

October 12, 2015

John Helmer, Planning Consultant
City of Escondido Planning Division
201 North Broadway
Escondido, CA 92025-4671

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for the Safari Highlands Ranch Development Project (SUB 15-0019; ENV 15-0009)

Mr. Helmer:

Thank you for providing the San Diego Local Agency Formation Commission (LAFCO) an opportunity to provide comments on the above referenced project. LAFCO is empowered by the California State Legislature with discretionary authority over proposed changes to local government organization, extension of municipal services, and any associated sphere of influence actions (California Government Code § 56000, et seq.).

LAFCO is directed to exercise its discretionary authority in a manner that encourages orderly development and growth while fulfilling many regional priorities, such as accommodating additional growth within, or through the expansion of local agency boundaries. LAFCO is also required to consider the impact that proposed jurisdictional changes may have on providing necessary governmental services and housing for persons of all incomes.

Therefore, we offer the following comments:

- The proposed 550-unit single-family residential development project known as "Safari Highlands Ranch" (APNs 240-270-33; 242-010-02; -36; -37, -38; and, 241-060-03; totaling approximately 1,098.0 acres) is contiguous to the City's incorporated boundary but is not located within the City of Escondido's adopted sphere of influence.
- Annexation of the proposed Safari Highlands Ranch development to the City of Escondido would require the proposal area to be located within the City's adopted sphere of influence; therefore, a comprehensive review of the City's sphere would be required to evaluate the potential inclusion of the Safari Highlands Ranch project area. As part of the comprehensive review of the City's sphere, a municipal service review is required to be conducted of the City of Escondido's provision of municipal services. The Environmental Impact Report for the Safari Highlands Ranch should include discussions and evaluations regarding

the comprehensive sphere review and municipal service review for the City of Escondido.

- Annexation of the proposed Safari Highlands Ranch development to the City of Escondido would involve the following additional jurisdictional changes: inclusion of the project area within the City of Escondido sphere of influence; and, a detachment of the proposal area from County Service Area (CSA) No. 135 (Regional Communications) that would include a concurrent divestiture (exclusion) of the proposal area from the latent structural fire protection/emergency medical service area of County Service Area (CSA) No. 135 (Structural Fire/EMS).
- Because the proposed annexation would involve more than one jurisdictional change, the proposal is considered a “reorganization” to the City of Escondido.
- As the proposed development requires LAFCO discretionary approvals, the San Diego LAFCO would be a responsible agency for the project’s environmental review under the California Environmental Quality Act (CEQA).
- As a responsible agency, LAFCO typically utilizes the lead agency’s CEQA documentation; therefore, it is important for the lead agency’s environmental documents to be germane to the statutory responsibilities of LAFCO. The proposal’s associated environmental documents should contain, at a minimum: a discussion of the required jurisdictional changes; a discussion of the proposed provision of public services (fire, police, sewer, water, etc.) to the subject territory; a description of the ability of existing agencies to provide services; and a detailed description of existing and proposed infrastructure, including sewer treatment and disposal capacities, water supplies, and emergency service response times.
- The proposed residential development area contains open space uses. Accordingly, the project’s environmental review should include discussions regarding the proposal’s conformance with San Diego LAFCO Policy L-101 (Preservation of Open Space and Agricultural Lands). Policy L-101 is attached for review.
- Government Code Section 56375 (a)(8)(A) requires city annexations of 10 acres or greater to be reviewed for the existence of disadvantaged unincorporated communities (DUC) that are contiguous to the proposal area. The Environmental Impact Report for the Safari Highlands Ranch should discuss and evaluate any existing contiguous disadvantaged unincorporated communities.

Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (858) 614-7788.

Sincerely,

ROBERT BARRY, AICP
Local Governmental Analyst