

A-5 JAMUL-DULZURA UNION SCHOOL DISTRICT

- A-5-1** The comment states the Jamul Dulzura Union School District (District) will be submitting comments and that a copy of the District's comments will be shared with the Jamul Dulzura Planning Group. The comment serves as an introduction to comments that follow. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-5-2** The comment states the Draft EIR is inadequate and inaccurate. The comment expresses the opinions of the commenter and does not raise an issue regarding to the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-5-3** The comment states the Draft EIR does not address issues such as annual operating revenue, loss of assessed value and current and future bond funding for facilities improvements. The comment raises economic issues (school operating revenue based on average daily student attendance, assessed property tax revenues, and bond funding) that do not relate to any physical effect on the environment. The County notes that the Project Area is currently uninhabited and, therefore, there are no existing students attending the District. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-5-4** The comment states the District is concerned and opposes the transfer of territory, and that such a transfer would have long-term consequences to the District and the community at large. The comment expresses concerns that do not appear to relate to any physical effect on the environment. Board of Supervisors Policy I-109 states:

It is the policy of the Board of Supervisors that Otay Ranch Associated Documents listed below on file with the Clerk of the Board of Supervisors and identified by the Document Numbers indicated below, shall be used in the preparation of plans, reports and other documents for the Otay Ranch project; County decisions-makers and staff shall assure that applications submitted for the development portions of the Otay Ranch project are consistent with these Associated Documents: ... – Facility Implementation Plans (Doc. No. 759223).

The School Facility Implementation Plan in Doc. No. 759223 states, "This analysis assumes all of Central Proctor Valley is within the Chula Vista Elementary Sweetwater Union High districts." The County notes that the Otay Ranch General Development Plan/Subregional Plan, Volume II (GDP/SRP) and School Facility

Implementation Plan anticipated that schoolchildren residing within Village 14 would attend the same local elementary school instead of the Jamul/Dulzura Elementary School.

The comment expresses opposition to the proposed Transfer of Uninhabited Territory that was noted in the Otay Ranch GDP/SRP under School Processing Requirements (page 328), as follows: “Identify and process school district boundary adjustments, as appropriate, through approval by the appropriate governing body.” This process will be conducted through the County Department of Education pursuant to California Education Code Section 35700 et seq. and is not part of the Proposed Project. The County has abided by Board of Supervisors Policy I-109 in assuming that elementary school students in Village 14 would attend the same elementary school sited in the Otay Ranch GDP/SRP within the Village Core and in the Chula Vista Elementary School District.

Further, the County notes that there would be no impact to schools within the District because the Proposed Project does not propose to take any existing students from that district and place them into the Chula Vista Elementary School District. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-5-5 The comment states the District has been meeting with the San Diego County Superintendent and local superintendents to discuss the impacts to the District. The comment continues that the Project Applicant has not addressed the fiscal and environmental impacts a transfer would cause.

The comment provides background information that does not appear to relate to any physical effect on the environment or inadequacy of the analysis contained in the Draft EIR. The issues raised by the commenter will be addressed by the County Department of Education during the Transfer of Uninhabited Territory process, and will not be before the decision makers for the Proposed Project. The Draft EIR and the Proposed Project documents have accurately described the California Education Code Section 35700 et seq. process as a process that is entirely within the discretion of the County Department of Education. As such, there is no inference that the “transfer” is a foregone conclusion. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-5-6 The comment states the District is in a better position to accommodate students generated by the Proposed Project. The comment expresses the opinion of the commenter and serves as an introduction to comments that follow, but does not raise

an issue related to the adequacy of any specific section of or analysis within the Draft EIR. The comment serves as an introduction to **Comments A-5-7** and **A-5-9**, below. No further response is required or provided.

A-5-7 The comment states the three closest Chula Vista schools to the Project Area are currently (2017) over-enrolled by 133 students. The comment asserts there is more room in Chula Vista only when it includes charter schools. Enrollment at Chula Vista Elementary School District schools near the Proposed Project fluctuate on an annual basis.

The Draft EIR, Appendix 3.1.6-1, Otay Ranch Village 14 and Planning Areas 16/19 Public Facilities Finance Plan, School Facilities, provides that Village 14 students may be served at several schools within the Chula Vista Elementary School District, including Heritage Elementary, McMillin Elementary, Hedencamp Elementary, Veterans Elementary, Wolf Canyon Elementary, and Camarena Elementary School. The Chula Vista Elementary School District would determine where there is capacity to serve students from the Proposed Project. It is also noted that the Chula Vista Elementary School District has provided a Service Availability Letter demonstrating its ability to accommodate the students generated by the Proposed Project. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-5-8 The comment states the District administrative and support services are situated closer to the Project Area than those of Chula Vista Elementary. The comment provides factual background information regarding the location and services provided by the District. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-5-9 The comment states the District is in a better position to absorb students generated by the Proposed Project without the construction of a new school.

The comment expresses the opinion of the commenter about the District's ability to accommodate new students without the need to build a new school. As expressed in the comment, the District has capacity to absorb the students generated by the Proposed Project; thus, should the Transfer of Territory be denied, it is noted that no additional construction of new or expanded facilities would be required to accommodate students. Therefore, the Draft EIR conservatively assumed a worst-case scenario for a physical impact to the environment. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

- A-5-10** The comment states the District is in a better position to offer more robust education programs in a smaller class-size setting. The comment expresses the opinion of the commenter and does not appear to relate to any physical effect on the environment. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-5-11** The comment states the District will provide more detailed comments in a formal letter. The commenter refers to the **Responses to Comment Letter O-5.1**. The comment provides concluding remarks. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.