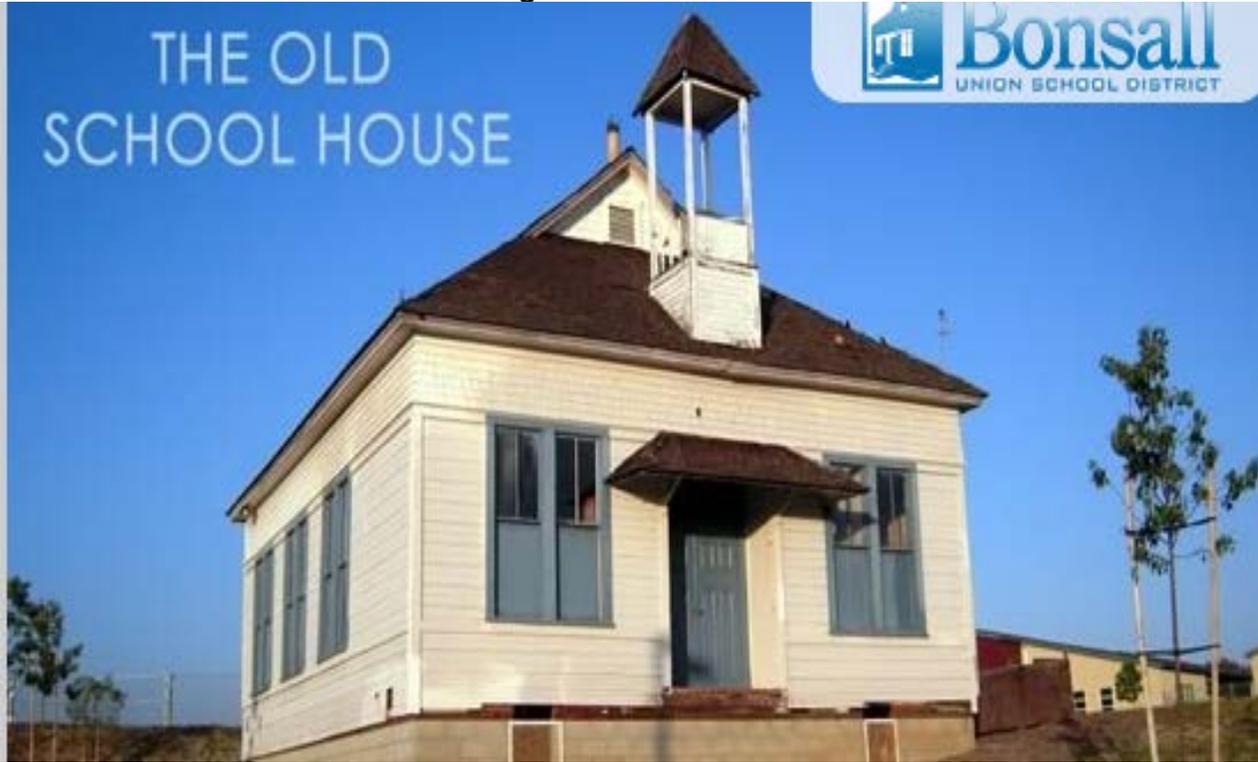


Bonsall Union School District Unification  
Initial Study  
And Negative Declaration



Prepared for:  
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Project Information

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Figure 1 Map of BUSD, Area Proposed for Unification

Attachment 1 Traffic Evaluation, LOS Engineering

## 1.0 Introduction

The voters of the Bonsall Union School District (BUSD) have petitioned the California State Board of Education (SBE) to change the current government structure from separate elementary and high school districts to one unified district to serve grades K-12 (Project). The BUSD voters first decided to seek unification in 2007 and submitted the required petition to the San Diego County Committee on School District Organization (County Committee), which transmitted the petition to the SBE along with its recommendation to approve the petition. In July 2011, the SBE voted to allow the unification petition to return to the SBE following the completion of the California Environmental Quality Act (CEQA) process. Upon completion of this process, the SBE will decide whether to adopt a resolution approving the petition to form a new unified school district.

### 1.1 Overview and Regulatory Guidance

This draft Initial Study and Negative Declaration (Draft IS/ND) for the Project has been prepared under the guidance of the lead agency, the California Department of Education (CDE) on behalf of the lead agency, the SBE, which has oversight and authority over proposed unification actions. The SBE has delegated authority to the CDE to administer and oversee the CEQA requirements on its behalf.

An initial study is a public document used by the decision-making lead agency to determine whether a project may have any significant effects on the environment. In the case of the Project, the CDE will use the Draft IS/ND to make a recommendation to the SBE about whether the Project will have a significant effect on the environment. In accordance with CEQA Guidelines (Section 15064[a]), an environmental impact report must be prepared if there is substantial evidence, such as conclusions of an Initial Study, that a project may have significant effects on the environment. This is true regardless of whether the overall effect of the project would be adverse or beneficial. A negative declaration (ND) or mitigated negative declaration may be prepared if the lead agency determines that the project would have no potentially significant impacts or that revisions to the project, or measures agreed to by the applicant, mitigate the potentially significant impacts to a less than significant level (CEQA Guidelines Section 15063[f]). This document has been prepared to meet the requirements of the CEQA Guidelines.

### 1.2 Summary of Findings

In accordance with CEQA Guidelines Section 15063(b)(2), an ND shall be prepared if the lead agency determines there is no substantial evidence in light of the whole record before the public agency that the project may have a significant effect on the environment. There is no substantial evidence that the Project would have a significant effect on the environment, based on the available project information and environmental analysis presented in the Initial Study. Therefore, an ND has been prepared in accordance with the CEQA Guidelines.

### 1.3 Public Review and Comments

The draft IS/ND prepared for the Project is available for review at the following locations:

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

Fallbrook Public Library  
124 South Mission Road  
Fallbrook, CA 92028

San Diego County Superintendent of Schools  
6401 Linda Vista Road  
San Diego, CA 92111

This draft IS/ND is available for a 30-day review period beginning January 25, 2012 and ending February 27, 2012 at 5:00 pm. Written comments must be submitted to:

Haynie Law Group  
Excel Centre  
17140 Bernardo Center Drive, Suite 354  
San Diego, CA 92128

Comments may be submitted in writing, by facsimile (858-485-7707), or by e-mail (ahaynie@haynlaw.com), or at the public hearing scheduled for March 8, 2012 at the Bonsall Community Center at 31505 Old River Road, Bonsall, CA 92003.

## 2.0 Project Description

### 2.1 Project Location

The BUSD is located in northern San Diego County in an area generally located south of the community of Fallbrook, east of the City of Oceanside, and north of Escondido and Valley Center. BUSD includes the community of Bonsall, the eastern portion of the City of Oceanside and extends east to include the small community of Pala. Major roads in the area include Interstate 15, State Route 76, Mission Road, Camino Del Rey, Gopher Canyon Road, Couser Canyon Road, and Lilac and West Lilac Road. Approximately 88 square miles are in the BUSD. The Project area includes the entire BUSD district.

The area within which BUSD is located is generally rural in nature with a variety of housing types ranging from multi-family apartments and condominiums to homes on very large lots. Agriculture is an important land use throughout the Project area. There is a small commercial area and Bonsall Town Center located at the intersection of State Route 76 and Mission Road. More urban uses exist in the adjacent City of Oceanside to the west and in the community of Fallbrook located to the north of the Project area. The community of Pala, located on the Pala Indian Reservation, includes a casino, limited commercial facilities and various public services.

### 2.2 Background and Project Need

The Bonsall Community and the BUSD Board of Trustees (Board) have a shared vision for the unification of the BUSD; that is to provide an education for students within the BUSD through grade 12. For many years, the Board has planned and implemented phases of changes necessary to encompass a comprehensive small high school into the future opportunities for the learners in the BUSD. Three members of the current Board have been serving eight-years; one has fourteen years and one sixteen. The unification of the BUSD is a long-term work in progress. The community members initiated the petition to unify in 2007 and have long sought to have a Bonsall High School. The community and BUSD have worked with the County Committee, CDE, and SBE to complete the unification process. In July 2011, the SBE voted to allow the unification petition to return to the SBE pending the completion of the CEQA process. Upon completion of this process, the SBE will decide whether to adopt a resolution approving the petition to form a new unified school district. SBE approval will result in a local election for the final approval of the Project.

### 2.3 Project Objective

The Project's objective is to create a unified school district that will provide elementary and high school services to BUSD residents.

### 2.4 Project Description

The Project involves a change of local government structure from separate elementary and high school districts to one unified school district (i.e., the formation of a new unified school district to serve grades K-12). The SBE will decide whether to adopt a resolution approving the petition to form a new unified school district through the unification of the existing BUSD (which is comprised of two elementary schools serving grades K-5 and K-6, a charter school serving K-5, and a middle school serving grades 6-8), with the corresponding portion of Fallbrook Union High School District (FUHSD) within its boundaries

(Figure 1). An SBE resolution approving the petition triggers a local election to approve the Project. If the SBE adopts a resolution to approve the petition, it also will determine the area of election.

Subdivision (c) of the California Education Code Section 35735.2 requires that a new unified school district, within five years of the effective date of the new district, provide the school facilities necessary to provide instructional services by employees of the district to all secondary students within the boundaries of the unified school district. The Board has studied their existing facilities and has determined that Sullivan Middle School can adequately house the small high school that is envisioned for at least five years. The BUSD’s plans are based on the demographics and character of the Bonsall community, and on projected growth. Grade levels at Sullivan Middle School would be reconfigured over time (approximately four years) and would serve as a high school serving grades 9-12. This phased approach will greatly reduce transition issues and effects on BUSD students and on the existing Fallbrook High School Campus. Grade levels at the existing elementary schools (Bonsall West, Bonsall, and possibly Vivian Banks Charter School) will also be reconfigured. Instead of providing for grades K-5/6, they will serve K-7/8. All of the existing schools have the facilities and capacity to serve the additional students. Current enrollment and that projected upon completion of the four-year grade reconfiguration program is shown below:

<u>School</u>	<u>Current Enrollment</u>	<u>Projected Enrollment</u>
Sullivan Middle School	510	510
Bonsall Elementary School	900	1,235
Bonsall West Elementary School	500	675

New facilities could include the creation of a Continuation School at an existing 0.49 acre fire station site located at 41430 Old River Road in Bonsall, and the construction of approximately 100 additional parking spaces at Sullivan Middle School.

The Continuation School is expected to serve up to 25 students. The site was previously graded and already includes structures, driveway entry and parking. Modification of the existing fire station structure would be done within the existing graded area and would consist of updating as necessary to accommodate the needs of the continuation students. The renovation could, but is not required to, include computer and internet, office and work stations.

The 100 additional parking spaces at Sullivan Middle School will be located within the boundaries of the existing campus on an unused, previously graded area that is currently mowed grass. No natural vegetation or cultural resources will be disturbed. The parking lot will cover approximately three-quarters of an acre. Construction would not extend more than one foot below the current surface. The parking lot would be installed in accordance with existing rules and regulations and would include a bio-swale along the downhill edge to collect and filter run-off. Site preparation would involve the removal of any surface vegetation and minor scarification and leveling. The site would be watered to reduce dust. Requisite base material and asphalt paving would be installed and the parking lot would be striped. Construction would be done between the hours of 7:00am and 7:00pm, Monday through Friday. Construction should last less than one month.

The proposed unified district has yet to be formed and it is not certain that voters will approve the new school district. Moreover, there currently is no decision-making body (i.e., governing board) for the

proposed district to make any final decisions regarding how secondary students of the new proposed district will be provided instructional services. However, for purposes of CEQA, it is reasonably foreseeable that the new governing board would decide to house secondary students within existing facilities since capacity is available. This is true whether the decision-making body is the current Board appointed as an interim board or whether a newly elected board is seated concurrently with voter approval of the new proposed district. This would be the most cost effective use of the existing facilities and the proposed district's financial resources. This would also allow the successful policies and programs that are already in place at the elementary and middle school facilities to be continued through the high school instructional years.

Should the proposed Project not be approved by the voters, there will be no change in the existing condition. Elementary and middle school students in BUSD would continue to attend high schools outside of the BUSD as they do now. Although a No Project Alternative is not required under CEQA because the Draft IS/ND demonstrates that the Project will not result in any significant environmental impacts, lack of approval by the voters is effectively a No Project alternative. The impacts of the proposed Project and the No Project Alternative are the same.

3.0 Environmental Checklist Form

3.1 Determination

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would not be potentially affected by the Project, meaning there are no impacts that are "Potentially Significant Impacts" as indicated by the checklist on the following pages.

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Aesthetics               | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources     | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Geology /Soils                     |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials      | <input type="checkbox"/> Hydrology / Water Quality          |
| <input type="checkbox"/> Land Use / Planning      | <input type="checkbox"/> Mineral Resources                  | <input type="checkbox"/> Noise                              |
| <input type="checkbox"/> Population / Housing     | <input type="checkbox"/> Public Services                    | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Transportation/Traffic   | <input type="checkbox"/> Utilities / Service Systems        | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

3.2 Environmental Checklist

*Aesthetics*

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Project would not have any significant effect on the existing aesthetic resources as it is principally a reorganization of school district boundaries. The construction of a 100-space parking lot within an existing elementary school site will not have a significant effect on surrounding views as this area is already used for overflow parking. The upgrading of the existing fire station for the Continuation School would not result in a significant effect to the existing aesthetic resources as improvements because it would be done within the existing building.

*Agriculture and Forestry*

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The proposed project does not propose any new facilities in agricultural areas. There will be no significant effect on agricultural resources.

*Air Quality*

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The Project is a reorganization of school district boundaries to allow a new unified school district to offer students both elementary and high school educational services. No air quality impacts will result from such reorganization. In fact, there will be a slight reduction in vehicle miles traveled for those students who will attend high school in Bonsall at the Sullivan Middle School site because they will no longer have to drive the 8-9 miles from Sullivan Middle School to Fallbrook High School, which will slightly lessen overall automobile emissions.

Any necessary remodeling/updating of the existing fire station building so that it can be used as the Continuation School would be done internally and no significant emissions of air pollutants are anticipated in connection with that remodeling/updating. Construction of the new parking lot (see Project description) will be done in accordance with applicable regulations and codes to ensure any effect on air quality would be minimal and localized. Grading will only be necessary to remove existing non-native vegetation and to prepare the site to accept the base material and asphalt paving. The site will be watered during site preparation to minimize dust. Minimal equipment will be used to construct

the parking lot and the parking lot improvements will be completed in less than 30 days. Any equipment storage will be on the existing parking lot. Only equipment used in the construction of the new parking lot will be allowed to be stored onsite. The effect on air quality resulting from the construction of the parking lot will be less than significant.

**Biology**

IV. BIOLOGICAL RESOURCES:

Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The Project does not include the construction of any new facilities on land that is currently occupied by natural habitat. The Continuation School is located on a completely disturbed property that is currently occupied by a fire station. The additional 100 parking spaces will be located within an existing facility on land that is currently mowed grass. There will be no significant effect on biological resources.

**Cultural Resources**

V. CULTURAL RESOURCES. Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- d) Disturb any human remains, including those interred outside of formal cemeteries?

Facilities that could be constructed as a result of the Project are all located on previously disturbed, graded land. No disturbance of land is anticipated for the Continuation School. Construction of the new parking lot will not extend more than one foot below existing ground level. The parking lot site was graded previously and no cultural resources were found at that time. No significant effect on cultural resources are anticipated.

*Geology and Soils*

VI. GEOLOGY AND SOILS. Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
- ii) Strong seismic ground shaking?
- iii) Seismic-related ground failure, including liquefaction?
- iv) Landslides?
- b) Result in substantial soil erosion or the loss of topsoil?
- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The Project would not result in significant impacts due to geologic factors or unfavorable soils. The proposed parking lot would be located within an existing school site and would be constructed according to existing building codes. The Continuation School would be located in an existing building that would be updated, again according to existing applicable building codes. According to the County of San Diego Geologic Hazards Guidelines for Determining Significance, neither the 100 space parking lot nor the Continuation School is located in an area with known geologic hazards (fault rupture or shaking zones, liquefaction area, landslides).

*Greenhouse Gas Emissions*

VII. GREENHOUSE GAS EMISSIONS. Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? See Additional Information.
- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Project does not add new trips to area roads nor will extensive new facilities be created that would attract automobiles or generate emissions. The shorter distance from many homes to Sullivan Middle School (as compared to driving an additional 8-9 miles to Fallbrook High School) might result in a slight reduction in vehicle miles traveled and a concomitant slight reduction in greenhouse gas emissions throughout the new unified district. No significant effect resulting from greenhouse gas emissions is anticipated.

*Hazards and Hazardous Materials*

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The Project is a reorganization of school district boundaries and relies upon existing facilities. Construction of the new parking lot on the existing school grounds and updating/remodeling of the existing fire station building so that it can be used as the Continuation School will not create, emit or

expose a human population to hazardous materials. Neither the existing schools nor the proposed new parking lot and Continuation School are located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. There are no airports in the vicinity of any of the existing schools or in the vicinity of the proposed new parking lot and the remodeled/updated Continuation School.

*Hydrology and Water Quality*

IX. HYDROLOGY AND WATER QUALITY.

Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Otherwise substantially degrade water quality?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Inundation by seiche, tsunami, or mudflow?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The proposed unification will not result in a significant effect to existing hydrology and water quality. Construction of the new parking lot and remodeling/updating of the existing fire station to serve as a Continuation School will be done in accordance with existing regulations and codes. No water courses or drainage patterns would be disrupted. Construction of the new parking lot will include the inclusion of a bio-swale at the downhill edge to collect and filter run-off. None of the existing schools, the proposed parking lot and the existing fire station/Continuation School are located in a 100-year flood hazard area or in areas subject to possible seiches, tsunamis or mudflows. Runoff from the existing

schools and the fire station site would not be changed. There will be no significant effect with respect to hydrology and water quality.

**Land Use and Planning**

X. LAND USE AND PLANNING. Would the project:

- a) Physically divide an established community?
- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

The proposed unification action will not result in a significant effect to land use and planning as construction of new facilities on undisturbed land is not proposed. The new parking lot will be located on mowed grass at an existing school. The Continuation School will be located on property that currently houses a fire station. As such, there will be no division of an established community, and no conflict with applicable land use plans. There is no existing habitat conservation or natural community conservation plans that effect either the existing school sites or the fire station site.

**Mineral Resources**

XI. MINERAL RESOURCES. Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The Project will not result in a significant effect to mineral resources because it does not propose to construct any facilities on previously undeveloped land.

**Noise**

XII. NOISE -- Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? See

Additional Information

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Typically, traffic generated by any use must double to cause an increase of 3 dBA CNEL, a measure commonly regarded as being a significant direct noise impact. In this case, the number of students at any of the BUSD's schools would need to double before the traffic generated would double, resulting in a noise increase of 3 or more dBA.

The Project may result in slight changes to existing traffic patterns as the grade levels accommodated at each of the BUSD's schools are reconfigured to allow high school services to be provided. As shown in the Project Description, there will be no change in enrollment at Sullivan Middle School (510 current enrollments and 510 projected enrollments). Enrollment at Bonsall Elementary School will change from 900 current enrollments to 1,235 projected enrollment. Enrollment at Bonsall West Elementary School will change from 500 current enrollments to 675 projected enrollment). In no case is the enrollment doubled, nor will traffic generated by each school be doubled. Noise increases due to increased traffic will not reach or exceed 3 dBA. Therefore, no significant change in noise levels is anticipated.

*Population and Housing*

XIII. POPULATION AND HOUSING. Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No new buildings will be constructed and no housing or other uses will be displaced. There will be no significant effect on population and housing.

*Public Services*

XIV. PUBLIC SERVICES.

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause

significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed unification will result in the elementary schools operated by BUSD housing more students. These facilities have the capacity to handle these students. Area parks should not be affected as the proposed action does not create new housing or new demand for park facilities. Fire and police protection are already provided to all of the BUSD's facilities. Levels of service should not be affected by the redistribution of students.

*Recreation*

XV. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed Project is the reorganization of school district boundaries and will have no effect on the use of recreation facilities in the area. The proposed new parking lot and the remodeling/updating of the existing fire station building for the Continuation School will not create any additional demands for recreational facilities. There will be no significant effect upon recreation facilities.

*Traffic*

XVI. TRANSPORTATION/TRAFFIC. Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in inadequate emergency access?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

There are no applicable congestion management plans or other applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system so there is no conflict. The proposed reorganization of school district boundaries will not have any effect on air traffic patterns. As no new roads, signals or other mobility system components are being proposed; there will be no effect on emergency access or existing road configurations.

The proposed reorganization of school district boundaries will not create any new trips on area roads, but rather it will redistribute them. Over time, more students will be attending the elementary schools as they are reconfigured to provide K-8 services. It is anticipated that enrollment at Sullivan Middle School will remain the same. LOS Engineering has evaluated the potential increase in traffic at both elementary schools and concluded that the increases in the number of vehicle trips do not meet the SANTEC (San Diego Traffic Engineers' Council) criteria for preparing a traffic impact report. As a result, there are no significant traffic impacts that will result from the increase in traffic at the two elementary schools. There was no need to evaluate potential impacts at Sullivan Middle School as there will be no change in enrollment and thus no corresponding increase in traffic. (See attached LOS Engineering letter)

*Utilities and Service Systems*

XVII. UTILITIES AND SERVICE SYSTEMS.

Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- g) Comply with federal, state, and local statutes and regulations related to solid waste?

The Project is the reorganization of school district boundaries. No new schools will be needed to accommodate projected enrollment. The existing schools are already connected to potable water, sanitary sewer and storm drain systems. The fire station building which will be remodeled/updated to serve as a Continuation School is also similarly connected to existing utilities. The new parking lot will be constructed in accordance with existing codes and regulations and will not require new storm drain facilities.

Utilities and service systems are provided to a region that is much larger than the current district boundaries. At a regional level, there will not be any increase in the use of utility and service systems, including landfills, because there is no increase in the overall number of students attending regional schools. Students are only being re-distributed to different schools (i.e. from Fallbrook High School to Sullivan Middle School).

### 3.3 Findings of Significance

#### XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The Project will not degrade the quality of the environment, both built and natural. The project will not have significant biological or cultural resources impacts.

The Project will not result in substantial cumulative impacts because students are simply being redistributed, i.e. the Fallbrook Union High School District will see a decrease in students while the new unified district will see an increase in the number of students.

The Project will not result in any substantial adverse effects on human beings.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors*, (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.





**LOS Engineering, Inc.**  
**Traffic and Transportation**

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Phone 619-890-1253, Fax 619-374-7247, e-mail: Justin@LOSEngineering.com

October 24, 2011

Dr. Justin Cunningham, Ed. D., Superintendent  
Bonsall Union Elementary School District  
31505 Old River Road  
Bonsall, CA 92003

Dear Dr. Cunningham:

This letter is to introduce myself and the services of LOS Engineering, Inc. Since January 2004, LOS Engineering, Inc. has been preparing traffic and parking studies as stand-alone documents or as part of Environmental Impact Reports/Statements. The firm's philosophy is to provide accurate, timely, and cost-effective solutions to each client. I have personally prepared several traffic studies for both public and private schools throughout the San Diego region.

I understand the Bonsall Union School District is pursuing a unification process. I also understand Bonsall serves a vast area including the eastern portions of the City of Oceanside, Bonsall, portions of Valley Center, and includes the community of Pala. With coverage over several jurisdictions, the option exists of using individual jurisdiction's significance criteria or the regional significance criteria prepared by the San Diego Traffic Engineers' Council (SANTEC). SANTEC criteria are also used by the City of Oceanside and the San Diego Association of Governments (SANDAG) as part of the region's Congestion Management Program (CMP).

The SANTEC criteria notes that a traffic study should only be prepared if a project exceeds 1,000 Average Daily Trips (ADT) or 100 peak hour trips if in conformance with the underlying land use. If the number of students that shift between schools does not exceed the aforementioned traffic threshold, then a traffic generation letter can be prepared to fulfill the California Environmental Quality Act (CEQA) requirements in place of a traffic study.

For the unification process, my understanding is that Bonsall Elementary, Bonsall West Elementary, and Sullivan Middle School will each have a change in the number of students. Due to continuing enrollment fluxuations, the number of new students will be added to a fixed student body number such as the school's capacity. According to Mr. Tom Krzmarzick, the capacity of Bonsall Elementary is 1,051 students, while Bonsall West Elementary is 620 students, and Sullivan Middle School is at 510 students.

**LOS Engineering, Inc.**  
**Traffic and Transportation**

Dr. Justin Cunningham, Ed. D., Superintendent – October 24, 2011  
Bonsall Union Elementary School District – Traffic Criteria

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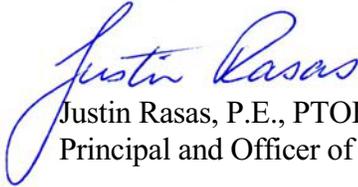
Bonsall Elementary with a capacity of 1,051 students would see an increase of 184 students to reach the anticipated 1,235 students as part of the unification process. The SANDAG trip generation for 184 elementary students is less than the SANTEC threshold; therefore, a traffic study would not be required.

Bonsall West Elementary with a capacity of 620 students would see an increase of 55 students to reach the anticipated 675 students as part of the unification process. The SANDAG trip generation for 55 elementary students is less than the SANTEC threshold; therefore, a traffic study would not be required.

Sullivan Middle School with not have a change in the number of students; therefore, a traffic study would not be required per SANTEC.

If the number of students that shift between schools does not exceed the aforementioned levels, then a traffic generation letter can be prepared to fulfill CEQA requirements in place of a traffic study. If you should have any questions, please call me at (619) 890-1253.

Sincerely,  
**LOS Engineering, Inc.**



Justin Rasas, P.E., PTOE  
Principal and Officer of LOS Engineering, Inc.