



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



March 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](mailto:David.Medcalf@bonsallusd.com)

**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

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

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