



County of San Diego

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David Medcalf
Bonsall Unified School District
Facilities, Maintenance and Transportation
31505 Old River Road
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Via e-mail to: david.medcalf@bonsallusd.com

REQUEST FOR COMMENTS ON THE NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BONSCALL HIGH SCHOOL PROJECT

Mr. Medcalf,

The County of San Diego (County) reviewed the Bonsall Unified School District's Notice of Availability of a Draft Environmental Impact Report (DEIR) for the Bonsall High School Project dated February 5, 2018 (Project).

The County previously submitted comments during the Notice of Preparation public comment period (Attachment A). The County appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

GENERAL

1. The Project site is located within the Fallbrook Community Planning Group (CPG) area. The Project proponents should coordinate with the CPG for adequate public participation regarding the Project.
2. A copy of the Final EIR should be sent directly to both County Planning & Development Services (PDS), and Department of Public Works (DPW).

TRANSPORTATION/TRAFFIC

1. The Project's trip generation rate of 1.3 as documented in the DEIR's Traffic Impact Analysis (TIA; page 22, Table 2) is inadequate. The SANDAG trip generation rate of 1.3 trips per student for a high school is based on limited data from 2002 or earlier and is insufficient when compared to ITE Trip Generation Rates. ITE estimates an average trip generation rate of 1.71 trips per student, within a range of 0.71 to 3.96. The TIA states on page 49, "...there are generally no existing sidewalks or designated bicycle facilities in the Project vicinity." With limited pedestrian and bicycle facilities adjacent the proposed High School, there is a greater likelihood that students will either drive themselves to school or be picked-up and dropped-off. A revised traffic analysis should be conducted utilizing a higher and more appropriate

vehicle trip generation rate that is more representative of a high school serving a rural community like Bonsall / Fallbrook.

2. The TIA (Tables 5 and 6) demonstrates that with the addition of Project traffic with 1,500 students, the morning intersection Level of Service (LOS) at Old River Road and Camino del Rey (Intersection #5) degrades from LOS E to LOS F. Once the trip generation rate has been recalculated as discussed in our comment above, this will assist in determining whether any additional facilities could be impacted, and whether the identified impact at Old River Road and Camino del Rey would worsen. A fair-share TIF contribution alone is inadequate. The proposed Project must provide physical improvements to mitigate a potential Direct Impact.
3. All "With Project" figures (i.e., location and turn volumes) and tables (i.e., lane geometry and LOS) should include the Project driveway(s).
4. Gird Road is an arterial road on the County's General Plan Mobility Element and within the Bonsall / Fallbrook community. Any Project proposing a new driveway/intersection on Gird Road must assess the potential impact. The TIA (Page 39) states that based on Warrant 3, the proposed Project driveway is not forecasted to meet the minimum thresholds for a traffic signal. The TIA must analyze the proposed Project driveway under each of the Traffic Signal Warrants to determine if any of the Warrants' thresholds are met. The TIA should also analyze a roundabout alternative.
5. It is unclear why the Project proposes only one driveway (with no traffic signal or roundabout). Additional consultation with the local Fire Authority and the County must be conducted to ensure adequate access, particularly emergency access, is provided for the proposed high school. It should be noted that there does not appear to be any other similarly sized high school within the region that has only one driveway (without a traffic signal or roundabout) entering mid-block on a Mobility Element roadway.
6. Upon completing the District's revisions to the Project TIA, the County requests an opportunity to assess the revised analysis and conclusions, and to further consult with the District on suitable improvements that would adequately mitigate the Project's traffic impacts.

VECTOR CONTROL PROGRAM

1. The County's Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV).
2. The VCP respectfully requests that the DEIR address potential impacts from possible mosquito breeding sources created by the Project, and that the Project be designed and constructed in a manner to minimize those impacts. Specifically, ensure construction-related depressions created by grading activities, vehicle tires, and excavation do not result in depressions that will hold standing water.
3. In addition, ensure drains, BMPs, detention basins, and other structures do not create a potential mosquito breeding source. Any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development. Finally, if habitat remediation

is required for the Project, the design should be consistent with guidelines for preventing mosquito habitat creation.

4. Please note, the VCP has the authority pursuant to state law and County Code to order the abatement of any mosquito breeding that does occur either during construction or after the Project is completed that is determined to be a vector breeding public nuisance. The VCP will exert that authority as necessary to protect public health if the Project is not designed and constructed to prevent such breeding.
5. For your information, the County's Guidelines for Determining Significance for Vectors can be accessed at http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf and the California Department of Public Health Best Management Practices for Mosquito Control in California is available at <http://www.cdph.ca.gov/HealthInfo/discond/Documents/BMPforMosquitoControl07-12.pdf>
6. The VCP appreciates the opportunity to participate in the environmental review process for this Project. If you have any questions regarding these comments, please contact Daniel Valdez at 858-688-3722 or by e-mail at Daniel.Valdez@sdcounty.ca.gov.

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 495-5468, or via e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,



FOR E. LARDY

Eric Lardy, AICP
Group Program Manager, Advance Planning Division
Planning & Development Services

E-mail cc: Darren Gretler, Chief of Staff, Board of Supervisors, District 5
Vincent Kattoula, CAO Staff Officer, LUEG
Nick Ortiz, Project Manager, PDS
Everett Hauser, Transportation Specialist, PDS
Richard Chin, Associate Transportation Planner, DPW
Jeff Kashak, Planner, DPW
Mary Bennett, Administrative Analyst, DEH
Fallbrook Community Planning Group

Enclosure: Attachment A: 2017-06-27 COSD Comment letter