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VIA EMAIL TO [JHELMER@ESCONDIDO.ORG](mailto:JHELMER@ESCONDIDO.ORG) AND VIA HAND DELIVERY ON 1/2/18

January 2, 2018

John Helmer  
Contract Planner  
City of Escondido  
201 North Broadway  
Escondido, CA 92025

**Re: Draft Environmental Impact Report For The Safari Highlands Ranch Specific Plan and the Citywide Sphere of Influence Update; State Clearinghouse #2015091039**

Dear Mr. Helmer:

The San Pasqual Union School District (“District”) appreciates the opportunity to provide the following comments with respect to the above-referenced Draft Environmental Impact Report (“Draft EIR”) for the Safari Highlands Ranch Specific Plan and the Citywide Sphere of Influence Update (the “Project”).

At the outset, it should be noted that the District is currently communicating directly with the Project applicants to discuss how best to mitigate the impacts identified by the District in this letter. While the District is hopeful that these discussions will yield a written agreement that will satisfactorily address its concerns relative to the Project, the District nevertheless provides the following comments so that it may preserve and protect its administrative and legal remedies under the California Environmental Quality Act (“CEQA”) in the event a satisfactory agreement cannot be timely reached.

The purpose of an EIR is to identify:

- Significant impacts of the proposed project on the environment and indicate the manner in which those significant impacts can be avoided or mitigated.
- Any unavoidable adverse impacts that cannot be mitigated.
- Reasonable and feasible alternatives to the proposed project that would eliminate any significant adverse environmental impacts or reduce the impacts to a less than significant level.

An EIR also discloses cumulative impacts, growth-inducing impacts, and impacts found not to be significant. CEQA requires that an EIR reflect the independent judgment of the lead

agency regarding the impacts, disclose the level of significance of the impacts both without and with mitigation, and discuss the mitigation measures proposed to reduce the impacts. (DRAFT EIR, ES-1-2).

With respect to the impacts the Project will have on the District both during the construction phase and post build-out, the Draft EIR fails to adequately identify/address all of the potential impacts, opting instead to provide a cursory, surface-level analysis of generic traffic counts, statutory level school impact fees and other generalized assumptions about traffic and construction impacts to the educational programs of the District.

The District's concerns are primarily focused on the areas of (1) impacts to School Facilities; (2) safety with respect to traffic and parking (particularly during school drop off and pick up hours) and fire evacuation routes; (3) interference with educational programs resulting from fugitive dust and noise levels during blasting activities and grading associated with the construction phase of the project.

### **SCHOOL FACILITIES**

The impacts to the District's facilities are embodied in a few paragraphs and essentially indicate (without analysis) that statutory fees are sufficient to address the Project's impacts to the District's facilities. The District currently operates one campus with a steadily-rising student population of 559 as of the date of this letter.

The District currently levies developer fees for residential construction in the amount of \$2.32 per square foot. Given the current state of the District's facilities (which are not addressed in any detail), it is unclear whether this amount will be sufficient to fully mitigate the increased student population generated by the Project.

Without an arrangement for additional funding, the District may be forced to send unhoused students to other school sites in other Districts in the Project area, which in some cases, are a significant distance away. As a direct result, extensive bussing and private car trips will increase resulting in additional adverse impacts to the environment that should be addressed in the Final EIR. These impacts include, but are not limited to the following:

- 1) The direct, indirect, and cumulative impacts the Project will have on the circulation and traffic patterns of the community in the event the District cannot house the students generated by the Project.
  - a) the Project-specific and cumulative impacts of the increased bus and private vehicle trips;
  - b) the Project-specific and cumulative impacts to air quality that will result from the transportation impacts identified hereinabove.
- 2) The direct, indirect, and cumulative impacts the Project will have on increased utility usage (including gas, electricity, water, sewage, and waste water treatment, etc.) at other schools in the Project area where students generated as a direct result of the Project may be housed.

- 3) The direct, indirect, and cumulative impacts the Project will have on the need for public services at other schools in the Project area that may ultimately house the students generated by the Project.
- 4) In order for the District to accommodate the students from the Project which are not accommodated by mitigation measures, the District may have to modify territorial and/or attendance area boundaries, load classrooms with students in excess of District and State standards, and house students in inadequate and inappropriate school facilities. This effect on the overall operation and administration of the District, its students, employees, and constituents affected by such actions must be addressed since it will undoubtedly result in physical, social, financial, and psychological impacts on the students, employees, and constituents of the District.

However, in the event the District's discussions with the Project applicants result in an agreement that will adequately mitigate the impacts identified hereinabove, the District will withdraw its concerns.

### **TRAFFIC**

The District's campus is located along Rockwood Road. The Draft incorrectly indicates that there is no on-street parking on this road and that even at full build-out of the Project; Rockwood Road will maintain an acceptable level of service ("LOS").

This conclusion is flawed for several reasons. First, there IS on-street parking on Rockwood Road, particularly in front of the school. If analyzed to include the existence of on-street parking, the LOS drops significantly. Second, the traffic study does not adequately consider the amount of traffic that stops at the school on Rockwood Road from both directions during the morning drop-off and afternoon pick-up times. Traffic is already congested and a safety issue during these times. Adding large construction vehicles and heavy equipment during the construction phase without mitigation measures that would avoid moving such equipment during the already heavily -impacted morning and afternoon hours will only exacerbate this problem. To illustrate this point, the District did a vehicle count on December 14, 2017, at the school site. In the span of less than one hour, 346 vehicles were counted. A report complete with photographs is attached hereto and incorporated herein as Exhibit "A".

Similarly, the additional traffic resulting from the full build-out of the Project will *permanently* exacerbate the problem during these hours.

Of particular concern is the impact on traffic and pedestrian safety during these drop-off and pick-up hours and even more so in the event of an evacuation due to fire. Areas around the District property have already had to evacuate *twice* since 2002 due to fires and with additional traffic from the Project without corresponding ingress and egress improvements, the Project applicants are creating a potentially dangerous situation. The addition of a fire station (without a financial commitment to operate it) and the construction of a northern evacuation road that would not be required until well into Project build-out, do nothing to ameliorate the District's concerns with respect to fire safety. More analysis is needed in the Final EIR on this point as well.

It should also be noted that the Project's impacts on San Pasqual Road are not considered in sufficient detail. A large portion of the school's pick-up and drop-off traffic utilize this road to access Rockwood Road. San Pasqual Road is already in a dangerously dilapidated state. Adding additional traffic without corresponding improvements will only add to the existing safety hazard.

While the District is currently discussing the need for traffic and parking improvements in front of the school, as of the date of this letter, there is no written agreement in place that will adequately address the District's traffic and safety concerns pertaining to the Project's impacts to Rockwood Road and San Pasqual Road.

Sequencing of any agreed-upon road improvements is crucial. As a part of any negotiated agreement, improvements on the impact roads, in particular, Rockwood Road and San Pasqual Road, should be implemented prior to the construction phase.

### **AIR AND NOISE IMPACTS**

The Project applicants acknowledge that there will be significant impacts to air quality and noise (particularly during the construction phase) but stops short of identifying mitigation measures to lessen the adverse impact on the District's students and their learning environment. The Project will involve significant grading and blasting during construction, yet offers no meaningful mitigation measures specifically addressed to how such activities could interfere with the educational programs being conducted down the road. For example, there is no discussion of whether the most disruptive activities (blasting and earth moving) could be conducted outside of school hours or during days that school is not in session.

Likewise, the Draft EIR lacks significant specific data on the impacts of blasting activities on the District's nearby school site. Aside from noise, vibration and debris and air quality, impacts to structures (including underground utilities such as the District's on-site well) need to be addressed in the Final EIR.

Similarly, there is no discussion of whether it would be feasible/possible to move heavy equipment in and out of the Project site using Rockwood Road on hours outside of school hours or during days that school is not in session. There should be more analysis of how the noise, vibration and dust generated by these activities could impact the District's students should such activities be carried out during a school day.

Also, air quality analysis should not be limited to application of general thresholds. Localized impacts may still be significant even if certain region-wide standards are met. Localized impacts, particularly with respect to grading and construction, should be analyzed. An additional concern regarding fugitive dust is the potential for people being exposed to illness and disease from spores in fill material. Mitigation measures are necessary to address the safety of the children and staff at the neighboring District school site.

Moreover, more analysis is needed to flesh out the cumulative air and noise impacts to the District's educational programs resulting from full project build-out.

At a minimum, more analysis specific to how the construction activities and additional air and noise pollution impacts resulting from full project build-out could impact the students

attending school is needed. This additional, more specific information should be addressed and appropriately-tailored mitigation measures should be analyzed together in the Final EIR.

**CONCLUSION**

It is the District's position that the Project should *not* move forward until all of the impacts identified by the District herein have been adequately addressed.

The District looks forward to receiving responses to the comments offered above, and hereby requests formal notification of any public hearings that may be scheduled with respect to the proposed Project. The District hereby reserves its right to supplement these comments and provide additional comments in the future.

Thank you for your assistance and consideration.

Sincerely,



Shannon Hargrave

Superintendent

Enclosures  
Exhibit A

# EXHIBIT A

On Thursday, December 14th, several staff members at San Pasqual Union School conducted a traffic analysis of student pick-up and drop-off patterns. The District has three parking lots that are part of the school site — East, Front and West Parking Lots. The study conducted is a typical, representative sample of the District's traffic situation.



At morning drop-off between 7:45am to 8:35am, the following number of cars enter or park in the school parking lots or along the curb:

East Parking Lot: 102 cars  
Front Parking Lot: 184 cars  
West Parking Lot: 60 cars

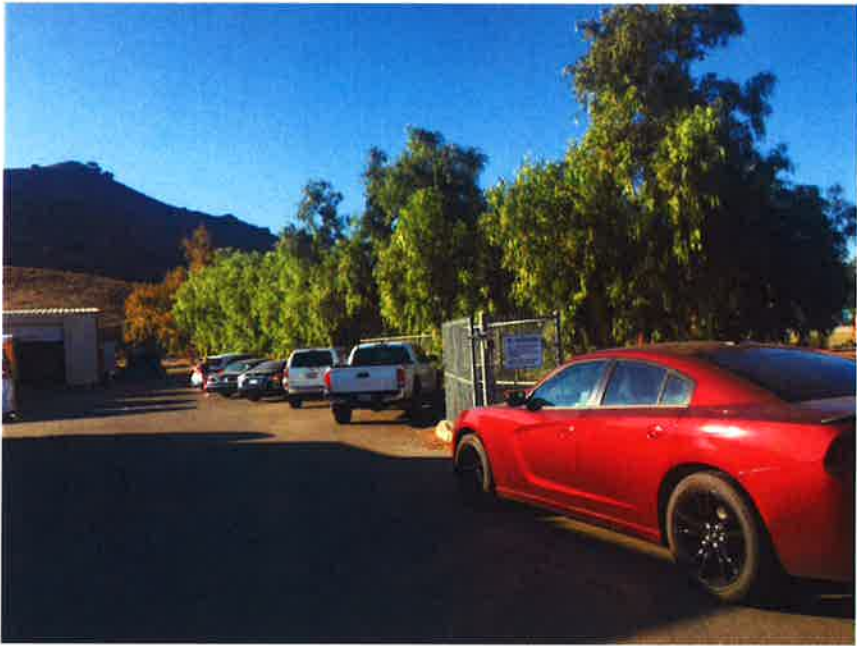
Parents of Kindergarteners and 1st graders typically drop off their children in the East Lot, as this is closer to the Kindergarten/1st grade playground. A majority of parents use the Front Lot to drop off their children. The West Parking Lot is mainly used for parents who have children in the Transitional Kindergarten or Pre-School programs.

On December 14, 2017, a total of 346 cars entered the school parking lots to either drop off students, park to drop off to walk their children to class, employees arriving for work or parents who were staying to volunteer. The traffic the school encounters not only occurs in the parking lot but residents of the two neighborhoods accessed via Rockwood Road also contribute to the traffic congestion.

Also, the District notes that parents end up in a localized traffic jam upon exiting the East Parking Lot.



Additional photographs taken December 14, 2017, are included herein below.





This photograph depicts the afternoon student pick up between 1:20pm-1:45pm, the following number of cars entered or parked in the school parking lots or along the curb:

East Parking Lot: 97 cars  
Front Parking Lot: 82cars  
West Parking Lot: 95 cars

Parents of Kindergarteners and 1st graders typically also pick up their children in the East Lot. The Front Lot and West Parking Lot are both used for afternoon pick up. Additionally, during the afternoon pick up, parents park across the street in the golf course delivery driveway to wait for their student. Many parents make illegal u-turns on Rockwood Road, despite posted signs.

In order to assist parents safely exit the West Parking Lot and East Parking Lot, District utilizes its own staff to direct/stop traffic.

Most days, there are after school activities that further impact Rockwood Road in front of the school site.





Cars parked across the street



Staff directing/stopping traffic for passengers  
West Parking Lot