

2. *Introduction*

2.1 **PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT**

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. This Draft Environmental Impact Report (DEIR) has been prepared to satisfy CEQA, as set forth in the Public Resources Code Section 21000, et seq., and the State CEQA Guidelines, 14 California Code of Regulations, Section 15000, et seq. The Environmental Impact Report (EIR) is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present and reasonably foreseeable future projects.

Pursuant to CEQA Section 21067, the Lead Agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.” The Santa Ana Unified School District Board of Education has the principal responsibility for approval of the proposed project. For this reason, the SAUSD is the CEQA Lead Agency for this project.

The intent of the DEIR is to provide sufficient information on the potential environmental impacts of the proposed project to allow the Board of Education to make an informed decision regarding approval of the project. Specific discretionary actions to be reviewed by the District are described later in Section 3.4, *Intended Uses of the EIR*.

This DEIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code Section 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (herein referenced as CEQA Guidelines), as amended (California Code of Regulations Sections 15000 et seq.)

The overall purpose of this DEIR is to inform the lead agency, responsible agencies, decision makers and the general public of the environmental effects of the development and operation of the proposed project. This DEIR addresses the potential environmental effects of the project, including effects that may be significant and adverse, evaluates a number of alternatives to the project, and identifies mitigation measures to reduce or avoid adverse effects.

2.2 **PUBLIC MEETING AND CEQA SCOPING MEETING**

Prior to preparation of the DEIR, the District held an information and CEQA scoping meeting for the community on December 20, 2012, to determine the concerns of the community regarding the proposed project. The meeting was held at the SHS auditorium, 2802 S. Flower Street, Santa Ana, CA 92707, and was attended by two community members and interested parties.



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During the scoping meeting the proposed project was described and oral comments were recorded. The scoping meeting was held to request input from public agencies, stakeholders, organizations, and individuals on the scope of the analysis addressing the potential environmental effects of the proposed project. Table 2-1 summarizes the oral comments made at the scoping meeting and written comments received after the meeting, along with a reference to the sections of this Draft EIR where the issues are addressed. Scoping meeting written comments are included in Appendix A.

Table 2-1
Scoping Meeting Comment Summary

Comment Type	Comment Summary	Issue Addressed In:
Various	<ul style="list-style-type: none">The District should rent the City's stadium approximately 3 miles from the SHS campus for home games to reduce traffic, parking, security, pedestrian safety, and trash issues surrounding the project site.	Sections 5.5, <i>Public Services</i> , and 5.6, <i>Transportation and Traffic</i> .

2.3 NOTICE OF PREPARATION AND INITIAL STUDY

A Notice of Preparation of a Draft Environmental Impact Report (NOP) and Initial Study (IS) were prepared (included as Appendix B). The NOP included information about the environmental document and public review period and was distributed to the surrounding community using three methods: the NOP was mailed to the surrounding community, posted at the District office and the SAHS administrative office, and posted on the District web site. The NOP was printed in English and Spanish and included information on where the IS was available for review and how to comment on the IS. The public review period for the NOP/IS was from March 1, 2013, to April 1, 2013 (See Appendix B). Comments received during the public review period are in Appendix C.

Notice of Preparation (NOP)

Per the CEQA Guidelines Section 15082, a NOP was prepared. Public outreach for the NOP included distribution of the NOP, using the US Postal Service, to last known address based on County assessor records, to every property within a 500-foot radius of the high school (included property owners, tenants, and businesses), along with people who requested project notification by including name and address on the sign-in sheet at the community information / scoping meeting.¹ Altogether, 705 NOPs were mailed.

Initial Study and NOP

The IS and NOP were sent to the Governor's Office of Planning and Research, State Clearinghouse, for distribution to the state agencies. They were also sent by certified mail to six local agencies. During the 30-day review period, the IS and NOP were made available for public review at the following locations:

- Santa Ana Unified School District office, 1601 East Chestnut Avenue, Santa Ana, CA 92701
- Saddleback High School administrative office, 2802 S. Flower Street, Santa Ana, CA 92707
- Santa Ana Unified School District, Facilities Department website: www.sausd.us

¹ Per CEQA Guidelines Section 15082, direct mailing of the NOP to surrounding residents is not required.

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Comments received during the NOP public review period—March 1, 2013 to April 1, 2013—are in Appendix C. The scoping process is used to help determine the scope of the environmental issues to be addressed in the DEIR. Based on this process and the IS for the project, certain environmental categories were identified as having the potential to result in significant impacts. Issues considered Potentially Significant are addressed in this DEIR. Issues identified as Less Than Significant or No Impact are not addressed beyond the discussion contained in the IS. Refer to the IS in Appendix B for discussion of how these initial determinations have been made.

A total of three agencies and four interested parties/community organization submitted comments to the NOP. Table 2-2 summarizes the issues identified by the commenting agencies, along with a reference to the sections of this Draft EIR where the issues are addressed.

Table 2-2
NOP Comment Summary
Saddleback High School

Commenting Agency/Person	Comment Type	Comment Summary	Issue Addressed In:
Scott Morgan, Director, State Clearinghouse	Not applicable	Transmittal (NOP distribution to state agencies); NOP entry in State Clearinghouse database	Chapter 1 describes NOP distribution
Ian MacMillan South Coast Air Quality Management District	Guidelines for air quality impacts analysis	<ul style="list-style-type: none">Requested a copy of the EIR with air quality, greenhouse gas emissions, and health risk assessment technical documents.Guidance for analyzing and mitigating air quality impacts.	Section 5.2, Air Quality
Dave Singleton, Native American Heritage Commission	Recommended methods of impact analysis	<ul style="list-style-type: none">Recommendations for analyzing and mitigating impacts to archaeological resourcesContact list of Native American tribal representatives; request that District contact the representatives	Initial Study (DEIR Appendix B) Section 3.6, Cultural Resources
Connie Hamilton, South Coast Neighborhood Association	Noise; Public Safety; crime; graffiti; Lights; project cost; number and types of events	<ul style="list-style-type: none">Stated that nearly everyone in her association opposes project.Stated concerns about noise and vibration at homes close to stadium.Stated concerns about gang activity; illicit partying; and that site could become graffiti magnetClaimed that project would worsen existing traffic congestion on Flower StreetStated concerns about lights at homes near siteStated concerns about project cost (capital, operations, and maintenance) relative to other District spending prioritiesStated concerns about potential uses of stadium other than high school sportsStated that there are preferable alternative sites.	Section 5.4, Noise; Section 5.1, Aesthetics; Section 5.6, Transportation and Traffic; Chapter 4, Project Description



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Kathleen Kuilanoff, resident (Board Member, South Coast Neighborhood Association)	Noise; vibration; Trash; Traffic; parking	<ul style="list-style-type: none"> Asked how District would mitigate noise impacts: <ul style="list-style-type: none"> Heighten walls? Double-paned windows? Stated concern about vibration impacts- home vibrates from school bells now Stated that she often can't exit tract now due to heavy traffic; asked how District would control project traffic Asked how District would control parking for stadium: permit parking? Asked if Stadium use would be limited to students & school events. 	Section 5.4, Noise; Section 5.6, Transportation and Traffic; Chapter 4, Project Description
Ruben Begino, Ruben Begino, Maria Begino, Claudia Begino, Residents	Parking; traffic and traffic safety; glare	<ul style="list-style-type: none"> Stated that attendees of existing stadium events park in their neighborhood (nearest parking to stadium) rather than parking on campus; and that project would worsen parking impact in their neighborhood. Stated that numerous accidents have occurred in their neighborhood; stated concern that project would increase traffic accidents. Stated that noise pollution and lighting would disturb their neighborhood. 	Section 5.4, Noise; Section 5.6, Transportation and Traffic; Section 5.1, Aesthetics
Jeff Dimsdale	Public participation; cost; noise; lighting; parking; trash; crime; number of events	<ul style="list-style-type: none"> Claimed that opportunities for public participation have been inadequate. <ul style="list-style-type: none"> Public hearing Dec. 23, 1 week after receiving letter, 2 days before major holiday, and when families were traveling A member of School Board commenter spoke with was unaware of project Asked if project is best use of tax dollars vs. other District maintenance, equipment costs, etc. Asked how noise impacts to neighborhood would be mitigated. Asked how lighting impacts would be reduced. Asked how parking impact would be reduced. Asked how trash and crime impacts would be reduced. Asked how many events, and what types of events, would be held at stadium. 	Chapter 1, Executive Summary; Chapter 2, Introduction; Section 5.4, Noise; Chapter 3, Project Description; Section 5.6, Transportation and Traffic

2.4 SCOPE OF THIS DRAFT EIR

Based upon the Initial Study and Environmental Checklist Form, the District determined that a Draft EIR should be prepared for the proposed project. The scope of the Draft EIR was determined based upon the Initial Study, comments received in response to the NOP, and comments received at the scoping meeting conducted by the District. Pursuant to Sections 15126.2 and 15126.4 of the State CEQA Guidelines, the Draft EIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance.

The information contained in Chapter 4, *Project Description*, establishes the basis for analyzing future project-related environmental impacts.

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2.4.1 **Impacts Considered Less Than Significant**

Eleven environmental impact categories are identified here as not being significantly affected by, or affecting the proposed project and as such are not discussed in detail in this Draft EIR. This determination was made by the District in its preparation of the Initial Study. The following topical issues are not addressed in the Draft EIR:

- Agricultural and Forest Resources
- Biological Resources
- Cultural Resources
- Geology and Oils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Recreation
- Utilities and Service Systems

2.4.2 **Potentially Significant Adverse Impacts**

Six environmental factors have been identified as potentially significant impacts if the proposed project is implemented. These factors are:

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Noise
- Public Services
- Transportation and Traffic



2.4.3 **Unavoidable Significant Adverse Impacts**

This Draft EIR identifies one significant and unavoidable adverse impact, as defined by CEQA, that would result from implementation of the proposed project. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. If the District, as the lead agency, determines that unavoidable significant adverse impacts will result from the project, the District must prepare a Statement of Overriding Considerations before it can approve the project. A Statement of Overriding Considerations states that the decision-making body has balanced the benefits of the proposed project against its unavoidable significant environmental effects and has determined that the benefits of the project outweigh the adverse effects and, therefore, the adverse effects are considered acceptable. The noise from full-capacity stadium events was found to be significant and unavoidable.

2.5 **INCORPORATION BY REFERENCE**

The following documents are incorporated by reference in this DEIR, consistent with Section 15150 of the State CEQA Guidelines, and are available for review at the District office.

- *City of Santa Ana General Plan*. Prepared by City of Santa Ana. Adopted 1982, September 20 (Reformatted January 2010).

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2.6 **FINAL EIR CERTIFICATION**

This Draft EIR is being circulated for public review for a period of 45 days. Interested agencies and members of the public are invited to provide written comments on the DEIR to the District address shown on the title page of this document. Upon completion of the 45-day review period, the District will review all written comments received and prepare written responses for each comment. A Final EIR will be prepared incorporating all of the comments received, responses to the comments, and any changes to the Draft EIR that result from the comments received. This Final EIR will be presented to the Board of Education for potential certification as the environmental document for the project. All persons who commented on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearing before the District Board of Education.

The Draft EIR is available to the general public for review at the following locations:

- Santa Ana Unified School District office, 1601 East Chestnut Avenue, Santa Ana, CA 92701
- Saddleback High School office, 2801 South Flower Street, Santa Ana, CA 92707
- Website: www.sausd.us - Facilities Department webpage

2.7 **MITIGATION MONITORING**

Public Resources Code Section 21081.6 requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code 21081 or adopted a Negative Declaration pursuant to 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration.

The Mitigation Monitoring Program for the proposed project will be completed as part of the Final EIR and prior to consideration of the project by the SAUSD Board of Education.