

A-5 Escondido Union School District

Comment Letter A-5



August 14, 2017

Ms. Ashley Smith
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, California 92123

BOARD OF EDUCATION

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Luis A. Rankins-Ibarra, Ed.D.

Subject: Comments on Newland Sierra Draft Environmental Impact Report
Newland Sierra, Log No. PDS2015-ER-15-08-001; SCH NO.
2015021036. PROJECT NUMBERS: PDS2015-GPA-15-001,
PDS2015-SP-15-001, PDS2015-REZ-15-001, PDS2015-TM-5597,
PDS XXXX-HLP-XXX.

Dear Ms. Smith:

The Escondido Union School (District) appreciates the applicant's efforts to collaborate via the Draft Environmental Impact Report (DEIR) process. The District has reviewed the Public Services section of the Newland Sierra DEIR and the associated Technical Section entitled School District Analysis. The District offers the following comments regarding these documents:

- 1. Page 3.5-4 states that "the proposed project has reserved a 6-acre site for a school." We are curious about the assumptions used to arrive at a six-acre parcel for a school. Also, is this acreage within the guidelines of usable acreage per the California Department of Education Guide to School Site Analysis and Development? EUSD looks forward to exploring options and feasibility for a future school.
2. The School District Analysis (Technical Appendix FF) identifies 449 K-5 students from both San Marcos Unified School District and Escondido Union School District and 130 grade 6-8 students from both districts that will be generated from the proposed project. Using California Department of Education guidelines, please confirm the capacity of the proposed school site to serve K-8 students. While the DEIR states on page 3.5-18 that the new school would serve K-8 students, if that provision is revised to serving only K-5 students, please confirm the capacity of the proposed school site to serve the generated elementary student enrollment.
3. The School District Analysis, Technical Appendix FF in the DEIR, cites the use of data included in the "district's most recent school fee study." The referenced study is dated March 28, 2016. While the School District Analysis, prepared by Development Planning and Financing Group, Inc., is dated March 30, 2017, the Escondido Union School District has a more recent school fee study. The study is dated March 27, 2017, and was approved by the Board of Education on April 27, 2017. We recommend that data from the 2017 study be used for future environmental reports and analyses. Use of this data, particularly as related to the

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Comment Letters

student generation rates, will increase the future anticipated enrollment projected for the Escondido Union School District.

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4. The map on page 59 of Chapter 1 of the DEIR shows that the proposed school site is bordered by an existing slope, a proposed park, and proposed multi-family housing. If the school site acreage must be increased, what is the alternative location for the proposed school?
5. Page 3.5-19 states that the “the proposed project would either pay the state-mandated fees or enter into a School Mitigation Agreement(s) to ensure that schools are built as population increases during the phased development.” Given the complexity associated with the phasing of residential developments over multiple years, any likely School Mitigation Agreement(s) must be negotiated in a timely manner so school districts have enough time to approve and, if necessary, implement any needed facilities improvements.
6. Lastly, please consider that blasting operations required to establish buildable residential pads, roadways, and other required developments be conducted at times when classes are not in session. The noise and vibration associated with blasting will interrupt instruction and testing.

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If there are any questions or comments regarding the issues discussed in this letter, please contact Russ Decker, Director, Facilities Planning and Construction at rdecker@eusd.org or please call him at (760) 432-2194.

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Sincerely,



Michael Taylor
Assistant Superintendent, Business Services
Escondido Union School District

cc: Dr. Luis Ibarra, Superintendent
Russ Decker, Director, Facilities Planning & Construction
Michael Simonson, Escondido Union High School District
Mark Schiel, San Marcos Unified School District