

A-7 San Marcos Unified School District

Comment Letter A-7



Facilities
255 Pico Avenue, Suite 250
San Marcos, CA 92069
T 760.752.1299
F 760.471.4928
www.smusd.org

August 14, 2017

San Diego County
Planning Department
5510 Overland Ave, Suite 310
San Diego, CA 92123

Re Newland Sierra Environmental Impact Report - Plan Project – PDS2015-001

To Whom it May Concern:

This letter is to serve as the comments from San Marcos Unified School District (District) to the Environmental Impact Report Plan (EIR) for the proposed Newland Sierra Project (Project) of 2,135 residential units. It is our understanding that 1,049 units are planned to reside in the San Marcos Unified School District's attendance area. Please be advised that the District periodically updates enrollment data, capacity data, and other relevant data contained in this letter. Therefore, information contained in this letter is accurate as of the date of this letter, but is subject to change. Additionally, this information provided is in response to specific information in the EIR and does not represent an opinion of the District for approval or disapproval of the Project. This letter is based on current, known facts and information supplied to the District, and any changes to those facts and information may change the District's response.

A-7-1

The existing school capacity within the District currently is not adequate to meet the student population with the approved and planned future combined developments presented in the 2011 San Marcos General Plan (2011 General Plan). Information in the 2011 General Plan was based on 2010 data supplied by the District and reflected that at that time, there was a capacity deficiency within the District. Considering information from the 2011 General Plan along with the already approved projects in the San Elijo area, University and Creekside Districts, and the Rancho Tesoro Area, the District anticipates that most schools will be at or over capacity before development approval of this Project. The District's response to the San Diego County Planning Department have been consistent: "our schools are at maximum capacity" (see will serve letter dated September 1, 2016). The District also stated in its response on February 1, 2015 that "this project will result in the overcrowding of elementary, junior, and high school."

A-7-2

The following schools currently serve the Project area.

School	Grade Level	Distance	Enrollment	School Capacity
Twin Oaks Elementary	K-5	2.60	659	760
Woodland Park Middle	6-8	6.08	1,368	1,183
Mission Hills High	9-12	5.85	2,489	2,603

A-7-3

The EIR states the proposed project is served by three school districts but does not list all the schools serving the Project by the District. We ask that the EIR be corrected and be consistent throughout the report that the current serving schools of the project by the District be Twin Oaks Elementary School, Woodland Park Middle School, and Mission Hills High School. Although Richland Elementary School is listed as a serving school in the EIR, this school is not within the current attendance area of the Project. If the Project serving schools are over capacity at the time the Project is developed, the District may be forced to choose an alternate education site which may result in extensive long-term bussing of students that would cause

A-7-4

A-7-5

Governing Board: Stacy Carlson Victor Graham Pam Lindamood Janet McClean Randy Walton
Melissa Hunt, Superintendent

extreme financial hardship to the District. Other geographic barriers, traffic congestion, or other constraints could also impose additional extreme financial hardship.

In regards to the EIR reference to Policy LV 17.3, the EIR states the following:

“Priority school locations encourage school district to locate schools with village or rural village areas whenever possible and site and design them in a manner that provides the maximum opportunity for students to walk or bicycle to school states that the schools should be built within a downtown urban setting.”

The proposed Project will generate students that will not be given the option to walk or bicycle to District schools because of the distance and insufficient pathways to schools. The closest school among the three school districts is over 2.5 miles away and most others are over 5 miles away. Bussing is not provided as an option, at this time, because of the financial burden it would place on the District. Because of currently impacted schools, and the potential for students being required to attend schools across the District where capacity may exist, the District is requesting the CEQA report include additional traffic impact analysis, air quality analysis, and noise analysis arising from the additional dropping-off and picking-up of students at potentially further schools than the current servicing schools.

For example, the alternative schools that could serve the project area as follows,

School	Grade Level	Distance	Enrollment	Capacity
Richland Elementary	K-5	5.00	782	888
San Marcos Middle	6-8	5.81	1,235	1,332
Mission Hills High	9-12	5.85	2,489	2,603

The District does not have any improvements or additions planned in the near future for the schools currently serving the Project area. Other schools in the District are currently under modernization, but may not increase capacity. For example, San Marcos Middle School is undergoing new construction of a 2-story classroom building; however, it is intended not increase capacity but rather replace aging portables with new classrooms.

The Project has reserved a 6-acre site for a school with a joint use park of 2.2 net acres located in the Escondido Union School District. Although the school site does not fall under the jurisdiction of San Marcos Unified School District, we would like to provide general comments as it relates to public schools construction requirements according to the following: the California Department of Education, Title 5; California Code of Regulations Article 1, Section 14000 “Minimum Standards” and; the California Department of Education’s Guide to School Site Analysis and Development, Section 3. The Districts asks for clarification and that the EIR reflect the school site to be net or gross of the 6 acres. The acreage net or gross will not be sufficient for an elementary or K-8 school according to current California Department of Education regulations. Since the site is adjacent to a road and freeway, site related traffic and sound level studies would have to determine if there are any safety problems or sound levels that could adversely affect the educational program of the school. A geological and soils engineering survey will be required to determine hazards, both geographical and material.

If a charter school or non-public school would open in lieu of a public school, the potential student generated would not alleviate the enrollment projections or relieve capacity. The District cannot plan on assumptions that relief will be provided by a proposed school. The District asks that a separate study be conducted to

A-7-5
Cont.

A-7-6

A-7-7

A-7-8

A-7-9

A-7-10

substantiate that the school on the 6-acre site would provide relief to District and include the cumulative project area and facilities in a timeframe, if this is the intended impact.

A-7-10
Cont.

During the 2016-17 school year, 25.79% of the District's capacity were in relocatable classrooms due to overcrowding. Please note that additional portable classrooms do not accommodate for the strain on core instructional and support facilities such as administration, cafeteria, libraries, and play areas (hardscape and green space). There may be capacity at other schools that serve potential Project students even considering the current District-wide capacity shortage of 3,884 students.

A-7-11

For your information the student generation rates (SGR) for residential land uses, as stated in the 2017 Schools Facilities Needs Analysis (SFNA), are as follows.

- Single family detached units: 0.6280
- Single family attached units: 0.2925
- Multi-family units: 0.3904

The SGR is an average of all residential development in the District within the last five years. It does not reflect the most recent trends of more students per resident and the surge of development throughout the District. Since SGR is an average of all residential development within the District, it includes non-student generating residence, such as senior housing.

A-7-12

Applying the .62 SGR to the single-family detached residential dwelling units and .292 to the Multi-Family units, within the District's attendance area, results in a projected 553 students generated from the proposed Project, an additional 53 students over what the EIR summarized. The increase of students lowers the overall total school fees per student and thus raises the financial impact on the District to provide facilities by 11%. We ask that the EIR be updated to reflect the current SGR and School Fees. As reflected above, we believe the numbers presented in the EIR are not accurate and needs to have a more recent and localized study to be included in the EIR not those presented.

In addition, it is understood based on previous conversations that it may be several years before the housing units are seen from this Project. Since the District updates its SGR and SFNA annually, the District requests that ongoing analysis be performed on the impacts to the District as the SGR and SFNA are updated.

A-7-13

The District's 2017 SFNA calculates the cost of school facilities needed to house students generated from new development, on a per student basis. According to this report, the per student cost for an elementary student is \$35,425; the per student cost for a middle school student is \$49,358; and the per student cost for a high school student is \$62,714. The average school facility cost, on a per student basis is \$49,166.

Based on the estimated number of students generated from the Project (553 students) and the average school facility cost per student (\$49,166), the total estimated financial impact on the District (in current year dollars) to provide the required instructional facilities for the students generated from the proposed Project is approximately \$27.2 million. It should be noted that this impact is in current year dollars and does not contain any inflation factor for rising costs in the construction industry.

A-7-14

The District has established various programs to levy and collect developer fees, as authorized by State statute and local ordinances. The fees serve as a method to assist in providing financial resources to provide the necessary educational facilities. However, current developer fees are not sufficient to fully mitigate the additional school fees needed for the 100% cost of new school construction.

A-7-15

Comment Letters

As the stated in the EIR, the formation of a Community Facilities District (CFD) would help reduce potential cost impacts to providing adequate classrooms and core facilities necessary for the students that will be generated as a result of the Project. The developer may also have the option of annexing into an existing CFD. The District is also open to discussion other mitigation options/ideas proposed by the developer.

A-7-16

Finally, as stated in the EIR, the Project is currently served by three different school districts: Escondido Union School District, Escondido Union High School District and San Marcos Unified School District. However, the EIR does not mention that school attendance boundary issues may exist within the Project area between the three school districts. The school districts are committed to resolving any potential conflicts; however, it is important to note that these issues currently exist and have not been solved.

A-7-17

Please do not hesitate to contact me if you have any questions or comments regarding the foregoing at mark.schiel@smusd.org or at (760) 752-1212.

A-7-18

Sincerely,



Mark A. Schiel
Assistant Superintendent
Business Services

MS/km

cc: Tova K. Corman, Executive Director
Michael Taylor, Escondido Union School District
Michael Simonson, Escondido Union High School District