



August 7, 2008

Erik Reuter
Director of Construction
Carlsbad Unified School District
6225 El Camino Real
6226 Carlsbad, CA 92009

Subject : Comments on DEIR Carlsbad High School

Dear Mr. Reuter :

These comments are submitted on behalf of Preserve Calavera, the largest conservation organization in coastal North San Diego County. We very much appreciate the effort required to design a high school that is sensitive to its very special location- surrounded on three sides by permanently protected natural lands. Because of its unique location, the site provides particular challenges to balance the educational needs of the community with protecting the natural resources that are entrusted to all of us.

The following comments and recommendations are offered in hopes that we can achieve that balance.

Executive Summary

The following are comments on Table 1-1

- 5.1-2 Mitigation Measure(MM) 1-2 should add "trails and public view areas"
- 5.1-3 MM 1-3 Needs to also address that the positioning and shielding of lights will be addressed through inclusion in the site O & M Plan. Lighting is not just an issue at the time of installation, but these conditions will need to be addressed throughout the life and operation of the facility.
- 5.3-1 Reduction of auto trips would reduce these air quality impacts. The site should include appropriate TDM measures such as transit use incentives, car pooling, and better provisions for pedestrian and bicycle access.
- 5.4-1 MM4-2 needs to add "north" to the directions of light shielding- and clarify that the maximum foot candle on the property line applies to the entire property boundary.

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- 5.4-1 MM 4-6 This issue of directing irrigation away from the Nuttall's scrub oaks needs to be added to the site O& M plan.
- 5.4-1 MM 4-6 Landscaping plan need to be provided for public review so that it can be confirmed that landscaping meets the criteria- including minimizing the need for irrigation.
- 5.4-2 MM 4-9 states that this is to be directed away from the riparian woodland adjacent to the project site- but there is also riparian woodland on the project site that must also be protected.
- 5.4-2 MM 4-17 Should specifically identify a need for a 9 foot fence around all sides of the project to assure there is no intrusion onto sensitive habitat. (It is the experience of land managers in the area that 6 foot fences do not provide adequate protection in areas like this).
- 5.4-3 Wetlands impacts from the project as currently designed are significant. A wetlands delineation is required to determine the boundaries of state and federal jurisdictional wetlands. The required wetland and upland buffer boundaries need to be identified. Only then can full mitigation needs be determined.
- 5.4-4 Until the report is produced by a qualified biologist and the mitigation recommended is reviewed, it is not possible to determine the level of impact significance. Therefore, the Level of Significance after Mitigation remains significant.
- 5.4-5 The summary fails to identify cumulative and project specific impacts to wildlife movement as discussed in the comments on Biological Resources.
- 5.4-6 This is not correct- the project as proposed is in conflict with the MHCP and city of Carlsbad HMP, for not providing full protection from edge effects, inadequate evaluation and avoidance of wetlands impacts, and lack of compliance with the standards for Zones 14 and 15.
- 5.4-7 MM needs to be modified to provide for protection of all of the land that is or is planned to become preserve land- both outside the project and within the project boundaries.
- 5.7-6 Please add a figure that shows the areas rated for 75,000 pounds for fire truck access. This should be included as part of an assessment of how much of the paved area may be permeable or semi-permeable.
- 5.7-7 The last MM for vegetation management says" Caution must be exercised on steep slopes to minimize erosion with the removal of vegetation and the addition of irrigation." This MM is unclear and unenforceable as written. Please re-state this to a specific action that will mitigate the identified impact to a less than significant level.
- 5.8-1 Preliminary SWPP needs to be provided in order to determine if the proposed plan in fact reduces the impacts to less than significant.
- 5.8-2 The increase in impervious cover is a cumulative impact to the watershed.

- 5.9-1 This is not correct. The project as proposed is in conflict with the MHCP and HMP, which were specifically designed to reduce the biological impacts of development. Project redesign and/or improved mitigation is required to reduce the significant impact.
- 5.10-2 The impact of stadium noise is not just to residents- it is to sensitive species in the hardline open space that live much closer to the stadium than the human residents.
- 5.10-2 MM 10-2 needs to also be included in the site O & M Plan.
- 5.10-5 MM 10-4 needs to also be included in site O & M Plan.
- 5.13-3 The parking study for the stadium identified that there is a shortage of 200 parking spaces for the estimated 48 days a year of peak use. No plan is provide for how to accommodate these additional 200 cars when there is no on street parking on the adjacent streets. A peak event management plan should be prepared- which includes traffic control and provisions to direct vehicles to a planned off site facility when the parking lot is full. There also should be provisions for additional handicapped access for peak events. If there is not a reasonable plan to address this, there are significant additional impacts from the proposed stadium that have not been identified or mitigated.

Chapter 2

- 2-4 The public needs to have the opportunity to review and comment on the Mitigation and Monitoring Plan. We request that this be provided prior to issuance of the FEIR.

Chapter 3

- The parking lot footprint could be minimized by using a multi level parking structure. This should be considered as a project alternative that could reduce the overall footprint and thereby reduce direct and indirect impacts to sensitive habitat and the watershed.
- 3.3.1- The project touts "emphasis on environmental learning and experience" yet there is no discussion in this document about using environmentally-friendly design strategies, such as CHPS or LEED. According to presentation by the Eco>Logic Studio there are currently 227 schools currently in the process of receiving formal LEED certification. The usage of pervious paving blocks in the 1,000 space parking lots, renewable-certified building materials, lead-free paints and native plantings etc. should all be considered as part of the response to the extreme environmental sensitivity of the project site. There is potential for this school to be truly a "model" for environmentally sensitive design- and not just a high school that is located in an environmentally sensitive setting..
- 3-1 Goals. These include " Provide physical education and sports opportunities for students as well as community members by providing a facility available for student and public use as approved by the District." However the only such "opportunities" identified in the DEIR are attending events at the stadium. Are there other activities being considered? If so these should be identified so any potential environmental impacts could be assessed.
- Figure 3-2. This Figure and the associated text throughout the document really minimizes the biological values of the surrounding land. While the specific parcels are at different stages in

their formal transition- over 80% of the surrounding land is formally identified as permanent, hard line natural lands- with an intent to be managed in perpetuity to protect the natural resources. There are very few parcels anywhere in north county that are so significant for their impact on core habitat. The EIR has failed to properly consider the impact of this type of development within what is really a core habitat area.

- 3-2 This says " The campus conceptual design emphasizes the idea of a balance between the manmade environmental(sp) and nature. The architectural and site design would feature an intellectual understanding and experience of natural systems with diverse indoor and outdoor learning experiences." Please explain what is meant by this as the description of activities includes no outdoor learning- except for traditional sports activities- which in many cases are sited where they will adversely effect the natural systems (like the biological and wildlife movement functions normally associated with a creek).
- Figure 3-3 The text says the existing riparian vegetation along the natural site drainage will be protected. But the aerial shows what appears to be an existing vegetation corridor of about 200' where it has not been cleared. Yet the site plan shows a much narrower vegetated area along the creek. Please provide more detail on current vs proposed width of the riparian corridor along this natural drainage and clarify how much buffer will be provided. The key issue is to assure that at least the minimum 100' buffer is provided- both wrt the "natural drainage" on site as well as the nearby corridor along Calavera Creek,
- Please clarify why the stadium is being constructed in the first phase, although it is stated there will initially be no football team and consequently no need for a foot ball stadium. Why would this not be included in the later phase of construction as the facility is expanded to accommodate the build-out student population of 2,400 students and it is determined that this is a priority? This is of particular concern because many of the unmitigated adverse impacts are associated with the stadium.
- 3-11 Stadium Features-The stadium location and activities described will have numerous direct and indirect impacts to the nearby riparian corridor. The corridor is already compromised by the development to the west and the completion of Cannon Rd and College. Location of the stadium here seems to disregard the 20 years of planning it took to delineate movement corridor sites. The stadium should be situated in a less sensitive part of the property, such as along the entrance road to the south.
- 3-11 Stadium Use & Scheduling-in the event of capacity crowds, where do you propose to direct the overflow parking? There are no residential streets nearby and parking is prohibited on the shoulders of Cannon Road and College Blvd. Promoting car-pooling may help alleviate the problem. A shuttle service would be ideal and could perhaps use the nearby public park planned at Robertson Ranch.
- 3-13 Access, Parking and Student Loading-states there would be a long queue area for student drop-off along the right side of the road extension. It appears to describe the Main Entrance road. This description is not consistent with what is shown in the Traffic study "Campus Circulation Exhibit" which does not indicate any queuing along Cannon Rd. Please clarify where drop-off queuing will be allowed and the number of vehicles that can be accommodated.

- 3-13 Parking does not change with the increase from 1500 to 2400 students. This is of particular concern because the proposed parking results in additional impervious cover- and the area of faculty parking in the far east corner is immediately adjacent to sensitive habitat with no identified buffer. We found no parking study that supports the parking plan- and the distinction in the area separated for faculty and student parking. The text says there will be a staff of 100 at buildout- yet there is 200 parking spaces provided in the staff lot. Please provide further explanation of projected parking need for both the initial facilities for 1500 students and for the buildout population.
- 3-14 Please provide a Figure that shows the impact area of each of the three road alignments discussed in the text and identify any existing right-of-ways or legally entitled access to the Project site.
- 3-14 Cannon Road Extension- it is impossible to assess issues or concerns without knowing the road alignment. The City prefers the central alignment, which would require significant design changes. (Any road extension cuts off Linkage B). Please show both the proposed and city preferred alignments and assess full impacts from the project design as proposed.
- 3-15 the list of required approvals should also include DFG for the Stream Alteration Permit as discussed elsewhere in the text.
- We are particularly concerned about how the site planning can accommodate the future projected reduction in students as long term population projections show fewer high school age students than the district is currently building for. Since this area is adjacent to hardline preserve it would make financial sense for the district to consider that - some day- part of this site may be excess to district needs and could be sold to expand the size of the adjacent natural reserve. Site planning should consider how the facility could be both sized up and sized down in the future in response to such changing needs. Planning for this now- (perhaps through some permeable parking, placing softball field within the stadium, etc) would reduce footprint and facilitate such later changes.

Chapter 4

- 4-2 Existing Land Use-p 1-correct the last sentence to read 'College Blvd lies west of the site.'
- 4-3 Calavera Hills and Robertson Ranch are two different projects.
- 4-3 The description of surrounding land uses again minimizes the importance of the surrounding natural lands- the largest natural core habitat area in coastal north San Diego County.
- 4-6 This page titled "Description of Environmental Setting" is identified as "intentionally "left blank. Is this oversight or is there no intent to provide a real description of the extra sensitivity of this site?

Chapter 5 Aesthetics

- 5.1-2. The description should be revised to add the proximity of Calavera Creek along the western property border, its location near its confluence with Agua Hedionda Creek and the need for appropriate wetland and upland habitat buffers.
- 5.1-11 Add a description of the potential impact from the public views from the Trailhead at College/Carlsbad Village Dr and along the public trails.
- 5.1-14 Impacts and Figure 5.1-5 Lighting Plan describes the stadium configuration as the 4 light poles on the north and south. This conflicts with the configuration shown on Figure 3-4 Conceptual Site Plan which shows the stadium light pole sides (Home and Visitors) as facing east and west. What is the correct stadium lighting configuration?
- 5.1-14 This is also a concern on the west side of the project- where the bleachers are within the buffer area of Calavera Creek- an area where night lighting could disrupt wetland species breeding. Discuss this impact and provide appropriate mitigation- like restriction on hours of lights and PA during breeding season as an enforceable project condition.
- 5-1-14 "Precise positioning" of the fixtures and accurate focusing of the lightbeams and shielding of the boxes to reduce glare and sky glow impacts is not just an issue at the time they are installed. This is a project condition that needs to be managed throughout the life of the facility. The MM should be modified to include that as an item to be incorporated in site O and M Plan.
- 5.1-14 Section 5.1.5 states there is "no existing regulation or standard." This is not correct as the City of Carlsbad has a lighting ordinance and the edge effect standards of the regional MHCP provides guidelines to address light spillover onto sensitive habitat. Please reflect these two standards in the analysis.
- Provide an assessment of effects of nighttime light levels on fish, wildlife, and migratory birds.

Agriculture

- 5.2-3 Agricultural land continues to be converted to non- ag uses- yet every project that does this concludes that there are no cumulative impacts. Clearly there are cumulative impacts from such conversions- or the CEQA process would not have called this out as a key item to evaluate. There is a value to local food production. The analysis of the alternative to eliminate the stadium said there would be higher traffic and air quality impacts because people would have to drive further to go to a stadium. Surely the same logic applies that if there is no local food production either farmers or consumers will have to go further for food/food distribution. At some point the loss of local food production has an impact. This issue has not been accurately assessed in the DEIR.

Air Quality

- 5.3-14 Please clarify what "as modified by the CUSD" means.
- 5.3-20 Impact 5.3-4 re air quality "hot spots." We are concerned that the back up at the car drop-off location may create an air quality hot spot at that location. The traffic study indicates that the majority of the drop-offs occur within a 30-minute time period- which would result in

significant back-up and idling in an area with lots of pedestrian activity. Please assess potential air quality impacts in the drop-off area.

- 5.3-25 Impact 5.3-2. There are significant impacts from failure to meet the pm10 standard. Please discuss actions that could be taken to reduce this to an insignificant level. Could restrictions on hours of equipment operation, or numbers of pieces of equipment operating at one time achieve this? There does not appear to be any real effort to even try to reduce this to an acceptable level- yet the people, plants and wildlife life will all be at risk for health impacts from this poor air quality.

Biological Resources

- 5.4-1 Source data for information on mapped species was identified as primarily RareFind, from the CA Dept of Fish and Game. We find this is not a complete source and suggest augmenting this with other sources including PC 2008, and the San Diego Plant Atlas, the best source of curated data on rare plants. Limitations are that it is not complete yet, and the resolution is at a 3x3 mile grid level; "What Grows Here" from Calflora. <http://www.calflora.org/app/wgh?page=entry> This is not vouchered like the Plant Atlas is, so the list may have errors.

Following are examples of plants (some on PC 2008 list) from DEIR target survey with moderate to high 'potential of occurrence' which were NOT observed, but which undergo summer dormancy or are annuals and have a reasonable expectation to occur. Please update the analysis of these species:

Dichondra occidentalis, CNPS 4.2, high potential for occurrence on target survey but not observed; is deciduous summer dormant; target survey was performed in summer when dormant; link for characteristics: <http://www.laspilitas.com/plants/870.htm>

Brodiaea filifolia, CNPS 1B.1, a bulb on target survey for 'moderate potential of occurrence' also has bloom time of May-June could be difficult to observe past bloom time; has been observed north and west of project site according to botanist Patrick with CNLM. Additional survey is inconclusive.

Acanthomintha ilicifolia, CNPS 1B.1, a dicot, is an annual herb found near project site. Moderate 'potential for occurrence' according to DEIR; San Diego thorn-mint germinates in the winter, flowers from April through June, and sets seed in July. As an annual, it dies after seed set. Not in PC 2008 list but discovered by Patrick nearby.

Pentachaeta aurea, CNPS 4.2, given moderate 'potential for occurrence' in the DEIR, is on PC 2008 plant list, not observed in target survey.

- 5.4-8 The description of chaparral indicates that this also includes southern maritime chaparral. It sounds like there is a difference of opinion as to indicator species for southern maritime chaparral between the various official government agencies, including Carlsbad HMP. Further characterization of the chaparral is needed in order to determine that this does not include mischaracterized southern maritime chaparral.

- 5-4 Biological Resources- correct the reference to the Biological Resources Study to Appendix E (not D)
- 5.4-23 Wildlife Movement Corridors- Wildlife mortality has indeed increased with the completion of Cannon/College and the construction of the Robertson's Ranch development to the west of Linkage B. The intersection at El Camino Real and Cannon Road has seen a significant increase in coyote roadkill and numerous small mammals have met their demise there and along College Blvd as well (personal observation-Karen Merrill). This is a traditional movement corridor between Cores #2, #3 and #4. The channelizing of the creek under Cannon Road has disrupted the riparian corridor. Wildlife have had to either traverse the roadways or find their way across the southwestern portion of the site to Agua Hedionda Creek and the undercrossing at ECR. The HS project proposes to install an entry roadway at the junction of College Blvd. and Cannon Rd. to access the school site. This will effectively create a dead end to the movement corridor through Linkage B. Development to the southeast is imminent. The impact to wildlife movement is cumulatively adverse and significant with the roadway. An under crossing should be installed as mitigation. See Carlsbad HMP Planning Standards Zone 14 (pg. D-76)
- Wildlife Movement Corridors-Edge Effects-Noise, light, trash, non-native species, such as the Norway rat, increased congregation of generalists, such as crows and raccoons will exact a heavy toll from predation, competition and disruption of movement patterns. Riparian zones always have a high rate of biodiversity. Given the corridor is approximately 300-400 feet in width and the project boundary with the corridor is approximately 1800 feet, that is a ratio of edge to habitat that has a more pronounced negative impact. Solitary and shy mammals, such as deer, bobcat and gray fox will avoid this area. Mammal predators are eleven times more likely to be present in riparian corridors than in upland habitat (Hilty and Merenlender 2004). The sum of these edge effects alters the natural dynamics and species composition and severely hampers the corridors' function for movement, dispersal and genetic exchange between the core areas. Carlsbad HMP (pg D-76) Zone 14, Linkage B explicitly states that "large mammals using these connections are needed to maintain ecosystem balance at Agua Hedionda Lagoon." Please provide further analysis and mitigation for these impacts to wildlife movement.
- 5.4-31-Impact 5.4-4- The statement "In the absence of further development around the project site, the "Link B" corridor would continue to function as it currently does" is untrue. This project impacts the function of Link B as outlined above.
- 5.4-32 /35 Landscaping restrictions. "The HMP recognizes the high potential for projects to introduce nonnative, invasive plant species that can displace native species in natural communities. This is a serious concern for the project that can be addressed by developing and implementing a landscape planting and monitoring/management plan that meets the conservation objectives of the Highlands Ecological Reserve. " and "Prior to the issuance of building permits, project landscape plans shall be reviewed and approved by the Carlsbad Planning Department. The applicant shall ensure that development landscaping does not include exotic plant species that may be invasive to native habitats. Exotic plant species not to be used include those species listed on Lists A and B of the California Invasive Plant Council's (Cal-IPC) list of "Exotic Pest Plants of Greatest Ecological Concern in California as of October 1999." This list includes such species as pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy,

French broom, Scotch broom, and Spanish broom. A copy of the complete list can be obtained from Cal-IPC's web site at <http://www.cal-ipc.org>.

In addition, landscaping should not use plants that require intensive irrigation, fertilizers, or pesticides adjacent to preserve areas and water runoff from landscaped areas should be directed away from the riparian woodland west of the project boundary and contained and/or treated within the development footprint. The applicant shall submit a draft list of species to be included in the landscaping to the Wildlife Agencies for approval at least 30 days prior to initiating project impacts. The applicant shall submit to the Wildlife Agencies the final list of species to be included in the landscaping plan within 30 days of receiving approval of the draft list of species."

Point 1: The landscaping plan needs to be included with the DEIR so it can be determined that it in fact meets the specified conditions including not to use plants that require 'intensive' irrigation, fertilizers or pesticides adjacent to preserve lands, but with no clarification of what "intensive" means.

Point 2: Has the plan for directing run-off and the site design and treatment BMP's considered protection of the native habitat- and not just the requirements of the storm water permit? (See also comments on water quality)

Point 3: This would be an excellent project for using native plants, particularly those present in CSS, chaparral and wetland habitats as they are best adapted to the site biologically. You can use native plants that require no fertilizers or pesticides, and little water. The conditions should specify the use of appropriate native plants and the landscaping plan should provide the details.

- 5.4-33-Impact 5.4-4 Cumulative Impacts-These impacts on wildlife movement are cumulative. Each compromise of the movement corridor further reduces the ability of the corridor to support sustainable wildlife movement, and will add to the cumulative roadkill impacts discussed above. Further mitigation is required to reduce both project specific and cumulative impacts to wildlife movement.
- 5.4-36-Impact 5.4-4-Mitigation measure 4-15-It would have been helpful to review these anticipated mitigation measures and the feasibility of implementing them. Since these are unknown at this time, it is impossible to determine whether or not the wildlife corridor, Linkage B, will be preserved.
- 5.4-1 and 2. The focussed biological surveys for rare plants, California Coastal Gnatcatcher (CCG) and least Bell's vireo (LBV) were not included with the DEIR. We appreciate receiving them recently upon request- but this later addition has resulted in no further analysis of potential impacts or mitigation measures. The DEIR has failed to adequately assess or mitigate for the additional impacts identified in these surveys. At a minimum the impacts to Coastal sage scrub need to reflect that this is occupied territory so mitigation would increase from 1:1 to 2:1.
- 5.4-1 Preserve Calavera 2007 plant list was referenced as source information. This has been updated in 2008 and new information was submitted separately.
- 5.4-2 and others. "Ruderal" is not a habitat type recognized in the MHCP or the city of Carlsbad HMP. Often this is properly classified as "non-native grassland" which is a sensitive habitat that

requires mitigation. Please use habitat classification system in use in the regional and local conservation plans and account for any additional mitigation that may be required.

- 5-4-23 The riparian scrub along the western border of the project appears to all be part of the wetlands along Calavera Creek. The on-site drainage appears to also be an ephemeral creek that would meet the state definition of wetlands. These wetlands need to be fully delineated under both state and federal guidelines. Once the delineation is done then the 100' buffer can be determined. Only then can the DEIR properly identify wetland impacts and mitigation requirements. The regional and local conservation plans and state and federal law all provide for special protection of wetlands- with no net loss of function. This area of the watershed is just upstream from confluence with Agua Hedionda Creek - an area that is within the 100 year flood plan and with on-going drainage system modifications to address flooding problems.
- 5.4-25/26 The Zone 14 requirements of the HMP include no net loss of wetlands, 67% preservation of coastal sage scrub, and 100' wetlands set-back when there is any conversion of agricultural land. Zone 15 includes similar standards. The project site is partially within each Zone. The proposed project appears to violate all three of these conditions. Please discuss consistency with the HMP and basis for any determination that what is proposed is functionally equivalent.
- 5.4-27 The text and figures are not consistent wrt the riparian scrub along the western border. Please correct these inconsistencies and explain how bleachers and perimeter fencing can be constructed in this area with no direct or indirect impact to this riparian habitat and buffer.
- 5.4-32 This is not a complete list of MHCP edge effect conditions. See MHCP and list of standard conditions in use by the City of Oceanside submitted separately and included by reference.
- The DEIR has failed to describe and assess the ways in which the Project might influence biodiversity, through changes in ecosystem and habitat loss; habitat fragmentation and barriers to movement; the recovery capacity of habitats or species; edge effect responses; species distributions; the occurrence of invasive or non native species; polluting emissions to water and air; species of concern; harvest levels; and important habitats.
- The identified MM are not sufficiently detailed to assure that impacts have been reduced to a less than significant level. Please provide full explanation of any proposed mitigation including habitat type, location, success criteria and management and monitoring.

Fire Safety

- 5.7-14 Please clarify that the entire fuel modification zone will be within the project footprint and will not extend in to the on-site protected habitat or the adjacent preserve lands.
- Please provide a figure that delineates area of fuel modification so that potential impacts can be identified.

Hazardous Materials

- Appendix L indicates quite a few poisons were (are) used on the farm. It is common to see warning signs regarding poison application on the fields. Please clarify what soil and water testing has and will be done to assure that site meets safety standards. This is of particular concern there are now at least 6 cases of children coming down with aplastic anemia (one-in-a-million chance) in Carlsbad, east of El Camino Real:
<http://www.nbcsandiego.com/health/11118790/detail.html>

Water Quality

- The DEIR failed to describe and quantify the hydrological conditions and water quantity and quality for all surface waters, including ephemeral streams by:
 - describing flow regimes;
 - seasonal flow patterns;
 - channel / bed / drainage basin morphology and stability;
 - sediment load – suspended and bedload;
 - providing estimates of normal (base and mean) flows and extreme (high and low) flows and water levels;
 - water chemistry and turbidity; and,
 - identifying all freshwater streams whose groundwater supplies originate within the site even though they may surface and flow outside the site. The absence of these baseline conditions and assessment of the project on these conditions makes it impossible to determine the significance of impacts to water quality and the other beneficial uses of the waters in this basin.
- The DEIR has not adequately assessed the potential impacts of Project-related changes in topography, terrain, and soil cover on surface drainage patterns, recharge areas, and other hydrologic components. Evaluate changes in seasonal flow patterns (including extreme high and low flows) of streams, as well as channel / bed / drainage basin morphology and stability, resulting from surface/groundwater withdrawal, pit dewatering, diversion, and topographic alteration. Evaluate the alteration of sediment load (suspended and bedload) of streams and their destinations.
- 5.8-10 The DEIR has provided no real definition of construction or post construction BMP's. It is impossible to assess the adequacy of the proposed run-off control measures or assure that all impacts have been mitigated in the absence of this information. Please provide text and figures that show what BMP's are proposed in sufficient detail for agency and public comment.
- 5.8-12 Please identify the percentage of the site that will have impervious, semi-pervious and pervious cover and describe the measures taken to minimize the amount of impervious cover. This is a key issue for watershed protection and is the starting point for site design under the new control of hydromodification guidelines of the RWQCB.
- 5.8-12 Please provide a figure that shows drainage basins and volumes of each so that potential impacts can be identified.
- 5.8-13 Figure 5.8-1 Please identify the source data and add a description of what is shown as dark blue to the key.
- The recently released Agua Hedionda Watershed Management Plan includes an analysis of key factors affecting the function of this watershed and identifies specific Low Impact Development and Enhanced Low Impact Development measures that will have the greatest benefit in reducing

adverse development impacts on the watershed. The recommended basic LID measures include reduce site impervious area, disconnect impervious area from storm drain system, swales, extended dry detention and stream buffers. The enhanced LID measures include: High level of effort to reduce impervious cover and disconnect from storm drain, minimize disturbance of pervious surfaces, bioretention, porous pavement, and cisterns/water harvesting. We discussed several of these measures when we met with team staff on April 28, 2008 and again request that these items receive serious consideration.

The draft AHWM Plan is titled WMP Public Comment Draft and is posted on the project website at: <http://www.carlsbadwatershednetwork.org/AH-Technical-Reports.html>

Land use

- 5.9-2 The hardline open space that surrounds the majority of this project is in various stages of implementation. But the key factor is that it has all been formally dedicated as hardline natural land that will be managed in perpetuity to protect the natural resources. The description emphasizes differences in these lands, but the key issue is that they are really all the same as far as it would effect the analysis of adjacent land uses.
- 5.9-2 We believe the closest residential area that is currently under construction is Robertson Ranch- not Calavera Hills.
- 5.9-4 Impact 5.9-3 does conflict with the Zone 14 and 15 standards in the HMP, which should be identified and discussed.

Noise

- 5.10-17 The analysis of exterior lunchtime noise has failed to assess the combined effect of activities likely to be taking place at the same time- 500 students remaining on campus for lunch, hundreds getting into cars and leaving campus, plus activities like sports and band practice that are often occurring simultaneously. Please correct the noise analysis to properly account for multiple noise generating activities occurring simultaneously.
- A key issue is impacts from the stadium along the adjacent western boundary of the project- not just to residences that are several hundred feet away- but to the wildlife along the riparian corridor. Further action is needed to reduce these impacts. This should include consideration of eliminating/reducing bleachers on this side, restrictions on hours of activities, restrictions on any nighttime activity during nesting season, etc.
- The following was identified as an issue of concern in our prior comment letter but has not been addressed "Specifically, discuss the duration and geographic extent (e.g., distance of noise related disturbance) of potential impacts in relation to how wildlife populations could be affected. Pay particular attention to wildlife movement corridors- both during and post construction."

Traffic

- 5.13-5 Table 5.13-1 Please discuss the relationship between the trip generation rate of 1.3/student and the assumptions used for sizing the parking lots. The lot design separates student from faculty parking yet the trip generation method does not have such a distinction. Furthermore staff have stated they expect that most students will drive but using the standard

SANDAG trip generation rate for a high school of 1.3 does not reflect differences in affluent neighborhoods. It appears that one set of assumptions is used for traffic generation (1.3/student) which underestimates the ADT and resultant impact on traffic. While another set of unspecified assumptions has been used to determine parking requirements- resulting in a higher number of parking spaces than is supported by the traffic study. Under estimating traffic, and overestimating parking (with more impervious surface and a larger project footprint) are both of concern as both could result in additional adverse impacts.

- 5.13-11/12 and Table 5.13-10 The statement is made that "Four of the 12 intersections are forecast to operate at an unacceptable level by the year 2030 without the project " is not correct. This is based on an assumption that without the project the site will generate 1065 trips- although it currently is only estimated to generate 6 trips a day. "Without the project" should assume current conditions with current trip generation. The difference between with and without traffic is the difference between 6 ADT and 1950.
- 5.13-10/12 and others. The traffic appendices appear to indicate that the traffic was modeled only without the construction of Reach 4 of Cannon Road and that this Reach is not required to meet traffic standards with the construction of this school. Please confirm this conclusion.
- 5.13-14 This discussion of the stadium implies that parking for the site is being sized to accommodate the peak conditions- of a major event at a stadium- that is not expected to be needed at all at the time the facility is opened- and in fact may never be needed. Even at worst case these peak parking events will occur a maximum of 48 times a year. The traffic study in Appendix 9 page 9 assumed that for 4,000 bleacher seats with an average of 3 persons/vehicle there would be a need for 1200 parking places, plus 200 would be dropped off on site and 220 would walk to the site.
- Please include more specific discussion about how the proposed site will meet the state requirements for new schools related to p18- promoting joint use of parks, 47 located to encourage walking and avoiding bussing and 53 how it supports the use of alternative transportation.

Alternatives

- 7-7 Section 7.5.3 Most of the identified unavoidable adverse impacts are associated with the stadium- visual, noise and air quality- yet there is no need for stadium to meet the project objectives. The objectives are for opportunities for community sports and recreation. The project can provide numerous such opportunities without a stadium. If there is no stadium and no football team there is no reason to conclude that students would go to another school to watch another school's team and thereby cause greater impacts. They might also stay home and read a book. Furthermore a grassy field without bleachers, lights and such an extensive PA could still accommodate many community sports activities or large group events while eliminating essentially all of the adverse impacts associated with a stadium.
- 7-7 Section 7.5.4. There would also be fewer indirect biological impacts with no stadium- as there would be no bleachers right next to the riparian corridor along the creek.

- 7-7 section 7.5.10 All of the unavoidable noise impacts were associated with the stadium-eliminating the stadium eliminates all of these impacts making this alternative significantly superior.
- 7-8 Section 7.5-12. With no team there is no increase in travel distances - again this alternative is superior to the proposed project.
- 7-8 Section 7.5.14 and Table 7-2. A large gathering could be held on the baseball and softball fields without a need for a stadium. The summary of the no stadium alternative impacts should show that it is superior to the project on aesthetics, air quality, biological resources, noise and traffic.
- Other alternatives should also be considered. These include :
 - 1.-Joint use of the nearby city of Carlsbad park at Robertson Ranch. This could greatly reduce the project footprint.
 2. Full LID/LEED compliant facility and how it would compare to what is proposed.

Cumulative Impacts

- Place potential cumulative Project impacts in an appropriate regional context; consider certified Local Coastal Plans (LCPs), including proposed revisions of LCPs; the MHCP, HMP and other regional plans including transportation plans, species recovery plans, TMDLs, air basin plans, the Agua Hedionda Watershed Management Plan and other management plans (e.g., Marine Sanctuary Management Plans), objectives and/or guidelines in an integrated manner in order to understand the aspirations of people and communities in the region.
- When assessing cumulative environmental impacts, identify any changes in environmental effect predictions, any changes in assessing their significance, the effectiveness of proposed mitigation and compensation measures, any response to such changes, and any implications for monitoring and follow up programs.
- Prepare a summary table of cumulative impacts.

Thank you for the opportunity to comment on this project.

Sincerely,

Diane Nygaard
On behalf of Preserve Calavera

Cc: Marci Koski USFWS, David Lawhead DFG, Eric Becker RWQCB