

Orange County Water District Mid Basin Centennial Park Injection Well Project

**Draft Environmental Impact Report
Response to Comments/Mitigation Monitoring Program
State Clearinghouse No. 2015061055**

**Prepared By
Orange County Water District
18700 Ward Street
Fountain Valley, CA 92708
Contact: Daniel Bott**

April 2016



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SECTION 1.0 PURPOSE

In compliance with the requirements of the California Environmental Quality Act (CEQA) Public Resources Code Section 21000 et seq. and the CEQA Guidelines, the Orange County Water District (OCWD) has prepared a Draft Environmental Impact Report (Draft EIR) for the Mid Basin Centennial Park Injection Well Project (State Clearinghouse No. 2015061055). The Draft EIR was circulated for public review from February 3, 2016 to March 18, 2016. During the public review period, comments were received on the Draft EIR and have been addresses in the Mid Basin Centennial Park Draft EIR Response to Comment Document. Section 2.0 of the Response to Comment Document identifies clarifications to the Draft EIR that were identified during their public review period. Section 3.0 provides responses to comments received on the Draft EIR. Section 4.0 is the Mitigation Monitoring and Reporting Program for the Mid Basin Centennial Park Injection Well Project.

SECTION 2.0 CLARIFICATIONS TO DRAFT EIR

The following are clarifications to the Final EIR. The clarifications do not identify new significant impacts or provide new information that would change a less than significant impact to a significant impact in the Draft EIR. The clarifications are identified in underline.

Hydrology/Water Quality

1. Page 5-114, Section 5.7.3 Thresholds of Significance has been clarified and revised to read as follows;

5.8.3 Thresholds of Significance

2. Page 5-11, 5.7.4 Project Impacts has been clarified and revised to read as follows;

5.8.4 Project Impacts

3. Page 5-131 Alternative 2: Typically, the back flushing operations would occur weekly or every two weeks and could discharge up to 70,000 gallons of well water per minute into Centennial Lake.

The above language has been clarified and revised as follows;

Typically, the back flushing operations would occur weekly or every two weeks and could discharge up to 3,500 gallons of well water per minute into Centennial Lake.

4. Page 5-131 Alternative 2: Assuming a worst case condition that four wells are back flushed into the Greenville-Banning Flood Control Channel, a total of 7.8 cfs of well water would be discharged into the channel.

The above language has been clarified and revised as follows;

Assuming a worst case condition that four wells are back flushed into the Greenville-Banning Flood Control Channel, all four wells would produce a total of 7.8 cfs of well water discharged into the channel.

5. Appendix C Biological Conditions Report, Page 5-1, Heritage Museum

In coordination with Heritage Museum staff the groundwater from the monitoring well would be discharged into the adjacent patch of riparian vegetation. The discharged groundwater be an additional source of irrigation for the riparian vegetation and would have a long term beneficial impact, especially during dry months when there is little rainfall.

The above language has been clarified and revised as follows;

Monthly, the monitoring well at the Heritage Museum site would be back flushed as part of the sampling activities. An average of 4,000 or 5,000 gallons of water would either be containerized or discharged in the local storm water system and then into the Greenville- Banning Flood Control Channel.

6. Appendix G preliminary Non-Priority Project Water Quality Plan

The Preliminary Non-Priority Project Water Quality Plan, Page 13, Worksheet Runoff Coefficient C

As shown in Attachment 1, the worksheet on Page 13 of the Preliminary Non-Priority Project Water Quality Plan has been clarified and revised to reflect a runoff coefficient of .90.

Attachment 1

Worksheet C: Capture Efficiency Method for Volume-Based, Constant Drawdown BMPs

Step 1: Determine the design capture storm depth used for calculating volume				
1	Enter design capture storm depth from Figure III.1, d (inches)	$d =$	0.75	inches
2	Enter calculated drawdown time of the proposed BMP based on equation provided in applicable BMP Fact Sheet, T (hours)	$T =$	7	hours
3	Using Figure III.2, determine the "fraction of design capture storm depth" at which the BMP drawdown time (T) line achieves 80% capture efficiency, X_1	$X_1 =$	0.43	
4	Enter the effect depth of provided HSCs upstream, d_{HSC} (inches) (Worksheet A)	$d_{HSC} =$	0	inches
5	Enter capture efficiency corresponding to d_{HSC} , Y_2 (Worksheet A)	$Y_2 =$	0	%
6	Using Figure III.2, determine the fraction of "design capture storm depth" at which the drawdown time (T) achieves the equivalent of the upstream capture efficiency (Y_2), X_2	$X_2 =$	0	
7	Calculate the fraction of design volume that must be provided by BMP, $fraction = X_1 - X_2$	fraction =	0.43	
8	Calculate the resultant design capture storm depth (inches), $d_{fraction} = fraction \times d$	$d_{fraction} =$	0.32	inches
Step 2: Calculate the DCV				
1	Enter Project area tributary to BMP (s), A (acres)	$A =$	0.12	acres
2	Enter Project Imperviousness, imp (unitless)	$imp =$	0.61	
3	Calculate runoff coefficient, $C = (0.75 \times imp) + 0.15$	$C =$	0.6075	
4	Calculate runoff volume, $V_{design} = (C \times d_{fraction} \times A \times 43560 \times (1/12))$	$V_{design} =$	84.1	cu-ft
Supporting Calculations				
Describe system:				
<i>Permeable Concrete Sidewalk with 6-inch rock reservoir, which provides an effective depth of 0.175 ft. Therefore:</i>				
BMP Surface Area Needed = $84.1 \text{ cu-ft} / 0.175 \text{ ft} = \mathbf{480.8 \text{ square feet}}$.				
Provide drawdown time calculations per applicable BMP Fact Sheet:				
<i>Drawdown time is based on 6-inch aggregate base depth for retention of the DCV in the permeable concrete sidewalk section. At 35% porosity, the effective depth is 2.1 inches or 0.175 feet, which will drawdown in 7 hours with a design infiltration rate of 0.3 inches/hour.</i>				
$((0.5 \text{ ft} \times 0.35) \times 12 \text{ in.}) / 0.3 \text{ in/hr} = 7 \text{ hours}$.				

SECTION 3.0 RESPONSES TO COMMENT LETTERS

In accordance with Section 15088 of the CEQA Guidelines, the OCWD as the Lead Agency has evaluated the comments received on the Mid Basin Centennial Park Injection Well Project Draft EIR. In accordance with CEQA Guidelines, the OCWD has prepared responses for each comment received. Below is a listing of the public agencies that provided comments on the Draft EIR. Each comment letter and individual comments are numbered so that can be cross referenced with responses.

Table 1: List of Comment Letters

Letter	Sender	Date Received
A	California State Clearinghouse	March 15, 2016
B	California Department of Transportation	January 30, 2015
C	County of Orange Public Works	February 2, 2015

Comment Letter A
California State Clearinghouse
March 15, 2016

Comment A-1

The submitted comment acknowledges that the Draft Environmental Impact Report complies with the State Clearinghouse review requirements, pursuant to the California Environmental Quality Act.

Response A-1

Comment noted.



EDMUND G. BROWN JR.
GOVERNOR

Comment Letter A
STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

March 15, 2016

Daniel Bott
Orange County Water District
18700 Ward Street
Santa Ana, CA 92708

Subject: Mid Basin Centennial Park Injection Wells Project
SCH#: 2015061055

Dear Daniel Bott:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on March 14, 2016, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

A-1

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Comment Letter B
California Department of Transportation
February 17, 2016

Comment B-1

The submitted comment letter states that the California Department of Transportation has no comments on the Draft Environmental Impact Report.

Response B-1

Comment noted.

DEPARTMENT OF TRANSPORTATION

DISTRICT 12

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*Serious Drought.
Serious drought.
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Comment Letter B

February 17, 2016

Daniel Bott
Orange County Water District
18700 Ward Street
Fountain Valley, CA 92708

File: IGR/CEQA
SCH#: 2015061055
IGR Log #: 4417-B
SR: I-405

Dear Mr. Bott:

Thank you for the opportunity to review and comment on the **Draft Environmental Impact Report for the Mid Basin Centennial Park Injection Wells Project** which will require the construction and operation of 4 underground injection wells at Centennial Park and the construction and operation of a monitoring well at the Heritage Museum. Centennial Park is located at 3000 West Edinger Avenue within the City of Santa Ana. Heritage Museum is located at 3101 West Harvard Street within the City of Santa Ana. The nearest State routes to the project sites is I-405.

Caltrans is a commenting agency on this project and has no comment at this time. However, in the event of any activity in Caltrans' right of way, an encroachment permit will be required.

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Maryam Molavi at (949) 724-2241.

Sincerely,

MAUREEN EL HARAKE
Branch Chief, Regional-Community-Transit Planning
District 12

C: Scott Morgan, Office of Planning and Research

Comment Letter C
Orange County Public Works
March 18, 2016

Comment C-1

The submitted comment requests that the Orange County Water District (OCWD) consult with the Orange County Public Works Environmental Resources to obtain recommendations on water quality issues associated with the back flushing of water from the injection wells into the Greenville-Banning Channel.

Response C-1

Page 5-132 of the Draft Environmental Impact Report identifies Mitigation Measure HWQ-1, which requires that OCWD obtain an encroachment permit from the County of Orange to allow the discharging of back flushed water from the injection wells into the Greenville-Banning Channel. As part of the coordination for the encroachment permit OCWD would coordinate with Orange County Public Works Environmental Resources on water quality issues associated with the back flushing of water from the injection wells into the Greenville-Banning Channel.

Comment C-2

The submitted comment identifies that based upon personal communication with OCWD it was identified that an incorrect amount of water (70,000 gallons per minute) was referenced in the Draft EIR, as the amount of water that would be periodically discharged from the injection wells.

The submitted comment is correct. The amount of water that would be discharged would be 3,500 gallons per minute per well. This amount is substantially lower and would not increase flood capacity impacts or potential flood risks within the Greenville-Banning Flood Control Channel.

Comment C-3

The submitted comment identifies that the section headings 5.7.3 Thresholds of Significance and 5.7.4 Project Impacts are mislabeled and should be referenced as section headings 5.8.3 Thresholds of Significance and 5.8.4 Project Impacts.

Response C-3

The comment is correct. The headings were inadvertently mislabeled. As shown in Section 2.0, the Final EIR has been revised to reflect the correct section headings.

Section 5.7.3 Thresholds of Significance has been clarified and revised to read as follows;

5.8.3 Thresholds of Significance

Section 5.7.4 Project Impacts has been clarified and revised to read as follows;

5.8.4 Project Impacts

Comment 4

The submitted comment identifies that worksheet on Page 13 of the Preliminary Non-Priority Project Water Quality Plan incorrectly identifies runoff coefficient as .6075. The correct coefficient value is .90.

Response 4

The comment is correct. The runoff coefficient was inadvertently identified as .6075. The worksheet on Page 13 of the Preliminary Non-Priority Project Water Quality Plan has been revised to reflect a runoff coefficient of .90. The analysis in the Preliminary Non-Priority Project Water Quality Plan was based on a runoff coefficient of .90. Therefore, no additional changes to Preliminary Non-Priority Project Water Quality Plan are required. The infiltration strategies and storm water control measures identified in the Preliminary Non-Priority Project Water Quality Plan would reduce long-term storm water management impacts to a less than significant level.



March 18, 2016

Comment letter C

NCL-15-021

Mr. Daniel Bott, Principal Planner
Orange County Water District
18700 Ward Street
Fountain Valley, California 92708

Subject: Recirculated Notice of Availability of a Draft Environmental Impact Report for the Orange County Water District Mid Basin Centennial Park Injection Well Project.

Dear Mr. Bott:

The County of Orange has reviewed the Recirculated Notice of Availability of a Draft Environmental Impact Report for the Orange County Water District Mid Basin Centennial Park Injection Well Project and offers the following comments:

Flood Programs:

1. Prior to final design of the Mid Basin Centennial Park Injection Wells Project, please consult the Orange County Public Works/Environmental Resources service area to obtain their recommendations regarding the water quality issues associated with back flushing waters discharging into the Greenville-Banning Channel (D03). *C-1*

If you have any questions or need clarification please do not hesitate to contact Robert McLean at (714) 647-3951 or Anna Brezezicki at (714) 647-3989.

Environmental Resources:

1. Section 5.8, Hydrology/Water Quality: Sub-Section 5.8.4, Project Impact HWQ3, describes the injection well backflushing operations at occurring weekly or every two weeks and having the potential to discharge up to 70,000 gallons of well water per minute into Centennial Lake (page 5-131). It was confirmed with OCWD Project Engineer, Ben Smith, that this discharge rate is incorrect. The correct discharge rate should be 3,500 gallons per minute for 20 minutes per well (personal communication with Ben Smith on 3/8/16). The EIR should be updated to include the corrected discharge rate. *C-2*
2. Sections 5.8.3, Threshold of Significance (page 5-114) and 5.8.4, Project Impacts (page 5-115): These sections are mislabeled as 5.7.3 and 5.7.4, respectively. They should be 5.8.3 and 5.8.4, respectively. *C-3*

SECTION 4.0 MITIGATION MONITORING PROGRAM

4.1 Introduction

The following is a Mitigation Monitoring Report Program (MMRP) for the Orange County Water District Mid Basin Centennial Park Injection Well Project prepared pursuant to Section 15097 of the CEQA Guidelines and Section 21081.6 of the Public Resources Code. This MMRP lists all applicable mitigation measures from the Draft Environmental Impact Report for the Orange County Water District Mid Basin Centennial Park Injection Well Project. The appropriate timing of implementation and responsible party are identified to ensure proper enforcement of the mitigation measures from the Draft EIR.

4.2 Project Description

Project Location

The Centennial Park project site is located at 300 West Edinger Avenue and the Heritage Park project site is located at 3101 West Harvard Street within the City of Santa Ana.

Project Description

The Project involves the construction and operation of four injection wells and a single monitoring well.

Project Objectives

Implementation of the Mid Basin Centennial Park Injection Well Project is intended to achieve the following objectives;

- Construct the Mid Basin Centennial Park Injection Well Project in location that can readily tie into the existing GWR System pipeline with minimal impacts to the environment.
- Provide 12 MGD per day of additional groundwater recharge capacity to the Orange County Groundwater Basin.
- Maximize the use of GWR System as the local water supply to replenish the Orange County Groundwater Basin.
- Ensure that the operation of the Mid Basin Centennial Park Injection Well Project does not result in permanent loss of usable open space.
- Ensure that during construction and operation of the Mid Basin Centennial Park Injection Well Project safety conflicts with students from Godinez High School, Mitchell Child Development Center and from Centennial Education and Day Care Center are avoided.

- Ensure that the construction and operation of the Mid Basin Centennial Park Injection Well Project is compatible with park facilities.

4.3 Development of Mitigation Monitoring Reporting Program

The basic elements of the Mitigation Monitoring and Reporting Program are the mitigation measures identified by each impact category addressed in Section 5.0 of the Draft EIR. The development of the program was based on the following procedures necessary to initiate and complete the monitoring process.

- Identification of the key periods and events in the project implementation schedule.
- Identification of the key personnel and agencies responsible for environmental monitoring.
- Monitoring of the implementation of the mitigation measures and documentation that the measures have been properly and thoroughly implemented.
- Development of the written document on the implementation of all the mitigation measures, identification of any areas of non-compliance, and proposed activities to bring the project into compliance with the mitigation monitoring and reporting program.

4.4 Requirement to Approve and Implement Mitigation Monitoring Plan

The OCWD has the authority to require and enforce the provisions of California Resource Code Section 21081.6. The OCWD will be responsible for approving the Mitigation Monitoring and Reporting Program and for preparing the written report documenting the implementation of project mitigation measures.

Table 2 summarizes the mitigation measures that have been adopted for the Project, specifies the timing for implementation of each measure and identifies the responsible parties for ensuring implementation and the satisfactory completion of each measure. The procedures for implementing the Mitigation Monitoring and Reporting Program are:

Monitoring Procedures

1. An Environmental Monitor, appointed by OCWD, will be responsible for coordinating review of project plans and activities, the construction site, and/or operations to ensure that the mitigation measures are properly and thoroughly implemented through the course of the project.
2. Written documentation that each mitigation measure in Table 2 has been implemented will be prepared. This documentation can be on an OCWD mitigation monitoring checklist or a similar form that clearly indicates the timing or schedule for implementation, whether the measure has, in fact, been implemented, or in the case of

measures that are ongoing, that a process has been developed to ensure continued implementation of the measure.

Reporting Procedures

1. The Environmental Monitor appointed by OCWD on this project will be responsible for periodically reviewing the program in Table 1 with the OCWD Environmental Compliance Advisor.
2. The Environmental Monitor will prepare a written report for the OCWD documenting the completion of the implementation of all the mitigation measures. For those measures not implemented or for activities that do not fully comply with mitigation measures included in Table 1, an explanation of the areas of noncompliance will be prepared, including a proposal to bring those elements of the project into compliance with the Mitigation Monitoring and Reporting Program.

The following table will be used by the Project Manager to enforce mitigation measures during each phase of the Project pursuant to Section 15097 of the State CEQA Statutes and Guidelines and Public Resources Code Section 21081.6.

**Table 2: Mid Basin Centennial Park Injection Well Project
Mitigation Monitoring Plan Reporting Program**

Mitigation Measure	Responsible for Implementation	Monitoring	Verification
Aesthetics			
AR-1: Construction lighting fixtures will be shielded by providing side flaps on lights, or providing a temporary drape/wall so that illumination is confined to within the work area. Onsite construction lighting will be arranged so that direct rays will not shine in or produce glare impacts to sensitive receptors.	OCWD	During Construction	
AR-2: if the onsite construction lighting creates a light or glare issue for sensitive receptor properties, OCWD will implement corrective measures to resolve the issue. Such corrective measures may include providing additional shielding on light fixtures, relocating lighting fixtures or increasing the height of the temporary drape/wall.	OCWD	During Construction	

Biology			
BIO-1: At each well site sound attenuation wall will be provided to minimize noise impacts.	OCWD	During Construction	
BIO-2: To extent feasible all heavy equipment will be equipped with noise reduction features, such as mufflers and engine shrouds.	OCWD	During Construction	
Cultural Resources			
CR-1: A qualified Archaeologist will be retained during construction to observe grading activities in the uppermost layers of sediment (soils and younger Quaternary Alluvium) and to salvage and catalogue archaeological resources, as necessary. The designated Archaeologist should be present during the pre-grade meeting to discuss cultural resources sensitivity and to assess whether archaeological resources have the potential to be encountered. The Archaeologist must first determine whether an archaeological resource uncovered during construction is a “unique archaeological resource” pursuant to Section 21083.2(g) of the <i>California Public Resources Code</i> or a “historical resource” pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a “unique archaeological resource” or a “historical resource”, the Archaeologist shall formulate a mitigation plan in consultation with the OCWD that satisfies the requirements of the above listed Sections.	OCWD	During Construction	
CR-2: If human remains are encountered during excavation activities, all work shall halt in the vicinity of the remains and the County Coroner shall be notified (<i>California Public Resources Code</i> §5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner, with the aid of a qualified Archaeologist, determines that the remains are prehistoric, s/he will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the <i>California Health and Safety Code</i> . The MLD shall make	OCWD	During Construction	

<p>his/her recommendation within 48 hours of being granted access to the site. If feasible, the recommendation of the MLD shall be followed and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (<i>California Health and Safety Code §7050.5</i>). If the landowner rejects the recommendations of the MLD, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (<i>California Public Resources Code §5097.98</i>).</p>			
<p>CR-3: A qualified Paleontologist be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the Older Quaternary Alluvium on the project site. The designated Paleontologist should be present during the pre-grade meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils have the potential to be encountered. The extent of monitoring activities will be determined at the meeting in consultation with the OCWD. If any scientifically important large fossil remains are uncovered during earth-moving activities, the Paleontological Monitor will divert heavy equipment away from the fossil site until s/he has had an opportunity to examine the remains. Samples of Older Quaternary Alluvium should be collected for processing and examination for very small vertebrate fossils.</p>	OCWD	During Construction	
Geology/Soils			
<p>GEO-1: Prior to the start of construction OCWD will obtain coverage under the General Construction Permit by the State Water Resources Control Board and in compliance with the permit shall file a Notice of Intent with the State Water Resources Control Board and prepare and implement Storm Water Pollution Prevention Plan.</p>	OCWD	Prior to Construction	
<p>GEO-2: The final design and construction of the project will incorporate the geotechnical recommendations provided in the Leighton Consulting Geotechnical Report prepared for the Mid Basin Centennial Park Injection Well Project.</p>	OCWD	During Final Design and Construction	

Hydrology/Water Quality			
HWQ-1: Prior to construction operations OCWD will obtain an encroachment permit from the County of Orange that allows for the discharging of groundwater from the Mid Basin Centennial Park Injection Well into the Greenville Banning Flood Control Channel.	OCWD	Prior to Construction	
HWQ-2: The final design of the Mid Basin Centennial Park Injection Wells Project will incorporate the storm water management program contained in the approved Mid Basin Centennial Park Injection Well Non-Priority Project Water Quality Plan.	OCWD	Prior to final design and during construction.	
HWQ-3: Prior to conducting dewatering activities OCWD will receive NPDES dewatering permit from the Regional Water Quality Control Board.	OCWD	Prior to Construction	
HWQ-4: Prior to construction activities occurring along the west and east levees of the Santa Ana River OCWD will obtain an encroachment permit from the County of Orange and 408 permit from the U.S. Army Corps of Engineers.	OCWD	Prior to Construction	
HWQ-5: Prior to placement of the water supply pipeline along the nose piers of the Edinger Avenue Bridge OCWD will obtain an encroachment permit from the County of Orange and as part of the permit conditions will coordinate with the County of Orange Flood Operations staff on the design of the water supply pipeline to ensure it does not impede flood maintenance activities along the bridge during flood events.	OCWD	Prior to Construction	
Noise			
N-1: The project will incorporate the noise reduction design features identified in the Mid Basin Centennial Park Injection Well Project EIR/EA.	OCWD	Prior to Construction	

Traffic/Transportation			
<p>T-1: Prior to start of pipeline construction activities along Edinger Avenue a Traffic Management Plan will be prepared and approved by the City of Santa Ana. The Traffic Management Plan will include traffic control devices and signage to avoid vehicle and pedestrian conflicts from the temporary closing of Edinger Avenue.</p>	OCWD	Prior to Construction	
<p>T-2: Pipeline construction along the Centennial Loop will be conducted during the night time hours. Steel plates will be placed over exposed trenches at the end of work activities to allow vehicle access during the day.</p>	OCWD	During Construction	
<p>T-3: A Traffic Control Plan with traffic control devices and signage will be implemented at Parking Area 2 directing student drop-offs to the turn-around located north of Centennial Park Skate Park</p>	OCWD	During Construction	
<p>T-4: A Construction Safety Plan will be prepared and implemented that will include fencing around work areas to prevent public access and the use of flag man if needed to direct students and pedestrians away from construction equipment and activities.</p>	OCWD	During Construction	
<p>T-5: During construction activities a signage program will be implemented that will identify parking areas where available.</p>	OCWD	During Construction	