

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



October 25, 2004

Michael Otavka
William s. Hart Union High School District
21515 Centre Pointe Parkway
Santa Clarita, California 91350

**Draft Environmental Impact Report Comments
Castaic High School Project
SCH# 2004031110**

Dear Mr. Otavka:

The proposed school project is located in an ecologically rich zone that is transitional between the Angeles and Los Padres National Forest ecosystems. This portion of the Santa Clara River watershed contains regionally significant recreational, ecological, and visual resources. Projects in this area warrant designs to avoid impacts to these resources.

Unavoidable Significant Adverse Visual and Ecological Impacts

The proposed Castaic High School project would result in regionally significant, adverse visual and ecological impacts. The Draft Environmental Impact Report (DEIR) concurs that the project would result in unavoidable, significant, adverse visual impacts. The DEIR is deficient for not considering the loss of 548.8 acres of high quality coastal sage scrub, 14 acres of riparian habitat, and 3.5 acres of native grassland an unavoidable significant adverse impact.

The DEIR concludes that the loss of these habitat types can be mitigated by onsite restoration. That conclusion is deficient for the following reasons. First, the DEIR must identify where specifically that mitigation would take place on the property. The DEIR must also state why the mitigation is appropriate in that location and why it is likely to succeed. Only with that explicit information can the public, agencies, and decision makers gage whether a mitigation measure of this scale is feasible on the property, and secondarily, whether it will be adequately situated biologically post buildout of the area.

Secondly, to our knowledge, not even a 50-acre inland coastal sage scrub restoration project, yet alone a 550-acre restoration, has ever been close to being successfully attempted or completed in Los Angeles County. Likewise, to our knowledge, no successful native grassland restoration effort in the County has ever exceeded one acre. Furthermore, the

California Department of Fish and Game (CDFG) is going to require a bare minimum of a 2:1 replacement ratio on the 14 acres of quality riparian habitat. We can assure the District that the site cannot yield 28 acres of equivalent riparian habitat in low lying portions of the subject project where little or none exists now.

The DEIR is proposing mitigation that probably is not feasible. The Mountains Recreation and Conservation Authority (MRCA), of which the Conservancy is a member entity of, currently has 8 riparian restoration and creation projects ranging in size from one acre to one-quarter-acre. The performance of each is dictated by a Streambed Alteration Agreement or Section 404 permit inherited from a developer. Habitat restoration and creation projects are labor intensive, fraught with unknowns, require reliable irrigation, and cost over \$50,000 an acre minimum to complete (including reports) at any scale. If you take the proposed project's combined 567.5 acres of direct impact to riparian, coastal sage scrub and native grassland habitat, and multiply by even \$25,000 an acre, the cost is over \$14,000,000. That does not account for the lily mitigation which will also involve substantial cost. If in lieu mitigation credits for riparian habitat equal \$100,000 an acre, that mitigation alone would be \$2.8 million for 28 acres (2:1 ratio). CDFG could easily require a ratio of 3:1 which would increase the cost to \$3.2 million.

Inappropriate Project Location

The proposed school project entails cutting off a minimum of 5.5 million cubic yards of earth from a ridgetop and mass grading an additional 14.5 million cubic yards to bring access and utilities to the site. The school structures and the day lighted ridgeline would be directly visible from numerous points within the Castaic Lake State Recreation Area. They could well also be visible from points within the Angeles National Forest to the east. A portion of the daylighted ridge property must be obtained in fee from the State Department of Water Resources. The DEIR appears to be deficient for not addressing the nature and specificity of the proposed land exchange with the Department of Water Resources. For this reason the project description may be deficient.

The proposed school location is at the edge of the community needing a high school. A more central location is appropriate. In addition, a full facility high school can be achieved on 25 acres rather than the proposed 60-acre flat graded pad. The DEIR failed to consider locating the school within the existing North Lake Specific Plan. That plan, which must be amended anyways, call for two school sites its current approved form. The DEIR will remain deficient until it addresses the feasibility of using one off these two sites for the proposed high school, including the scenario of expanding one of the sites.

Interrelationship with Proposed North Lake Project

The proposed school and the proposed North Lake subdivision project are inextricably linked projects and only a single California Environmental Quality Act (CEQA) document will comply with the intent of CEQA. The school project requires the road access from the subdivision and the subdivision requires the 5.5 million cubic yards of cut from the school in order to have adequate fill for Grasshopper Canyon. It is this agency's strong opinion that CEQA piecemealing will occur unless the proposed high school and all phases of the North Lake project are considered in a single EIR. Collectively the two projects could result in almost 30 million cubic yards of grading (Page 4-7). The Los Angeles County Department of Regional Planning's letter on the DEIR dated October 18, 2004 includes numerous other definitive examples of how the two projects are inextricable under CEQA.

Inadequate Alternative Analysis

None of the alternatives contained in the DEIR address an attempt to lessen the impacts (711 acres of grading) resulting from the needed offsite improvements. More specifically that DEIR must include an alternative for an access road that does not implement the Northlake subdivision and thus significantly reduces ecological impacts. The DEIR should also have included an alternative that excludes grading any property in the Castaic Lake Recreation Area. A subsequent CEQA document must also include an alternative that locates the school within the boundary of the North Lake Specific Plan.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above Ramirez Canyon Park address. More specifically please notify Mr. Edelman of all public hearings on the proposed project.

Sincerely,

JEROME C. DANIEL
Chairperson