

4.10 Public Facilities

4.10.1 Existing Setting

The environmental setting describes the regional public facilities related to fire protection, police protection, health care facilities, schools, water, solid waste, and sewer wastewater treatment facilities.

4.10.1.1 County of Santa Barbara Fire Department

The Carpinteria-Summerland Fire Protection District (CSFPD) provides fire prevention services to the Project site as well as the City of Carpinteria, the community of Summerland, and surrounding rural areas within a 40-square mile area. The CSFPD has 28 safety suppression personnel, three fire prevention personnel, and two administrative assistants. The CSFPD includes two fire stations. Fire Station 1 in Carpinteria is located at 911 Walnut Avenue and contains a minimum staffing of four firefighters and one Battalion Chief. Fire Station 2 in Summerland at 2375 Lillie Avenue is staffed with three firefighters per shift (CSFPD 2012). See Section 3.2, *Fire Protection*, for additional information on fire protection services.

4.10.1.2 County of Santa Barbara Sheriff's Department

The County of Santa Barbara Sheriff's Department provides public protection and law enforcement through the enforcement of local, state, and federal laws. There are nine sheriff's stations throughout the County, including a substation in Carpinteria. The Carpinteria Substation, located at 5775 Carpinteria Avenue, serves the outlying unincorporated areas stretching from the Santa Barbara city limits through Montecito and Summerland, down to the Ventura County line (Santa Barbara County Sheriff's Department 2015).

4.10.1.3 California Highway Patrol

As a major statewide law enforcement agency, the California Highway Patrol (CHP) is responsible for managing and regulating traffic on California highways as well as providing disaster and lifesaving assistance. The purpose of the CHP is to ensure safety on the state's highway transportation system. However, it also assists local governments during emergencies when requested. The primary responsibilities of the CHP are to patrol state highways and county roadways, enforce traffic regulations, respond to traffic accidents, and provide service and assistance to drivers in disabled vehicles. The CHP maintains a mutual aid agreement with the County of Santa Barbara Sheriff's Department.

The CHP is divided into eight different divisions. The County is located in CHP's Central Division, which includes 11 area offices, one resident post, and two commercial inspection facilities. The staff at the Central Division is made up of 530 uniformed officers and 162 non-uniformed employees. Area offices in the County are located in the cities of Buellton, Santa Barbara, and Santa Maria (CHP 2015).

Health Care Facilities

One County health center is located in Carpinteria. The nearest major hospitals and emergency rooms are located in the cities of Santa Barbara and Ventura.

Schools

The Carpinteria Unified School District (K-12) serves 2,310 students in the Carpinteria area and consists of the Aliso School (K-5), Canalino School (K-5), Carpinteria Family School (K-5), Carpinteria High School (9-12), Carpinteria Middle School (6-8), Foothill/Rincon High School (9-12) and the Summerland School (K-5) (Santa Barbara County Education Office 2012).

Solid Waste

Solid waste generally refers to garbage, refuse, sludge, and other discarded solid materials that come from residential, industrial, and commercial activities. Construction, demolition, and inert wastes are also classified as solid waste. These wastes include nonhazardous building materials such as asphalt, concrete, brick, drywall, fencing, metal, packing materials, pallets, pipe, and wood. The general waste classifications used for California waste management units, facilities, and disposal sites are outlined below:

- *Nonhazardous Solid Waste* – This classification consists of organic and nonorganic solid, semi-solid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction wastes, abandoned vehicles and parts thereof, discarded home and industrial appliances, manure, vegetable or animal solid and semi-solid wastes, and other discarded wastes, provided that such wastes do not contain hazardous materials or soluble pollutants in concentrations that would exceed applicable water quality objectives or cause degradation of waters of the State.
- *Special Waste* – Any waste that requires special handling, including ash, sewage, and industrial sludge.
- *Designated Waste* – Waste that contains pollutants that could be released in concentrations that would exceed applicable water quality objectives or reasonably be expected to affect beneficial uses of the waters of the State.
- *Hazardous Waste* – Waste or a combination of wastes that, because of quantity, concentration, or physical, chemical, or infectious characteristics, may result in the following:
 - Cause or significantly contribute to an increase in mortality or an increase in serious irreversible illness or incapacitating reversible illness.
 - Pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.
- *Industrial Waste* – Waste that originated in manufacturing facilities, factories, or refineries or from construction and demolition projects.

Not all of the above-mentioned wastes can be disposed of at a landfill. California state law regulates the types of waste that can be disposed of at the different classes of landfills. Class I landfills may accept hazardous and nonhazardous wastes. Class II landfills may accept designated and nonhazardous wastes, and Class III landfills may accept nonhazardous wastes.

The County of Santa Barbara is responsible for meeting the California Integrated Waste Management Act of 1989, Assembly Bill 939 (AB 939). AB 939 required cities and counties to reduce the amount of solid waste being sent to landfills by 50 percent by January 1, 2000. This 50 percent requirement also included the waste stream that comes exclusively through construction and demolition (C&D) of buildings and homes in the County.

AB 939 also required cities and counties to prepare solid waste planning documents. As of 2004, 63 percent of all solid waste generated in the unincorporated areas of the County was diverted for recycling or re-use (as certified by the California Integrated Waste Management Board). This diversion level is the result of implementation of the County Source Reduction and Recycling Element adopted by the County Board of Supervisors in February 1992.

C&D waste is heavy, inert material. This material creates significant problems when disposed of in landfills. Because C&D waste is heavier than paper and plastic, it is more difficult for counties and cities to reduce the tonnage of disposed waste. For this reason, C&D waste has been specifically targeted by the State of California for diversion from the waste stream. Projects that generate C&D waste should emphasize deconstruction and diversion planning rather than demolition. Deconstruction is the planned, organized dismantling of a prior construction project. This process allows maximum use of the deconstructed materials for recycling in other construction projects and sends a minimum amount of the deconstruction material to landfills.

The County of Santa Barbara Resource Recovery and Waste Management Division is responsible for management of solid waste and utilities in the County. There are four sections within the division, each responsible for performing a unique series of functions. The Collection and Materials Management section manages the County's resource recovery and waste diversion programs, reviews and manages long-range solid waste management plans, and oversees the County's solid waste collection franchises for regularly generated solid waste. This section also oversees the permitting of unscheduled solid waste collection in unincorporated areas of the County (County of Santa Barbara 2012a).

Landfills

The County-operated Tajiguas Landfill serves the Carpinteria area and is the only active landfill run by the County. It is a Class III landfill with a maximum permitted capacity of 23.3 million cy, and a throughput of 1,500 tons per day. Only franchise waste haulers may deposit waste at Tajiguas Landfill. The facility is closed to public dumping. All south county self-hauled waste is taken to the South Coast Recycling and Transfer Station (County of Santa Barbara 2012b; CalRecycle 2015).

Wastewater

Cate School wastewater is treated onsite at its own wastewater treatment plant. The wastewater plant filters and disinfects the wastewater and provides tertiary treatment to remove nutrients from the water. The treated wastewater (or "effluent") can be reused onsite for irrigating landscaping. .

Storm Water

Storm water runoff from lands modified by human activities can harm surface water resources and, in turn, cause or contribute to an exceedance of water quality standards by changing natural hydrologic patterns, accelerating stream flows, destroying aquatic habitat, and elevating pollutant concentrations. Such runoff may contain or mobilize high levels of contaminants, such as sediment, suspended solids, nutrients (phosphorous and nitrogen), heavy metals and other toxic pollutants, pathogens, oxygen-demanding substances, and floatables. After a rain event, storm water runoff carries these pollutants into nearby streams, rivers, lakes, estuaries, and wetlands as well as the ocean. The highest concentrations of these contaminants often are contained in “first flush” discharges, which occur during the first major storm after an extended dry period. Individually and combined, these pollutants impair water quality, threatening designated beneficial uses and causing habitat alteration or destruction. Uncontrolled storm water discharges from areas of urban development and construction activity negatively affect receiving waters by changing the physical, biological, and chemical composition of the water, resulting in an unhealthy environment for aquatic organisms, wildlife, and humans.

The County of Santa Barbara Flood Control District is responsible for channel maintenance, the design and construction of capital improvements, review of new development, and a hydrologic data collection/flood warning system. The District’s Operation and Maintenance Program is the highest priority. It involves operation of the District’s basins, channels, and other flood-protection facilities as well as routine and emergency maintenance and repair of these facilities. The District operates and maintains dams, 264 miles of channels and storm drains, 78 retention/recharge/debris basins, and many major storm drain systems (County of Santa Barbara 2010). Additionally, the County’s storm water quality program, known as Project Clean Water, was initiated in 1998 in response to community requests to improve water quality in local creeks and in the ocean. Project Clean Water is managed and staffed by members of the County of Santa Barbara Water Agency (Public Works Department) and staff from the Environmental Health Services Division of the Public Health Department (County of Santa Barbara 2009). Storm drain facility maps are available online through the Project Clean Water website. They show public and private storm drain facilities, including creeks and infrastructure within unincorporated urban areas of the County (County of Santa Barbara 2011).

The County has prepared a Storm Water Management Plan (SWMP) to address issues related to public health and the environment, Clean Water Act mandates, and public involvement and awareness. The County is responsible for implementing the SWMP in state-designated unincorporated urbanized areas, pursuant to the SWRCB General Permit (County of Santa Barbara 2009).

4.10.1.4 Regulatory Setting

The State of California’s public facilities policies that apply to the proposed Project include:

- *The California Department of Water Resources (DWR)* is responsible for regional water planning management, and oversees a variety of health- and safety-related measures, including measures to ensure the safety of dams.
- *State Water Resources Control Board (SWRCB) Order No. 2006-0003* provides the General Waste Discharge Requirement for Sanitary Sewer Systems (SWRCB Order No. 2006-0003) which requires wastewater agencies to evaluate and rehabilitate sewer systems, with a target of zero sewer overflows.

- *State Assembly Bill 341* was enacted in 2011 and amends the Public Resources Code relating to solid waste to set a goal for the State to recycle 70 percent of waste by year 2020. The bill identifies composting of organic materials as a method of attaining this goal.
- The *Public Resources Code Division 30, Part 2, Chapter 4, Section 41701* requires all jurisdictions in the State to manage disposal capacity for waste that cannot be reduced, recycled, or composted.
- The *California Global Warming Solutions Act of 2006 (AB 32)* sets a goal of reduction of all greenhouse gases (GHGs) generated in the State to 1990 levels by year 2020. The California Air Resources Board (CARB) has adopted a scoping plan that includes recycling and landfill methane capture as key components to achieve reductions in GHGs.

County of Santa Barbara policies with requirements for public facility resources that apply to the proposed Project include:

- *County of Santa Barbara Source Reduction and Recycling Element (SRRE)* was adopted in February 1992 by the County of Santa Barbara Board of Supervisors, consistent with the 1989 California Integrated Solid Waste Management Act. The goal of the SRRE is to reduce the amount of solid waste entering landfills by implementing, in order of priority, source reduction, recycling and composting, and environmental transformation (incineration, pyrolysis, or biological conversion), with the final option being land disposal of waste.
- *County of Santa Barbara Comprehensive Plan; Coast Land Use Plan* establishes goals, policies, and objectives adopted by the Count to ensure the adequate protection and provision of public facilities and resources. The goals and policies applicable to this Project are listed below:
 - **Policy 2-6:** Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e. water, sewer, roads, etc.) are available to serve the proposed development.

4.10.2 Impact Analysis

This section reviews the analysis and mitigation measures identified in the Scoping Document and MND, as well as, the odor analysis prepared for this Project. The proposed Project would increase throughput to the wastewater treatment plan, increase storm water volumes, and generate solid waste. Impacts are summarized in Table 4.10-1 below.

Table 4.10-1. Summary of Public Facilities Impacts

Public Facilities Impacts	Mitigation Measure	Residual Significance
Impact PF-1. The proposed Project would not require the provision of new or physically altered facilities for fire protection, police protection, schools, parks or other public facilities.	No mitigation required	Less than significant (Class III)
Impact PF-2. The proposed Project has the capacity to generate significant amounts of solid waste.	MM PF-2a MM PF-2b	Less than significant with mitigation (Class II)
Impact PF-3. The proposed Project would not require new or altered sewer system facilities.	No mitigation required	Less than significant (Class III)
Impact PF-4. The Project would require the construction of new storm water facilities.	MM WAT-1 MM WAT-2 MM WAT-3a MM WAT-3b MM WAT-3c MM GEO-2	Less than significant with mitigation (Class II)

4.10.2.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines states that a project is considered to have a significant impact on public facilities if it would result in an impact on any of the listed criteria.

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities?
- b) Would the project result in a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts?
- c) Would the project result in a need for new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public facilities:
 - 1) Fire protection
 - 2) Police protection
 - 3) Schools
 - 4) Parks
 - 5) Other public facilities

In addition to the CEQA Guidelines, the County of Santa Barbara has an additional set of thresholds for public facilities to determine significance:

- a. A need for new or altered police protection and/or health care facilities?
- b. Student generation exceeding school capacity? A significant level of school impacts is generally considered to occur when a project would generate sufficient students to require an additional classroom.
- c. Significant amounts of solid waste or breach any national, state, or local standards or thresholds relating to solid waste disposal and generation (including recycling facilities and existing landfill capacity)? A project is considered to result in significant impacts to landfill capacity if it would generate 196 tons per year of solid waste. This volume represents five percent of the expected

average annual increase in waste generation, and is therefore considered a significant portion of the remaining landfill capacity. In addition, construction and demolition waste from remodels and rebuilds is considered significant if it exceeds 350 tons. A project which generates 40 tons per year of solid waste is considered to have an adverse effect on solid waste generation, and mitigation via a Solid Waste Management Plan is recommended.

- d. A need for new or altered sewer system facilities (sewer lines, lift-stations, etc.)?
- e. The construction of new storm water drainage or water quality control facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

4.10.2.2 Project Impacts

Impact PF-1. The proposed Project would not require the provision of new or physically altered facilities for fire protection, police protection, schools, parks, or other public facilities.

The proposed Project would result in the net increase of four new detached faculty residences within the campus, increase enrollment by approximately 20 students, and add two additional maintenance staff over the course of build-out, and add two additional faculty to support the childcare center. This new development and increase in density would not have a significant impact on existing police protection or health care services. Existing levels of service for fire and police protection in the area are adequate to serve the additional demand. The proposed Project would not increase the demand for parks or other public facilities as Cate School would provide adequate recreation opportunities for those attending the school and living onsite. The proposed Project would not generate the number of school-aged children to necessitate an additional classroom (approximately 20); conversely, it would accommodate additional students. School fees would be paid as required by state law. Therefore, this Project would be consistent with applicable state and county plans/policies and impacts would be *less than significant* (Class III).

Impact PF-2. The proposed Project has the capacity to generate significant amounts of solid waste.

The proposed Project includes the demolition of 26,582 sf of existing development, construction of 180,861 sf of new development, and 41,402 sf of renovations of existing structures. Based on the County's Environmental Thresholds and Guidelines Manual (2015), waste generated by demolition and construction activities are estimated using the information contained in Table 4.10-2 below.

Table 4.10-2. Waste Generated by Demolition and Construction Activities

Commercial Development	Amounts in Pounds per Square foot
Remodel	40
Demolition	100
New construction	25
Residential Development	Amounts in Pounds per Square foot
Remodel	100
Demolition	60
New construction	15

Source: County of Santa Barbara 2014.

Based on the waste volumes (above) associated with construction demolition activities, demolition of the two faculty residences, totaling 4,777 sf, would generate an estimated 143 tons of solid waste. The demolition of the other school buildings, totaling 21,805 sf, would generate an estimated 1,090 tons of solid waste. Therefore, demolition alone would generate approximately 1,233 tons of solid waste.

New construction of the faculty residences would generate an estimated 105 tons of construction waste (14,100 sf x 15 pounds/sf). New construction of the other campus buildings would generate an estimated 2,085 tons of construction waste. Lastly, remodeling of 41,402 sf of campus buildings would generate an estimated 828 tons of construction waste. Overall, the Project would generate approximately 4,251 tons of construction waste. This is likely an overestimate of waste generated based on the experience of past construction projects on campus. Nevertheless, impacts would be significant but mitigable with the implementation of a solid waste management plan requiring that construction activities recycle at least 75 percent of construction waste and divert it from the landfill.

Operation of the Project would also generate additional solid waste. Waste generated from the four additional faculty residences was estimated by calculating a residential project's long-term solid waste generation using the following formula: 3.01 people/unit x # of units x 0.95 tons/year = tons/year/project (County Environmental Thresholds and Guidelines Manual). Therefore, the net addition of four faculty residences would generate an estimated 11 tons of solid waste per year. Waste would also be generated from the additional school facilities. This additional waste was estimated for educational institutions assuming that the solid waste generation rate is 0.0010 tons of solid waste per sf of development. Thus, the net increase of 144,956 sf of institutional development would generate an estimated 145 tons of waste per year. In total, the proposed Project would generate an estimated 156 tons of solid waste per year above existing levels, which would not exceed the significance threshold of 196 tons per year.

While long-term operational solid waste impacts from the Project would be less than significant, construction impacts would exceed County thresholds. However, implementation of MM PF-2a, *Construction Waste Management*, and MM PF-2b, *Solid Waste-SRSWMP*, would reduce construction generated waste. Therefore, the solid waste impact would result in a *less than significant impact with mitigation* (Class II).

Impact PF-3. The proposed Project would not require new or altered sewer system facilities.

The Project would be served by the existing tertiary wastewater treatment facility located on campus. No expansion of that facility is required, as there is currently surplus capacity to accommodate the proposed additional development and wastewater flows. However, operation of the facility to treat the increase in wastewater flows could result in added impacts with respect to odors. During the scoping process, neighbors raised concerns about odors associated with the increased flow through the wastewater treatment plant. In order to address these concerns, an odor analysis was prepared for the proposed Project (see to Appendix D). The analysis was done daily (Monday through Friday) over a period of 10 working days at 10 different locations along the northern property line. All 10 sampling location were primarily downwind and less than 30 feet from the wastewater treatment facility. All sampling was performed during school hours (during peak wastewater flow) and analyzed the presence of various sulfur compounds, mercaptans, amines, and phenols. The analysis of the proposed Project was estimated to conservatively increase wastewater flow through the treatment plant by 30 percent over baseline conditions. This estimate is considered to be conservative as odor levels would not actually experience a proportional increase as treatment tanks or ponds are not

increasing their surface areas. In an abundance of caution, the odor analysis assumes a linear scale up of odor with throughput. Results from the odor analysis indicated that even with the overestimation, odors generated would be below USEPA thresholds, (refer to Section 3.1, *Air Quality and Greenhouse Gas Emissions*, for a discussion on odors). Therefore, impacts associated to the sewer system facility would be *less than significant* (Class III).

Impact PF-4. The Project would require the construction of new storm water facilities.

The proposed Project would create new impervious surfaces that would result in greater surface runoff from the Project site. This increased surface runoff would be accommodated within the proposed storm water collection systems located downslope from the main campus to the west and south. While this system could generate impacts to agricultural, geologic, and water resources, as described in Sections 4.2, 4.6, and 4.13, use of corresponding mitigation as described in those sections, MM WAT-1, *Storm Water Control Plan Approval*, MM WAT-2, *Stormwater Control Plan – Project Operation*, MM WAT-3a to MM WAT-3c, and MM GEO-2, *Erosion and Sediment Control Plan*, would reduce environmental impacts to less than significant. Similarly, while the Project would require the construction of new storm water facilities, because these facilities are incorporated into the Project design, and regulated as described in Section 4.13 Water Quality and Flooding, they would not generate an impact on public storm water systems. Therefore, with implementation of the applicable mitigation measures identified in Sections 4.2, 4.6 and 4.13, the impact from construction of new storm water facilities would be *less than significant with mitigation* (Class II).

4.10.2.3 Mitigation Measures

The following mitigation measures would reduce the Project's public service impacts to a less than significant level.

MM PF-2a **Construction Waste Management** *Demolition and/or excess construction materials shall be separated onsite for reuse/recycling or proper disposal (e.g., concrete asphalt). During grading and construction, separate bins for recycling of construction materials and brush shall be provided onsite.*

Plan Requirements and Timing. This requirement shall be printed on the grading and construction plan. Permittee shall provide Planning and Development with receipts for recycled materials or for separate bins. Materials shall be recycled as necessary throughout construction. All materials shall be recycled prior to occupancy clearance.

Monitoring. Planning and Development shall review receipts prior to occupancy clearance.

MM PF-2b **Solid Waste-SRSWMP.** *The Applicant shall develop and implement a Source Reduction and Solid Waste Management Plan (SRSWMP) describing proposals to reduce the amount of waste generated during construction and demolition activities by a minimum of 75 percent and throughout the life of the Project and enumerating the estimated reduction in solid waste disposed at each phase of Project development and operation.*

Plan Requirements and Timing. The plan shall include but not be limited to:

1. Construction Source Reduction:
 - a. A description of how fill will be used on the construction site, instead of landfilling,

- b. Alternatives to landfilling: A list of each material proposed to be salvaged, reused, or recycled during the course of the Project.
 - c. A program to purchase materials that have recycled content for Project construction.
2. Construction Solid Waste Reduction:
- a. Manager: The Applicant shall designate an onsite party (or parties) responsible for instructing workers and overseeing and documenting results of the Plan for the Project site Foreman.
 - d. Distribution: The Contractor shall distribute copies of the Plan to the Job Site Foremen, impacted subcontractors, and the Architect.
 - e. Recycling and composting programs including separating excess construction materials onsite for reuse/recycling or proper disposal (e.g., concrete, asphalt, wood, brush). Provide separate onsite bins as needed for recycling;
 - f. Waste assessment: A brief description of the proposed Project wastes to be generated, including types and estimated quantities during the construction phases of the Project.
 - g. Transportation and processing: A description of the means of transportation of recyclable materials and waste, and destination of materials (whether materials will be site-separated and self-hauled to designated centers, or whether mixed materials will be collected by a waste hauler and removed from the site to be processed at a mixed waste sorting facility).
 - h. Instruction: The Applicant shall provide onsite instruction of appropriate separation, handling, and recycling, salvage, reuse, and return methods to be used by all parties at the appropriate stages of Project development.
 - i. Documentation: The Applicant shall submit prior to Final Building/Zoning Inspection Clearance a Summary of Waste Generated by the Project. The Summary shall be submitted on a form acceptable to Planning & Development or Public Works and shall contain the following information:
 - 1) Disposal information:
 - i. amount (in tons or cy) of material landfilled
 - ii. identity of the landfill
 - iii. total amount of tipping fees paid at the landfill
 - iv. weight tickets, manifests, receipts, and invoices (attach copies)
 - 2) Recycling information:
 - i. amount and type of material (in tons or cy)
 - ii. receiving party
 - iii. manifests, weight tickets, receipts, and invoices (attach copies)
 - 3) Reuse and salvage information:
 - i. list of items salvaged for reuse on Project or campus (if any)
 - ii. amount (in tons or cy)
 - iii. receiving party or storage location
3. Operation Source Reduction:
- a. A detailed set of office procedures such as use of duplex copy machines and purchase of office supplies with recycled content.
 - b. A program to purchase materials that have recycled content for operation (e.g., office supplies, etc.).
4. Operation Solid Waste Reduction Examples:
- b. Provision of space and/or bins for the storage of recyclable materials within the campus;

- c. Implementation of a curbside recycling program to serve the faculty residences if not already established;
- d. A green waste source reduction program, including the creation of composting areas, and the use of mulching mowers where possible;
- e. Implement a composting yard waste reduction program.

The Applicant shall (1) submit a Source Reduction and Solid Waste Management Plan to Planning and Development permit processing staff for review and approval prior to Zoning Clearance issuance for the first phase of development, and (2) include the recycling and composting areas on building plans. Program components shall be implemented prior to Final Building Clearance and maintained throughout the life of the Project.

Monitoring. During operation, the Applicant shall demonstrate to Planning and Development compliance staff as required that solid waste management components are established and implemented. The Applicant shall demonstrate to Planning and Development compliance staff that all required components of the approved SRSWMP are in place as required prior to Final Building Clearance.

4.10.2.4 Residual Impacts

With the incorporation of mitigation measures MM PF-2a, *Construction Waste Management*, MM PF-2b, *Solid Waste SRSWMP*, MM WAT-1, *Storm Water Control Plan Approval*, MM WAT-2, *Stormwater Control Plan – Project Operation*, MM WAT-3a to MM WAT-3c, and MM GEO-2, *Erosion and Sediment Control Plan*, residual impacts to Public Facilities would be *less than significant* (Class II).

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