



THE CITY OF SAN DIEGO

September 23, 2015

City of Escondido
Planning Division
Attn: John Helmer
201 North Broadway
Escondido, CA 92025
Submitted via email to: Jhelmer@escondido.org

Subject: **CITY OF SAN DIEGO COMMENTS ON THE SAFARI HIGHLANDS RANCH PROJECT (SUB 15-0019).**

The City of San Diego has completed a preliminary review of the request for comments for the Specific Plan, Sphere of Influence Update, Annexation, Development Agreement, Grading Exemption and Tentative Subdivision Map for 550 single family homes for the Safari Highlands Ranch Project (SUB 15-0019). The proposed Safari Highlands Ranch Project is located on 1,098 acres of vacant land immediately north of the City of San Diego and San Diego Zoo Safari Park in unincorporated San Diego County. This proposal would lead to significant effects to natural and community resources on property owned by the City of San Diego.

In June 2005, City of San Diego City Council adopted Council Policy 600-45 for the protection of water, agriculture, biological and cultural resources within the San Pasqual Valley.

For at least 50 years, the San Diego City Council has protected the treasured agricultural preserve of the San Pasqual Valley as well as the public's investment in water resources within the Valley by using land around Lake Hodges and its watershed for agricultural uses which are compatible with the vision to protect water quality, preserve open space, and maintain the Valley's rural character.

As expressed in the Council Policy, it is the desire of the City of San Diego to ensure the long-term protection of the significant water resources within the San Pasqual Valley, as these resources will play an important role in helping to meet the City's future water supply needs. It is also the desire of the City to preserve the Valley's significant agricultural areas, sensitive natural habitats and unique scenic qualities.

Because issues such as water quality, ground water recharge and habitat preservation do not necessarily follow jurisdictional boundaries, the City must work with the surrounding municipalities to protect the beneficial uses of the watershed. As such, provided herein are review comments from City of San Diego staff representing Long Range Planning, Public Utilities, and Real Estate Assets on the proposed Safari Highlands Ranch project.

Planning Department

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Public Utilities Comments

The City of San Diego, Public Utilities Department, owns and manages seven source water reservoirs in the County of San Diego watershed. Catchment basins collect rainfall runoff that drain eventually into these reservoirs. These local water sources contribute 10-15 % of the water supply for approximately 1.3 million people within the Public Utilities service area. The City of San Diego has owned and managed most of these reservoirs and adjacent lands for over 100 years. The reservoirs are managed for the primary and overarching purpose of protecting water quality in the City's source waters. All other management goals are subordinate to ensuring the health and safety of the public water supply. Other beneficial uses of this land, such as the Multiple Species Conservation Plan (MSCP) Cornerstone Lands, are overlays on this fundamental purpose and use. The proposed project is located within the Hodges catchment, and all surface water flows downstream into San Pasqual Valley and west into Hodges Reservoir.

Implementation of the proposed project could cumulatively and significantly impact groundwater resources and water quality in San Pasqual Valley and Hodges basin, which is further discussed below.

Background

The City of San Diego (City), is an adjacent downstream land owner to the proposed project and is actively involved with the preservation and protection of San Pasqual Valley (Valley) as an agricultural preserve and as a resource for groundwater production and storage. The groundwater in the San Pasqual Groundwater Basin (Basin) is the primary source of water supply for the residents and agricultural operations within the Valley. Please note that the San Pasqual Valley is one of the major MSCP Cornerstone Lands for the City of San Diego (Hodges Reservoir/San Pasqual Valley).

Issues of Concern

The issues below must be addressed:

1. Water Quality

Surface water from the proposed project will enter existing drainage systems and flow into Santa Ysabel Creek before entering the alluvial groundwater basin and Hodges Reservoir. It is anticipated that the project will utilize pesticides and fertilizers, which will cumulatively increase the salt and nutrient load and affect the quality of surface and groundwater. Regional stormwater regulations do not address salt and nutrient loading at the level needed to fully protect drinking source water reservoirs. In addition, the project will most likely increase sedimentation in drainages including Santa Ysabel Creek.

2. Groundwater Resources and Consistency with the Sustainable Groundwater Management Act (SGMA)

The City is presently assessing the development potential of all of its groundwater resources. The City reserves its right to consider and/or develop any and all available groundwater

resources. As a consequence, no activity should be performed and/or approved on the subject site that would affect the water quality or jeopardize the City's ability to develop groundwater resources in the San Pasqual Valley or near the subject site.

The Basin is regulated by the California Regional Water Quality Control Board (Water Board). In compliance with the Water Board's adopted Recycled Water Policy, the City completed the *San Pasqual Valley Groundwater Basin Salt and Nutrient Management Plan* (SNMP) (CH2M Hill, 2014). The Basin, identified as Tier A basin for having significant groundwater storage capacity and significant potential for municipal groundwater use, is of high priority for salt and nutrient management. Groundwater quality data in the Basin has been collected and reported from as early as 1950 and the City continues to collect water quality samples.

In addition to the SNMP, the City has completed numerous studies and investigations to manage groundwater quality and levels in the Basin. Among these are the *San Pasqual Groundwater Management Plan* (MWH, 2007), *San Pasqual Brackish Groundwater Desalination Demonstration Project* (RBF, 2011), *San Pasqual Conjunctive Use (Alternative Water Supplies)* (CDM 2010 (2012)) and *Installation of Transducers in Monitoring Wells in San Pasqual Valley* (Department of Water Resources, 2012) which includes a basin evaluation that may be used to update DWR's Bulletin 118.

The Basin is a Medium Priority Basin as designated by the California Department of Water Resources and as such the City is the designated monitoring entity for the Basin for the California Statewide Groundwater Elevation Monitoring (CASGEM) program, and monitors the groundwater elevations in the Basin. The City will be developing a Sustainable Groundwater Management Plan in accordance with State law.

Additional evaluation should be done regarding the applicability of SGMA, all drainages such as Rockwood Creek, and how implementation of the project (increased use of fertilizers and pesticides) could affect groundwater and source waters in San Pasqual.

3. West Zoo Road

Emergency access is proposed along West Zoo Road, located on City-owned land; it follows the western boundary of one of the City's lessee's, Safari Park. This is not a public road; it is designated as a "Z" Road by the County of San Diego. This means it is an unimproved road that has no public road status and is not maintained by either the City or the County of San Diego. Several neighboring properties have an easement over City land to use this road. The Safari Park uses the road for employee access. No other access shall be granted.

Long Range Planning Comments

San Pasqual Valley Plan

The San Pasqual Valley Plan (Plan) was adopted by the San Diego City Council on June 27, 1995 and amended in March 1996 and July 2005. The approximately 14,000-acre Plan area, largely owned by the City of San Diego, extends from the Hodges Reservoir eastward to Clevenger Canyon.

The Plan recognizes the Valley as an important water, agricultural and natural resource, home to San Diego County's most sensitive habitats. The key goals of the Plan are to maintain the community as an agricultural preserve, to minimize land use conflicts between agriculture and other land uses, and to continue to practice agriculture to minimize impacts on water quality.

The proposed Safari Highlands Project is located immediately north of the San Diego Zoo Safari Park and San Pasqual Community Planning Area in the City of San Diego. The proposed Safari Highlands Project could potentially have an impact on the rural character of the valley due to the land use and agriculture conflicts, increase in regional traffic, and impact on sensitive and biological resources and open space.

Issues of Concern

Circulation/Traffic

1. The San Pasqual Valley Plan envisioned that the rural character of roads in the San Pasqual Valley will be maintained, even as the need develops to widen certain roadways to accommodate increases in traffic (page 7).

The Safari Highlands Ranch Project proposes various intersection and road segment improvements that extend into City of San Diego property including widening Coverdale Road South of Rockwood Road for approximately 550' to accommodate the additional receiving lane, and adding an additional dedicated left-turn lane at the intersection of Cloverdale Road/San Pasqual Valley Road (SR 78) which is an already impacted intersection.

The proposed addition of 550 single family residential units north of the Safari Park will impact traffic circulation and increase vehicular traffic throughout the San Pasqual Valley as residents utilize Coverdale Road and San Pasqual Valley Road. Due to the rural nature of the valley, the area's existing circulation system is relatively limited and maintaining a circulation system that is compatible with the valley's rural character is necessary to be compatible with the vision of the Plan.

2. **Sensitive Biological Resources and Open Space**

As stated in the San Pasqual Valley Plan, the Lake Hodges/San Pasqual Valley area is a significant open space resource providing contrast with the extensive urbanization located on either side of the valley in Escondido and Rancho Bernardo (page 33). The lack of urban development throughout such a large land area is particularly sustaining to wildlife. Areas containing important biological resources are located around Hodges Reservoir, the San

Dieguito River and its tributary creeks, and the upland areas including the steep slopes above the valley where the Safari Highlands Ranch project is proposed.

Preserving the rural character of the valley through the retention of agriculture, preserving sensitive upland habitats and providing vital naturally-vegetated linkages to the surrounding regional open space system is vital to maintaining the vision of the San Pasqual Valley anticipated in the Plan.

Real Estate Assets Comments

Most of the "Off Site Improvements" will have impacts on City owned property and City lease holders. Below are the sections from the report discussing some type of improvement that will either affect City owned property and/or City owned property that is currently under a lease.

The following off-site improvements, intersection and roadway segment improvements and waste water system identified in the Safari Highlands Ranch Specific Plan will require easements, permits and discussions with our tenants.

Off Site Improvements identified in Specific Plan

- Traffic calming is proposed on Rockwood Road from the Cloverdale Road intersection to the eastern boundary of San Pasqual Union School.
- Zoo Road is an existing paved two-lane road that connects Safari Park and several homes in the hills to the northeast with SR-78.
- This will require Cloverdale Road south of Rockwood Road to be restriped and/or widened for approximately 550' to accommodate the additional receiving lane.
- Street Segment improvements identified along Cloverdale Road.

Intersection and Road Segment Improvements identified in Specific Plan

- An additional northbound receiving lane will be needed on Cloverdale Road. This will require two northbound lanes on Cloverdale Road for approximately 550'.
- The intersection of Cloverdale Road/San Pasqual Valley Road (SR 78) would be improved to provide a second dedicated left-turn lane.
- The segment of Cloverdale Road from Rockwood Road to SR 78 would be widened at the eastbound approach to the intersection of Cloverdale Road and San Pasqual Valley Road (SR 78) to provide an additional (second) dedicated left- turn lane.
- An approximately 1.0 mile improvement to Zoo Road as an emergency access road to the south
- Water system connection at the intersection of Safari Highlands Ranch Road and Rockwood Road to existing City of Escondido facilities

- Sewer system connection at the Safari Highlands Ranch Road/Rockwood Road intersection to existing City of Escondido facilities
- Gas, electric, cable, and phone system connections at Rockwood Road to existing infrastructure operated by San Diego Gas and Electric, Times Warner Cable, and AT&T.
- Similarly, the Project will connect to Zoo Road in the south, providing residents and the San Diego Zoo Safari Park an alternative evacuation route to the north in an emergency. Access roads will be improved to fire department standards.

Wastewater System

The Project will connect to the City of Escondido wastewater system. The city has existing sewer facilities in Rockwood Road in the vicinity of the Safari Highlands Project. The existing sewer system consists of a 8-inch gravity sewer that extends to the Rancho San Pasqual and Rancho Vistamonte communities and connects to a 12-inch gravity sewer that extends from Rockwood Road south the along the creek, under San Pasqual Valley Road (Highway 78), and south nearly to Old Pasqual Road. At the southwest corner of the intersection of Old Pasqual Road and San Pasqual Road the gravity sewer system discharges into Lift Station 13. Lift Station 13 pumps to an 8-inch force main that extends approximately 11,000 feet in San Pasqual Road from the lift station to the south and west. The force main transitions to a gravity sewer in San Pasqual Road just inside the City of Escondido boundary. From this point, a 10-inch gravity sewer flows west and connects to the 15-inch gravity sewer flowing south in Bear Valley Parkway.

If you have not already done so, please contact Charlie Jancic, Chairperson of the San Pasqual/Lake Hodges Community Planning Group at Charlie@bigtreepeople.com to provide information on the proposed project. The planning group is comprised of leaseholders and representatives of other communities within a larger study area that includes Escondido, Ramona, Rancho Bernardo and Del Dios.

In addition, we recommend contacting the City of San Diego Development Services Department (DSD) to initiate a multi-disciplinary Preliminary Review to discuss any permits or approvals for the project that may extend into City of San Diego jurisdiction. Additional issues, including, but not be limited to, MHPA Adjacency, MSCP Cornerstone and cultural resources, traffic, Site Development Permits, and easements for expanded road right-of-way will be addressed once plans are submitted for a preliminary review.

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City of Escondido
Planning Division
September 23, 2015

Sincerely,

A handwritten signature in blue ink, appearing to read "Tara Lieberman", with a long horizontal flourish extending to the right.

Tara Lieberman, Associate Planner
Planning Department in coordination with Public Utilities and Real Estate Assets

cc: Reviewing Departments (via email)