to a less than significant level. Therefore, all lighting impacts associated with the proposed project, not just the stadium, are addressed in the Draft SEIR. See Section 3.0, Changes to the Draft SEIR, changes to the Draft SEIR.

9. See response #1 above for comments regarding potential future access points and fencing design.

10. Comment acknowledged regarding the landscaping along the future streets to the east and south.

11. Comment noted. See response #1 above for comments regarding potential future access points and fencing design.

12. See response #1 above for comments regarding potential future access points. Section 15126.2 of the CEQA Guidelines states that "in assessing the impact of a proposed project on the environment, the lead agency should normally limit the examination to changes in the existing physical condition in the affected area as they exist at the time the notice of preparation is published." At the time of the publication of the notice of preparation, the property to the east and south were in agricultural production and still are. The Draft SEIR appropriately evaluated the proposed high school's impact on the existing environment.

There is no requirement in CEQA to evaluate a project's impact on a proposed future condition. See Board of Trustees meeting comments, response #3 for more discussion.

13. Construction noise was addressed and mitigated was identified in the Acquisition EIR and adopted by the School District Board of Trustees in 2006. Therefore, this issue did not need to be addressed again in the SEIR. Page 2-52 of the Draft SEIR includes a summary of how construction noise was addressed and mitigated in the Acquisition EIR.

14. This comment is acknowledged. Although the analysis was conducted, and the conclusions with a table presenting the noise data were included in the noise report and in the Draft SEIR, the textual description of the parking lot noise was inadvertently omitted from the noise report. See Appendix A, Noise Report Addendum, to this Final SEIR for the missing text regarding noise impacts from the parking lot along the western boundary. No changes to the Draft EIR are necessary.

15. Comment acknowledged. Here is a clarification regarding the increases in noise shown in Table VII of the noise study. The natural expected growth of the area is what would cause the 3 dB increase in traffic noise from the existing 52-67 dB to the future 55-70 dB. These noise exposures and increases are not due to the project. The project-generated noise exposures are shown in the third column, which reveals that the project would not add to the previous existing and future background noise exposures because of the relatively low volume of project vehicles. The source for Table VII of the Noise Assessment is "Noise Assessment Study for the St. Andrew's Parish and School Remodel, Saratoga Avenue, Saratoga", which was prepared by Edward L. Pack Associates, Inc, in October 2002.

16. See response #1 above for comments regarding potential future access points.

17. Alternatives 3 and 4 place the classrooms within approximately 50 feet of active farmland, and associated pesticide use, while the proposed site plan places the classrooms at least 400 feet from the active farmland. Placing the classrooms within 50 feet of the adjacent active farmland may place greater restrictions, beyond those identified in HZ-1, on the adjacent farming activities. See Section 2.4, Hazards and Hazardous Materials for a discussion of the pesticide impacts associated with the proposed site plan and Section 4.0, Alternatives for a discussion of the pesticide impacts associated with Alternative 4.

18. See response #1 above for comments regarding potential future access points.

19. See response #17 above.

20. See response #1 above for comments regarding potential future access points.

3.0
CHANGES TO THE DRAFT EIR

This section contains text, tables and graphics from the Draft EIR with changes indicated. Additions to the text are shown with underlines and deletions are shown with ~~strikethroughs~~. Also refer to Section 3.0 Revised Summary for an updated summary.

The following edits were made to page 1-23, paragraph 1, 2, and 3

Site Preparation

The demolition of the existing house and associated structures would require a demolition permit from the Monterey Bay ~~Area~~ Unified Air Pollution Control ~~Quality Management~~ District. The demolition of the septic system would require a septic tank demolition permit from the Monterey County Environmental Health Division. Wells that are necessary for irrigating adjacent agricultural fields will be maintained for irrigation purposes, in accordance with the School District lease agreement with the farmer, and will not ~~may~~ be utilized for irrigating the high school athletic fields.

Off-site Improvements

To service the proposed project, sewer lines would be extended along Rogge Road to the west to connect with the City of Salinas sewer system at the southwestern corner of Rogge Road and Bollenbacher Drive. The project requires a lift station, which will be located on site. The required on-site lift station shall be owned, operated, and maintained by the School District.

Water mains would be extended along Rogge Road to the west to connect with ~~City's~~ California Water Services Company water system at the southeastern corner of Rogge Road and Jade Drive.

Low Impact Development

The proposed project includes several Low Impact Development elements to reduce the impact of potential increases in runoff and to comply with the criteria of the City's Storm Water Development Standards and the requirements of the Regional Water Quality Control Board, which require the proposed development to match pre-development flow conditions. All BMPs and LID features shall be owned/operated and maintained by the School District.

The following edits were made to page 1-23, paragraph 5

The proposed project includes several Low Impact Development elements to reduce the impact of potential increases in runoff and to comply with the criteria of the City's Storm Water Development Standards and the requirements of the Regional Water Quality Control Board, which require the proposed development to match pre-development flow conditions. These elements include the use of pervious pavement, bioretention, an infiltration underdrain system under the football field, vegetated swales, and a shallow detention basin. The project also includes a channel along the eastern edge of the project site to convey offsite runoff to replace an existing ditch. All Best Management Practices and Low Impact Development features shall be owned, operated, and maintained by the School District under a recorded maintenance agreement.

The following edits were made to page 1-32

- City of Salinas Community Development Department (~~April 31, 2011~~ April 13, 2011)

The following edits were made to page 1-34

- City of Salinas
  - Approval – connection to the City's sewer ~~and water system~~
  - Approval – Encroachment permit on Rogge Road (Public Works)
- County of Monterey
  - ~~Approval – Encroachment permit on Rogge Road (Public Works)~~

The following edits were made to page 2-4

The plan also summarizes the state, city, and industry standards and requirements for campus exterior and stadium lighting. The report also lists the design measures that the proposed project would implement to reduce ~~the impact of~~ light emitted from the proposed project on the surrounding area.

The following addition was made to the impact statement on page 2-13

Less than Significant – Direct Emissions. The proposed project does not include any unusual uses that would utilize equipment that would result in direct emissions not already accounted for in the MBUAPCD AQMP. The operational emissions impact statement from the Acquisition EIR would not change with inclusion of direct stationary source emissions. The proposed project would not result in any significant levels of direct air quality emissions.

The following edits were made to page 2-26, paragraph 4

Using the URBEMIS2007 model, mobile source emissions in the form of CO_2 from the proposed project area estimated to be 2,496.54, or approximately 2,265 metric tons per year using a conversion factor of 0.907 metric tons per short ton per year.

The following edits were made to page 2-29, Table 6

Table 6 Total Operational GHG Emissions (metric tons CO_2e/year)

GHG Emissions Source	GHG Emissions ~~Volume~~ Metric Tons CO_2e/year
Mobile source	906
Area source	106
On-/Off-Site Electricity Demand (indirect sources)	852
Total	1,864

Source: EMC Planning Group 2012

The following edits were made to page 2-29 and 2-30

Total GHG emissions for these activities are estimated at ~~278.18 tons or 252 metric tons~~ 259.8 tons or 235.6 metric per year.

The following edits were made to the impact statement on page 2-33, first paragraph

The School District would consider the proposed project to be consistent with AB 32 if its unmitigated GHG emissions volume of 1,864 metric tons per year can be reduced 30 percent ~~below "business as usual~~ to a total of 1,305 metric tons per year or less.

The following edits were made to page 2-40, paragraph 1 under Background Information

The Monterey Regional Water Pollution Control Agency and the City of Salinas would provide sewer service and the California Water Service Company would provide water service to the proposed project.

The following edits were made to page 2-42, paragraph 2

The City of Salinas adopted new Storm Water Development Standards in April 2010.~~, which impact all new development in the City which create or disturb impervious surface areas greater than 5,000 square feet.~~

The following edits were made to page 2-45, mitigation measure HY-1 & HY-2

HY-1. Prior to final site design, the School District will integrate into the project design all applicable Low Impact Development features discussed in the storm water plan so that the proposed project meets City of Salinas design standards to match pre-construction flow conditions.

HY-2. Prior to final site design, the School District will conduct ~~infiltration rate testing and a prepare a detailed site grading plan to provide a design basis for infiltration at the football field area, the student parking area, and the staff parking area. The final design of the proposed project will integrate the Integrated Management Practices features with internal site drainage details~~ at least one dual ring infiltration rate test at the planned elevation of the limit of excavation for each of the three primary infiltration facilities (the football field area, the student parking area, and the staff parking area). A soil boring will be obtain near each of these locations prior to the infiltration testing to determine if soil strata, such as clay layers that could be penetrated, should be considered in the final design and selection of the limit of excavation. Final design of the infiltration facilities will be based on an infiltration rate not to exceed 50 percent of the measured rate. Long duration simulations will be conducted to demonstrate that design post-construction runoff rates are less than pre-project runoff rates.

The following edits were made to page 2-78

However, crosswalks are provided allowing students to ~~safely~~ cross from the north side of Rogge Road to the south side of Rogge Road.

In addition, as identified above, a crosswalk will also be provided across Rogge Road at the Jade Drive and Jasper Way intersections, allowing bicyclists to ~~safely~~ cross the road. These improvements are included as mitigation measures in "Impacts and Mitigation Measures" presented later in this section.

The following edits were made to page 2-82

In addition, the stadium-capacity parking lot would have a single access to Rogge Road and would not connect to other parking lots on site. This parking lot would only be used during stadium-capacity events. Eighty-one parking spaces will be provided in this parking lot. ~~Police~~

The School District will implement traffic control at the driveway intersection with Rogge Road ~~is recommended~~ when the parking lot is used for stadium-capacity events because left turn channelization is not provided on Rogge Road at this driveway.

The following edits were made to page 2-89, mitigation measure T-3

e. Provide a bulbout at the intersection of Rogge Road and Bollenbacher Road/s.

The following edits were made to page 2-90, paragraph 5

Water mains would be extended along Rogge Road to the west to connect with ~~the City's~~ California Water Service Company water system at the southeastern corner of Rogge Road and Jade Drive.

The following addition was made to page 2-79, at the end of the discussion of Intersection #5

As an alternative to the improvements described for to mitigate impacts at San Juan Grade Road/Penzance Road (Intersection 5), the starting time of the high school could be shifted to avoid the starting and ending times of the elementary and middle schools located on Rogge Road. La Joya Elementary School begins the day at 8:00 AM and ends at 2:40 PM and the Bolsa Knolls Middle school begins school at 8:15 AM and ends at 3:10 PM. Generally, peak traffic conditions occur in the 20 minute period prior to the beginning of school and dissipate soon after the scheduled beginning of school. By scheduling the high school to begin the first period prior to 7:45 AM or after 8:30 AM, impacts identified at the San Juan Grade Road/Penzance Road and San Juan Grade Road/Rogge Road would be reduced and the two intersections would operate at satisfactory levels of service with existing intersection geometrics and traffic control. Impacts to Intersections 5 and 6 would not be significant and mitigation improvements would not be necessary.

The following addition was made to page 2-83, after Mitigation Measure T-1

Less than Significant Impact with Implementation of Mitigation-Unacceptable Traffic Operations at the San Juan Grade Road/Penzance Street Intersection. Addition of the Project Phase 1 traffic at the San Juan Grade Road/Penzance Street intersection would result in unacceptable traffic operations during the AM, Midday, and PM peak hours. Implementation of mitigation measure T-1 would reduce this impact to a less than significant level.

The following edits were made to page 3-8, #15

15. Extension of El Dorado Drive as a 2-lane collector between Boronda Road and ~~Russell Road~~ Rogge Road.

The following edits were made to page 5-3, paragraph 2

Total project emissions are estimated at approximately ~~4,660~~ 1,864 metric tons CO_2~~e~~ per year. State regulations, especially the Pavley standards and LCFS would result in some GHG emissions reductions from mobile (transportation) sources. In total reductions of approximately ~~691~~ 320 metric tons per year, or ~~15~~ 17 percent of total project emissions could be realized from State measures. The proposed project includes improvements and measures which would reduce some GHG emissions. These reduction measures proposed by the School District would reduce the indirect emissions by approximately ~~64~~ 26 metric tons per year, or approximately another one percent. This is a total reduction of ~~755~~ 345 tons per year or a total GHG reduction of approximately ~~16~~ 18 percent.

APPENDIX A

NOISE REPORT ADDENDUM

EDWARD L. PACK ASSOCIATES, INC.

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January 18, 2012
Project No. 43-005-A

Ms. Christine Bradley
EMC Planning Group, Inc.
301 Lighthouse Avenue
Suite C
Monterey, CA 93940

Subject: Response to Comments on the Noise Assessment Study, Salinas High School #5, Rogge Road, Salinas

Dear Ms. Bradley:

This letter will provide you with our responses to the comments on the *Noise Assessment Study for High School #5, Rogge Road, Salinas*, which was prepared for the Environmental Impact Report for the project.

From the City of Salinas

Comment 37 regarding football game and marching band noise;

Response: The City of Salinas Noise Element of the General Plan allows the use of either the DNL or the CNEL, as shown in Tables N-2 and N-3 of the Noise Element. We have re-calculated the noise exposures using the CNEL and found that there is no difference in the noise exposures between the two descriptors with the exception of project sources that occur during evening hours. These sources are football games, as the stadium is planned to be lighted, and the outdoor theater if events occur between 7:00 p.m. to 10:00 p.m.

For sources that occur during evening hours, the CNEL is 5 decibels higher than the corresponding DNL. Therefore, the following table provides the DNL's and CNEL's at the property boundaries for football games and theater events. The table also includes corrected noise exposure values for the south property line, as the values in Table VIII of the noise study are incorrect. The correct hourly noise levels for Table VIII are:

1st hour = 49 dBA,
2nd hour = 56 dBA,
3rd hour = 50 dBA.
The DNL should read 44 dB.

DNL to CNEL Conversion and Corrections to Table VIII						
	West PL (limit = 60 dB)		East PL (limit = 70 dB)		South PL (limit = 70 dB)	
	DNL	CNEL	DNL	CNEL	DNL	CNEL
Football Game (Project)	42	47	64	69	46	51
Football Game (Alt. A & B)	47	52	47	52	44	49
Theater (Project)	40	44				
Theater (Alt. A & B)	33	37				

As shown, although the noise exposures are several decibels higher using the CNEL, the noise exposures remain within the limits of the standards resulting in less-than-significant noise impacts.

The noise study does not reference industrial land uses for the adjoining properties to the south and east. These land uses were analyzed as agricultural uses, as that is what they are currently. We have no information regarding future uses of these lands, and without some kind of indication as to what the future uses may be, it is difficult to reasonably analyze future unknown uses. Although the future uses may be residential, the appropriate noise mitigation measures for high school generated noise sources would likely be dependent upon the exact use, site design, buildings, etc. Typically, the future use developments are required to mitigate noise at their project levels.

From Global Investment and Development

First paragraph comment regarding the faculty parking lot noise;

The parking lot noise scenario analysis includes noise from vehicles entering or exiting the parking lot, pulling into and out of parking spaces, one car door opening and closing for each car and one engine starting within each parking space upon exit. The parking spaces will typically be loaded at the spaces closest to the school doors. However, as the noise standards are in terms of a 24-hour average (based on shorter term average noise levels) it does not matter which spaces are filled first. The most noise impacted receptor location will be any point on the residential property boundary that has at least 11 spaces on each side of the nearest space to that point. Vehicles accessing spaces beyond 11 parking spaces are too far to add to the noise generated by the nearer spaces.

Noise from people talking, car stereos, building alarms, classroom bells, etc., are not analyzed as the parking lot is a staff lot so boisterous activity often associated with high school students is not expected and the buildings are not at the level of design to analyze building associated noise. We have recommended that building noise, i.e., mechanical equipment, etc., be analyzed at the time the buildings are designed in detail.

The more detailed analysis of the parking lot was accidentally omitted from the body of the noise study on page 23. These details will be provided in a separate letter.

Second paragraph regarding the increases in noise;

There may be some confusion regarding the increases in noise shown in Table VII of the noise study. The natural expected growth of the area is what will cause the 3 dB increase in traffic noise, from the existing 52-67 dB to the future 55-70 dB. These noise exposures and increases are not due to the project. The project-generated noise exposures are shown in the third column, which reveals that the project will not add to the previous existing and future background noise exposures because of the relatively low volume of project vehicles.

If you have any questions, please contact me.

Sincerely,

EDWARD L. PACK ASSOC., INC.

Jeffrey K. Pack
President

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January 19, 2012
Project No. 43-005-B

Ms. Christine Bradley
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Monterey, CA 93940

Subject: Missing Parking Lot Noise Analysis Text, Noise Assessment Study, Salinas High School #5, Rogge Road, Salinas

Dear Ms. Bradley:

This letter contains the missing text from the *Noise Assessment Study for High School #5, Rogge Road, Salinas* regarding parking lot noise, which was prepared for the Environmental Impact Report for the project.

The following text should have been included at the bottom of page 23:

Parking lot noise was determined utilizing a scenario of all parking spaces filling during a one hour period in the morning and emptying during one hour period in the afternoon. As the parking lot under the Project scenario would only effect the Jade Drive residences, the Alternative A and Alternative B scenarios would effect only the east property line, albeit, different areas of the east property line.

The most impacted location along the property line is a point where there would be eleven parking spaces on each side of the parking space closest to the receptor location. The distance between parking spaces is 8 ft. Thus, the distance in either direction from the central space to the least noisy space is 88 ft. Vehicular noise beyond 88 ft. is inconsequential.

The parking lot noise scenario analysis includes noise from vehicles entering or exiting the parking lot at 5 mph, pulling into and out of parking spaces, one car door opening and closing for each car and one engine starting within each parking space upon exit. There is a 1 second difference between each adjacent parking space entrance or exit. The parking spaces will typically be loaded at the spaces closest to the school doors. However, as the noise standards are in terms of a 24-hour average (based on shorter term average noise levels) it does not matter which spaces are filled first.

The analysis includes the parking activity at both the easterly row of spaces and the westerly row of spaces.

A average noise level of several standard automobiles entering, parking and leaving a parking lot was measured to be 57 dBA L_{eq} at a distance of 35 ft. from a parking space as the vehicle enters the parking lot, turns into the space, parks, and the occupants exit the car closing two or three doors. The duration over which the car enters the space where the sound level is contributory is 15 seconds at a speed of approximately 5 mph. The parking lot noise data were acquired from a study of parking lot noise at the St. Andrew's Church and School in Saratoga, Ref. (g). Although we expect only one car door to open and close for the subject project, the operation of two or three doors did not significantly effect the average noise level of the vehicle parking operation.

The sound levels of vehicles parking were calculated to be 60 dBA L_{eq} at 20 ft. (westerly row) and 52 dBA L_{eq} at 65 ft. (easterly row) from the Jade Drive property line. The sound levels of 23 vehicles (11 on each side of the nearest space) entering the parking lot range from 47-59 dBA L_{eq} for the westerly row (20 ft. to 90 ft.) and 47-52 dBA L_{eq} for the easterly row 65-109 ft.

The total sound levels of 23 vehicles entering the lot and parking were calculated to be 68 dBA for the westerly row and 64 dBA for the easterly row. Extrapolating these noise levels and parking durations over a 1 hour period yielded noise levels of 44 dBA $L_{eq(h)}$ for the westerly row and 38 dBA $L_{eq(h)}$ for the easterly row. The combined noise level was calculated to be 45 dBA $L_{eq(h)}$ at the most impacted Jade Drive residential property line. A 3 dB upward adjustment was then added to account for sound reflections off of the school building under the Project scenario.

From the St. Andrew's noise study, vehicles exiting the parking lot generate similar noise levels, including engines starting, as those entering the parking lot, when averaged over a short period of time. Thus, the entering and exiting scenarios are expected to yield similar hourly average noise levels. The noise exposure from two hours of noise at 48 dBA $L_{eq(h)}$ was calculated to be 37 dB DNL.

For receptor locations farther from the parking spaces, such as the southerly end of the Jade Drive residences when the student parking lot or the north end of the staff lot are filling, the noise exposure was calculated to be 9 dB DNL.

This analytical method was used to calculate the noise levels and noise exposures for Alternatives A and B, as shown in the Table below.

The following reference should also have been included in Appendix A:

(g) "Noise Assessment Study for the St. Andrew's Parish and School Remodel, Saratoga Avenue, Saratoga", by Edward L. Pack Associates, Inc., Project No. 33-009, October 21, 2002

If you have any questions, please contact me.

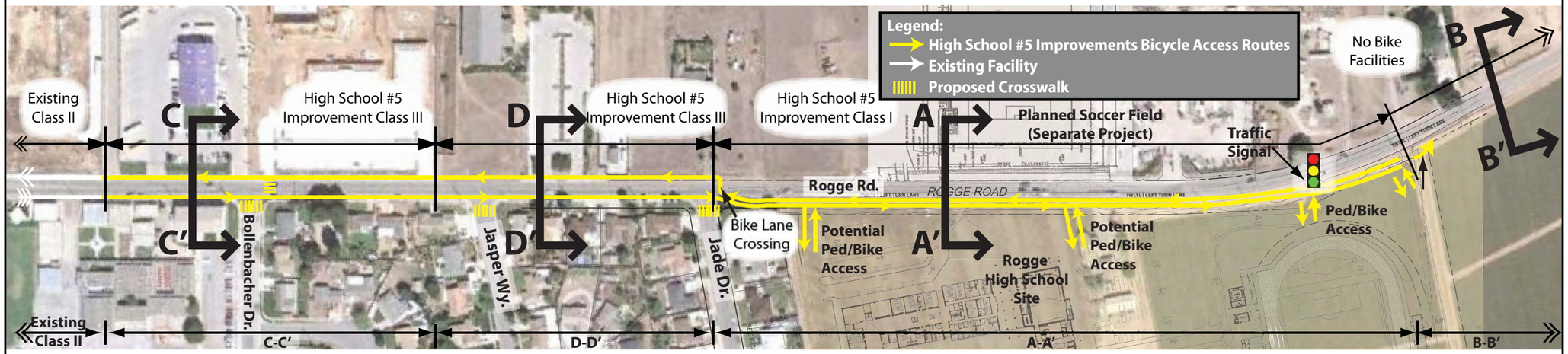
Sincerely,

EDWARD L. PACK ASSOC., INC.

Jeffrey K. Pack
President

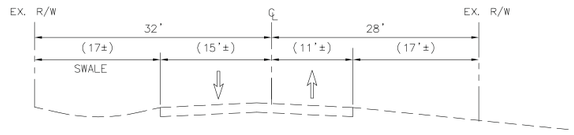
APPENDIX B

PROPOSED BICYCLE AND PEDESTRIAN FACILITIES

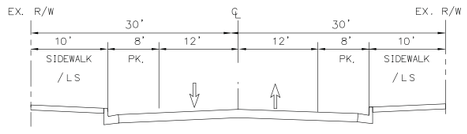


Existing

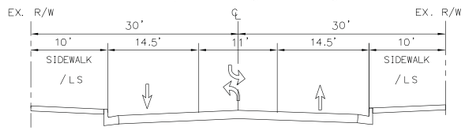
Section A-A' and B-B'



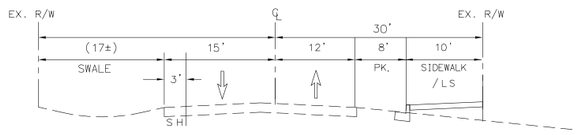
Section C-C'



Proposed by County

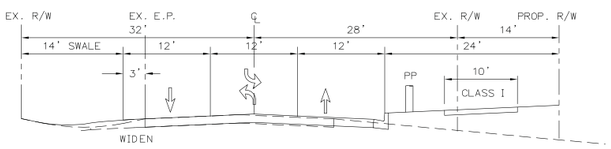


Section D-D'

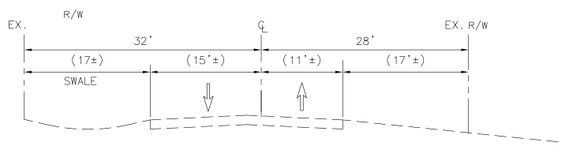


Interim (High School #5 Improvements)

Section A-A'

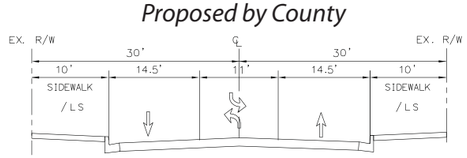


Section B-B'

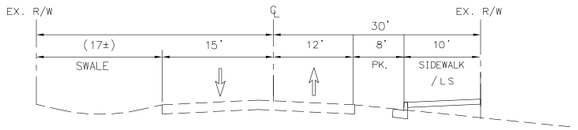


Section C-C'

Proposed by County



Section D-D'



RBF A Baker Company

Rogge Road Proposed Bicycle & Pedestrian Facilities (High School #5 Improvements)

Exhibit 1

APPENDIX C

REVISED URBEMIS RUN

4/10/2012 11:30:48 AM

Urbemis 2007 Version 9.2.4

Combined Annual Emissions Reports (Tons/Year)

File Name:

Project Name: SUHSD New High School 5 Revised Run 2

Project Location: Monterey Bay Air District

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

4/10/2012 11:30:48 AM

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2014 TOTALS (tons/year unmitigated)	0.01	0.08	0.05	0.00	0.13	0.00	0.13	0.03	0.00	0.03	9.41
2015 TOTALS (tons/year unmitigated)	1.34	1.40	1.72	0.00	0.51	0.09	0.59	0.11	0.08	0.19	249.89
2016 TOTALS (tons/year unmitigated)	0.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.50

AREA SOURCE EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
TOTALS (tons/year, unmitigated)	0.18	0.24	0.34	0.00	0.00	0.00	292.40

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
TOTALS (tons/year, unmitigated)	4.03	4.42	32.89	0.02	4.53	0.90	2,494.61

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
TOTALS (tons/year, unmitigated)	4.21	4.66	33.23	0.02	4.53	0.90	2,787.01

Construction Unmitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Annual Tons Per Year, Unmitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2

2014	0.01	0.08	0.05	0.00	0.13	0.00	0.13	0.03	0.00	0.03	9.41
Fine Grading 12/22/2014-02/13/2015	0.01	0.08	0.05	0.00	0.13	0.00	0.13	0.03	0.00	0.03	9.41
Fine Grading Dust	0.00	0.00	0.00	0.00	0.13	0.00	0.13	0.03	0.00	0.03	0.00
Fine Grading Off Road Diesel	0.01	0.08	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.99
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.42

2015	1.34	1.40	1.72	0.00	0.51	0.09	0.59	0.11	0.08	0.19	249.89
Fine Grading 12/22/2014-02/13/2015	0.04	0.28	0.18	0.00	0.51	0.01	0.52	0.11	0.01	0.12	37.64
Fine Grading Dust	0.00	0.00	0.00	0.00	0.51	0.00	0.51	0.11	0.00	0.11	0.00
Fine Grading Off Road Diesel	0.04	0.28	0.17	0.00	0.00	0.01	0.01	0.00	0.01	0.01	35.96
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.68
Asphalt 03/02/2015-04/10/2015	0.03	0.19	0.16	0.00	0.00	0.01	0.02	0.00	0.01	0.01	22.83
Paving Off-Gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	0.03	0.18	0.13	0.00	0.00	0.01	0.01	0.00	0.01	0.01	19.08
Paving On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.59
Paving Worker Trips	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.16
Building 04/27/2015-11/06/2015	0.20	0.93	1.36	0.00	0.00	0.06	0.06	0.00	0.05	0.05	188.10
Building Off Road Diesel	0.17	0.84	0.67	0.00	0.00	0.05	0.05	0.00	0.05	0.05	113.48
Building Vendor Trips	0.00	0.03	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.54
Building Worker Trips	0.03	0.05	0.65	0.00	0.00	0.00	0.01	0.00	0.00	0.00	65.08
Coating 11/23/2015-01/15/2016	1.07	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.32
Architectural Coating	1.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.32
2016	0.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.50
Coating 11/23/2015-01/15/2016	0.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.50
Architectural Coating	0.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.50

Phase Assumptions

Phase: Fine Grading 12/22/2014 - 2/13/2015 - Default Fine Site Grading Description

Total Acres Disturbed: 6.34

Maximum Daily Acreage Disturbed: 1.58

Fugitive Dust Level of Detail: Default

20 lbs per acre-day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

1 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

1 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Paving 3/2/2015 - 4/10/2015 - Default Paving Description

Acres to be Paved: 1.58

Off-Road Equipment:

4 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 6 hours per day

1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day

1 Paving Equipment (104 hp) operating at a 0.53 load factor for 8 hours per day

1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

Phase: Building Construction 4/27/2015 - 11/6/2015 - Default Building Construction Description

Off-Road Equipment:

1 Cranes (399 hp) operating at a 0.43 load factor for 6 hours per day

2 Forklifts (145 hp) operating at a 0.3 load factor for 6 hours per day

1 Generator Sets (49 hp) operating at a 0.74 load factor for 8 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day

3 Welders (45 hp) operating at a 0.45 load factor for 8 hours per day

4/10/2012 11:30:48 AM

Phase: Architectural Coating 11/23/2015 - 1/15/2016 - Default Architectural Coating Description

Rule: Residential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 100

Rule: Residential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Area Source Unmitigated Detail Report:

AREA SOURCE EMISSION ESTIMATES Annual Tons Per Year, Unmitigated

Source	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
Natural Gas	0.02	0.24	0.20	0.00	0.00	0.00	292.15
Hearth	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Landscape	0.01	0.00	0.14	0.00	0.00	0.00	0.25
Consumer Products	0.00						
Architectural Coatings	0.15						
TOTALS (tons/year, unmitigated)	0.18	0.24	0.34	0.00	0.00	0.00	292.40

Area Source Changes to Defaults

Operational Unmitigated Detail Report:

OPERATIONAL EMISSION ESTIMATES Annual Tons Per Year, Unmitigated

Source	ROG	NOX	CO	SO2	PM10	PM25	CO2
High school	4.03	4.42	32.89	0.02	4.53	0.90	2,494.61
TOTALS (tons/year, unmitigated)	4.03	4.42	32.89	0.02	4.53	0.90	2,494.61

4/10/2012 11:30:48 AM

Operational Settings:

Does not include correction for passby trips

Does not include double counting adjustment for internal trips

Analysis Year: 2013 Season: Annual

Emfac: Version : Emfac2007 V2.3 Nov 1 2006

Summary of Land Uses

Land Use Type	Acreage	Trip Rate	Unit Type	No. Units	Total Trips	Total VMT
High school		1.85	students	1,500.00	2,775.00	14,263.50
					2,775.00	14,263.50

Vehicle Fleet Mix

Vehicle Type	Percent Type	Non-Catalyst	Catalyst	Diesel
Light Auto	44.3	0.7	98.8	0.5
Light Truck < 3750 lbs	17.1	1.2	94.7	4.1
Light Truck 3751-5750 lbs	20.1	0.5	99.0	0.5
Med Truck 5751-8500 lbs	8.4	0.0	100.0	0.0
Lite-Heavy Truck 8501-10,000 lbs	1.4	0.0	71.4	28.6
Lite-Heavy Truck 10,001-14,000 lbs	0.9	0.0	55.6	44.4
Med-Heavy Truck 14,001-33,000 lbs	1.2	0.0	16.7	83.3
Heavy-Heavy Truck 33,001-60,000 lbs	0.7	0.0	0.0	100.0
Other Bus	0.1	0.0	100.0	0.0
Urban Bus	0.1	0.0	0.0	100.0
Motorcycle	4.5	55.6	44.4	0.0

4/10/2012 11:30:48 AM

Vehicle Fleet Mix

Vehicle Type	Percent Type	Non-Catalyst	Catalyst	Diesel
School Bus	0.1	0.0	0.0	100.0
Motor Home	1.1	0.0	90.9	9.1

Travel Conditions

	Residential			Commercial		
	Home-Work	Home-Shop	Home-Other	Commute	Non-Work	Customer
Urban Trip Length (miles)	11.8	8.3	7.1	11.8	4.4	4.4
Rural Trip Length (miles)	11.8	8.3	7.1	11.8	4.4	4.4
Trip speeds (mph)	30.0	30.0	30.0	30.0	30.0	30.0
% of Trips - Residential	32.9	18.0	49.1			
% of Trips - Commercial (by land use)						
High school				10.0	5.0	85.0

APPENDIX D

GREENHOUSE GAS MEMO

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

301 Lighthouse Avenue Suite C Monterey California 93940
Tel 831·649·1799 Fax 831·649·8399 www.emcplanning.com

To: **Karen Luna, Salinas Union High School District**

From: **Christine Bradley, EMC Planning Group**

Date: **April 23, 2012**

Re: **SUHSD New High School #5 FEIR – greenhouse gas reduction measures**

This memo summarizes the estimated emissions reductions that could occur from the implementation of the greenhouse gas (GHG) reduction measures listed on page 2-30 and 2-31 of the Draft SEIR. Please note that these are only estimates and a more in-depth technical analysis would need to occur in order to calculate accurate energy generation and emission reductions from these measures.

Solar photovoltaic (PV) power generation

The Draft SEIR states that the School District will install solar photovoltaic panels at the project site if funding is available. The School District will be installing conduits under the student parking lot, in the event funding is available to install solar panels on structures in the parking lot. According to the site plan, there are five rows of parking spaces in the student lot (excluding aisles). Structures built over these spaces would have a total roof surface area of about 25,191 square feet. According to Ken Scates, an architect with HGHB Architects in Monterey, who is familiar with alternative energy projects, solar panels have capacity to generate approximately 12 watts of electricity per square foot. Using this estimate, solar panels placed over these parking rows could have capacity to generate approximately 302,292 watts of electricity, or 302 kilowatts (kW), or approximately 0.3 megawatts (mW).

There are a number of sources that attempt to quantify the GHG emission reductions from electrical energy production for renewable sources, including solar cells. According to the Direct Normal Solar

Radiation map produced by the Center for Renewable Energy Resources, the Monterey Bay area can expect on average to receive approximately 4 to 5 hours per day of sunlight that would be useful for production of solar energy[1]. Given the variables involved with estimating electrical energy generation from solar panels, without an in-depth technical study, it is possible to only estimate the reduction in greenhouse gas emissions that could occur from solar panels producing approximately 302 kW of energy. The volume of potential reductions varies depending on the information source consulted. The following is a summary of three different information sources whose emissions factors were used as a basis to estimate potential emissions reductions:

1. According to a joint analysis conducted by the City of Santa Cruz Water Department and the Soquel Creek Water District, solar panels producing approximately 300 kW could offset approximately 94 metric tons of carbon dioxide equivalent per year (CO_2e/year)[2]. Using this calculation, the School District's installation of solar panels over the student parking lot as described above, would result in a reduction of 94.6 metric tons of CO_2e/year.

2. According to the Alameda County Waste Management Authority and the Alameda County Source Reduction and Recycling Board's Stopwaste.org website, for every kW of installed solar PV capacity, there will be an annual reduction of one ton of CO_2e[3]. Using this calculation, the School District's installation of solar panels over the student parking lot could result in a reduction of 302 tons of CO_2e/year, or 274 metric tons of CO_2e/year, using a conversion factor of 0.907 metric tons per short ton.

3. The US Environmental Protection Agency clean energy website includes an equivalence calculator to estimate the quantity of GHG emissions that may occur from the generation of electrical energy from fossil fuel[4]. Assuming that the solar panels would generate electricity on average for five hours each day, 365 days per year, approximately 551,150 kilowatt hours of electricity (302 watts x 5 hours x 365 days = 551,150 kilowatt hours) would be generated. Using the EPA calculator, production of this amount of energy using a renewable source such as solar panels would off-set the production of 380 metric tons of CO_2e/year.

To reiterate, a more in-depth technical analysis taking into account all of the environmental factors that could affect the net amount of electrical energy that could be produced from solar panels at the project site is required to obtain accurate numbers. However, using the available data presented above, it can be assumed that GHG emissions reduction would be approximately 94 to 380 metric tons CO_2e/year.

Wind Turbine Power Generation

According to Ken Scates, a vertical wind turbine similar to the one that is currently installed at the Monterey Peninsula College Education Center at Marina on Imjin Road is rated to have a capacity to generate up to 5 kW of electricity. This means that this type of wind turbine is capable of generating, when functioning at full capacity, a maximum of 5 kW of energy. A wind turbine with this capacity could be appropriate for the high school site.

Although the wind turbine would be rated to generate up to 5 kW, in reality due to environmental conditions, the turbine will likely only produce electricity a portion of the day. For this analysis, we assumed that the turbine would generate electricity on average for five hour each day, 365 days per year. Under these conditions, it would generate approximately 9,125 kilowatt hours of electricity (5 kW x 5 hours/day x 365 days = 9,125 kilowatt hours). Using the EPA calculator, the kilowatt hours produced by the panels would result in a reduction of approximately 6.3 metric tons of CO2e.

Solar Water Heaters

A solar water heater reduces, but does not eliminate, the need for electric or gas water heating. The performance of a system may be defined by its solar fraction, or the fraction of a building's water heating energy demand met by the solar water heating system. A system with a 60 percent fraction reduces the water heating demand (and also the water heating energy costs) by 60 percent. According to a report produced by the U.S. Department of Energy, Office of Energy Efficiency & Renewable Energy, typical solar fractions in the United States are in the range of 40 to 80 percent[5].

According to the US Department of Energy, Energy Efficiency & Renewable Energy website[6] and the Canadian Natural Resources website[7], the energy performance of a solar water heating system is influenced by a number of factors. These include resources and design elements such as the amount of solar radiation hitting the solar collectors, the collector types, area and efficiency, the solar tracking mode, and the slope and the physical orientation of the solar water heater. Other factors include the end-use water temperature required, the supply temperature of the water available, as well as the hot water storage tank.

Therefore, although it is not possible to pinpoint the estimated electricity savings or GHG emissions reductions from the installation of a solar water heater at the proposed school at this time, solar water heating systems have the potential to reduce electricity by 40 to 80 percent.

Purchasing Power from Renewable Sources through a Utility Company

Renewable Energy Certificates (RECs) provide a means for entities to purchase electricity that has been produced using renewable energy, even if the project site is not located within the same region as where the energy is produced. When renewable energy is generated, both energy and RECs are created. A REC is produced for every 1 MWh of electricity generated. The RECs can then be sold separately from the electricity. When the RECs are later purchased and combined with the purchaser's conventional power, the combination is equivalent to buying power directly from a renewable generator. This system allows buyers not located in the area where the alternative energy is being produced to purchase and support green energy. There are several companies that provide this service.

As an example, the City of Monterey currently purchases 100 percent of its electricity from a company called 3 Phases Renewables, located in Manhattan Beach, California. This memo uses this as a case study and a guide for the process that the School District would need to follow in order to purchase power from renewable energy providers.

According to Hans Usler, Assistant Director of Plans and Public Works at the City of Monterey, a few years ago the City made the decision to purchase all of its power from renewable sources[7]. The City first issued a Request for Proposal for a green energy provider and after receiving several proposals, decided to use 3 Phases Renewable due to fixed price and flexibility in allowing the City to reduce energy consumption in the future and not be monetarily penalized. Once a green energy provider was identified, the City entered a highly competitive on-line lottery that the California Public Utility Commission (CPUC) holds once or twice a year for businesses and jurisdictions to obtain the right to purchase green energy. The City was chosen during the second lottery held, which allowed them to obtain 100 percent of their electricity (with the exception of street lights) from renewable sources through 3 Phases Renewables. The City still receives its monthly electricity bill from PG&E, but 3 Phases Renewables appears on its utility bill as the electricity supplier. However, the cost of delivery, transportation of energy, and other meter-related costs and surcharges are charged and appear normally on the bill statement by the local utility, which is PG&E.

It is important to note that purchasing power from renewable sources was expected to result in a cost savings of approximately $40,000 per year for the City, however PG&E successfully lobbied the CPUC to increase charges related to transmission and delivery in order for them to recoup the amount of money they would lose to customers purchasing their power elsewhere from renewable sources. Therefore, at this time, the charge increase is almost equal to the cost savings, and the City now pays approximately what it paid before when it was receiving all of its electricity from traditional sources.

Like the City of Monterey, the School District could decide to purchase any percentage of its electrical power demand from a company like 3 Phases Renewables, through PG&E. However the lottery system does not guarantee that the School District would be able to obtain the right to purchase this power. Purchasing electricity from a renewable source would offset that percentage of the proposed project's indirect greenhouse gas emissions.

According to Table 6, Total Operational GHG Emissions (metric tons CO_2e/year) on page 2-29 of the Draft SEIR, the proposed project would generate approximately 852 metric tons of CO_2e/year of indirect emissions. The below table outlines the emissions reductions that would occur if School District purchased 25, 50, or 100 percent of its electricity in the form of RECs.

	Current Indirect Emissions (metric tons of CO_2e/year)	Potential Emissions Reductions (metric tons of CO_2e/year)	Remaining Total Emissions (metric tons of CO_2e/year)
25 percent	852	213	639
50 percent	852	426	426
100 percent	852	852	0

Therefore, purchasing power from renewable sources is a possibility for the School District; however it is contingent on its being selected in a highly competitive statewide lottery.

References:

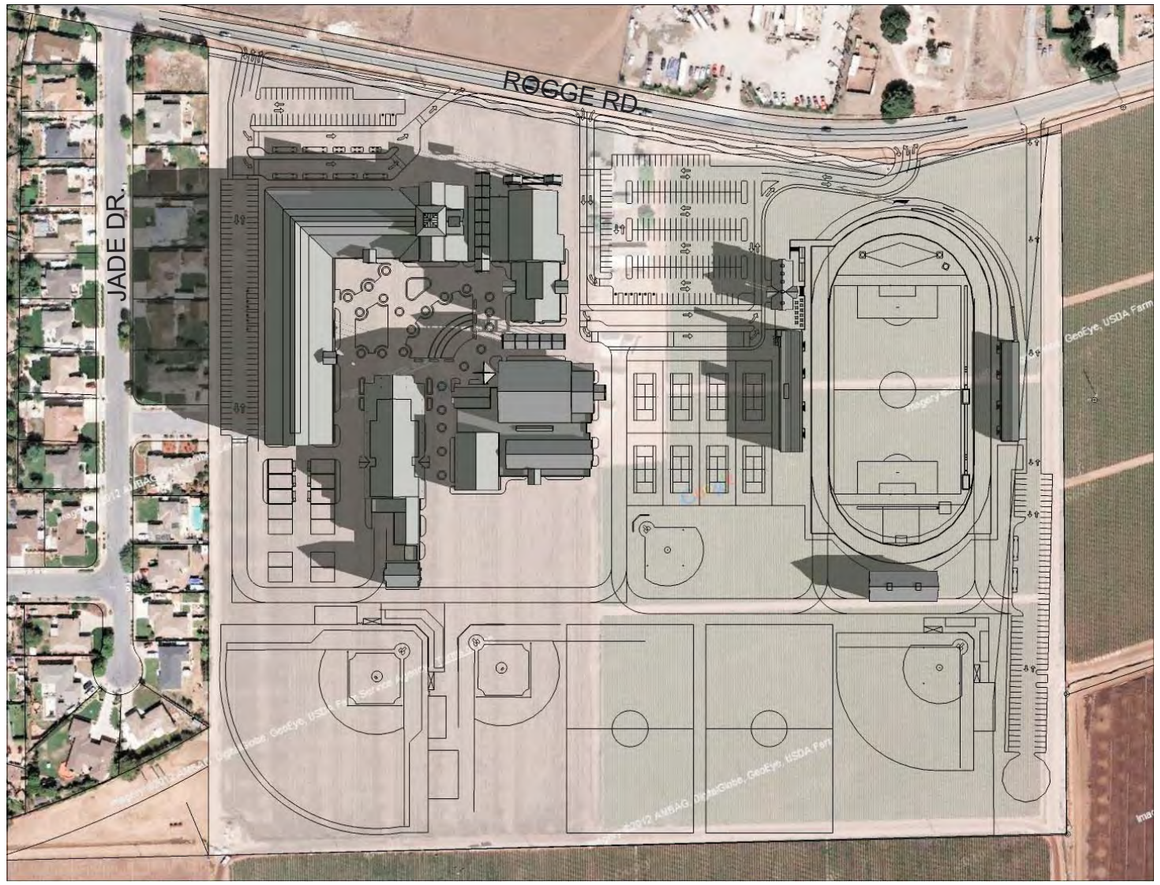
1. http://www.americanenergyindependence.com/solarenergy.aspx
2. http://www.scwd2desal.org/documents/Energy_PAs/Draft%20PA%2010_Local%20Solar_9-22-11.pdf
3. http://www.stopwaste.org/docs/appendix_d._assumptions___calculations.pdf
4. http://www.epa.gov/cleanenergy/energy-resources/calculator.html#results
5. http://www.retscreen.net/ang/g_solarw.php
6. Denholm, P. US Department of Energy, Office of Energy Efficiency & Renewable Energy, National Renewable Energy Laboratory. *The Technical Potential of Solar Water Heating to Reduce Fossil Fuel Use and Greenhouse Gas Emissions in the United States.* March 2007. http://www.nrel.gov/docs/fy07osti/41157.pdf
7. http://www.energysavers.gov/your_home/water_heating/index.cfm/mytopic=12910
8. Hans Usler, Assistant Director of Plans and Public Works City of Monterey. Telephone conversation with consultant, April 18, 2012

APPENDIX E

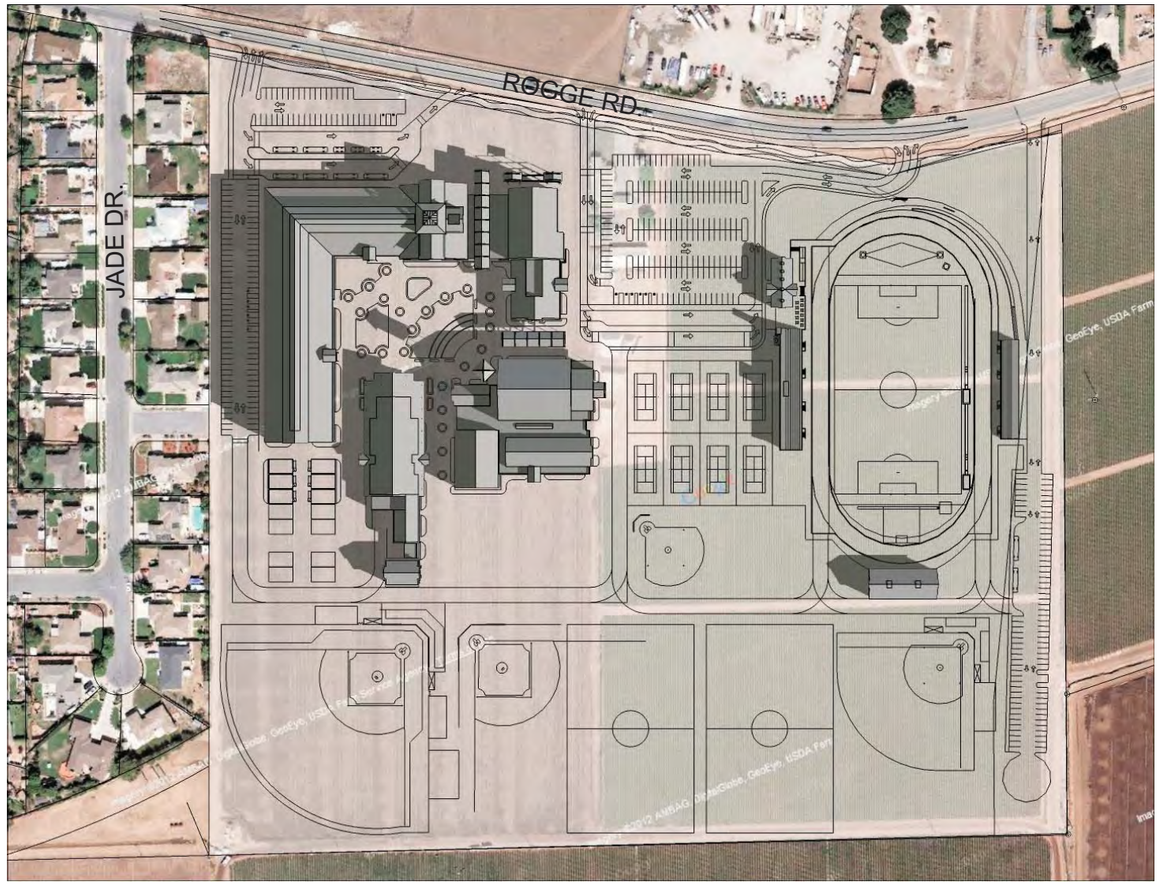
SHADOW PATH STUDY

WINTER SOLSTICE

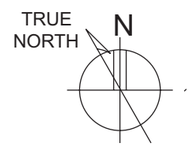
(DECEMBER 21ST: SHORTEST DAY OF THE YEAR)



SHADOW ONE HOUR AFTER SUNRISE: APPROX. **8:20 AM**



SHADOW CROSSES FENCE AT PROPERTY LINE: APPROX. **9:10 AM**



KASAVAN ARCHITECTS
60 W. Market St., Suite 300 Salinas, CA 93901 831.424.2232

SHADOW PATH STUDY

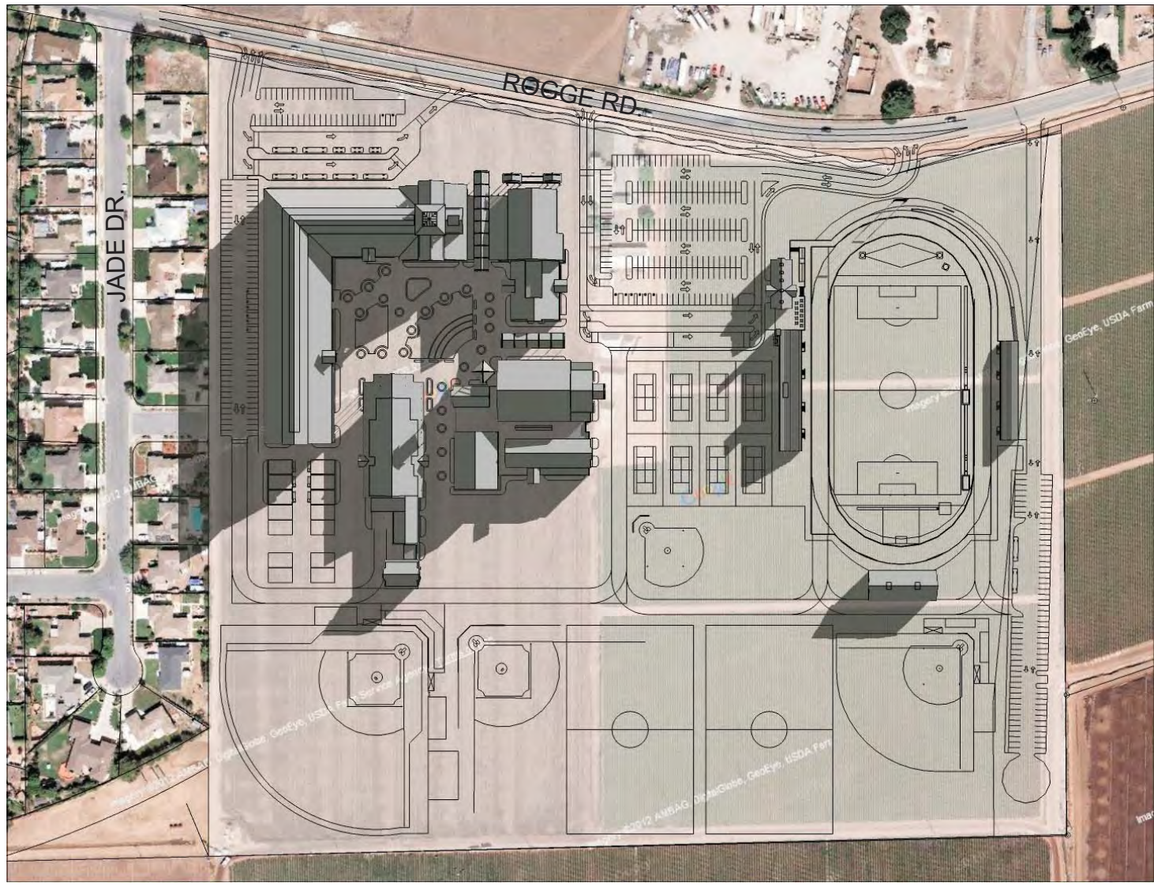
FEBRUARY 2012

High School # 5
Salinas Union High School District

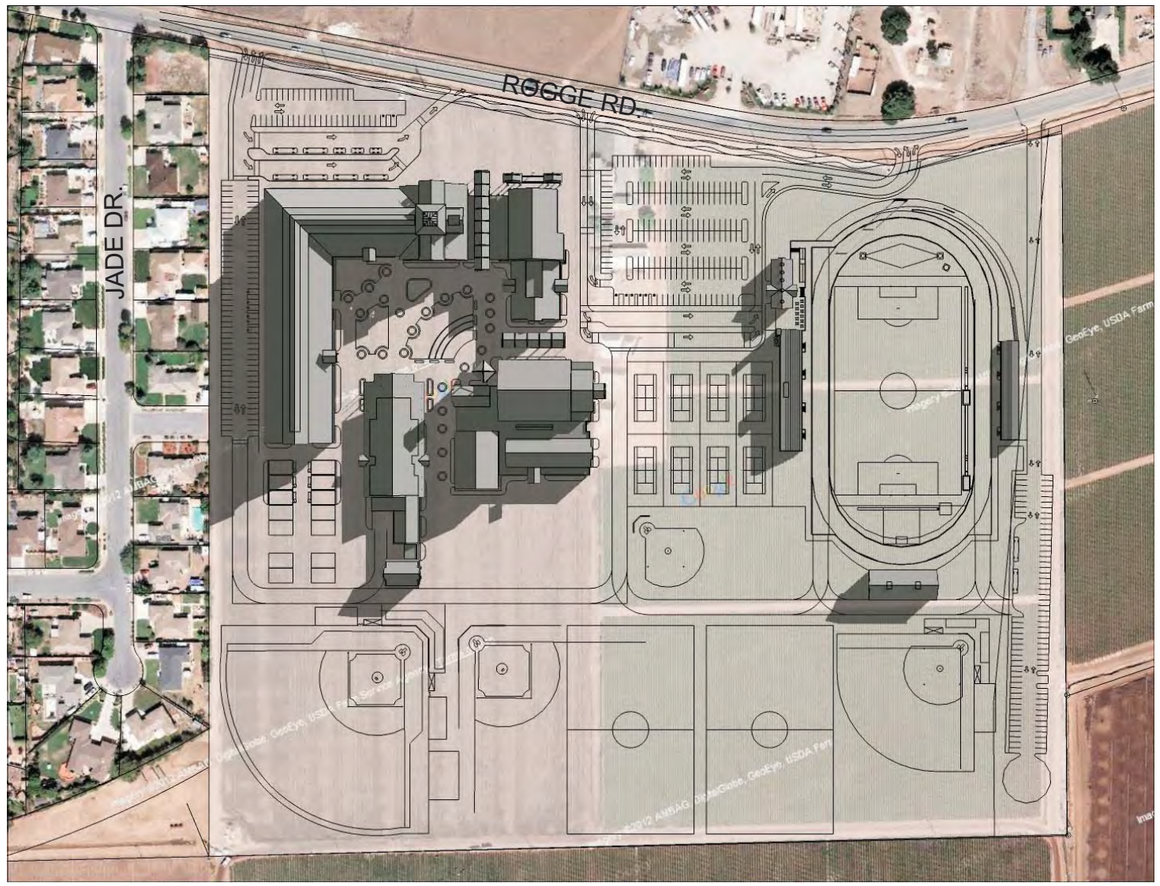
Salinas, California

SUMMER SOLSTICE

(JUNE 21ST: LONGEST DAY OF THE YEAR)



SHADOW ONE HOUR AFTER SUNRISE: APPROX. **6:50 AM PDST**



SHADOW CROSSES FENCE AT PROPERTY LINE: APPROX. **7:10 AM PDST**

TRUE NORTH N

KASAVAN ARCHITECTS
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SHADOW PATH STUDY

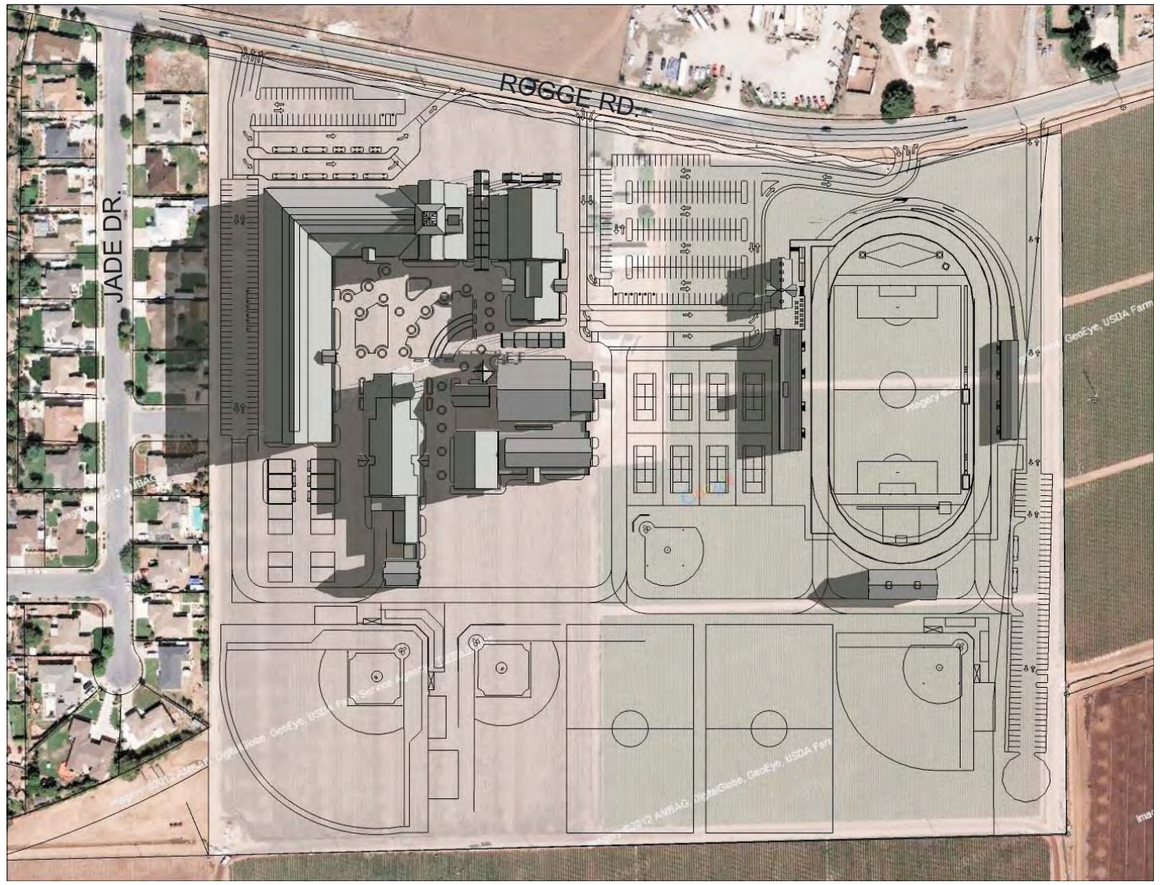
FEBRUARY 2012

High School # 5
Salinas Union High School District

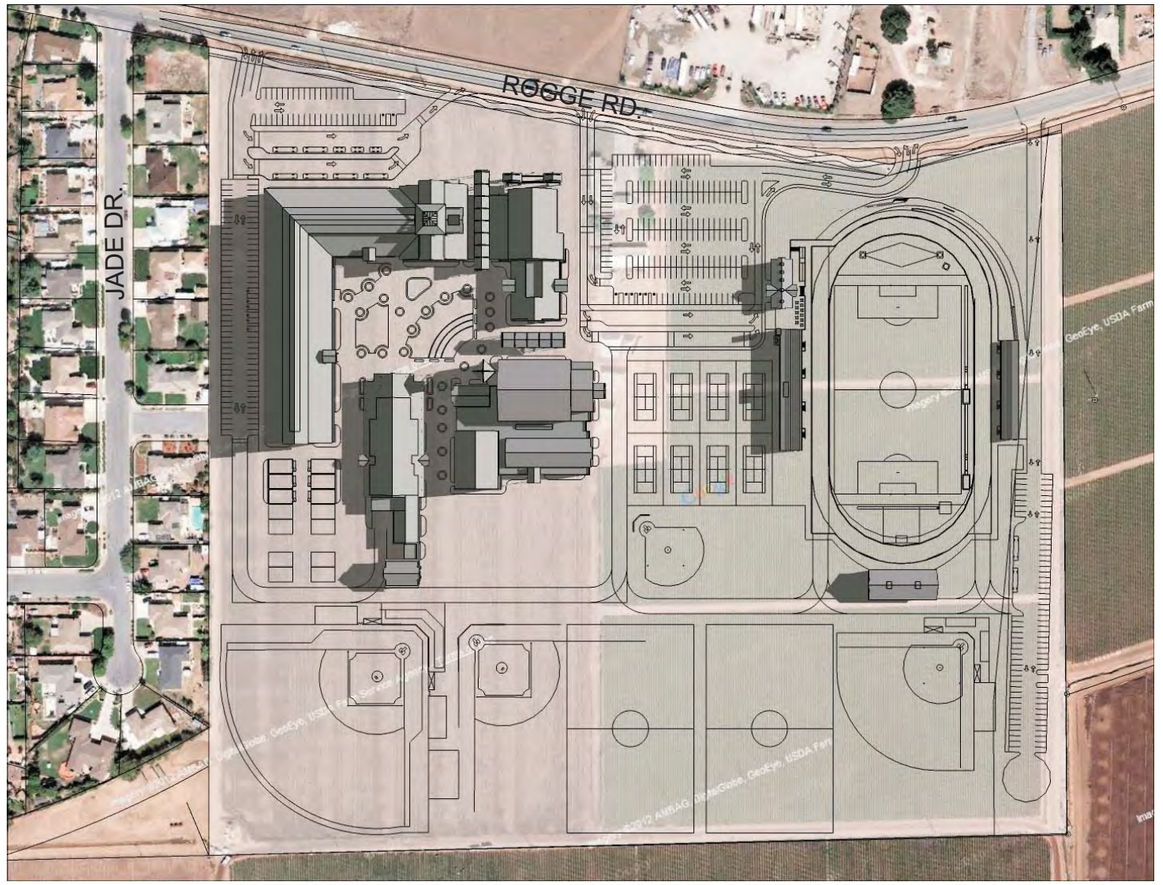
Salinas, California

MARCH + SEPTEMBER EQUINOX

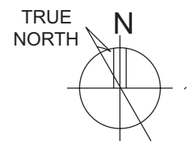
(MARCH + SEPTEMBER 21ST)



SHADOW ONE HOUR AFTER SUNRISE: APPROX. **8:10 AM PDST**



SHADOW CROSSES FENCE AT PROPERTY LINE: APPROX. **8:40 AM PDST**



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SHADOW PATH STUDY

FEBRUARY 2012

High School # 5
Salinas Union High School District

Salinas, California