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Date: March 26, 2018

RE: Bonsall Unified School District's (BUSD) Draft Environmental Impact Report ([DEIR](#)), as required by the California Environmental Quality Act (CEQA), for a 1,500-student high school proposed for the [five-times-rejected site](#) in Fallbrook's Gird Valley.

To: BUSD Facilities Manager David Medcalf, david.medcalf@bonsallusd.com

Mr. Medcalf:

I fully support the comments submitted [in 2017](#) and in March [2018](#) on behalf of [SaveGirdValley.com](#) and the [letter submitted](#) by retired Fire Chief Bob Roper, along with my March 22, 2018 letter.

I am also taking this opportunity to submit additional comment from others over the last few days who noticed items not included in the other comment letter above. Please share this letter with the BUSD Board of Trustees.

Thank you for your time and consideration.

Teresa Platt
Gird Valley, Fallbrook, California

COMMENTS ON DEIR PROPOSED BUSD HIGH SCHOOL, GIRD VALLEY, FALLBROOK, CA

NOISE POLLUTION: The DEIR makes no mention of noise pollution from constant ringing of bells during the day. It is asked if the school can utilize other methods to let students know that it is time to go to class. Suggestions include a phone app that goes off specific to each student's schedule or a red, yellow, green light system in the hallways and by doorways. Peace and quiet is very important in Gird Valley.

FIRD HAZARD: We understand that the recent Lilac Fire was a traumatic experience, but it is important to recognize that the same fire raged just south of Gird Road, very close to the site BUSD proposes for a 1,500-student school in Gird Valley. Per the San Diego County Office of Emergency Services' [Know Your Hazards](#) mapping tool, Gird Road is in a VERY HIGH WILDFIRE HAZARD LEVEL zone. 7350 W. Lilac Road, where the current BUSD high school is located, is rated MODERATE. Gird Valley has been evacuated twice in the last decade, is overgrown and will burn at some point in the near future. For this reason alone, we prefer expansion as needed onto the Ocean Breeze property next door to the current Sullivan Campus. Any new buildings

must include adequate and multiple exits. BUSD should be actively working with the owners of Ocean Breeze Ranch on security appropriate exit routes to the north as that property is in the planning stages for development.

ACREAGE: The [Initial CEQA](#) on the proposed Gird Road site reported, "Development of the project will impact approximately 22.4 acres of the 48 acre site." The [NOP of the EIR](#) stated the project "would disturb 39.5 acres" of a 49.8 acre site and the DEIR states it will disturb 24.6 acres of a 47-acre site that is also described elsewhere as 48.9 acres. Since California Department of Education (CDE) standards require 38.7 acres at the minimum ([see Table 6](#)) to serve 1,500 students, it is unclear how BUSD can provide adequate services for 1,500 students on just 24.6 acres of land. Noncompliance with CDE standards puts California State funding at risk. Please clarify the numbers and explain the inconsistencies.

We assume the limited use of the 50-acre Gird Valley site is an attempt to work around environmentally sensitive and unbuildable areas. Along these lines, Fallbrook Union High School District (FUHSD) valued the property in 2010 at as much as \$5 million and [declared](#) it unsuitable for a high school, stating, "[T]he district has determined that the Gird Rd. site is not suitable for construction as a school site because of the current costs to modify the topography of the land, environmental impact mitigation, and the property's proximity to the Sycamore Ranch development." FUHSD made plans to dispose of the site but BUSD [acquired the site from FUHSD](#), along with \$2 million in cash, via its unification process as approved by voters 2012 (the same year BUSD ran a [\\$2 million operating budget deficit](#)). 2018 marks the seventh year BUSD has run budget deficits and its reserves are below legal limits.

JUSTIFICATION OF NEED: As part of the process of justifying the need for building a large 1,500 student high school, BUSD should provide specific numbers, hard data/sources, multipliers used for projecting annual increases, for BUSD's high school student population projections. It should be noted that less than half of BUSD's K-8 students enter its high school program (currently 328 high school students). This is most likely due to competition and course offerings from surrounding high schools, charter schools, online educational opportunities and home schooling options.

To justify need, BUSD should collect information on the 32 publicly-funded high schools ringing its boundaries, along with the 15 privately-funded high schools. Enrollment and capacity should be tabulated for each high school and enrollment as a percentage of capacity should be calculated. Since Fallbrook High School and Valley Center High School are both reporting declining enrollment (along with declining income, budget cuts and teacher layoffs), the North County area may be overbuilt with high schools. Add in a sharp increase in online learning, charter schools and home schooling options and the trend may be moving away from centralized brick and mortar schools over the next few decades. Before committing to another

large community building, BUSD should fully assess the competition and prove the need for another large high school in North County San Diego.

ALTERNATIVES: During BUSD's unification process, the County/State Board/Office of Education recommended BUSD sell the Fallbrook property and, should it need to build in the future, keep construction within Bonsall's central core in order to limit greenhouse gases (GHGs) and transportation related environmental costs. We agree with this recommendation. We also recommend BUSD avail themselves of the expertise provided by the taxpayer-funded County Office of Education's [services for facilities planning](#).

Following the advice of the County/State Board/Office of Education during its unification process, BUSD should expand as needed in the core of its district, onto the Ocean Breeze Ranch property adjacent to its Sullivan Middle School/Bonsall High School campus on West Lilac Road in Bonsall. This property has been offered for zero down, payable against developer fees later. Ocean Breeze is developing part of its 1,400-acre property and working with the County on transportation corridors now. This centralized location would reduce costs related to duplicating buildings (such as maintenance, cafeteria, etc.) and buses at/for the Gird Road site, along with reducing greenhouse gases (GHGs). See the community's [Interim Property Report](#) on this subject. Over time, BUSD should convert this central location in Bonsall to a stand-alone high school. Then, as needed, BUSD should add two middle schools, one to the east near the I-15 corridor and one to the west, both feeding into the central high school located on West Lilac Road. Middle schools require far less land and are less costly to build than a high school.

In order to increase its options and open itself of all alternatives, BUSD should be in a position to divest itself of the Gird Road property. To do so it needs to indicate to potential buyers (County, mitigation, small-scale residential development, Camp Pendleton, etc.) that it is a willing seller. By publicly declaring itself a willing seller and communicating this to potential buyers, BUSD indicates that buyers are welcome to submit offers on the Gird Road property. Potential buyers exist for uses which include mitigation land, preserves, inclusion into the County's San Luis Rey River Park area (the land is located within the Park map), small scale residential development (17-18 homes built while preserving the land's environmental values), etc.

HARDSCAPE: Parking and hardscape square footage should be broken out from landscaping in the DEIR.

MISCELLANEOUS ERRORS: The DEIR misidentified houses on the east side of Gird, opposite the proposed site, as agricultural land. One of the houses was [built by the community](#) for disabled veteran Julian Torres and his family. The DEIR also misidentified a "house" to the south of the site. This "house" is the maintenance yard for the Golf Club of California (which is misidentified as the Golf Club of America in the DEIR). Teresa Platt's name is misspelled (Table 1.1, page 41 of pdf, NOP Comments) as Theresa Platte.

TRAFFIC, ACCIDENTS, PARKING CONCERNS: Gird Road runs four miles from the 76 to Reche Road and Live Oak Park at the North. It is a 2-lane, winding country road with no parking or sidewalks. In several places, Gird Road falls off steeply to Live Oak Creek below. Gird Road

experiences accident rates higher than the statewide average of 1.32 per million vehicle miles: 2.36 from the 76 to south of Oak Cliff Drive and 1.90 to the north of Oak Cliff Drive to Reche Road. Official comments submitted on behalf of SaveGirdValley.com by the Kevin K. Johnson law firm note that the DEIR understates traffic impacts generated by the development, that a 1,500-student school will generate 2,700 vehicle trips/day. Adding this to a [recent traffic study in Gird Valley](#) (3,697 vehicle trips/day) gives us 6,397 vehicle trips/day, a shocking and completely unacceptable 73.03% increase in traffic in Gird Valley. This will result in a corresponding increase in parking problems and accidents.

There is no information in the DEIR on the negative impact of traffic on businesses, to relaxation and recreation in Gird Valley. The Gird Road site is located adjacent to the Golf Club of California. Golf courses are struggling and North County has lost several to development. The Golf Club of California's business will be negatively impacted by morning and afternoon congestion. Ditto for Monserate Winery located about two miles to the north on Gird Road. Monserate Winery, which has committed to conserving its agricultural land (vineyard) via conservation easements, will host conferences, family celebrations and weddings on its property beginning in 2019. Live Oak Park to the north offers similar functions to the public.

This traffic problem is not unique to BUSD and few schools are doing anything to address the issue. "In 1969, 89 percent of K-8th grade students who lived within one mile of school usually walked or bicycled to school. [By 2009](#), only 35 percent of K-8th grade students who lived within a mile of school usually walked or bicycled to school even once a week." Some of this shift can be attributed to fears over children's safety and an increase in density resulting in more road traffic. In California alone, almost 7 million students + 300,000 teachers attend 12,000 schools. Nationwide, out of 83 million students, 50.4 million students [attend](#) pre-K-12th grade with school buses transporting 26 million, the second largest expense after labor costs. Overstressed and overworked parents and older students need help establishing carpools and shared bike-walkabouts that work.

Schools should be located as close as possible to the neighborhoods where the children live. This is not the case for the Gird Road site and the DEIR does not detail where the BUSD students live. It should do so with a zip code/density map for BUSD high school students.

To address the traffic/accidents/parking problems created by California's schools, we've asked our state representatives to introduce legislation requiring school and businesses with 500+ attending daily to be required by law to implement carpooling/rideshare apps.

The DEIR does not mention the lack of carpooling programs at North County schools. Palomar College, and its new North County Campus located in Fallbrook at 76 and 15, has stated publicly that it does not run a carpool/rideshare/transit program and, while poor traffic patterns, accidents and limited parking are issues at all the BUSD schools, district wide, BUSD does not run a carpool program either. SaveGirdValley.com has offered to contribute \$1,000 toward the establishment of carpools and, to this end, reviewed a dozen apps on the market and recommended CarpoolToSchool.com.

As a good neighbor, BUSD should make every effort to reduce traffic generated by all its facilities, district wide, and a simple carpool program is a modest beginning.

COMMUNITY VIEW SHEDS: View sheds will be negatively impacted from the top of Monserate Hill which is not included during the discussion of impacted views.

FIRE SAFETY: The project must have at least two access/exit points for [fire safety](#) since it is located in a high fire danger area. This viewpoint is supported by a letter submitted to BUSD from Fire Chief (retired) [Bob Roper](#). Gird Valley is four miles long, culminating to the north at Reche Road and Live Oak Park. Beyond evacuation of students, teachers and staff, the safety of valley residents is important. The Lilac Fire in December 2017 ran just south of this property and all of Gird Valley was evacuated, the second such evacuation in a decade. For the safety of students, teachers, staff and Gird Valley residents, this is non negotiable: at least two access/exit points.

ENVIRONMENTAL DEGRADATION OF THE SITE BY THE DEVELOPER/BUSD: The site was never farmed, tilled or developed and the [Initial CEQA](#) stated, “eight sensitive plant species” and “22 sensitive wildlife species were determined to have the potential to occur on the project site.” Ignoring these facts, BUSD used mechanical clearing and ran goats (from the water use, we estimate 600 goats) with sheepdogs on the property and erected an unsightly barbed wire fence shortly before starting the environmental review process. How many species were disturbed is unknown. What wildlife was barred by the fence from using the land as a wildlife route or corridor is unknown. In the fall of 2017, BUSD repeated this process, running goats again on the property. BUSD should be required to remove the fence and stop degrading the site, wait for the land to recover and assess the biological values properly.

ENDANGERED SPECIES ON THE PROPERTY: In spite of BUSD’S efforts to clear the property before the EIR process began, evidence of endangered species is reported in the biological reports attached to the DEIR (nesting least Bell’s vireos, kangaroo rats, pocket mice, burrowing owl burrows). The DEIR does not include a full biological report on plants present on the site and this may be partially due to the goats clearing this land. We are, therefore, lacking in detail regarding plants and wildlife.

For comparison, we do have a [Habitat Assessment](#) for Fallbrook Land Conservancy’s (FLC) property, 47.74 acres located in Gird Valley to the north of the BUSD site. The FLC land was not cleared by goats and mechanical methods before it was inventoried. Please FLC’s Habitat Assessment references the Migratory Bird Treaty Act (MBTA) but the BUSD DEIR does not. It should.

The FLC Habitat Assessment concludes: *“The site contains high and moderate quality sensitive riparian and upland resources that merit preservation including southern coast live oak riparian forest, valley needlegrass grassland, southern willow scrub and coastal sage scrub habitats. Potential exists for the onsite riparian, native grassland and coastal sage scrub habitat to be sold as mitigation credit for preservation purposes. Suitable habitat for the federally threatened California gnatcatcher is present and Critical Habitat is within 1 mile of the Site. [For comparison, gnatcatcher Critical Habitat is located only 500 feet from BUSD’s property.] The property also contains scrub oak chaparral habitat and non-native grassland, which is not as commonly needed as mitigation. The non-native grassland as well as the disturbed areas onsite could be restored to provide additional mitigation credit sale opportunities.”*

Fallbrook Land Conservancy agreed with this Habitat Assessment and its 47.74 acres is now preserved forever. Camp Pendleton is required to mitigate its damage to endangered species and is involved in the protection of this project, the [Gird Valley Preserve](#).

Beyond these environmental values, the Gird Road site includes 16.14 acres of federally-designated critical habitat for the endangered arroyo toad. The DEIR dismisses this, arguing that arroyo toad habitat does not exist onsite. The DEIR ignores evidence submitted by a [federal biologist](#) of arroyo toads present on adjacent property. Clearly there is habitat on the Gird Road site for the arroyo toad. A federal biologist should be called in to review.

Beyond packs of coyotes roaming the area, a mountain lion was sighted on Gird Road next to the BUSD property in December 2017, proving that Gird Valley is a travel route for wildlife. The FLC [Habitat Assessment](#) (page 10) for the property located to the north of the BUSD property states, *“WILDLIFE MOVEMENT WITHIN THE STUDY AREA The Site is expected to be utilized by wildlife for foraging, breeding, and local movement within the vicinity and to the surrounding open space areas. The Site may serve as a travel route from the San Luis River and surrounding open space north to the open space on Camp Pendleton.”*

If the BUSD EIR process had been done correctly, we assume biologists would have found similar values to preserve on the BUSD property so the FLC [Habitat Assessment](#) is worth reviewing.

NONCOMPLIANCE WITH PREVIOUS BUSD EIR: BUSD stated in its petition for unification to the State and County that it could accommodate all its high school students on the Sullivan campus in Bonsall. The State and County Board/Office of Education both recommended the Gird Road property be sold since it had never been used as a school site and had been officially declared surplus by FUHSD. **“Because the parcel is undeveloped and has never been a school site, this study recommends the districts negotiate the value and disposition of the parcel,” said the State Board of Education.** BUSD ignored this. The Negative Declaration that BUSD received in the EIR related to its Unification Petition was based on minimal environmental impact (approx. 100 parking spaces on what was then grass). *“Upon unification, the district’s plan for the high school facility is to convert the existing Sullivan Middle School site into a high school over a 4 year period,”* stated BUSD.” The current enrollment at the middle school is 533 students. **At this time, the site has 10 excess capacity classrooms for additional students if needed. This would provide ample space for the projected enrollment of 513 students for all four grades of high school.** In addition, the site has a special education classroom and regional program currently housed on site.” BUSD never removed the 10 excess capacity classrooms and built a 350 student high school on the Sullivan Campus (opened in 2016). It currently has 328 high school students enrolled and should explain why the Sullivan Campus can no longer support them, conflicting with its previously statements that it had adequate housing during in its unification documents.

Unification was offered to the community as an alternative to the big schools (1500+ enrollment at Fallbrook, Vista, Oceanside, Temecula) that the vast majority of students attend today. BUSD was to offer an alternative with the recognition that students don't all do well at big schools. As a small unified district, BUSD is in a position to offer this alternative. There is sufficient space at its brand new “state-of-the-art” Bonsall High School (opened 2016) on its Sullivan Middle School Campus in Bonsall, in the excess classrooms at Sullivan Middle School, and, for expansion as

needed, on land adjacent to Bonsall High School/Sullivan Middle School (Ocean Breeze Ranch property).

BUSD promised the community, in its Petition for Unification: **“The board has studied the facilities issue and believes that SMS can house very adequately the small high school that it envisions. We do not want, nor do we need a massive brick and mortar high school that it envisions.....Nor do we need fifty acres of dirt to accomplish our mission.”** Based on these statements, the community (by a small majority) supported BUSD’s expansion to include the high school grades without any additional construction (Measure BB, 2012).

NONCOMPLIANCE WITH FEDERAL, COUNTY AND LOCAL COMMUNITY PLANS: The DEIR attempts to ignore San Diego County’s Multi-Species Conservation Program (MSCP) and the San Luis Rey River Park (SLRRP) plans. The North County MSCP map includes the Gird Road site and the SLRRP includes [direct reference](#) to this site, designating it a Tier A Site, an Active Recreation Area and stating, “Site A9, the Fallbrook High School Site, is presently owned by the Fallbrook High School District, although they have determined that [it] is not well suited for the development of a new high school.” The DEIR also attempts to ignore the federal government’s designated Critical Habitat map for the arroyo toad which states the property hosts 16.14 acres of arroyo toad habitat.

The developer/BUSD sent a request for comments on the project to the local planning group, the Fallbrook Community Planning Group (FCPG), but the request was sent to the wrong address, signature required, twice. The documents were returned twice. This error resulted in late notice to the FCPG. In spite of this, the FCPG placed the item on its March agenda.

Gird Valley neighbors attended the FCPG’s March 19 meeting (Agenda, Item 5) to engage in discussion on the Draft EIR for BUSD’s proposal to build a 1,500-student high school in Fallbrook’s Gird Valley. Several residents spoke and shared concerns regarding the very large project creating a massive increase in traffic, parking problems and accidents while pointing out that the proposed site is not centrally located within the BUSD.

FCPG’s Planning Committee Vice-Chairman Jack Wood noted that endangered species were found on the property, detailed how the property had been declared surplus and was to be sold when Fallbrook High School owned it, that it had been declared not suitable for a high school. He noted that the FCPG requires that we “don’t disrupt the natural terrain of the land, this is absolutely contrary to that.” Commenting on the undulation of the property, he questioned the volume of cubic yards of land that would have to be removed. He had concerns about the “undulation of that property, the inadequacy of the parking,” noting that the school was being built to a 1,500-student population. “That location would clearly disrupt Gird Valley and would create traffic that is far in excess of what you have there today.” “There are a number of reasons why **this property is not suitable for a school.** This would create, with the current zoning, 2-acre lots, this would create about 17 to 18 houses on that particular property and that would be my recommendation. **So based on the interest of saving the Gird Valley from the unwanted traffic and congestion, I strongly oppose the development of a high school on this location.”**

FCPG Planning Committee Chairman Jim Russell stated, “I think a **major egregious error in this EIR is the fact that the property is not centrally located where a high school should be so folks can feed in from all around.** This is the very extreme edge of the school district,” “on the very extreme edge, the northern edge, of the district and **in my opinion is not an appropriate place for a high school.**” Russell stated BUSD understated parking needs for students, staff, “they will have parking for less than 10% of the student body.” “**I think [this development] would totally devastate Gird Valley with all the students trying to park out on Gird Road and I seriously question the logic of the folks who put those numbers in the EIR and think that is an appropriate thing to do.**”

CONCLUSION: In light of the obvious environmental values present on the property, the community’s consistent and overwhelming opposition to building a high school on Gird Road (five fails at the ballot box and recent statements of opposition by FCPG), along with the availability of land adjacent to the current campus located in the center of the BUSD, I strongly oppose any school construction in Gird Valley. Thank you for your time and consideration.

Respectfully submitted,

Teresa Platt
Gird Valley, Fallbrook, California