

**Kings Canyon Unified School District**  
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(559) 305-7024

April 29, 2010

Mr. David Bryant  
Project Planner  
Tulare County RMA  
Government Plaza  
5961 South Mooney Blvd.  
Visalia, CA 93277

RE: TULARE COUNTY GENERAL PLAN 2030 UPDATE AND  
RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT  
(State Clearinghouse No. 2006041162)

Dear Mr. Bryant:

The Kings Canyon Unified School District (KCUSD) has reviewed the above documents and offers the following comments:

**General Plan 2030 Update Background Report**

Although most of KCUSD's territory is within Fresno County, the District includes approximately 36 square miles mostly within the northwest portion of Tulare County, west of and adjacent to the City of Dinuba. The Background Report section on schools is 18 pages long and includes information on each of the school districts in Tulare County, including a subsection addressing "Border County Public Schools" that extend into Tulare County. KCUSD should have been included in this subsection, but was not.

## General Plan 2030 Update Goals and Policies Report

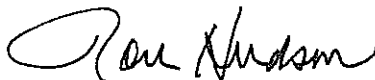
We have reviewed the various policies related to schools within the Goals and Policies Report. The policies appear to be appropriate in that they recognize the school district's authority in locating schools, promote coordination and cooperation include joint use facilities and programs, encourage schools to be located in the neighborhoods they will serve (thereby facilitating safe pedestrian and bicycle access), promote compatibility with current and future land uses, and promote workforce education and vocational training in secondary schools.

## Recirculated Draft Environmental Impact Report

Overall, the discussion in the section of the Draft EIR addressing school impacts appears to be appropriate. We support the additional policy provided as a mitigation measure (PFS-8.6 School Funding), which indicates the County may require new projects to mitigate impacts on school facilities in addition to the use of school fees. (It is generally recognized that school fees do not cover the cost of providing school facilities to students generated by new development.) Although the DEIR recognizes the current restrictions of Government Code Section 65996, which essentially limits school facilities mitigation to the school fees authorized by State law, the DEIR provides for the possibility for additional mitigation should the law change in the future.

Thank you for the opportunity to comment on the General Plan Update documents. We look forward to working with Tulare County on any planning issues that arise within KCUSD's Tulare County territory.

Sincerely,



Ron Hudson  
Deputy Superintendent  
Kings Canyon Unified School District

Attachment: Kings Canyon USD attendance boundaries (599 square miles of which 36 square miles are in Tulare County)

