

**A-5.1 JAMUL-DULZURA UNION SCHOOL DISTRICT**

- A-5.1-1** The comment introduces comments that follow. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-5.1-2** The comment describes the Proposed Project. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-5.1-3** The comment states that the Draft EIR makes an assumption that a portion of the Village 14 development will be transferred from the Jamul–Dulzura Union School District (JDUSD) and Grossmont Union School District to the Chula Vista Elementary School District (CVESD) and Sweetwater Union High School District. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-5.1-4** The comment expresses an opinion that Jamul–Dulzura has grave concerns regarding the portions of the Draft EIR that address the following: (1) new school site, (2) impact of development on the District, (3) proposed transfer of territory, and (4) parklands. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-5.1-5** The comment states the Draft EIR inaccurately refers to Jamul–Dulzura as a Unified School District. The comment also describes the grade levels served by the districts and schools.

The Final EIR, Section 3.1.6, Public Services has been revised to reflect the District’s correct name Jamul–Dulzura Union School District in ~~strikeout~~/underline. These revisions do not include the identification of any new impacts or mitigation measures, and do not constitute substantial new information pursuant to CEQA.

- A-5.1-6** The comment states that the Draft EIR includes a statement that Jamul–Dulzura recommended using CVESD student generation rates to estimate the students generated by the new development. The comment states this is inaccurate. The comment further states that Jamul–Dulzura rejected the estimated generation rate as too low and suggested using the California State generation rate of 0.5 per household.

The Draft EIR, Section 3.1.6, Public Services Tables 3.1.6-10 and 3.1.6-11, and Appendix 3.1.6-1, provide the student generation rates. The preparer of Appendix 3.1.6-1, Development Planning and Finance Group, indicated that Jamul–Dulzura did

not provide the requested district student generation rates. Development Planning and Finance Group calculated a student generation rate for Jamul–Dulzura as 0.2 students/household based on the districts 2015/2016 student accountability report for enrollment (581 student in K–8) and 2010 Census data for housing units in the district (3,060). Development Planning and Finance Group’s calculated student generation rate of 0.2 is below the 0.5 cited in the comment. Since Jamul–Dulzura has not developed student generation rates for their district, the Draft EIR reasonably used the Chula Vista’s student generation rate of 0.4. Resultant calculations represent the best available data on this issue.

- A-5.1-7** The comment expresses an opinion that the elementary school site within the Proposed Project is not adequate to serve the students generated by the Proposed Project. The comment further cites the Otay Ranch General Development Plan/Otay Subregional Plan, Volume II (Otay Ranch GDP/SRP) threshold to meet at a minimum, State Department of Education Standards. The school site within the Proposed Project is located within the CVESD boundaries, which would provide direction to the type, size, function of the proposed school facilities pursuant to the Division of the State Architect, which provides design and construction oversight for K–12 schools (Division of the State Architect 2018). In addition, the Proposed Project would generate approximately 460 elementary school students (51 students in Planning Areas 16/19 and 409 students within Village 14), well below the student population of 750 utilized by the CVESD for planning, sizing and siting elementary schools within the District. The CVESD is the agency that determines the adequacy of the elementary school sites within their district and CVESD has indicated the school site size (9.7 acres) is adequate.
- A-5.1-8** The comment expresses the commenter’s opinion that the proposed elementary school site is too small and cites another elementary school that is twice the enrollment, has exceeded its capacity and implies that the site was too small. Please refer to **Response to Comment A-5.1-7**.
- A-5.1-9** The comment states the Draft EIR appears to suggest that 700 to 1,000 students is the standard size for an elementary school on 8 acres, citing Chula Vista as the source for the standard. The comment further suggests that appropriate enrollment size is closer to 500 students and there is no evidence to support a conclusion that attempting to house 1,000 students on a site under 10 acres is not educationally sound. The proposed school site is located within the boundaries of the CVESD. Therefore, it is appropriate to use Chula Vista standards for an elementary school.

**A-5.1-10** The comment expresses an opinion that “the high school size is overly optimistic as there is research pointing to an ideal size closer to 600 students per high school.” The comment cites the information from a 1996 Michigan Research Study and another article from 1996. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

**A-5.1-11** The comment expresses an opinion that Chula Vista schools were not originally planned or built to house such larger number of students. The comment also states inadequate EIRs and inadequate funding by developers has led to enrollments over 1,000 in some elementary schools. The comment further states that the CVESD must add portable buildings that are neither desirable nor educationally sound. The comment also indicates that the State of California has moved away from recommending housing children in portable classrooms.

The Draft EIR, Section 3.1.6, describes CVESD’s student enrollment capacities and states that most of Village 14 students are within the CVESD, not the JDUSD. All four of the school districts involved with this Proposed Project have submitted school availability forms, stating that they could service the Proposed Project. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

**A-5.1-12** The comment expresses the commenter’s opinion regarding classroom sizes and support facilities. The commenter also asserts that the elementary school would require 45 classrooms and the school site is inadequate to accommodate such a large footprint. Please refer to **Response to Comment A-5.1-7**.

**A-5.1-13** The comment states the Draft EIR provides no support that the school site is adequate for the enrollment or would result in an educationally sound environment. Please refer to **Response to Comment A-5.1-7**.

**A-5.1-14** The comment states that the Draft EIR fails to cite any appropriate educational standards and evaluate whether the Proposed Project would meet those standards. The County notes that CEQA does not require an analysis of project-related impacts on educational standards. That issue is exclusively within the province of the affected school district. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

**A-5.1-15** The comment expresses an opinion that the proposed temporary locations for children by the development are all near, at, or over capacity except those over 5 miles from the Proposed Project. The Draft EIR, Section 3.1.6 describes the school district

evaluations as well as regulatory options for school districts with high enrollment. It is typical for local schools to fluctuate on an annual basis. The 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 CVESD, including Heritage Elementary, McMillin Elementary, Hedencamp Elementary, Veterans Elementary, Wolf Canyon Elementary and Camarena Elementary School. CVESD will determine where there is capacity to serve students from the Proposed Project. CVESD has provided a Service Availability Letter demonstrating its ability to accommodate the students generated by the Proposed Project. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

**A-5.1-16** The comment states that the traffic study prepared for the Draft EIR does not adequately address the effects of transporting children over these distances across the City of Chula Vista. The County does not agree with the comment. The Draft EIR, Appendix 2.9-1, Transportation Impact Study, the Proposed Project trips distribution and trips assignment were developed using the SANDAG Series 12 Select Zone model. The SANDAG select zone model takes into account the Proposed Project's location in relation to nearby land use, including school and school district boundaries. The Draft EIR and Appendix 2.9-1, Transportation Impact Study did not assume all students were attending JDUSD facilities. As analyzed in Appendix 2.9-1, Transportation Impact Study, Figure 5-2, Proposed Project daily Roadway Trip Assignment, Existing Plus Project Buildout Conditions), shows that 12,300 average daily traffic (ADT; or 94% of Proposed Project ADT) travel southwest towards the City of Chula Vista. Only 6% of Proposed Project traffic, or approximately 800 ADT, travel from the Proposed Project northwest of the Project Area towards schools in the JDUSD. The County notes that the existing Jamul Dulzura Elementary School is over 4 roadway miles from the northern boundary of the Project Area, and approximately 6 miles away from Village 14's Village Core, which is similar to or great than elementary schools in the CVESD.

**A-5.1-17** The comment expresses an opinion that there is inadequate evidence to support the Draft EIR's conclusion that the Proposed Project will have a less than significant impact on public services. The County disagrees with this comment. Impacts to public services, including school services, are adequately analyzed in Section 3.1.6, Public Services in the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

**A-5.1-18** The comment asserts that there are a number of considerations regarding utilizing adjacent parkland for joint field and recreational facility uses that have not been

evaluated in the Draft EIR. It is noted that the CVESD has determined that the 9.7-acre school site within the Proposed Project is adequate to provide for on-site administration, classroom, parking, and play and field areas to serve the projected student population. Thus, while joint use may be considered, the school site would be sufficient for play and field areas. No further response is required or provided.

**A-5.1-19** The comment expresses an opinion that the Draft EIR fails to properly evaluate or consider the school territory transfer. The comment also restates information from the Draft EIR regarding the transfer. The County addressed the issue in its response to the comment letter submitted by the JDUSD. The County refers the commenter to **Responses to Comments A-5-4 and A-5-5**.

**A-5.1-20** The comment state the Draft EIR makes no reference to the fact that both Jamul–Dulzura and the Grossmont Unified School District oppose the territory transfer. The County points out that the proposed territory transfer must be reviewed and approved by the San Diego County Office of Education and thus is beyond the scope of this Draft EIR. Please also refer to **Responses to Comments A-5-4 and A-5-5**.

**A-5.1-21** The comment states the impact of the transfer was not analyzed in the Draft EIR. The proposed territory transfer must be reviewed and approved by the San Diego County Office of Education and thus is beyond the scope of this Draft EIR. Please also refer to **Responses to Comments A-5-4 and A-5-5**.

**A-5.1-22** The comment states than neither the City of Chula Vista nor the County of San Diego has any authority or jurisdiction over the proposed territory transfer nor can such a transfer be dictated in a general development plan. The comment further asserts the statement suggesting that the transfer has been approved or is even appropriate is erroneous. The comment further states the authority to a transfer a territory or adjust boundaries is vested in the State Board of Education, the County Board of Education and a County committee thereunder. The comment further asserts such a transfer is arguably the subject of a public project subject to CEQA. The County agrees that it has no authority or jurisdiction over the proposed territory transfer, as that is a County Office of Education issue. However, as the plenary land use authority and the lead agency under CEQA, the County is permitted to make reasonable assumptions as to which school district ultimately will be responsible for housing the students generated by the Proposed Project. In this case, the applicant has expressed its intent to process a territory transfer through the Office of Education. In the event the territory transfer does not occur and the school district boundaries remain unchanged, the available evidence – including evidence provided by JDUSD – is that the Proposed Project’s students can be adequately housed by Jamul–Dulzura without need for additional

facilities. Consequently, there would be no CEQA impact. Please also refer to **Response to Comment A-5-5**.

- A-5.1-23** The comment asserts simply suggesting this is an appropriate transfer is inadequate without full evaluation of impacts and required mitigation. The comment expresses an opinion the conclusions in the Draft EIR are flawed and the analysis of school services should be reanalyzed. The comment states the study should consider the alternative of keeping the existing territory boundaries. The County refers the commenter to **Response to Comment A-5.1-22** and **Responses to Comments A-5-4, A-5-5, and A-5-9**.
- A-5.1-24** The comment refers to the Service Availability Letters. The comment states the letters from Jamul–Dulzura and Grossmont Union High School District stated they have capacity and oppose the transfer. The commenter further states the letters from Chula Vista Elementary School and Sweetwater Union High School District noted the Proposed Project would result in overcrowding in their schools. Please refer to **Responses to Comments A-5.1-22, A-5-4, A-5-5, and A-5-9**. Also, please see Appendix 3.1.6-3, Service Availability Letters, in which CVESD indicates that it can adequately house the Proposed Project’s students without the need to build additional facilities. Lastly, as the comment makes clear, even if the proposed territory transfer does not occur and the school district boundaries remain unchanged, both JDUSD and the Grossmont Union High School District have adequate capacity to serve the students generated by the Proposed Project. Thus, under such circumstances, there impacts to school services would remain less than significant.
- A-5.1-25** The comment provides information regarding enrollment declines experienced by the JDUSD. The comment also asserts that Jamul Dulzura would benefit from the development’s projected enrollment. This is not a CEQA issue and thus is beyond the scope of the Draft EIR. No further response is required.
- A-5.1-26** The comment provides further information regarding the impact of declining school enrollment on educational programs at the JDUSD. This is not a CEQA issue and thus is beyond the scope of the Draft EIR. The County would point out; however, that currently there are no students within the Project Area. Consequently, even if the territory transfer were approved and the Proposed Project’s students assigned to CVESD, no current students would be removed from any Jamul–Dulzura school. Thus, the Proposed Project has no effect on enrollment declines at JDUSD. The County also refers the commenter to also **Response to Comment A-5-9**.

- A-5.1-27** The comment states Grossmont Union High School District has sufficient space to serve the studies that would be generated. The County refers the commenter to **Response to Comment A-5.1-24**.
- A-5.1-28** The comment states Jamul–Dulzura estimates it has capacity for 258 to 300 additional students and that this number could be increased through improvements to its existing facilities. The County refers the commenter to **Response to Comment A-5.1-24**.
- A-5.1-29** The comment expresses the commenter’s position that the proposed territory transfer would result in an inefficient use of public resources. This is not a CEQA issue. For further information on the proposed territory transfer, see **Responses to Comments A-5-4, A-5-5, and A-5-9**.
- A-5.1-30** The comment states that the Draft EIR fails to “review, study, evaluate or analyze” the issues pertaining to the proposed territory transfer. The comment serves as a summary statement for comments above. The Draft EIR adequately analyzes the Proposed Project’s environmental impacts on school facilities. The proposed territory transfer will be addressed at the appropriate time by the County Office of Education through its own review process, as mandated by state law.
- A-5.1-31** The comment expresses the commenter’s opinion that CVESD does not have adequate capacity to serve the students generated by the Proposed Project. Please refer to **Response to Comment A-5.1-7**.
- A-5.1-32** The comment states that data confirms Chula Vista Elementary is unable to absorb any capacity. The comment refers to data provided in tables in **Comment A-5.1-33**. The County refers the commenter to **Response to Comment A-5.1-7**.
- A-5.1-33** The comment includes a table showing distance, enrollment and capacity for CVESD and JDUSD Schools. The County refers the commenter to **Response to Comment A-5.1-7**. Also, the County notes Jamul–Dulzura provided inaccurate information regarding the distance from the Proposed Project’s 203 units in the Project Area within the JDUSD and Jamul–Dulzura schools, i.e., “within 3 miles.” In fact, the distance is approximately 6 miles.
- A-5.1-34** The comment provides “[a]necdotal information” regarding the inability of students in CVESD to attend their neighborhood schools due to overcrowding. In contrast, the comment states Jamul–Dulzura campuses are small and able to serve new children without bussing extended distances. The County refers the commenter to **Response to Comment A-5.1-7**. The County relies on the CVESD Service Availability Letter that

- it can adequately serve the Proposed Project's students. No further response is required.
- A-5.1-35** The comments states that the Draft EIR's traffic analysis must be redone to reflect the distances student must be travel to attend school in Chula Vista. The County does not agree with this comment and refers the commenter to **Response to Comment O-5.1-16**. No further response is required.
- A-5.1-36** The comment expresses the commenter's opinion that the Draft EIR is nothing more than a cursory boiler-plate conclusion that lacks a thoughtful evaluation of the facts in the Draft EIR. The comment does not agree with this comment. The Draft EIR adequately analyzes school services. The County refers the commenter to **Response to Comment A-5.1-31 through A-5.1-35**.
- A-5.1-37** The comment states that the Draft EIR fails to analyze the Proposed Project's economic impacts on the JDUSD. CEQA does not require the County, as lead agency, to evaluate a project's economic impacts except to the extent those impacts result in foreseeable impacts on the physical environment. In this case, there is no evidence that the Proposed Project will have any economic impact on the JDUSD large enough to result in physical effects. For more information regarding the proposed territory transfer, see **Response to Comments A-5-4, A-5-5, and A-5-9**.
- A-5.1-38** The comment states that the Draft EIR fails to adequately address the Proposed Project's impacts on local parks. The County disagrees. The Draft EIR addresses Proposed Project-related impacts on parks in Section 3.1.7, Recreation. Note also that, per the County General Plan, Chapter 5, Conservation and Open Space Element (page 5-40), "The Park Land Dedication Ordinance (PLDO) provides funding for local park active recreation. The PLDO specifies that new subdivisions are required to dedicate active park land, or pay a fee in-lieu of dedication, or a combination of both, at a level of *three* acres per 1,000 population." The County PLDO divides the County into Local Park Planning Areas to facilitate park planning by communities. The County PLDO for the Jamul Local Park Planning Area requires dedication of 390.73 square feet of improved park land for each unit/lot, whichever is greater. Consistent with the County General Plan, the County PLDO and in satisfaction of the Jamul Local Park Planning Area requirement to provide 10.0 acres of improved park land, the Proposed Project includes 13.67 net acres of improved parks.
- A-5.1-39** The comment states that the County's goal of 10 acres for each 1,000 residents would be severely undermined utilizing the Proposed Project's formula. The County refers the commenter to **Response to Comment A-5.1-38**.

**A-5.1-40** The comment states that the Draft EIR fails to adequately analyze cumulative impacts on parks. The County does not agree. This issue is covered in Section 3.1.7.3, Cumulative [Recreation] Impact Analysis of the Draft EIR, which determined that the “Proposed Project would provide park facilities that would be adequate to meet the needs of its residents, as well as residents in Jamul and neighboring communities, and would satisfy the requirements of the PLDO” (see Draft EIR, page 3.1.7-17). Further, the Draft EIR states:

Cumulative residential projects, as previously described, would contribute to a cumulative demand for recreational facilities. However, these cumulative projects would also be required to satisfy the requirement of the PLDO. Pursuant to the PLDO, and to accommodate future demand for park and recreational facilities from population growth in the County, additional park and recreational facilities would be developed and constructed throughout the region. Importantly, the cumulative projects would be required to demonstrate compliance with CEQA prior to project approval, which would help ensure that potential environmental impacts are adequately addressed at the project level, thereby minimizing the potential for cumulative impacts. Therefore, the Proposed Project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to recreation.

Accordingly, the Draft EIR adequately analyzes cumulative impacts on parks. No further response is required.

**A-5.1-41** The comment expresses the commenter’s opinion regarding the parkland equity between the Jamul Planning Area, the Proposed Project and the City of Chula Vista. The County refers the commenter to **Response to Comment A-5.1-38**.

**A-5.1-42** The comment states that the Draft EIR fails to provide information regarding use of surrounding parklands. The County disagrees. The Draft EIR analyzed impacts to off-site recreational facilities in Section 3.1.7.2.1, Deterioration of Parks and Recreational Facilities, on pages 3.1.7-15 and 3.1.71-16 of the Draft EIR. As analyzed therein, the Draft EIR determined that “Proposed Project would provide sufficient parks and recreation facilities such that substantial physical deterioration of the surrounding off-site facilities (i.e., Salt Creek Community Park, Chula Vista Community Park, Mount San Miguel Community Park) is not expected to occur or be accelerated.” The Draft EIR further determined that “the Proposed Project is consistent with applicable Otay Ranch GDP/SRP Parks, Recreation, and Open Space objectives and policies. The Proposed Project would include diverse park and recreational opportunities to meet the recreational, conservation, preservation, cultural, and aesthetic needs of residents,

- as well as park areas serving the general public.” For these reasons, the Draft EIR concluded that “substantial physical deterioration of the surrounding off-site facilities is not expected to occur, [and] impacts would be less than significant.
- A-5.1-43** The comment expresses an opinion regarding the size of the proposed school site within the Proposed Project. The County refers the commenter to **Response to Comment A-4.1-38**.
- A-5.1-44** The comment expresses an opinion regarding co-locating elementary school and public parks. The County refers the commenter to **Response to Comment A.5.1-18**.
- A-5.1-45** The comment expresses an opinion regarding school safety issues and joint use agreements between school and park uses. The comment does not raise a specific issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-5.1-46** The comment asserts Section 3.1.7, Recreation, of the Draft EIR inadequately analyzes the impacts caused by the Proposed Project on recreational areas. The County disagrees with this comment. The County refers the commenter to **Response to Comment A.5.138**.
- A-5.1-47** The County acknowledges the comments and notes that it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required or provided.
- A-5.1-48** The comment asks that the alternative of leaving territories unchanged be considered as an alternative to the Proposed Project. The comment also reiterates the commenter’s position regarding the proposed territory transfer. The proposed territory transfer must be reviewed and approved by the San Diego County Office of Education and thus is beyond the scope of this Draft EIR. Please also refer to **Responses to Comments A-5-4, A-5-5, A-5-9, and A-5.1-22**. No further response is required or provided.
- A-5.1-49** The comment provides contact information. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.