



THE CITY OF SAN DIEGO

September 8, 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 REQUEST FOR 15-DAY EXTENSION OF PUBLIC REVIEW OF THE SAFARI HIGHLANDS RANCH PROJECT (CASE NO. 15-0019).**

We are requesting an extension of time from the City of Escondido (lead agency) to review 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.

The City of San Diego respectfully requests an extension of time (15 business days) from September 8 to September 29, 2015 to adequately complete its review and submit comments about this major project. This request is based on the following reasons:

1. This is a regional project which will affect many issues of concern to the City of San Diego, an adjacent public agency, such as groundwater and water quality, traffic circulation, recreational trails and uses, land use adjacency, brush management, and MSCP Cornerstone lands.
2. In addition, the City of San Diego is the land use authority and is a "responsible" agency under CEQA, for any permits project approvals that may extend into its jurisdiction. These permits and approvals would include a Site Development Permit, a MHPA Boundary Line Adjustment, and easements for expanded road rights-of-way (Old Zoo Road on city-owned land). These issues need to be thoroughly analyzed to determine if issues of concern to the City have been adequately addressed for the City to rely upon for issuance of these discretionary permits.
3. Our review will require intense and time consuming review and analysis to determine if the issues of concern are adequately addressed for the reasons outlined above. Our review requires comments from multiple city departments such as the Public Utilities, Real Estate Assets, Park and Recreation, and Planning Department in order to compile one letter to the County. Project documents were not received by the City of San Diego Planning Department until August 18, 2015 and coordination of these efforts requires additional time.

Planning Department

1222 First Avenue, MS 413 – San Diego, CA 92101-4155
Tel (619) 235-5200

4. Based on our brief review of the proposed project, it does not appear that environmental review has been initiated. Your project includes entitlements and discretionary actions which meet the definition of a project under CEQA (Section 15378). As such, the City of San Diego as a Responsible Agency under CEQA cannot provide meaningful comments to the City of Escondido on the project. In addition, the request for easements or other discretionary actions requested from the City of San Diego for this project have the potential to result in significant impacts to resources managed by the City. The environ4mntasl document and associated technical analysis would need to be adequate and meet CEQA standards as well as the City's requirements in order for it to be relied on by the City for processing future discretionary actions within our permitting authority.

A less than 30 day public review period is too short for such a major project with regional impacts affecting many jurisdictions. In addition, the City of San Diego requests a meeting with the City of Escondido Planning Division to discuss the issues of concerns related to the Safari Highlands Ranch Project.

Please provide response to this request in writing and via email at tlieberman@sandiego.gov so that all reviewing departments can be notified if the request for an extension of public review has been granted.

Sincerely,



Tara Lieberman, Associate Planner
Planning Department

cc: Reviewing Departments (via email)

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City of San Diego Department Contact Information:

Myra Herrmann,
Senior Planner/Archaeology/Tribal Liaison
City of San Diego - Planning Department-Environmental
1222 1st Avenue, MS 501
San Diego, CA 92101

Tara Lieberman
Associate Planner
City of San Diego - Planning Department
1222 First Avenue, Mail Station 413
San Diego CA 92101

C. Tracy Irvin
Property Agent
City of San Diego - Real Estate Assets Department
1200 3rd Ave, Suite 1700 - MS51A
San Diego, CA 92101

Jeffery Pasek
Watershed Manager
City of San Diego - Long-Range Planning & Water Resources Division Public Utilities
535 B Street, Suite 300
San Diego, CA 92101

Cathy Cibit
Project Officer
City of San Diego - Long-Range Planning & Water Resources Division Public Utilities
535 B Street, Suite 300
San Diego, CA 92101