



County of San Diego

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October 12, 2015

John Helmer, Planning Consultant
City of Escondido
201 N. Broadway
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Via email to: safarihighlands@escondido.org

COMMENTS ON THE NOTICE OF PREPARATION FOR THE SAFARI HIGHLANDS RANCH PROJECT AND ASSOCIATED DISCRETIONARY LAFCO ACTIONS

Dear Mr. Helmer:

The County of San Diego (County) has received a copy of the Notice of Preparation (NOP) and appreciates this opportunity to comment. The County Planning & Development Services, and the Departments of Parks and Recreation, Public Works and Environmental Health have reviewed the NOP and Draft Specific Plan in addition to our previous correspondence associated with the Safari Highlands Ranch proposal which identified issues that may have an effect on unincorporated County lands. Please note that none of these comments should be construed as County support for this project or the associated annexation.

GENERAL COMMENTS

Consistent with the correspondence sent to the City of Escondido, dated April 22, 2014 regarding the Safari Highlands Ranch proposal, the County remains concerned about the projects potential inconsistencies with County land use regulations, impacts to biological resources, and provision of fire protection services, impacts to recreational facilities and, transportation and traffic impacts. Until a thorough environmental evaluation of the project has been completed, the County cannot be certain if these concerns have been satisfactorily addressed.

The County Planning & Development Services department has developed Guidelines for Determining Significance that are used to determine the significance of environmental impacts and mitigation options for addressing potentially significant impacts in the unincorporated portions of the County. Project impacts that could have potentially significant adverse effects to the unincorporated County or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: <http://www.sandiegocounty.gov/pds/procguid.html>

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The County requests to attend any meetings with the City of Escondido and LAFCO regarding the City's Sphere of Influence update. The County has been experiencing a compromise of the Transportation Impact Fee (TIF) program as well as the Multiple Species Conservation Program (MSCP) and associated Pre-Approved Mitigation Areas (PAMA) during annexation processes. The environmental analyses for projects and associated annexations have been insufficient regarding these very important mitigation programs. The County recognizes that not all annexations are occurring within the City of Escondido; however, the City has had a number of annexations over the recent past.

The County TIF program evaluates the potential development of lands within the unincorporated County and calculates a 'fair share' impact fee to address the cumulative impacts that development project have on the existing circulation infrastructure. When land is removed from this equation it can place an inequitable burden on the remaining unincorporated lands to compensate for those annexed properties.

Likewise, when land is removed from the PAMA or when project impacts arise that hinder the implementation of the MSCP, important regional biological conservation goals are not served and sensitive species habitat can be impacted without programmatic mitigation which is afforded by the MSCP, specifically within PAMA areas.

RECREATION

The Project has an opportunity to provide the residents of the new community and surrounding community with an excellent interconnecting trail system with potential for future regional connectivity.

The proposed trails shown on the "Land Use Map" and "Constraints" maps are generally supported by the County and could provide future trail opportunities to the north for connectivity to the unincorporated Community of Valley Center's Trails Plan, Hellhole Canyon Preserve to the northeast and Bottle Peak Preserve to northwest. To the south, the proposed trails for the Project could provide future trail opportunities for connectivity to the Coast to Crest Regional Trail, the unincorporated Community of Ramona's Trails Plan and the Ramona Grasslands Preserve.

In order for the proposed project trails to successfully provide connectivity to adjoining regional trails the County recommends the following:

- The project trails be open and available to the general public;
- Dedicate improved trails to a public agency as trail easements;
- Designate trails as non-motorized multi-use (hiking, horseback riding, mountain biking).

WATERSHED PROTECTION

Chapter III, Section E.4 ("Drainage System") of the Specific Plan references 2013 MS4 Permit Order No. "R9-2013-001". This should be revised to "R9-2013-0001." Additionally, the 2013

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MS4 Permit (Order No. R9-2013-0001, NPDES No. CAS010266) has been amended by Order No. R9-2015-0001 in February 2015.

This project may generate offsite impacts to County lands with respect to storm water quality. Please ensure the environmental analysis discusses how this project will be in conformance with the State of California Construction General Permit, County of San Diego's Grading Ordinance and Watershed Protection Ordinance.

The certification statement on the cover page of the Safari Highlands Ranch Water Quality Technical Report (WQTR), dated January 26, 2014, references "Order R9-2010-0001". The Safari Highlands Ranch Specific Plan indicates that the WQTR is to meet the requirements of the 2013 MS4 Permit (Order No. R9-2013-0001). Please update the certification statement to reference the appropriate Permit Order No.

The proposed biofiltration BMPs may be adequate to meet the requirements of the 2013 MS4 Permit (Order No. R9-2013-0001); however, the project-specific WQTR (or soon to be called "Storm Water Quality Management Plan") must assess the feasibility/practicability of harvest and use BMPs and infiltration BMPs before the biofiltration BMPs could be considered acceptable. In order to comply with the 2013 MS4 Permit requirements, the WQTR will need to be updated consistent with the Model BMP Design Manual, dated June 2015.

In the WQTR, it appears that not all of the DMA's and biofiltration BMP areas are labeled on the DMA exhibits. Also, it is not clear if the water quality calculations for the biofiltration BMPs have considered the minimum required surface area of 3% pursuant to the Model BMP Design Manual.

The Project proposes various off-site street improvements. Please ensure that the storm water quality requirements for those off-site street improvements are also addressed appropriately in the WQTR to comply with the 2013 MS4 Permit and BMP Design Manual.

PUBLIC HEALTH

The County of San Diego Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The EIR needs to address potential impacts arising from possible mosquito breeding sources created by the project including but not limited to the design and maintenance of storm water systems, retention and detention structures (such as: catch basins, storm water treatment units, and bio-swales/ filters), water tanks and water distribution systems, construction related depressions such as those created by grading activities and wheel ruts as well as fountains, ornamental water features planters/tree pits and landscaping. Any location that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development.

For your reference, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at www.sandiegocounty.gov/dplu/docs/Vector_Guidelines.pdf and

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the California Department of Public Health Best Management Practices for Mosquito Control in California is available at <http://www.cdph.ca.gov/HealthInfo/discond/Documents/BMPforMosquitoControl07-12.pdf> .

BIOLOGY/MSCP

The proposed Project area is within both the County's approved South County MSCP and the Draft North County MSCP. The County understands the City of Escondido's conservation plan has yet to be finalized and adopted. Based on the description in the NOP, the Project proposes to reassign permits for habitat loss between jurisdictions, and would use the County of San Diego's MSCP. The EIR must clearly explain how permit reassignment from an approved plan to a jurisdiction without an approved plan would occur. Moreover, the EIR must analyze how the proposed reassignment would affect the County's approved South County MSCP and the Draft North County MSCP. The County will need to discuss this proposal with the City. Additionally, the biological impacts (loss of habitat) of the proposed Project must be analyzed and effective mitigation identified, regardless of permitting process.

The County appreciates the opportunity to participate in the environmental review process for this project and the City's Sphere of Influence update. We look forward to providing additional assistance at your request. If you have any questions regarding these comments, please contact Eric Lardy, Planning Manager, at (858) 694- 3052, or via email at eric.lardy@sdcounty.ca.gov

Sincerely,



Joe Farace, AICP
Planning Manager
Advance Planning Division

e-mail cc:

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