



March 13, 2019

VIA EMAIL: JEFF.WEINSTEIN@OUHSD.K12.CA.US

Mr. Jeffery Weinstein
Oxnard Union HS District
309 South K Street
Oxnard, CA 93030

Governor's Office of Planning & Research

MAR 14 2019

STATE CLEARINGHOUSE

Dear Mr. Weinstein:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE
NEW HIGH SCHOOL NO. 8 PROJECT, SCH# 2019029101

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation for the New High School No. 8 project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description

The Oxnard Union High School District proposes to construct and operate a new state of the art neighborhood High School to accommodate existing and anticipated future enrollment in the District. The new school facilities are designed to meet the educational and recreational needs of up 2,500 students in grades 9-12. The proposed project would comprise approximately 211,115 square feet (sq. ft.) of building and structures and provide approximately 806 parking spaces on the project site. In addition, the proposed project includes a variety of recreational areas including a variety of play fields, hard courts, and a pool. The project site is currently classified as Prime Farmland and/or Farmland of Statewide Importance by the Department of Conservation's Farmland Mapping and Monitoring Program.¹

Department Comments

Although direct conversion of agricultural land is often an unavoidable impact under CEQA analysis, mitigation measures must be considered. In some cases, the argument is made that mitigation cannot reduce impacts to below the level of significance because agricultural land will still be converted by the project, and therefore,

¹ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, <https://maps.conservation.ca.gov/DLRP/CIFF/>

mitigation is not required. However, reduction to a level below significance is not a criterion for mitigation under CEQA. Rather, the criterion is feasible mitigation that lessens a project's impacts.

All mitigation measures that are potentially feasible should be considered. A measure brought to the attention of the Lead Agency should not be left out unless it is infeasible based on its elements. The Department suggests that the County consider any and all mitigation measures that will effectively mitigate the conversion of agricultural land.

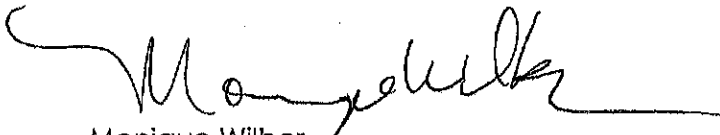
Agricultural conservation easements are an available mitigation tool that the City should consider. The Department highlights easements as a mitigation tool because of their acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because they follow an established rationale similar to that of wildlife habitat mitigation.

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

Conclusion

Thank you for giving us the opportunity to comment on the Notice of Preparation for the New High School No. 8 project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,



Monique Wilber
Conservation Program Support Supervisor