



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

March 22, 2018

David Medcalf  
Bonsall Union School District  
31505 Old River Road  
Bonsall, CA 92003

Subject: Bonsall High School Project  
SCH#: 2017051078

Dear David Medcalf:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 21, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2017051078  
**Project Title** Bonsall High School Project  
**Lead Agency** Bonsall Union School District

**Type** EIR Draft EIR

**Description** The 48.9 acre project site is located within the unincorporated community of Bonsall in the north-central portion of San Diego County. The project is located within APN 124-340-3400 approx 0.4-mi north of the intersection of SR 76 and Gird Rd. Specifically, the project is located in an unsectioned portion of T 10S, R3W, on the Bonsall USGS 7.5-min topographic quadrangle. The proposed project is the construction of a new high school for grades 9-12 with a max enrollment of 1,500 students, 60 staff. The project would provide approx 150,500 sf of building floor area and approx 21.4 acres of recreational fields, parking, and landscape/hardscape on the 48.9 acre site. The proposed buildings include permanent classrooms, administrative offices, media centers, and gym. The project would also include recreational fields and facilities for community use after school hours, weekends, and holidays. Horticultural plantings could be incorporated into the landscaped areas.

**Lead Agency Contact**

**Name** David Medcalf  
**Agency** Bonsall Union School District  
**Phone** 760-631-5200 **Fax**  
**email**  
**Address** 31505 Old River Road  
**City** Bonsall **State** CA **Zip** 92003

**Project Location**

**County** San Diego  
**City**  
**Region**  
**Lat / Long** 33° 19' 18.49" N / 117° 11' 45.37" W  
**Cross Streets** SR 76 and Gird Road  
**Parcel No.** 124-340-3400  
**Township** 10S **Range** 3W **Section** **Base** SBBM

**Proximity to:**

**Highways** 76  
**Airports**  
**Railways**  
**Waterways** San Luis Rey River  
**Schools** Sullivan MS  
**Land Use** public/semi public

**Project Issues** Agricultural Land; Air Quality; Archaeologic-Historic; Geologic/Seismic; Noise; Population/Housing Balance; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Landuse; Aesthetic/Visual; Biological Resources; Forest Land/Fire Hazard; Growth Inducing; Public Services; Water Supply; Wetland/Riparian

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; California Department of Education; State Water Resources Control Board, Division of Drinking Water; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

**Date Received** 02/05/2018 **Start of Review** 02/05/2018 **End of Review** 03/21/2018



State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 South Coast Region  
 3883 Ruffin Road  
 San Diego, CA 92123  
 (858) 467-4201  
 www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
 CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

Clear  
 3/21/18  
 t

March 21, 2018

MAR 21 2018

Mr. David Medcalf  
 Director of Facilities, Maintenance and Transportation  
 Bonsall Unified School District  
 31505 Old River Road  
 Bonsall, California 92003  
 David.Medcalf@bonsallusd.com

STATE CLEARINGHOUSE

**Subject: Comments on the Draft Environmental Impact Report for the  
 Bonsall High School Project SCH#2017051078**

Dear Mr. Medcalf:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Bonsall High School Project Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program.

The 48.9-acre project site is located within the unincorporated community of Fallbrook in the north-central portion of San Diego County. The project is located within Assessor Parcel Number (APN) 124-340-3400 approximately 0.30 mile north of the intersection of State Route 76 (SR-76) and Gird Road. The proposed project would include the construction and operation of a new high school on an undeveloped 48.9-acre site within the Bonsall Unified School District (District). The overall site area including easements is 50.18 acres. The project would provide about 150,500 square feet (sf) of building floor area and about 21.4 acres of recreational fields, parking, landscape, and hardscape. The project would include recreational fields and facilities for school and community use after school hours, on weekends, and holidays. On-site parking would be provided for staff and student vehicles with a 199-space parking area and a bus parking area. Off-site improvements would be required on Gird Road to accommodate a northbound left turn pocket and associated striping at the project access driveway.

The Department offers the following comments and recommendations to assist the District in avoiding or minimizing potential project impacts on biological resources.

1. The DEIR lists permanent impacts to 25 acres of non-native grassland (NNG). Due to the likely intensive use of the project site, the Department recommends purchase of NNG credits at an off-site approved mitigation bank at a ratio of 0.5:1 for 12.5 acres. The DEIR also lists 15.7 acres of un-impacted NNG but does not specify if this acreage would be counted as mitigation for impacts of the project. The final EIR should specify the exact mitigation for the 25 acres of NNG impact. If the District chooses to utilize on-site acreage as

Mr. David Medcalf  
Bonsall Unified School District  
March 21, 2018  
Page 2 of 2

mitigation, the Department recommends that the final EIR include measures for ensuring that any on-site mitigation acreage would be protected in perpetuity from all active and passive uses stemming from the immediate and adjacent activities associated with operation of the project. The final EIR should require that any such acreage be placed in a conservation easement and managed in perpetuity to preserve the biological resources. In addition, a management and monitoring plan, including a funding commitment, should be specifically developed for the conservation easement (i.e., mitigation area) and implemented in perpetuity to protect the existing biological functions and values. The implementation of the plan should commence prior to, or concurrent with, the initiation of construction. The plan should include, but not be limited to, the following: method of protecting the resources in perpetuity (e.g., conservation easement); monitoring schedule; measures to prevent human and exotic species encroachment; Property Analysis Record (PAR) or similar analysis; a description of the funding mechanism; proposed land manager; and contingency measures should problems occur. We further request the opportunity to review and comment on the draft management plan prior to its approval by the District.

5. The Department recommends that measure BIO-3 of the final EIR include the following additional information. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season, which generally runs from February 1- September 15 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys within 3 calendar days prior to the start of construction by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

We appreciate the opportunity to comment on the referenced DEIR. Questions regarding this letter and further coordination on these issues should be directed to Eric Hollenbeck at (858- 467-2720) or [Eric.Hollenbeck@wildlife.ca.gov](mailto:Eric.Hollenbeck@wildlife.ca.gov).

Sincerely,



Gail K. Sevens  
Environmental Program Manager  
South Coast Region

cc: Emily Cate (U.S. Fish and Wildlife Service)  
Scott Morgan (State Clearinghouse)