

# Notice of Preparation September 11, 2015

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CITY OF ESCONDIDO  
 PLANNING DIVISION  
 201 NORTH BROADWAY  
 ESCONDIDO, CA 92025-2798  
 (760) 839-4671

**NOTICE OF PREPARATION**  
**NOTICE OF PUBLIC SCOPING MEETING**  
**Safari Highlands Ranch**

Date: September 11, 2015

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| <b>To: State Agencies</b><br><b>Responsible Agencies</b><br><b>Local and Public Agencies</b><br><b>Trustee Agencies</b><br><b>Interested Parties</b> | <b>From: Jay Petrek</b><br><b>Assistant Planning Director</b><br><b>City of Escondido</b><br><b>201 N. Broadway</b><br><b>Escondido, CA 92025</b> |
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**Subject: Notice of Preparation/Notice of Public Scoping Meeting**  
**Safari Highlands Ranch, City Case #: SUB 15-0019, ENV 15-0009**

The City of Escondido will be the Lead Agency for the preparation of an Environmental Impact Report (EIR) for the Safari Highlands Ranch project (proposed project). We need to know the views of your agency (and the views of other interested parties) as to the scope and content of the environmental information germane to your agency's statutory responsibilities in connection with the proposed project if your agency will need to use the EIR prepared by our agency when considering your permit or other approvals associated with the proposed project.

The proposed project description, location and the scope of the EIR are contained in the attached materials. Because an EIR will be prepared, the City is not required to complete an Initial Study.

The City will also conduct a **public scoping meeting on Thursday, September 24, 2015, at 3:00 p.m. in the Mitchell Room, Escondido City Hall, 201 North Broadway, Escondido.** Your agency and the public are invited to attend. The purpose of this scoping meeting is to further define the issues, feasible alternatives and potential mitigation measures that may warrant in-depth analysis in the EIR.

Please send your response no later than **5:00 p.m. Monday, October 12, 2015 to John Helmer, Planning Consultant, City of Escondido Planning Division**, at the address shown above. We will need the name and contact information for the representative in your agency. Written comments may also be submitted via e-mail to [safarihighlands@escondido.org](mailto:safarihighlands@escondido.org). Additional information about the proposed project may be obtained on the city's website at: <http://www.escondido.org/safari-highlands-ranch-specific-plan.aspx>

**Project Title:** Safari Highlands Ranch  
**Project Applicant:** Safari Highlands Ranch, LLC  
**Project Location:** 23360 Old Wagon Road, Escondido, San Diego County, California

Signature:  \_\_\_\_\_

Jay Petrek, Assistant Planning Director  
 City of Escondido Planning Division

## **NOTICE OF PREPARATION-Safari Highlands Ranch**

DATE: **September 11, 2015**

COMMENTS DUE: **October 12, 2015**

### **SAFARI HIGHLANDS RANCH (Case No: SUB 15-0019 and ENV 15-0009)**

The City of Escondido will be the Lead Agency for the preparation of an Environmental Impact Report (EIR), as defined in Section 15161 of the CEQA Guidelines for the proposed Safari Highlands Ranch (proposed project). The Safari Highlands Ranch (SHR) is located at 23360 Old Wagon Road, Escondido, San Diego County, California. The proposed project is located on 1,098 acres of vacant land east of Rancho San Pasqual, northeast of the Rancho Vistamonte Community and just north of the San Diego Zoo Safari Park in unincorporated San Diego County. The project site is within the City's General Plan Specific Plan Area (SPA) #4. See Figure 1.

The project proposes to build 550 single family residential units along with new public and private parks and open space, a new City fire station, a community center, and on-site sewage treatment plant and a system of new private and public streets. A complete description of the proposed project starts on the following page. Figure 2 is an illustrative site plan of the proposed project.

Since the City has determined that an EIR will be prepared, an Initial Study is not required and has not been prepared (Section 15063 of the CEQA Guidelines). The EIR will consider all potential environmental effects of the proposed project to determine the level of significance of the environmental effect, and will analyze the potential effects to the detail necessary to make appropriate determinations on significance. In addition, the EIR may consider those environmental issues which are raised by responsible agencies, trustee agencies, and members of the public or related agencies during the NOP process. An electronic version of this notice is posted on the City's website, along with additional project information including the Specific Plan document and technical studies, at: <http://www.escondido.org/safari-highlands-ranch-specific-plan.aspx>.

We need to know the views of your agency or organization as to the scope and content of the environmental information germane to your agency's statutory responsibilities or of interest to you in connection with the proposed project. This includes the following for responsible and trustee agencies:

1. Whether your agency will be a responsible or trustee agency.
2. List of permits or approvals required by your agency for the proposed project.
3. If your agency would like to meet with the City regarding the proposed project.
4. Significant environmental issues and reasonable alternatives and/or mitigation measure(s).

Due to the time limits mandated by state law, responses from responsible agencies, other agencies, and organizations must be sent and received by the City of Escondido not later than 30 days following the publication of this Notice of Preparation (5:00 p.m. Monday, October 12, 2015). **Comments may be sent to:**

**John Helmer**  
**Planning Consultant**  
**City of Escondido Planning Division**  
**201 N. Broadway**  
**Escondido, CA 92025**  
[safarihighlands@escondido.org](mailto:safarihighlands@escondido.org)  
**(760) 839-4543 fax: (760) 839-4313**

If response from your agency or organization is not received, we will presume that your agency or organization has no response to make. A responsible agency, trustee agency, or other public agency may request a meeting with City representatives in accordance with Section 15082(c) of the CEQA Guidelines.

### **Project Description**

The proposed project consists of the following:

1. 550 single-family residences on lots ranging from approximately 8,000 square feet to over 200,000 square feet clustered into seven neighborhoods. Average lot size range among the different neighborhoods from 16,000 square feet to 66,000 square feet.
2. A "Village Core" providing a new 2.6-acre, three bay fire station site, a five-acre public park and trails, private recreation center, small convenience retail store and community gathering areas.
3. Safari Highlands Ranch Road, a new primary access road intersecting at Rockwood Road between Old Ranch Road and Vistamonte Avenue.
4. An internal private street system with street rights of way varying from 49 feet wide with travel lanes, parking and walkways to 82 feet wide with a median, travel lanes, bike lanes and walkways.
5. Approximately 14 acres of recreational parks and trails and 784 acres of resource, wildlife corridors, open space and conservation easement areas (totaling approximately 69.6 percent of the site).
6. An on-site satellite sewage treatment facility (also referred to as a water factory) providing reclaimed water consistent with Title 22 requirements for a portion of the project's common landscaped and open areas irrigation. Remaining solids would be discharged into the City sewer system via a new connection in Rockwood Road.
7. Water utilities would include connection to the City of Escondido water system, pumps to boost water to an on-site 80 foot diameter water tank, and an internal water distribution system that would use both pumps, reducing stations, and gravity feed.

8. A stormwater system that includes hydro-modification management practices including the use of biofilters and the use of both retention and detention basins.
9. A multi-modal transportation system that emphasizes the integration of vehicular, bicycle and pedestrian traffic throughout the project.
10. Various off-site improvements including the following:
  - Reconstruction and improvements to Rockwood Road's intersection with the proposed SHR Road;
  - Improvements along Rockwood Road between Cloverdale Road and San Pasqual Union School to enhance the school's student pick up and drop off locations;
  - Intersection of Rockwood Road/Cloverdale Road. Install traffic signal and restripe westbound approach to provide one left-turn and one shared left-turn lane. Restripe southbound Cloverdale Road to provide an additional receiving lane from Rockwood Road left turning movements;
  - Restripe Rockwood Road between Cloverdale and San Pasqual Union School to provide additional westbound lane;
  - Intersection of San Pasqual Valley Road (SR 78)/Citrus Avenue. Install new signal and restripe southbound approach to provide one left hand and one right hand turn lane;
  - Intersection of San Pasqual Valley Road (SR 78)/Cloverdale Road San Pasqual Road. Widen eastbound approach of San Pasqual Valley road to provide dual left-turn lanes. Widen northbound section of Cloverdale Road north of the intersection to provide approximate 650 foot long plus a 150-foot transition lane;
  - Segment of Felicita Road/17<sup>th</sup> Avenue from Escondido Boulevard to San Pasqual Valley Road (SR 78). Stripe a new eastbound turn pocket at Lendee Drive and extend the two-way left turn lane eastward to the City of Escondido/San Diego County boundary;
  - Two gated emergency access roads: a 2.4 mile road to the northwest connecting to Stonebridge Road and a one mile road to the south connecting to Zoo Road;
  - 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;
  - Improvements to the Eagle Crest Golf Course including replacing the existing temporary clubhouse with a new 4,000 square foot permanent clubhouse with restaurant, reconstruction of hole #14, extension of SHR Road and miscellaneous other golf course improvements (all by separate permit).

Seven phases of development are proposed, corresponding to the seven neighborhoods being created. Public facilities and services and phase development would be coordinated so that services are available and ready to serve the residences as need arises.

## **Project Entitlements/Approvals**

The proposed Project consists of the following entitlements and agency approvals, which would be processed concurrently unless noted:

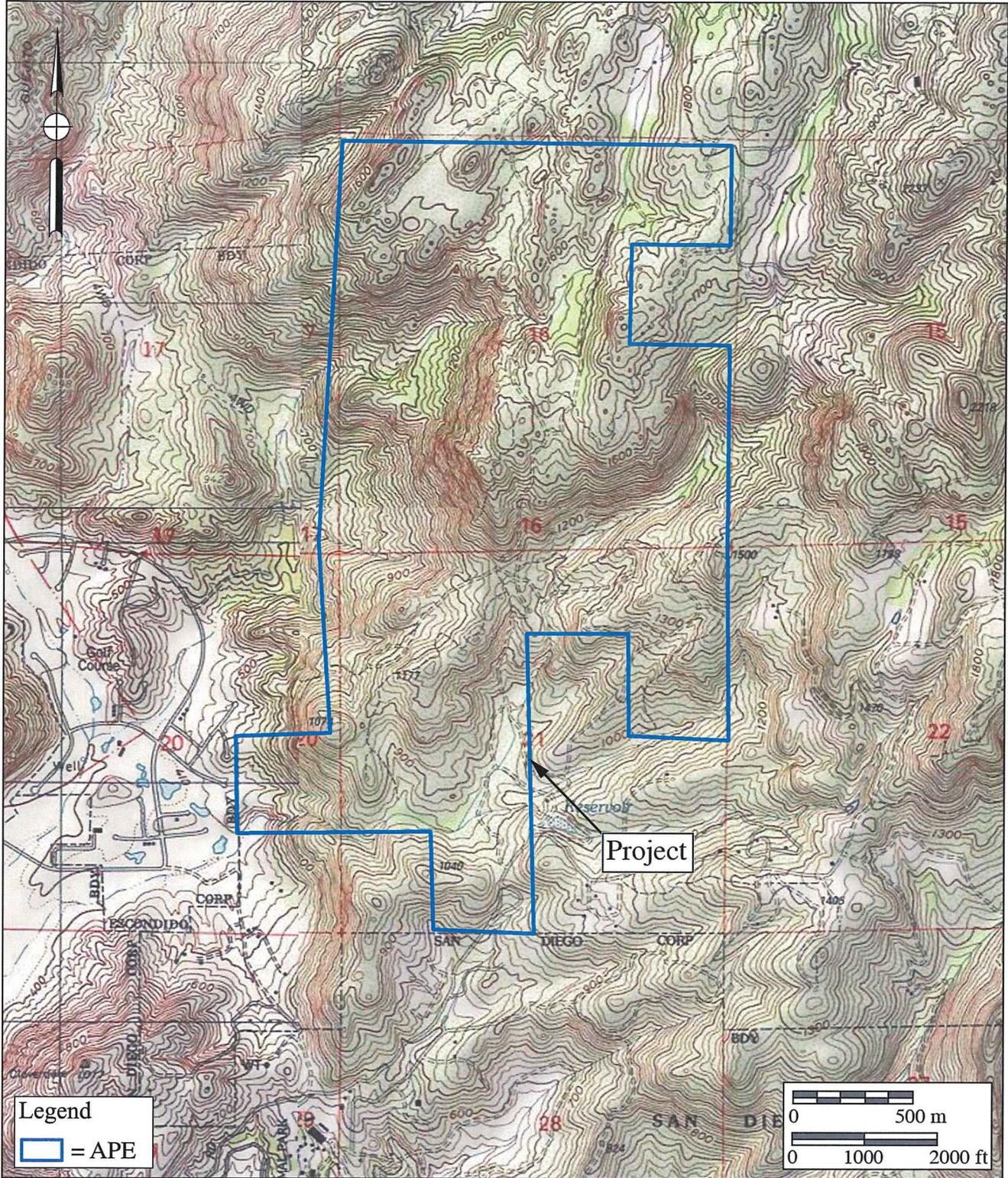
1. Update of the City of Escondido's Sphere of Influence (SOI) to include SHR (SPA #4) as well as other properties as determined by the City to be appropriate to be included as part of a larger SOI update and municipal services review (LAFCO);
2. A Development Agreement to allow residential lots of less than one acre in size and to authorize an increase in the General Plan "maximum theoretical yield" of 284 dwelling units . The applicants request to add an additional 266 dwelling units totaling 550 dwelling units. This increase in density would be in exchange for on-site and/or off site community benefits above and beyond the project's impacts as permitted in the General Plan. This request is within the maximum permissible density allowable for the site pursuant to SPA #4.
3. Adoption of a Specific Plan Text and Map providing development and design standards for the SHR site involving 550 units and other proposed features, community benefits and amenities (i.e. trails, recreational, fire station, landscaping, public park, open space, and small neighborhood-serving commercial);
4. Tentative Subdivision Map creating a total of 591 lots consisting of: 550 residential lots; 13 open space lots; 15 Home Owners' Association lots; eight (8) private street lots; two (2) public facilities lots; one (1) fire station lot; one (1) public park lot; and one (1) private park lot.
5. Amendment to the Escondido General Plan Circulation Element map to add Safari Highlands Ranch Road as a new Local Collector with a Specific Alignment Plan for deviations to horizontal and vertical angles and inclinations and designating other proposed primary and emergency access route(s) accessing the site;
6. Amendment to General Plan SPA #3 map (Rancho San Pasqual) to designate Safari Highlands Ranch Road (as described in #5 above) through the Eagle Crest Golf Course fairway between Old Ranch Road and Vistamonte Avenue in the southern portion of SPA #3 in an alignment currently designated as "Emergency Access Road".
7. Pre-zoning of the SHR property to the category of Specific Plan (S-P) Zone, consistent with the City's General Plan SPA designation;
8. Pre-zoning of the other properties annexed into the City consistent with the underlying General Plan designations.
9. Annexation of the SHR property and the Beacon-Sun Ranch (underlying property for Emergency Access route to the North) into the City of Escondido corporate limits and into the City's membership of the Metropolitan Water District. Other properties considered in the SOI update may be included in a larger annexation, but such annexations are not a precondition of the SHR project. (LAFCO);
10. Detachment from the County Communications District (LAFCO);

11. Detachment from CSA No.113, San Pasqual Fire Protection District (LAFCO);
12. Optional detachment of a portion of the Specific Plan from the Valley Center-Pauma Unified School District and subsequently reorganize into the San Pasqual Union School District and the Escondido Union High School District.
13. Requests for multiple grading exemptions: 118 interior lot grading-exempted cut slopes ranging up to 106 feet at 1.5:1 inclination and 220 interior grading exempted fill slopes ranging up to 135 feet at 2:1 inclination.
14. Standard Urban Storm Water Mitigation Plan
15. Certification of a Final Environmental Impact Report
16. The project also seeks associated permits and agreements from agencies including:
  - Agreements with San Diego County and both the US and California Departments of Fish and Wildlife to reassign the Multiple Species Conservation Plan (MSCP), previously approved for the southern approximately one-half area of SPA #4, from San Diego County to the City of Escondido and to reassign permits for project related habitat loss.
  - Adoption of a habitat plan management plan for northern portion of project site located outside of adopted MSCP area.
  - Water quality permits from the Army Corps of Engineers and the Regional Water Quality Control Board.
  - Other responsible or trustee permits/approvals as identified through the NOP process.

Completion of SOI update and annexations/detachments (items #1, 9, 10 and 11 above) would take place through the San Diego Local Agency Formation Commission (LAFCO) after EIR certification and conditional Project approval by the City Council. LAFCO approval of SOI update and annexations/detachments are necessary for project development to proceed.

### **Issues to be Addressed in the EIR**

The EIR will address issues related to aesthetics, air quality, biology, cultural/historical resources, greenhouse gases, hazards and hazardous materials, hydrology and water quality, planning/land use, geologic/mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities. If analysis is completed and it is determined that an issue would have a less than significant impact, it may be included in a less than significant section with analysis supporting that conclusion.



**Figure 1**

**Project Location Map**

The Safari Highlands Ranch Project

USGS *San Pasqual, Rodriguez Mountain, Escondido, and Valley Center* Quadrangles (7.5-minute series)





**LEGEND**  
See Figure 1-1B for Enlarged Legend

- NEIGHBORHOOD AREAS**
- Neighborhood R-1 Lots
  - Neighborhood R-2 Lots
  - Neighborhood R-3 Lots
  - Neighborhood R-4 Lots
  - Neighborhood R-5 Lots
  - Estate Residential E-1
  - Estate Residential E-2
- LANDSCAPE ELEMENTS**
- Preserved, Native Open Space - With existing tree stands and natural drainage ways.
  - Open Space Transition and Brush Management Avenue - Details of naturalized and fire resistant plant material that blends with the native landscape.
  - Detention Basin/ Detention Basin Landscapes - Revealing plant material and basin appropriate grass/hard material.
  - Orchard Tree Groves - Small stands of tree communities from trees.
  - Interior Managed Slope Landscapes - Informal evergreen and deciduous trees and shrubs, flowering shrubs, and appropriate views and provide privacy.
  - Village Promenade Landscapes - Characterized by informal drifts of Oaks and Sycamores. Trees with trunk spiral form and a meandering, multi-use trail.
  - Neighborhood Intersect Street "Tropes" - formal street trees with square spaces for each neighborhood. See street tree framework diagram.
- RECREATION ELEMENTS**
- Neighborhood Park and/or Trailhead Park - Informal passive spaces ringing the perimeter of the neighborhoods to make use of views and the trail network.
  - Private Recreation Facility - 2 acre private facility featuring swimming, club houses, play and other amenities.
  - Public Community Park - 5 acre park featuring a community market, play and fitness areas, amphitheater, the promenade space, open air, city creek feature etc. incorporating the community.
  - Open Space Trail Network - extensive network of open space trails.
  - View Point - Feature areas within the trail network that make use of expansive views. Including scenic overlooks, trees and seating elements.
- ENTRY ELEMENTS**
- Major Community Entry - Characterized by an iconic tower and landscaped plaza. The landscape will consist of the pool cover and formal landscaped plaza including granite, stone, spiral form and other rustic elements.
  - Gated Community Entry - Featuring a Guard house, enhanced specimen trees and natural borders, grasses, signage and a rustic trellis.
  - Neighborhood Entry - Individualized and understated entry areas featuring on-site borders with signage, specimen trees and enhanced planting.
- OTHER AMENITIES**
- Fire Station - 1 unique community fire station.
  - Waste Water Treatment Facility - will produce reclaimed irrigation water for the community.

Illustrative Site Plan

Figure 2

# Public Scoping Meeting Notice September 2015

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CITY OF ESCONDIDO  
 PLANNING DIVISION  
 201 NORTH BROADWAY  
 ESCONDIDO, CA 92025-2798  
 (760) 839-4671

## NOTICE OF PUBLIC SCOPING MEETING

Safari Highlands Ranch  
**Thursday, September 24, 2015**  
**3:00 – 4:00 p.m.**  
**Mitchell Room**  
 Escondido City Hall

**Meeting Purposes:** This notice is to inform you and all those interested that a scoping meeting will be held for the project described below. The purpose of this meeting is to discuss the proposed project and to solicit input regarding environmental issues to be addressed in the Environmental Impact Report (EIR), in accordance with CEQA Section 21083.9. This meeting is primarily scheduled for the convenience of other public agencies although it is open to the public. Notification of evening time neighborhood meetings will be scheduled and advertised at a future date. City staff will host the meeting and a City consultant will provide an overview of the proposed project. After presenting information, staff and the consultant will be available to answer any questions and receive any comments. The meeting will be informational only and no decisions about the project will be made.

**Project Title:** Safari Highlands Ranch Environmental Impact Report (ENV 15-0009).

**Project Location:** The Safari Highlands Ranch (SHR) is located at 23360 Old Wagon Road, Escondido, San Diego County, California. The proposed project is located on 1,098 acres of vacant land east of Rancho San Pasqual, northeast of the Rancho Vistamonte Community and just north of the San Diego Zoo Safari Park in unincorporated San Diego County.

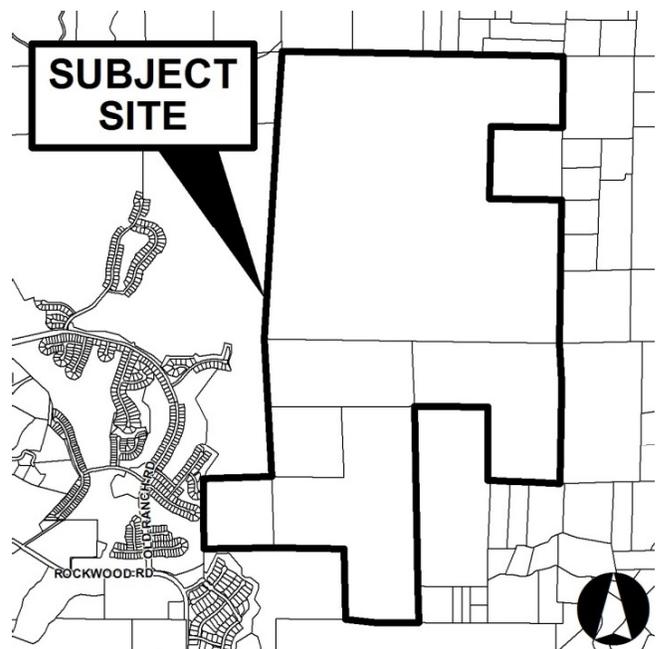
**Project Description:** The project proposes to amend the City's Sphere of Influence and annex approximately 1,100 acres order to construct 550 single family residential units along with new public and private parks and open space, a new City fire station, a community center, and on-site sewage treatment plant and a system of new private and public streets. A complete description of the proposed project, additional project information and technical studies are available at: <http://www.escondido.org/safari-highlands-ranch-specific-plan.aspx>.

**Project Applicant:** Safari Highlands Ranch, LLC

The City of Escondido recognizes its obligation to provide equal access to public services for individuals with disabilities. Please contact the American Disabilities Act (A.D.A.) coordinator (760) 839-4643 with any requests for reasonable accommodations at least 24 hours prior to the meeting. The City of Escondido does not discriminate against persons with handicapped status.

All interested persons are invited to attend. For further information, please call **John Helmer at (760) 839-4543** or email at [safarihighlands@escondido.org](mailto:safarihighlands@escondido.org).

JAY PETREK, AICP  
 Assistant Planning Director  
 City of Escondido



Dated: September 10, 2015

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# Public Comments Received September 2015 Scoping Meeting

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## **AGENCY/PUBLIC SCOPING MEETING**

### **SAFARI HIGHLANDS RANCH**

**Thursday September 24, 2015**

#### **SYNOPSIS OF COMMENTS AND QUESTIONS**

##### **TRAFFIC**

- Analyze Traffic on Rockwood Road in front of school
- Describe nature of proposed improvements on San Pasqual Valley Road. Will it be widened?
- Describe in better detail than that contained in the Traffic Report all proposed road and intersection improvements.
- Analyze traffic impacts to San Pasqual Road and Old Milky Way
- Analyze traffic impacts near the High School
- Analyze traffic impacts to San Pasqual Valley Road and Citrus
- Analyze traffic impacts to San Pasqual Valley Road and Cloverdale
- Do impacts from San Pasqual Valley Road impact adjacent Agricultural Preserves?
- Analyze traffic impacts to Felicita and Center City Parkway
- Ensure that all traffic counts are accurate, current and reflect typical driving day when school is in session.
- There is a concern about steep grades of access roads. Will these roads be accessible to bicycles and emergency vehicles?
- How will improvements to San Pasqual School affect school parking?
- Analyze safety of increased traffic on the school.
- How will increased enrollment affect school parking?
- Analysis should consult Office of Traffic Safety accident data and ratings and evaluate increased accidents.
- How effective would the two emergency access routes be?
- What is the effect of area wide emergency evacuation?
- Would the development use the emergency access roads? How much?
- If Level of Service (LOS) is no longer used as the measurement for significant impact, then what measurement is used to determine a significant impact in the EIR?

##### **LAND USE/PLANNING**

- Is project consistent with Smart Growth Plan?
- Analysis should include consistency with all applicable land use plans and policies in Escondido and affected City and County of San Diego areas.

- How does this project affect growth inducement?
- Will the full range of public services be adequate and how will they be impacted?
- How will the need for increased public services be paid for?
- Will project related increase in school attendance require new school buildings or school facilities?
- Will this project require an update to the Water Master Plan?
- What is the full range of community benefits?
- How will the community benefits be evaluated and weighed against project impacts?
- Does the project related sewage and drainage affect City of San Diego Basin Plan?
- The Escondido Public Utilities Dept. was worried about the nature of the effluent (solids/sludge) that is delivered into the City sewer system
- Is the EIR going to contemplate state wide water restrictions?

#### NOISE

- What is the noise level of the sewage treatment plant? Will the noise echo throughout the Valley?
- What will be the construction related noise?

#### AESTHETICS/VISUAL IMPACTS

- Analyze lighting impact as viewed from Palomar Mountain/ dark skies impact
- Analyze visual impacts of grading, new roads and retaining walls.
- Analyze impacts of ridgeline development
- Provide visual simulations as viewed from Cloverdale Road/Highway 78 and San Pasqual Valley Road

#### CULTURAL RESOURCES

- Have all affected tribes been consulted and notified?

#### FIRE STATION

- Will the fire station be built first? If not, at what time will the fire station be built and operational?
- Who will pay to provide equipment and personnel for the new station?
- There is concern about the impact on fire protection and fire response time.

#### AIR QUALITY

- EIR should analyze both construction and long term operational air quality impacts

# Public Scoping Meeting Notice October 2015

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CITY OF ESCONDIDO  
 PLANNING DIVISION  
 201 NORTH BROADWAY  
 ESCONDIDO, CA 92025-2798  
 (760) 839-4671

## NOTICE OF PUBLIC SCOPING MEETING #2

Safari Highlands Ranch  
**Monday, October 5, 2015**  
**6:00 – 7:30 p.m.**  
**Mitchell Room**  
 Escondido City Hall

**Meeting Purposes:** This notice is to inform you and all those interested that a second scoping meeting will be held for the project described below. The purpose of this meeting is to discuss the proposed project and to solicit input regarding environmental issues to be addressed in the Environmental Impact Report (EIR), in accordance with CEQA Section 21083.9. This meeting will be the second public scoping meeting and has been primarily scheduled for the convenience of the public. City staff will host the meeting and a City consultant will provide an overview of the proposed project. After presenting information, staff and the consultant will be available to answer any questions and receive any comments. The meeting will be informational only and no decisions about the project will be made.

**Project Title:** Safari Highlands Ranch Environmental Impact Report (ENV 15-0009).

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**Project Description:** The project proposes to amend the City's Sphere of Influence and annex approximately 1,100 acres order to construct 550 single family residential units along with new public and private parks and open space, a new City fire station, a community center, and on-site sewage treatment plant and a system of new private and public streets. A complete description of the proposed project, additional project information and technical studies are available at: <http://www.escondido.org/safari-highlands-ranch-specific-plan.aspx>.

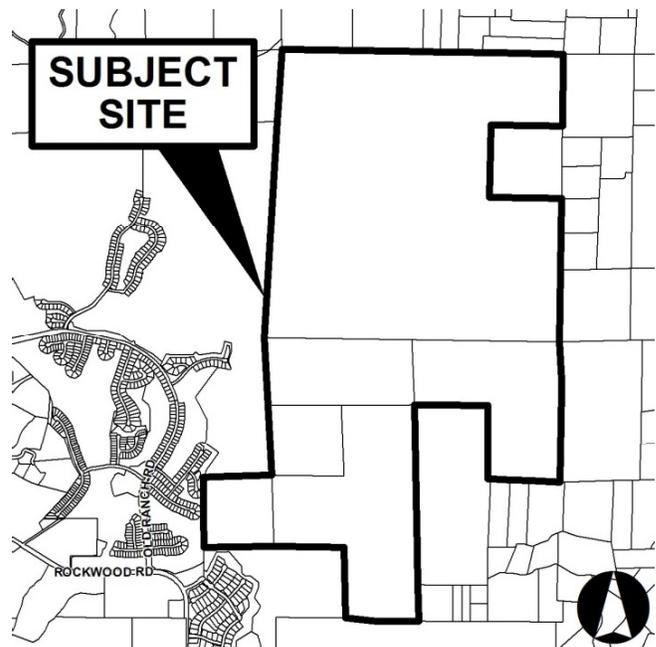
**Project Applicant:** Safari Highlands Ranch, LLC

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All interested persons are invited to attend. For further information, please call **John Helmer** at (760) 839-4543 or email at [safarihighlands@escondido.org](mailto:safarihighlands@escondido.org).

JAY PETREK  
 Assistant Planning Director  
 City of Escondido

Dated: September 23, 2015



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# Public Comments Received October 2015 Scoping Meeting

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## **AGENCY/PUBLIC SCOPING MEETING #2**

### **SAFARI HIGHLANDS RANCH**

**Monday October 5, 2015**

#### **SYNOPSIS OF COMMENTS AND QUESTIONS**

##### **TRAFFIC**

- Concerned about traffic in front of San Pasqual Valley Union Elementary School
- Will the Rockwood bike lane stay in place so the kids can ride to school?
- Concerned about changes to the school drop off areas and changes to the rural community character
- Concerned about the elimination of parking on Rockwood Road due to proposed improvements.
- How will SHR Road be noise mitigated for sound attenuation?
- How are the additional students and parents accommodated at the school?
- Concerned about the school's already full parking lot and increased enrollment and demand for parking.
- EIR should study impacts to San Pasqual Road.
- EIR should analyze traffic during both school time and work time peak hours
- Will additional trips to project area (service calls, landscaping, maintenance, deliveries, etc.) be considered in analysis?
- Escondido is the #1 most dangerous city for traffic accidents per the Office of Safety & Traffic. Traffic safety should be analyzed.
- Concerned about construction traffic

##### **SEWAGE TREATMENT/WATER FACTORY**

- Analyze the impacts of concentrated solids going to City sewage treatment plant
- Is the effluent toxic; will the kids at school be exposed?
- Concerned about odors and night time views
- Why is on-site plant proposed at all?
- Concerned about impact of proximity to the plant to existing homes.
- Concern about how SHR sewer connection might join the main line and push sewage back up the pipe toward RVM (i.e. will there be backflow devices to prevent backflow).
- Why is the water factory located at the bottom of the project?

##### **CONSTRUCTION**

- What are the short-term and long-term construction impacts?
- How long will construction last?

- What are the impacts of construction staging? Where will it take place?
- Is there a higher risk of fire from construction activity?
- What are the construction related noise impacts to homes and to the roadways?
- What are the construction related dust impacts on nearby solar panels?
- Will portable restrooms or other staging needs be required for landscapers?

#### EMERGENCY ACCESS ROADS/FIRE HAZARDS

- What are the emergency evacuation times for these two roads?
- Prepare evacuation plans
- How many homes will have access to the emergency roads?
- How many existing homes currently use the proposed emergency access roads?
- How will access be achieved through the emergency road locked gates?
- Project will need a full fire hazard analysis
- What is the burn history of the area?
- What is the potential for fires in the area?
- What is the degree of fire hazard in the area?

#### MISCELLANEOUS/OTHER COMMENTS

- Will USPS deliver mail to the site?
- Concern about sound echoing off the canyon
- Ensure that there is an accurate survey. Existing survey markers are inaccurate.
- Project will need a full fiscal impact analysis
- Long-term project phasing should be considered in fiscal impact.
- What is project's impact on well water and the integrity of wells?
- How will adjacent properties to the north be protected from trespassers?
- There should be a full analysis of impacts to the habitat, species and all other biological impacts.
- Will the San Diego Zoo Safari Park be consulted with and will they be involved in the project's decision?
- Will there be an impact to the animals at the Zoo Safari Park?
- Can only portions of the project be approved and if so, would it still go forward?
- Can the project proceed if LAFCO does not approve annexation?
- Will there be a fiscal impact analysis done to see if the fire station can be funded, equipped and maintained?
- Can a future developer change or amend the project?

# Public Agency Comments Received During Public Notice Period

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# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



In Reply Refer To:  
FWS-16B0010-16CPA0003

OCT 09 2015

Mr. Jay Petrek  
Assistant Planning Director  
City of Escondido  
Planning Division  
201 North Broadway  
Escondido, California 92025

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Safari Highlands Ranch (City Case # SUB 15-0019, ENV 15-0009), City of Escondido, County of San Diego, California

Dear Mr. Petrek:

The U.S. Fish and Wildlife Service (Service) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR), dated September 11, 2015. The comments provided herein are based upon information provided in the NOP and associated reference materials, our knowledge of sensitive and declining vegetation communities, and ongoing regional habitat conservation planning in the County of San Diego (County).

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. As such, the Service is responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*).

The 1,100-acre project site is located along the southeastern boundary of the City of Escondido within the unincorporated area of the County. The southern half of the project site is within the County's approved Multiple Species Conservation Program Subarea Plan (Subarea Plan) and the northern half of the project site is within the County's draft North County Multiple Species Conservation Program (NCMSCP). The proposed project is located within the Pre-approved Mitigation Area (PAMA) of the Subarea Plan and the draft NCMSCP. In both the Subarea Plan and the draft NCMSCP, the PAMA is the area targeted to assemble a regional preserve. The entire project site is proposed to be annexed into the City of Escondido.

On March 17, 1998, the Service issued a section 10(a)(1)(B) permit pursuant to the Act for the Subarea Plan. The Subarea Plan is a comprehensive, long-term habitat conservation planning program that addresses the needs of multiple species and the preservation of natural vegetation communities within the southwestern subregion of the County. The MSCP also addresses the loss of covered species and their habitats due to the direct, indirect, and cumulative impacts

associated with land development. The Subarea Plan and its associated Implementing Agreement and section 10(a)(1)(B) permit are the means by which the County has obligated to assemble a regional preserve and to mitigate for impacts to covered species and their habitats.

In addition, the County, Service, and the California Department of Fish and Wildlife entered into a planning agreement (Agreement; revised and amended 2014) for development of the NCMSCP to address regional conservation needs and future planned development in north San Diego County. The Agreement includes an interim review process to ensure that projects do not compromise conservation goals and objectives prior to the completion of the NCMSCP.

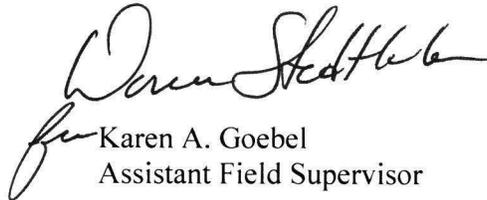
Based on our review of the NOP and the associated documents, our primary concern is that the proposed development design and the proposed annexation of lands currently within PAMA are not consistent with the planning and conservation goals of the Subarea Plan and draft NCMSCP. The County has identified a target level of conservation for lands within PAMA (both the Subarea Plan and draft NCMSCP) at 75 percent; however, the project, as proposed, would achieve only about 63 percent conservation. We acknowledge that the 75 percent conservation is an average across the preserve, where some areas will be conserved at higher levels and others at lower levels. This level of conservation is our starting point as we review each proposed project that is located within the PAMA boundaries. We then factor in other variables including the importance of the project area to identified biological core and linkage areas within the preserve and the presence of critical biological resources.

The proposed project site is located within the Hodges Reservoir-San Pasqual Valley Core Resource Area of the Subarea Plan, and the draft NCMSCP Planning Unit 8 (Daley Ranch-Lake Wohlford Core Area). The project site encompasses a large contiguous block of high quality and very high quality native habitat that currently supports the coastal California gnatcatcher (*Poliophtila californica californica*; gnatcatcher), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), and other sensitive species targeted for conservation in both the Subarea Plan and the NCMSCP. In addition, the proposed project site provides a core block of live-in habitat for the gnatcatcher that connects PAMA in the Subarea Plan to high value habitat within the draft NCMSCP PAMA. Conservation of contiguous blocks of habitat is essential because studies suggest that the gnatcatcher, in particular, is highly sensitive to the effects of habitat fragmentation and development activity (Atwood 1990; ERCE 1990 (Ogden) unpublished data). As currently designed, the proposed project would increase fragmentation of natural habitats including, but not limited to, coastal sage scrub within the Subarea Plan (i.e., Hodges Reservoir-San Pasqual Valley Core Resource Area) and the draft NCMSCP Planning Unit 8.

We recommend that the DEIR address the impacts to the Subarea Plan and draft NCMSCP preserve systems (i.e., PAMA) that would result from the proposed annexation and subsequent development of the project. The DEIR should also include an analysis of project alternatives that are consistent with the conservation goals for the PAMA (i.e., 75 percent conservation of lands designated as PAMA), and that would maintain a large block of un-fragmented habitat on site.

We appreciate the opportunity to comment on the NOP and request that we be provided a copy of the DEIR when it becomes available. If you have questions regarding our comments or would like to schedule a meeting to discuss the proposed project or potential alternatives, please contact Michelle Durflinger at 760-431-9440, extension 356.

Sincerely,



Karen A. Goebel  
Assistant Field Supervisor

cc:

Gail Sevrens, California Department of Fish and Wildlife, San Diego, CA

Mindy Fogg, County of San Diego Planning and Development Services, San Diego, CA

#### LITERATURE CITED

Atwood, J. L. 1990. Status review of the California gnatcatcher (*Polioptila californica californica*). Unpublished technical report, Manomet Bird Observatory, Manomet, Massachusetts. 79 pp.

[ERCE] ERC Environmental and Energy Services (Ogden). 1990. Phase I report, Amber Ridge California gnatcatcher study. Prepared for Weingarten, Siegel, Fletcher Group, Inc. April. 26 pp.



State of California – Natural Resources Agency  
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CHARLTON H. BONHAM, Director



October 16, 2014

Mr. John Helmer, Planning Consultant  
City of Escondido Planning Division  
201 N. Broadway  
Escondido, CA 92025  
safarihighlands@escondido.org  
jpetrek@escondido.org

**Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Safari Highlands Ranch Project, City of Escondido (Case #Sub 15-0019, ENV 15-0009SP, SCH# 2015091039), California**

Dear Mr. Helmer:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for a draft Environmental Impact Report (DEIR) for the Safari Highlands Ranch Project (SCH#2015091039) (Project) dated September 15, 2015 (City of Escondido, 2015). Comments on the NOP were requested by October 14, 2015. On October 14, 2015, Jay Petrek of the City of Escondido granted the Department an extension for the comment period. We committed to providing our comments by October 16, 2015. The Department appreciates the extension.

The comments provided herein are based upon information provided in the NOP for the DEIR and associated reference materials [including the Althouse and Meade biological survey information (Althouse and Meade, 2015)], our knowledge of sensitive and declining vegetation communities, and ongoing regional habitat conservation planning in the County of San Diego (County). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State of California's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA, Fish and Game Code §2050 et seq.) and other sections of the Fish and Game Code. The Department is also responsible for the administration of the Lake and Stream Alteration Agreement Program (Fish and Game Code §1600 et. seq.) and the Natural Community Conservation Planning (NCCP) program (NCCP, Fish and Game Code §2800 et. seq.).

The County is a participant in the NCCP program. Currently, the County has an approved South County Multiple Species Conservation Program (SC-MSCP), and is actively pursuing its draft North County Multiple Species Conservation Program (NC-MSCP) which, although not yet completed, has undergone substantial negotiation and is anticipated to seek approvals in the next one to two years. The NC-MSCP is a comprehensive habitat conservation planning program that attempts to preserve native habitats for a multitude of sensitive species for which the County, U.S. Fish and Wildlife Service (Service), and the Department entered into a Planning Agreement (County of San Diego, 2014a). The City of Escondido (City) participated in the NCCP program and prepared a draft Subarea Plan (SAP) under the Multiple Habitat

Conservation Program (MHCP) Subregional Plan that was circulated for public review in May 2001; however, it was never adopted by the City Council or submitted to the Department and the Service for permitting. The Draft Escondido MHCP Subarea Plan currently encompasses an area of approximately 24,624 acres and abuts the approved SC-MSCP preserve area and the NC-MSCP planning area within the unincorporated areas. The preserve is designed to protect important portions of sensitive vegetation communities, including 65 percent of the coastal sage scrub and 100 percent of wetlands in the Escondido subarea. The proposed Project site is located within unincorporated San Diego County within the boundaries of both the approved SC-MSCP (approximately 491 acres or 45 percent of the site) and the draft NC-MSCP (approximately 607 acres or 55 percent of the site), within the draft Pre-Approved Mitigation Area (PAMA) in a core resource area.

Specifically, the 1,098-acre Project site is located in unincorporated northern San Diego County along the southeastern boundary of the City of Escondido on vacant land just north of the San Diego Zoo Safari Park within the County's North County Metropolitan Subregional Plan. The site is located two miles north of State Route 78 (San Pasqual Valley Road) and east of Cloverdale Road and is within the City's General Plan Specific Plan Area (SPA) #4 just northeast of the Rancho Vistamonte Community. The entire 1,098 acres are currently located within the County and are proposed to be annexed into the City, subject to the Local Agency Formation Commission approval. Access to the site would be from Safari Highlands Ranch Road, a new primary access road intersecting at Rockwood Road between Old Ranch Road and Vistamonte Avenue (City of Escondido, 2015). The Project proposes to build 550 single family residential units in seven neighborhoods with new public and private parks, trails, and open space, a new City fire station, a community center, an on-site sewage treatment plant and a system of new private and public streets. The Project proposes a 753-acre resource open space preserve encompassing 68.6 percent of the site that will surround the development area. Public facilities and services would connect to the City of Escondido water system at the intersection of Safari Highlands Ranch Road and Rockwood Road. A water reclamation system is proposed on-site to extract and treat excess water in the effluent to secondary treatment standards. Two emergency access roads are proposed to be upgraded to accommodate emergency vehicles; the northern road will be approximately 2.4 miles long and will connect to Stonebridge Road leading through Beacon-Sun Ranch and the southern road would be approximately one mile long and will connect to Zoo Road (City of Escondido, 2015). Project approvals would include a local General Plan Amendment, specific plan, rezone, major use permit, tentative map and site plan. Other public agency approvals required include: a) agreements with San Diego County and both the Department and Service to reassign the Multiple Species Conservation Plan (MSCP), previously approved for the southern approximately one-half area of SPA #4, from San Diego County to the City of Escondido and to reassign permits for project-related habitat loss; and, b) adoption of a habitat plan management plan for the northern portion of project site located outside of adopted MSCP area (City of Escondido, 2015).

The Project site is largely undisturbed and encompasses important biological resources. Vegetation on the project site consists of coast live oak riparian forest, oak woodland, chaparral, and Diegan coastal sage scrub (Althouse and Meade 2015). To the west and southwest are the Ranch San Pasqual and Rancho Vistamonte developments and Eagle Crest Golf Course within the Escondido city limits, and to the south is the San Diego Safari Park within the boundaries of the City of San Diego. The northern portion of the Project site (approximately 607 acres) is also located within Planning Unit 8 (Daley Ranch-Lake Wohlford Core Area) of the NC-MSCP planning area, within the PAMA and comprises a large block or natural habitat. The habitat

Mr. John Helmer, Planning Consultant  
City of Escondido Planning Division  
October 16, 2015  
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evaluation mapping for the County's draft NC-MSCP plan indicates that habitats on and adjacent to the project site range from "low" to "moderate" and "high" quality. The southern portion of the Project site (491 acres) is located within the North-Metro PAMA segment of the County's approved SC-MSCP (County of San Diego, 1998). The mapping for the SC-MSCP shows the areas in the southerly 491 acres to consist of "moderate" and "high" to "very high" quality. The lands surrounding the Project site are also identified as conserved lands and/or PAMA with mapping indicating "moderate" and "high" to "very high" quality in both the NC-MSCP and SC-MSCP (County of San Diego 1997 and 2014b). Species known to occur on-site include the federally threatened California coastal gnatcatcher (*Polioptila californica californica*) and state species of special concern coastal cactus wren (*Campylorhynchus brunneicapillus*).

The Department offers the comments and recommendations in the enclosure to assist the City in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources, and to ensure that the Project is consistent with adopted and ongoing regional habitat conservation permits and planning in San Diego County. At this initial (*i.e.*, NOP) stage, our main concerns with the Project are the proposed annexation/removal of 1,098 acres of land with substantial biological resources from the County's adopted SC-MSCP and the in-progress NC-MSCP; ensuring the Project's consistency with the County's NC-MSCP, which calls for 75 percent conservation for natural lands designated as PAMA; minimizing impacts to coastal sage scrub; and, maintaining a viable wildlife connection through the site to off-site conserved lands and areas targeted for conserved under the County's SC-MSCP and NC-MSCP (County of San Diego 1997 and 2014b).

We appreciate the opportunity to comment on this NOP and look forward to further coordination with the City on this Project. If you have questions regarding our letter, please contact Randy Rodriguez at (858) 637-7111 or [Randy.Rodriguez@wildlife.ca.gov](mailto:Randy.Rodriguez@wildlife.ca.gov).

Sincerely,



for  
Gail K. Sevens  
Environmental Program Manager  
South Coast Region

Enclosure: (12 pages)

ec: State Clearinghouse, Sacramento  
Karen A. Goebel, U.S. Fish and Wildlife Service ([Karen\\_Goebel@fws.gov](mailto:Karen_Goebel@fws.gov))  
Mindy Fogg, County of San Diego ([Mindy.Fogg@sdcounty.ca.gov](mailto:Mindy.Fogg@sdcounty.ca.gov))  
Eric Lardy, County of San Diego ([Eric.Lardy@sdcounty.ca.gov](mailto:Eric.Lardy@sdcounty.ca.gov))

## ENCLOSURE

California Department of Fish and Wildlife Comments and Recommendations:  
NOP for the Safari Highlands Ranch Project DEIR  
(SCH#2015091039)

### **SC-MSCP and NC-MSCP**

1. The DEIR should analyze how the annexation/removal of Project lands from the County of San Diego to the City of Escondido could potentially affect the County of San Diego's existing SC-MSCP and in-progress NC-MSCP, including covered species goals and objectives, preserve design, wildlife movement, and management and monitoring requirements. The analysis for consistency with the MSCP should acknowledge that the entire conserved open space would now be moving from an active NCCP jurisdiction (County of San Diego) to a non-active NCCP jurisdiction (City of Escondido), so many of the assurances to ensure long-term viability of the conserved open space for biological purposes would not be as enforceable from the Wildlife Agencies' perspective. The DEIR should clearly demonstrate how the conserved areas on-site would be managed once annexed into the City of Escondido.

#### A. NC-MSCP and Annexations

The County, Service, and the Department entered into a planning agreement (County of San Diego, 2014a) for the NC-MSCP which includes an interim review process to ensure that projects do not compromise conservation goals and objectives prior to the completion of the plan. The County's planning agreement for the NC-MSCP (County of San Diego, 2013b) includes annexations as interim projects and provides that: "In the event land within the County's jurisdiction is annexed to another jurisdiction an agreement shall be reached between the County, annexing jurisdiction, Service and the Department as part of the annexation process to ensure that annexation would only occur when the annexation will not jeopardize the build-out of the preserve or the coverage of species within either of the Planning Areas, or compromise viable habitat linkages within the proposed preserve, and that any development of the annexed lands proceeds in accordance with the Planning Goals set out in section 3 of this Agreement and the Preliminary Conservation Goals set out in section 5 of this Agreement. The agreement shall also set forth the resulting responsibilities for ongoing maintenance and enforcement of the terms of this Agreement as they relate to the annexed land. Issuance of Take Authorizations to the annexing jurisdiction or amendment of the annexing jurisdiction's Take Authorizations, if any are already in place, may be required in order to authorize Take on the annexed land" (County of San Diego, 2014a). As part of the analysis for NC-MSCP, it is important to acknowledge that in developing the draft PAMA and habitat/species goals it was assumed that development would occur in accordance with the densities allowed under the adopted County General Plan (County of San Diego, 2014b).

The DEIR should include sufficient information and analysis to demonstrate how the project is consistent with the preliminary conservation objectives of the NC-MSCP, including the planning units goals for the Daley Ranch-Lake Wohlford Core Area (Planning Unit 8), the Planning Agreement Exhibit B guidelines for interim project and how it would meet the NCCP/4(d) findings required impacts to coastal sage scrub (which are subject to Department and Service concurrence). The analysis should also demonstrate how the proposed management and monitoring program for the Project

would meet or exceed NC-MSCP standards. Since the County and City do not have approved NCCPs for the area of the Project that falls within the NC-MSCP, authorizations for any take to state-listed species would need to be requested through CESA.

B. South County MSCP and Annexations

No. 16 under "Project Entitlements/Approvals" of the NOP (City of Escondido, 2015) states that the project seeks associated permits and agreements from agencies including:

- 1) Agreements with San Diego County and both the U.S. and California Departments of Fish and Wildlife to reassign the Multiple Species Conservation Plan (MSCP), previously approved for the southern approximately one-half area of SPA #4, from San Diego County to the City of Escondido and to reassign permits for project related habitat loss; and,
- 2) Adoption of a habitat plan management plan for the northern portion of project site located outside of adopted MSCP area.

Section 5.4.3 (Annexations) of the south San Diego County Subregional MSCP Plan (County of San Diego, 1998a) addresses annexations and anticipates that the following three categories of annexations involving local jurisdictions could occur in the future as follows: 1) Annexation of Lands Outside the MSCP Study Area into the Corporate Boundaries of Participating MSCP Jurisdictions; 2) Anticipated Annexation of Lands within the MSCP Study Area; and, 3) Annexation of Lands within the MSCP Study Area Involving MSCP Participants Where Subarea Plans and Implementing Strategies Are Not Identical. Section 9.19 of the County's implementing agreement for the SC-MSCP addresses annexations and provides that "[i]n the event land within the County's jurisdiction is annexed to another jurisdiction, an agreement shall be reached between the County, the annexing jurisdiction, USFWS, and CDFG, as part of the annexation process, to ensure that any development of the annexed lands proceeds in accordance with the conservation goals of the MSCP (and, if the annexing jurisdiction is a Participating Local Jurisdiction, the goals of the Jurisdiction's Subarea Plan) and sets forth the resulting responsibilities pursuant to the MSCP for ongoing maintenance and enforcement of the terms of this agreement and the MSCP as it relates to the annexed land" (County of San Diego, 1998b).

Please be advised that any such transfer of permits for the portion of the site located in the adopted SC-MSCP would require approval from the County and Wildlife Agencies, and likely would involve a major amendment to the County's permit. The DEIR should adequately provide the information necessary to support any required action related to amending the County's MSCP to support this Project. This information should include (but not be limited to) documenting the species found on-site based on current surveys; analyzing how removing 1,098 acres of land with biological value from the County's jurisdiction would affect the County's existing SC-MSCP and in-progress NC-MSCP in terms of conservation goals, species coverage and management/monitoring requirements; and, assessing how going from a jurisdiction with an approved NCCP for South County and Planning Agreement for the North County to a jurisdiction without an active permit or agreement would affect the long-term viability of the known species that

occur on-site and the assurances provided to the Wildlife Agencies. The DEIR and supporting biological report should provide sufficient information to allow for any amendment to the County's MSCP that may be required to implement the proposed Project; otherwise, additional environmental documentation may be required. The DEIR and supporting biological technical report should also analyze how the Project would be consistent with the approved MHCP and the City's draft MHCP Subarea Plan and the County's MSCP as part of the overall analysis of the Project's consistency with adopted and planned NCCP-HCPs.

2. As stated above, the proposed Project is located primarily within the PAMA, within the Daley Ranch-Lake Wohlford Core Area (Planning Unit 8) and is part of a larger block of natural habitat (typically 500 acres or more) that supports a viable population of multiple wildlife species in the PAMA. The draft NC-MSCP plan anticipates that approximately 75 percent of lands designated as PAMA would be conserved with 25 percent utilized for development and anticipates the following conservation goals for the Daley Ranch-Lake Wohlford Core Area (Planning Unit 8) (County of San Diego, 2014b):
  - a. Maintain sensitive habitats, such as oak woodlands, grasslands, especially those supporting Stephens' kangaroo rat or large numbers of raptors, and upland habitat on mafic soils that support sensitive plant species, such as chaparral beargrass and Parry's tetracoccus (particularly north of Lake Wohlford) to the maximum extent practicable.
  - b. Ensure that coastal California gnatcatchers are able to move through coastal sage scrub, in particular by ensuring line of sight between patches of coastal sage scrub when continuous habitat is absent.
  - c. Minimize impacts to and aim to retain the integrity and function of the upper San Dieguito Creek watershed, a high integrity watershed with little development and few roads, and a tributary to Santa Ysabel Creek.
  - d. Conserve the integrity of Santa Ysabel Creek so it continues to provide habitat and maintain water quality.
  - e. Ensure that large and medium sized mammals continue to be able to move through natural and agricultural lands between the preserved habitats at Daley Ranch and Lake Wohlford.

Based on the NOP, the current project design proposes 69 percent open space; however, the biological viability of some of these areas would be substantially reduced from the development's edge effects, fuel management areas, public access and the two emergency access roads which would fragment a larger block of habitat that is planned to connect designated preserve areas with high value habitat within the NC-MSCP PAMA, including areas currently conserved to mitigate impacts to California gnatcatchers and their habitat. Fragmentation reduces habitat quality and promotes increased levels of nest predation and brood parasitism, and ultimately, increased rates of local extinction (Wilcove 1985, Rolstad 1991, Saunders et al. 1991, Soulé et al. 1988). Connectivity among habitat reserve areas (i.e., connectivity among gnatcatcher habitat within the NC-MSCP PAMA) is essential for long-term maintenance of the viability of California gnatcatchers in this area. Maintaining connectivity among these patches of habitat serves to: (1) allow exchange of genetic

material among populations; (2) allow recolonization of habitat patches from which gnatcatchers have been extirpated; and (3) allow relatively safe travel for gnatcatchers moving from one area to another. Fragmentation of habitat within core habitat areas and the narrowing of connections among blocks of remaining habitat for gnatcatchers are expected to reduce the function and value of these areas.

The DEIR should evaluate direct and indirect impacts that the proposed development would have on the planned Daley Ranch-Lake Wohlford Core Area (Planning Unit 8) and NC-MSCP planning unit goals, and in particular consider adverse effects on wildlife movement through the site. The DEIR should analyze potential impacts to wildlife movement (including gnatcatchers, mammals and herpetofauna), loss of and fragmentation to habitat patches/blocks on-site and implications to adjoining habitat, and the narrowing of movement corridors in relation to existing conditions and topography. In the DEIR analysis, any changes in proposed land use density should be evaluated for its potential to result in greater, more intense impacts than under a lower density scenario. Some increased or new impacts associated with increased density in this location may include increased edge effects from noise, lighting, water quality and erosion, higher levels of recreational use (i.e., designated and non-designated trails) in the open space, feral animals, and animal strikes from increased vehicular traffic. If the Project would increase density over that which is anticipated under the NC-MSCP (County of San Diego, 2014b), the DEIR should demonstrate that any standard for wildlife corridors, buffers and mitigation ratios is appropriate for the Project based on site-specific studies and would be adequate to reduce impacts to existing natural habitat community plans and regional wildlife corridors to a level of less than significant.

3. To enable the Department to adequately analyze potential impacts to biological resources and the County's SC-MSCP and in-progress NC-MSCP, the following should be included in the DEIR and supporting biological reports and shown on appropriate figures:
  - A. Wildlife corridors, which should be a minimum 1,000 feet in width along the entire property boundaries, and not include fuel management, accessory uses and other uses not compatible with long-term biological preservation of the conservation lands.
  - B. Wildlife road crossings (with proposed dimensions).
  - C. Any revegetation proposed for mitigation or otherwise intended to integrate natural and developed areas along the edge of the development). The DEIR should identify the proposed parameters for the 145 acres of revegetation for temporary disturbance areas, including success criteria, type of funding assurances, future maintenance, time-frame for sign-off, whether or not these areas are being considered as mitigation and covered under the RMP for the Project.
  - D. Updated, current surveys for sensitive animal and plant species, including gnatcatcher, cactus wren, white-tailed kite, least Bells' Vireo, small mammals, horned lizard, golden eagle, etc.. We recommend that 2016 spring season be conducted and included in the DEIR considering the anticipated rainfall forecasted for this Fall/Winter/Spring.
  - E. Where the DEIR shows mapping for "developed areas", the supporting biological information should clearly describe the methods used to determine that these areas do

not qualify as non-native grasslands (e.g., based on percent cover, species composition, authorized grading, etc.).

- F. The DEIR should clearly distinguish between which species occur within areas that have an adopted NCCP-HCP permit and those species which do not.
- G. We recommend addressing yellow-billed cuckoo (*Coccyzus americanus*), as a recent observation of this state-listed species occurred in San Diego County in 2012 and in 2014 in nearby Coachella (Imperial County). Also recommended is to assess the habitat suitability of the site for the state-listed southwestern willow flycatcher (*Empidonax traillii extimus*).
- H. Based on initial biological surveys for the Project (Althouse and Meade, 2015), the coastal California gnatcatcher (*Polioptila californica californica*), federally threatened and state species of concern, were observed on site during 2014 surveys. Due to the presence of this federally threatened species on-site, we recommend that the Service be consulted to determine the appropriate federal process for evaluating and mitigating impacts to this species. The information from that consultation should be included in the DEIR and supporting biological report for the Project. We recommend that all on-site territories for the gnatcatcher be mapped and included in the impact analysis.
- I. Based on initial biological surveys for the Project (Althouse and Meade, 2015) white-tailed kite (*Elanus leucurus*), a state fully protected species was observed on-site. One pair of white-tailed kites was detected during the 1998 surveys; however, they were not detected in 2014 or 2015. We recommend that updated surveys for this species be conducted and the results included in the DEIR. An evaluation of impacts and avoidance of this fully-protected state species should be included in the DEIR.
- J. Based on initial biological surveys for the Project (Althouse and Meade, 2015), San Diego horned lizard (*Phrynosoma coronatum blainvillei*) was detected at three locations in the south-central portion of the site during the 1998 survey and was very common in the central portion of the site during the 2015 field effort. Project impacts (direct and indirect) to this species should be evaluated as part of the DEIR, including how the loss of habitat/species occurrences at this site would affect the County existing SC-MSCP and future NC-MSCP coverage for this species.
- K. CNDDDB notes a historic (1906) occurrence of tricolored blackbird (*Agelaius tricolor*) in the area (approximately 500-feet to the southwest of the site). We recommend that suitable habitat and potential impacts to this species be fully evaluated in DEIR.
- L. Based on initial biological surveys for the Project (Althouse and Meade, 2015), a total of 321 oaks would be impacted by the proposed Project. The DEIR and supporting biological report should identify proposed mitigation for impacts to oak trees, including the proposed parameters for the oak tree replacement, including success criteria, type of funding assurances, future maintenance, time-frame for sign-off, whether or not these areas are being considered as mitigation and covered under the RMP for the Project.
- M. We recommend that the proposed Project avoid impacts to nesting locations for cactus wren (*Campylorhynchus brunneicapillus*) and include an adequate buffer from the active

territories. The location and status (through on-going monitoring) of this species should be included as part of the RMP for the project.

## **Project Alternatives**

4. The DEIR should provide analyses of a range of feasible alternatives to ensure that alternatives to the proposed Project are fully considered and evaluated. The analyses must include alternatives that avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity, where appropriate.

The Project currently proposes 753 acres (69 percent) as biological open space (City of Escondido, 2015) in areas that are in both the County's existing SC-MSCP and in-progress NC-MSCP. The Department recommends that the proposed Project be designed to be consistent with the draft NC-MSCP in terms of conservation goals for the PAMA (i.e., 75 percent conservation of lands designated as PAMA), and provide a viable wildlife connection (consistent with accepted regional standards) through the property to maximize the conservation of coastal sage scrub and to ensure wildlife movement through the site to existing and planned conserved lands in the area (County of San Diego 1997 and 2014b). Although the current project design proposes 69 percent open space, it appears that the long-term biological viability of some of these areas would be substantially reduced from edge effects and fragmentation related to the proposed development from required fuel management areas, public access and the two emergency access roads, the northerly one would be approximately 2.4 miles long and the southern road would be approximately 1 mile long with no dedicated wildlife crossing currently proposed due to the level of traffic anticipated (Althouse and Meade, 2015).

We recommend (at a minimum) that the DEIR include an alternative that is consistent with the draft NC-MSCP conservation goals for the PAMA (i.e., 75 percent conservation of lands designated as PAMA with sufficient wildlife connectivity). Such a DEIR alternative would: substantially minimize project impacts to the draft PAMA and occupied coastal sage scrub; provide for a large, contiguous block of open space on-site that is not bisected by roads; minimize edge effects to onsite biological open space areas; and maintain wildlife connectivity between on- and off-site conserved lands and areas designated as PAMA in the adopted SC-MSCP and in-progress NC-MSCP. In addition to minimizing impacts to the County's existing SC-MSCP and NC-MSCP to the maximum extent practicable, we recommend that the DEIR include an alternative that would retain all of the biological open space necessary for MSCP consistency within the County of San Diego. This alternative would keep the biological open space within a jurisdiction that has an active NCCP and a planning agreement and commitment to complete the NC-MSCP, which would better ensure the long-term conservation, management, and monitoring of the on-site open space from a land use planning and biological conservation perspective. The Department would consider this alternative biologically superior to the proposed Project while still meeting Project objectives for the reasons stated above.

The proposed Project is located adjacent to various lands that have been or are planned to be conserved for biological resources, including Rancho Pasqual Open Space (City of Escondido) to the immediate west, Vista Monte Open Space (City of Escondido) to the southwest, other private conserved lands to the southeast (Yalof Joint Revocable Trust),

and BLM lands and Boden Canyon to the east. The DEIR should evaluate the direct and cumulative effects that the proposed development would have on the adjacent existing and proposed conservation. The analysis should include effects on these lands from the proposed Project, including direct and indirect impacts from: (a) increased public use of these open space areas from the Project's population; (b) lighting; (c) noise; (e) drainage; (f) landscaping and introduced vegetation, etc.

### **Threatened and Endangered Species**

5. Based on initial biological surveys for the Project (Althouse and Meade, 2015), the project site contains several sensitive species, some of which are federally and/or state-listed. Such species include: mule deer, least Bell's vireo, yellow-breasted chat, loggerhead shrike, Cooper's hawk, white-tailed kite, gnatcatcher, cactus wren, orange-throated whiptail, San Diego horned lizard, hoary-leaf ceanothus, summer holly, coast live oak, delicate clarkia, Engelmann oak, San Diego sagewort, and spiny rush.

The NC-MSCP is still in-progress, and is expected to be completed in 2017. Until the NC-MSCP is completed and permit issued, the Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options [Fish and Game Code §§ 2080.1, 2081, subs. (b) and (c)]. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

### **General Comments**

6. To provide a complete assessment of the flora and fauna within and adjacent to the project area with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the DEIR should include the following information.
  - a) Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis placed on resources that are rare or unique to the.

- b) A current inventory of the biological resources (to include rare, threatened, and endangered, and other sensitive species) associated with each habitat type on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive plant, fish, wildlife, reptile, and amphibian species. The Department's California Natural Diversity Data Base in Sacramento should be contacted at [www.wildlife.ca.gov/biogeodata/](http://www.wildlife.ca.gov/biogeodata/) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
  - c) Discussions regarding seasonal variations in use of the project area and vicinity by sensitive species, and acceptable species-specific survey procedures as determined through consultation with the Department. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.
7. The DEIR should discuss direct, indirect, and cumulative Project-related impacts expected to adversely affect biological resources. All facets of the Project should be included in this assessment. Specifically, the DEIR should include:
- a) Specific acreages and descriptions of the types of wetlands, coastal sage scrub, and other habitats that would potentially be affected by the proposed Project or project alternatives. Maps and tables should be used to summarize such information.
  - b) Detailed discussions, including both qualitative and quantitative analyses, of potential direct effects on listed and other sensitive species (fish, wildlife, plants) and their habitats within the area of impact of the proposed and alternative projects.
  - c) Discussions regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP).
  - d) Impacts to wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated.
  - e) Discussions of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: Project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the Project site.
  - f) If applicable, a discussion of the effects of any Project-related dewatering or ground water extraction activities to the water table and the potential resulting impacts on the wetland/riparian habitat, if any, supported by the surface and groundwater.
  - g) Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development Project and natural habitats.

- h) A cumulative effects analysis as described under CEQA Guidelines, section 15130, assessing the impacts of the proposed Project in conjunction with past, present, and anticipated future projects, relative to their impacts on native plant communities and wildlife.

As described above, we recommend (at a minimum) that the DEIR include an alternative that is consistent with the draft NC-MSCP conservation goals for the PAMA (i.e., 75 percent conservation of lands designated as PAMA with sufficient wildlife connectivity). From a cumulative perspective, we are concerned that the proposed Project, as currently designed, would increase fragmentation of natural habitat within this area of the County's MSCP, including, but not limited to coastal sage scrub, from Project edge effects, emergency access roads, public access, and required fuel management areas.

- 8. A thorough discussion of mitigation measures for adverse Project-related impacts on sensitive plants, animals, and habitats. Specifically, the DEIR should include/address:
  - a) Measures to fully avoid and otherwise protect Rare Natural Communities from Project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
  - b) Where avoidance is infeasible, mitigation measures that emphasize minimization of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable (e.g., it would not adequately mitigate the loss of biological functions and values), off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. The Department generally does not encourage the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown these efforts are experimental in nature and do not provide for the long-term viability of the target species.
  - c) Mitigation measures to alleviate indirect Project-related impacts on biological resources, including measures to minimize changes in the hydrologic regimes on site, and means to convey runoff without damaging biological resources, including the morphology of on-site and downstream habitats.
  - d) Where proposed grading or clearing is within 100 feet of proposed biological open space, or otherwise preserved sensitive habitats, a requirement for temporary fencing. Fencing should be placed on the impact side and should result in no vegetation loss within open space. All temporary fencing should be removed only after the conclusion of all grading, clearing, and construction activities.
  - e) A requirement that a qualified biological monitor be present during initial clearing, grading, and construction in sensitive habitat areas and/or in the vicinity of biological open space areas to ensure that conservation measures associated with resource agency permits and construction documents are performed. The biological monitor should have the authority to halt construction to prevent or avoid take of any listed species and/or to ensure compliance with all avoidance, minimization, and mitigation

measures. Any unauthorized impacts or actions not in compliance with the permits and construction documents should be immediately brought to the attention of the Lead Agency and the Department.

- f) Measures to protect, in perpetuity, the targeted habitat values of proposed preservation and/or restoration areas from direct and indirect negative impacts. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Habitat protection, adaptive management of threats to the habitat and species, and monitoring should all be assured and begin at the same time as the project impacts. Permanent fencing should be installed between the impact area and biological open space and be designed to minimize intrusion into the sensitive habitats from humans and domestic animals. There should be no gates that would allow access between the development and biological open space. Additional issues that should be addressed include proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, etc.
  - g) Development and implementation of a management and monitoring plan (MMP), including a funding commitment, for any on- and/or off-site biological open space easements, if applicable. An appropriate natural lands management organization, subject to approval by the County and Department, should be identified. The MMP should outline biological resources on the site, provide for monitoring of biological resources, address potential impacts to biological resources, and identify actions to be taken to eliminate or minimize those impacts. A Property Analysis Record (PAR) or comparable method should be completed to determine the amount of funding needed to perform start-up activities and for the perpetual management, maintenance, and monitoring of the biological conservation easement areas by the natural lands management organization. It should be demonstrated that the proposed funding mechanism would ensure that adequate funds would be available initially and on an annual basis to implement the MMP. The natural lands management organization should submit a draft MMP, PAR results, and proposed funding mechanism to the Department for review and approval prior to initiating construction activities; the final plan should be submitted to the Department and the funds for implementing the MMP transferred within 90 days of receiving approval of the draft plan.
9. The Department recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1 - September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be

appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

10. If the Project includes parks and/or fuel modification zones within the open space acreage, please be aware that these uses would be considered fully impacted by the Department and cannot be included in biological open space proposed for conservation to offset impacts to sensitive resources and must be mitigated appropriately. The DEIR should clearly differentiate between biological open space that would be used as mitigation to offset Project impacts (natural open space) and open space (i.e., parks and fuel modification zones) that would be routinely maintained/impacted.
11. All plans for restoration/revegetation associated with the Project should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.
12. The Department is concerned about the potential direct and indirect effects to biological resources associated with the construction of trails in areas proposed for designation as open space on site. We recommend that trails in open space be located to not bisect intact areas and instead be placed along the perimeter or edge of open space areas. The following information should be included in the DEIR regarding any proposed trail: an aerial photograph with an overlay of the proposed alignment of the trail in relation to designated or proposed open space; specifications of the trail type and design; measures to avoid/minimize impacts related to users straying off-trail and/or unauthorized activities (e.g., vehicles); and a discussion of how the proposed location and use of the trail would be consistent with the County's existing SC-MSCP and in-progress NC-MSCP.
13. The City should ensure that all development-related landscaping proposed adjacent to on- or off-site habitat does not include exotic plant species that may be invasive to native habitats. Exotic species should be removed and replaced with native or non-invasive exotic species based on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" list that can be obtained from Cal-IPC's web site at <http://www.cal-ipc.org>. This list includes such species as pampas grass, fountain grass, myoporum, black locust, capeweed, tree of heaven, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. In addition, landscaping should not use plants that require intensive irrigation, fertilizers, or pesticides adjacent to preserve areas and water runoff from landscaped areas should be directed away from the biological conservation easement area and contained and/or treated within the development footprint. The applicant should submit a draft list of species to be included in the landscaping to the Department for approval at least 60 days prior to initiating Project impacts. Additionally, the applicant should also submit to the Agencies the final list of species to be included in the landscaping within 30 days of receiving approval of the draft list of species. Moreover, to increase potential habitat and functionality of on-site wildlife corridors, we recommend that any Project-graded slopes and fuel clearing areas requiring replanting be planted with compatible, low-fuel natives (e.g., cacti and other succulents) to

minimize the potential for invasive species to spread into the proposed on-site mitigation/open space areas and into adjacent natural lands.

14. Based on a review of CNDDDB, the site has the potential to contain a number of drainages that bisect the project site. On-site construction could result in direct or indirect impacts to streambeds (and associated coast live oak woodland), as well as to southern (willow) riparian forest and mule fat scrub habitats. The Department recommends that a minimum 100-foot buffer from the riparian habitat in the major on-site drainages be incorporated into the Project. We further recommend that any encroachment (necessitated by site topography) from on-site trails be avoided or extremely limited, and not approach any closer than 50-feet to riparian/wetland habitat.

The Department has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. The project area supports aquatic, riparian, and wetland habitats. The DEIR should include a jurisdictional delineation of the creeks/drainages and their associated riparian habitats. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service wetland definition adopted by the Department (Cowardin et al. 1979). Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the City's DEIR for the project. We recommend that all wetlands and watercourses on-site, whether ephemeral, intermittent or perennial, should be retained and provided with substantial setbacks to preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife and plant populations. Moreover, to minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of an SAA.

15. Based on initial biological surveys for the Project (Althouse and Meade, 2015), it appears that cactus wren (*Campylorhynchus brunneicapillus*) was only incidentally noticed in southwest portion of the project site while conducting gnatcatcher surveys. We recommend that a more species-specific survey be conducted for the cactus wren. This survey should include an inventory of the patch size/extent of suitable cacti habitat on the site, including the locations of habitat with cacti over 0.5 meter in height and how much would be potentially impacted by the Project. To the extent practicable, the Project should identify measures for avoidance if possible, then salvage of all cacti on-site for use as part of Project migration for species and habitat, and for landscaping and potential inclusion in fuel management and trail areas. Last, the DEIR should include measures to conduct surveys for gnatcatcher and cactus wren during the breeding season where habitat would occur within proposed fuel management areas.
16. The DEIR should analyze how the proposed Project would directly and indirectly impact habitat connectivity and wildlife movement. Based on the information provided as part of the

NOP, mountain lion has historically been detected on-site and included individuals passing through the site. The historic movement of mountain lion and mule deer should be included in the analysis of project impacts to wildlife corridor and related project design features. The analysis should include a discussion of wildlife corridor dimensions (how it meets the 1,000 foot minimum recommended), and whether or not fuel management, lighting, and accessory/other uses are proposed within these areas. Identification of areas where crossings, fencing, vegetation or other project features or mitigation are recommended to offset Project impacts or ensure impacts would be below a level of significance should be included in the DEIR and supporting biological report.

16. This DEIR and supporting biological report should evaluate and propose mitigation for impacts (direct and indirect) related to trails and other uses proposed within open space expected to be preserved on-site. The analysis should identify all staging and support facilities needed to support trails, and include an appropriate buffer from designated trails to account for indirect impacts (we recommend that a 300-foot buffer be included for the trail buffer area). In addition, the RMP should include a program to adequately monitor and manage any public use proposed within the on-site conserved open space areas to ensure that the gnatcatcher, cactus wren and other species are persisting in the on-site conserved open space.

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## THE CITY OF SAN DIEGO

September 23, 2015

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Planning Division  
Attn: John Helmer  
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Submitted via email to: [Jhelmer@escondido.org](mailto: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](mailto: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.

Page 7 of 7  
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)



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](mailto: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](mailto: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)

Page 3 of 3  
City of Escondido  
Planning Division  
September 8, 2015

**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



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](mailto:Jhelmer@escondido.org)

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Sincerely,



Tara Lieberman, Associate Planner  
Planning Department

cc: Reviewing Departments (via email)

Page 3 of 3  
City of Escondido  
Planning Division  
September 8, 2015

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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



# County of San Diego

**MARK WARDLAW**  
DIRECTOR  
PHONE (858) 694-2962  
FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123  
[www.sdcounty.ca.gov/pds](http://www.sdcounty.ca.gov/pds)

**DARREN GRETLER**  
ASSISTANT DIRECTOR  
PHONE (858) 694-2962  
FAX (858) 694-2555

October 12, 2015

John Helmer, Planning Consultant  
City of Escondido  
201 N. Broadway  
Escondido, CA 92025

Via email to: [safarihighlands@escondido.org](mailto: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>

October 12, 2015  
Mr. Helmer  
City of Escondido

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

October 12, 2015  
Mr. Helmer  
City of Escondido

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](http://www.sandiegocounty.gov/dplu/docs/Vector_Guidelines.pdf) and

October 12, 2015  
Mr. Helmer  
City of Escondido

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](mailto:eric.lardy@sdcounty.ca.gov)

Sincerely,



Joe Farace, AICP  
Planning Manager  
Advance Planning Division

e-mail cc:

Keith Corry, Policy Advisor, Board of Supervisors, District 3  
Conor McGee, CAO Staff Officer, LUEG  
Michael D. Ott, Executive Officer, LAFCO  
Jeff Kashak, Environmental Planner, Department of Public Works  
Nick Ortiz, Land Development Project Manager, Planning & Development Services  
KariLyn Merlos, Program Coordinator, Department of Environmental Health

PLAN REVIEW COMMENTS

**Date:** September 4, 2015  
**Reviewed by:** La Vona Koretke

Project Name: Safari Highlands  
Project Address: Zoo Rd and Rockwood Rd  
Project: 240-270-33; 242-010-02, -36-37-38; 241-060-03  
Plan Check Number: SUB15-0019

**Comments**

1. A Fire Protection report will be required.
2. Provide 20 feet of Fuel Mod area on roadways
3. Water source / hydrants will be required on secondary access roadway.
4. Secondary access roadway will be a minimum width of 24 ft. Provide a minimum of 3 turnarounds on secondary access roadway. Turnaround locations to be approved by Escondido Fire. Fire department turnaround shall be marked, "No Parking Fire Lane." Stenciled in 4 inch white lettering over red curb with a sign every 50 ft.
5. Show footprint of homes on site plan. The minimum setback from the top of the slope for a 1 story home shall be 15 ft and 30 ft for a 2 story home.
6. Provide HOA agreement to the Escondido Fire Department for review prior to approval. HOA shall approve all landscape plans for single family dwellings for compliance with Fire Department requirements. All planting will need to be of an approved species; no undesirable plants or trees. Drip edge for tree at maturity shall be 30 ft to farthest projection of the structure. HOA shall approve any additional structures, patio covers, etc. for compliance with Chapter 7A of CBC. All additional structures shall comply with current Fire Department setbacks. HOA agreement shall include the maintenance of the fuel modification area in compliance with the approved fire protection report. All fire access roadways shall be maintained as such.
7. A phasing plan shall be approved by the Escondido Fire Department. Secondary access and Fire Station shall be completed at the conclusion of phase one.
8. Fire access roadways and operational fire hydrants shall be installed prior to combustibles being allowed on site

PLAN REVIEW COMMENTS

9. Fire Station will need to be at least 7000 -7500 sq ft with pull thru bays. A minimum of 5 dorm rooms, 3 apparatus bays, workshop, laundry area, kitchen, PPE (personal protective equipment) storage, and a weight room shall be required in the station. A fueling area, generator (size to be approved later), and hose drying rack (similar to EFD station 4) will be required within the gated area of station for Fire Fighter use. Minimum 10 personal parking spaces will be required. Block wall will be required along rear of station. Fire station to meet minimum 100 ft fuel modification zone depending on slope and minimum 15 ft setback from the top of the slope.
10. Minimum hydrant spacing required every 350 ft throughout project.
11. Grades shall not exceed 15% slope without Fire Department approval and mitigation.
12. All driveways over 150 ft length will require a turnaround. No parking will be allowed in the fire department turnaround.
13. Fire Department access shall be required to walking trails. Provide an all-terrain vehicle for access with gurney capabilities.
14. Some lots appear to share driveway access of the cul-de-sac. Driveways serving 3 or more homes shall be a minimum of 24 ft in width; driveways serving 2 homes shall be 20 ft in width.
15. All single family residence shall be sprinklered with NFPA 13D. All other structures shall be sprinklered with NFPA 13.

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

**Subject**

PRESERVATION OF OPEN SPACE AND AGRICULTURAL LANDS

**Purpose**

To further the policies and priorities of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 regarding the preservation of open space and prime agricultural lands.

**Background**

The State Legislature has instructed Local Agency Formation Commissions to establish policies that address the preservation of open space (Govt. Codes § 56300 and 56377). LAFCOs are required to consider how spheres of influence or changes of local governmental organization could affect open space and prime agricultural lands. Commissions are directed to guide development away from prime agricultural lands – unless that action would not promote the planned, orderly and efficient development of an area – and to encourage development of existing vacant or non-prime agricultural lands within a jurisdiction before approving any proposal that would allow development of open-space lands outside of an agency’s boundary (Govt. Code § 56377). Proposals must be further reviewed for their effect on maintaining the physical and economic integrity of agricultural lands (Govt. Code § 56668).

**Policy**

It is the policy of the San Diego Local Agency Formation Commission to:

1. Discourage proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area **or** the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use;
2. Require rezoning of territory (city only) to identify areas subject to agricultural/preservation and planned development;

## L-101 LEGISLATIVE POLICY

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3. Follow San Diego LAFCO's adopted procedures to define agricultural and open space lands and to determine when a proposal may adversely affect such lands.

Adopted: November 6, 1978  
Amended: June 4, 1990  
Amended: May 4, 1998  
Technically Updated: January 1, 2001

**Cross-reference:**

***SAN DIEGO LAFCO PROCEDURES:***  
-Open Space and Agricultural Preservation



401 B Street, Suite 800  
 San Diego, CA 92101-4231  
 (619) 699-1900  
 Fax (619) 699-1905  
 sandag.org

October 12, 2015

File Number: 3330300

Mr. John Helmer  
 Planning Consultant  
 City of Escondido Planning Division  
 201 N. Broadway  
 Escondido, CA 92025

*MEMBER AGENCIES*

- Cities of*
- Carlsbad*
- Chula Vista*
- Coronado*
- Del Mar*
- El Cajon*
- Encinitas*
- Escondido*
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- Lemon Grove*
- National City*
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- Poway*
- San Diego*
- San Marcos*
- Santee*
- Solana Beach*
- Vista*
- and*
- County of San Diego*

*ADVISORY MEMBERS*

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- California Department of Transportation*
- Metropolitan Transit System*
- North County Transit District*
- United States Department of Defense*
- San Diego Unified Port District*
- San Diego County Water Authority*
- Southern California Tribal Chairmen's Association*
- Mexico*

Dear Mr. Helmer:

**SUBJECT: Comments on the Safari Highlands Ranch Notice of Preparation**

Thank you for the opportunity to comment on the Safari Highlands Ranch Notice of Preparation (NOP). The project proposes to build 550 single-family residential units along with new public and private parks, open space, a new city fire station, a community center, an on-site sewage treatment plant, and a system of new private and public streets. The proposed project is located on 1,098 acres of vacant land.

Our comments are based on policies included in the Regional Comprehensive Plan (RCP) and the 2050 Regional Transportation Plan and its Sustainable Communities Strategy (2050 RTP/SCS), and are submitted from a regional perspective, emphasizing the need for land use, transportation coordination, and the implementation of Smart Growth and sustainable development principles. The goal of these regional plans is to focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure to create a more sustainable region.

The 2050 RTP/SCS sets forth a multi-modal approach to meeting the region's transportation needs. Therefore, it is recommended that the selected alternative consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the integration with a robust Transportation Demand Management (TDM) Program. The San Diego Association of Governments (SANDAG) recommends that the following comments be addressed in the Environmental Impact Report (EIR).

**Transportation Demand Management (TDM)**

Please consider integrating Transportation Demand Management (TDM) measures into the Safari Highlands Ranch development project to encourage the use of alternative travel modes that can assist with relieving traffic congestion in and around the proposed project area. TDM measures could include shuttle service connections to nearby transit centers and major destinations; bicycle and pedestrian facilities that connect residents to transit/shuttle service and commercial destinations; bicycle amenities, such as secure bicycle parking; safe and interconnected pedestrian paths; promotion

of ridesharing, and the provision of park & ride. The presence of Interstate 15 Express Lanes to the west of the proposed development provides an incentive for residents to carpool and vanpool to key commute and non-commute destinations within the San Diego region. Residents and visitors can utilize ridematching and trip planning services offered by [www.iCommuteSD.com](http://www.iCommuteSD.com). The SANDAG TDM division can assist with integration of these measures as part of this project.

Again, we appreciate the opportunity to comment on the Safari Highlands Ranch NOP, and encourage, where appropriate, consideration of the following tools in evaluating this project based on these SANDAG publications (which can be found on our website at [www.sandag.org/igr](http://www.sandag.org/igr)):

1. Designing for Smart Growth, Creating Great Places in the San Diego Region
2. Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
3. Trip Generation for Smart Growth
4. Parking Strategies for Smart Growth
5. Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis In Environmental Impact Reports
6. Integrating Transportation Demand Management into the Planning and Development Process - A Reference for Cities
7. Riding to 2050, the San Diego Regional Bike Plan
8. SANDAG Regional Parking Management Toolbox
9. Healthy Communities Atlas

Intergovernmental review procedures of the State of California give each local clearinghouse the authority to determine whether a project will need to be reviewed. In reviewing environmental documents, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.

When available, please send the draft Environmental Impact Report to:

Intergovernmental Coordination

C/O SANDAG

401 B Street Suite 800

San Diego, CA 92101

We appreciate the notification of your proposed project and encourage you to keep us informed of any changes in the project.

If you have any questions, or if we can be of assistance in any way, please contact me at (619) 699-1943 or susan.baldwin@sandag.org.

Sincerely,

A handwritten signature in black ink that reads "Susan Baldwin". The signature is written in a cursive style with a long horizontal flourish at the end.

SUSAN BALDWIN  
Senior Regional Planner

SBA/DGA/bga/epo

Dear John Helmer,

Please add me to the Draft EIR distribution list. I would like to receive a CD or copy of the DEIR when it is available for public review. The project is located on the north boundary of the San Dieguito River Park's Focused Planning Area.

Thank you,

Shawna

**Shawna Anderson, AICP**

*Principal Planner*

San Dieguito River Park JPA

18372 Sycamore Creek Rd.

Escondido, CA 92025

858-674-2275, ext. 13

FAX: 858-674-2280

[www.sdrp.org](http://www.sdrp.org)

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# Public Comments Received During Public Notice Period

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# DELANO & DELANO

October 12, 2015

*VIA E-MAIL & U.S. MAIL*

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

Re: Safari Highlands Ranch Project (SUB 15-0019, ENV 15-0009): Notice of Preparation

Dear City of Escondido:

This letter is submitted on behalf of San Pasqual Valley Preservation Alliance in connection with the proposed Safari Highlands Ranch project ("Project"). The EIR should address the following issues:

- The scope of the Project;
- All phases of Project development, including related developments in the area;
- Biological resource impacts, including impacts to designated open space and habitat;
- Construction traffic impacts, including impacts associated with slow-moving and heavy equipment;
- Land use impacts, including existing General Plan and Proposition S requirements and existing uses in the surrounding area;
- Traffic impacts, including impacts associated with inducing travel and impacts associated with existing traffic patterns;
- Noise impacts to surrounding uses, including nearby neighborhoods, parks and habitat uses, and impacts associated with destruction of on-site vegetation;
- Light impacts to surrounding uses, including nearby neighborhoods, parks and habitat uses;
- Toxics and human health impacts, including impacts associated with construction and airborne contamination during construction and impacts associated with exiting soil and water contamination;
- Water and air quality impacts, including impacts associated with existing on-site and groundwater contamination and impacts associated with any water quality treatment system;
- Water supply impacts;

EVERETT L. DELANO III  
*Admitted in California and Colorado*

M. DARE DELANO  
*Admitted in California and New York*

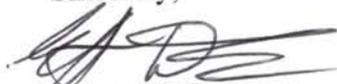
220 W. Grand Avenue  
Escondido, CA 92025

(760) 510-1562 :: Office  
(760) 510-1565 :: Fax

- Historical and cultural resource impacts, including impacts associated with destruction of existing features on the Site;
- Cumulative impacts;
- Climate Change impacts;
- Requirements associated with consideration by San Diego LAFCO, including those found in the Cortese-Knox-Hertzberg Local Government Reorganization Act;
- Adequate and verifiable mitigation for Project impacts;
- Consideration of mitigation that includes open space protection in and around the Project site; and
- An adequate range of alternatives, including an alternative that protects biological resources and a “no project” alternative that is consistent with existing uses and existing conditions in the Project vicinity.

Please contact me if you have questions or need additional information. Additionally, please ensure I am provided a copy of the draft EIR and any notice regarding the Project. Thank you for your consideration of the above.

Sincerely,



Everett DeLano



August 21, 2015

*VIA ELECTRONIC MAIL*

The Hon. Sam Abed, Mayor  
City of Escondido  
201 N Broadway  
Escondido, CA 92025

**RE: Agenda Item 9, August 26, 2015: Sphere of Influence Update and Safari Highlands Ranch Update– *OPPOSITION UNLESS AMENDED***

Dear Mayor and Members of the Council:

The Endangered Habitats League (EHL) urges you to rethink the Sphere of Influence update and processing of the proposed Safari Highlands Ranch development and decline to move these projects forward unless and until provisions are made to preserve the interests of the San Diego County Multiple Species Conservation Program. For your reference, EHL is Southern California's only regional conservation group. We served on the Working Group for the San Diego Multiple Species Conservation Program (MSCP) and the Advisory Committee for the Multiple Habitats Conservation Program (MHCP), of which Escondido is a part.

We oppose the Sphere of Influence Update and Safari Highlands Ranch for two reasons: 1) Irretrievable impacts to the MSCP which could jeopardize permits for the entire region and 2) unsustainable land use planning.

Two thirds of the project lies in "Preapproved Mitigation Area" for the MSCP and one third in draft Preapproved Mitigation Area for the North County MSCP. These are the lands needed for successful preserve assembly. Project design shows that roads and development would hopelessly chop up the pristine natural resources of the site. This would "throw a wrench" into the regional conservation planning that allows infrastructure and compatible development to proceed in many jurisdictions. On the other hand, if the land remains in the unincorporated area, the County's rural zoning and subdivision standards will ensure both economic use of the property and MSCP conformance.

Secondly, pushing more and more automobile dependent sprawl into the countryside is the wrong way to accommodate growth. Instead, the City should make use of its transit investments to reduce traffic congestion and create high quality urban environments.

A prior EIR failed due to significant unavoidable impacts to biological and other resources. The wise course is to retain the site as unincorporated land for compatible rural development.

As an alternative, proceeding with the Sphere of Influence update and processing of the proposed Safari Highlands Ranch could be *continued* until such time as:

- 1) MSCP conformance is assured through an Annexation Agreement between Escondido, the County, and the wildlife agencies per Section 9.19 of the MSCP Implementing Agreement. This occurred, for example, in the case of an annexation to the City of Vista.

AND

- 2) Any conditions regarding these lands contained in the MHCP, for which Escondido has a Planning Agreement, are met.

Please be a constructive force for the environment and for urban planning in the region. Thank you for considering our views.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dan Silver", is placed on a light gray rectangular background.

Dan Silver  
Executive Director

Sept. 24, 2015

Dear Mr Helmer:

Endangered Habitats League (EHL) is in receipt of the NOP for this proposed residential development in pristine, high quality wildlife habitat. EHL particularly urges a thorough and objective analysis of biological resources and a full range of project alternatives, both on and off-site, with the goal of reducing biological impacts.

We look forward to reviewing the DEIR, and please retain EHL on all mailing and distribution lists for this project, including CEQA documents and public hearings.

Sincerely,  
Dan Silver

Dan Silver, Executive Director  
Endangered Habitats League  
8424 Santa Monica Blvd., Suite A 592  
Los Angeles, CA 90069-4267

213-804-2750  
[dsilverla@me.com](mailto:dsilverla@me.com)  
[www.ehleague.org](http://www.ehleague.org)

Johnson & Sedlack

A T T O R N E Y S at L A W

Raymond W. Johnson, Esq. AICP, LEED GA  
Carl T. Sedlack, Esq. Retired  
Abigail A. Smith, Esq.  
Kimberly Foy, Esq.  
Kendall Holbrook, Esq.

26785 Camino Seco, Temecula, CA 92590

*E-mail:* ray@socalceqa.com

abby@socalceqa.com  
kim@socalceqa.com  
kendall@socalceqa.com  
Telephone: (951) 506-9925  
Facsimile: (951) 506-9725

October 7, 2015

Diane Halverson  
City Clerk  
City of Escondido  
201 N. Broadway  
Escondido, CA 92025

John Helmer  
Planning Consultant  
City of Escondido Planning Division  
201 N. Broadway  
Escondido, CA 92025  
safarihighlands@escondido.org

**VIA U.S. MAIL**

***RE: Written Request for all Public Notices Related to Safari Highlands Ranch Project***

Greetings:

Please allow this letter to serve as a written request to receive all public notices regarding the proposed project entitled Safari Highlands Ranch (City Case #: SUB 15-0019, ENV 15-0009)

This written request is intended to include all notices of public hearing issued pursuant to City of Escondido ordinances as well as all notices pursuant to the California Environmental Quality Act ("CEQA").

Please send all notices to the following address:

Johnson & Sedlack  
26785 Camino Seco  
Temecula, CA 92590  
contact@socalceqa.com

Thank you very much for your assistance.

Sincerely,



Raymond W. Johnson  
JOHNSON & SEDLACK

# Rancho Vistamonte Garden Society

C/O FirstService Residential  
5473 Kearny Villa Rd. Suite 200, San Diego, CA. 92123



Ms. Barbara Redlitz, Director of Community Development  
Mr. Jay Petrek, Assistant Planning Director  
CITY OF ESCONDIDO  
201 North Broadway  
Escondido, CA 92025

October 2, 2015

RE: Input Regarding Environmental Issues to Be Addressed in the Environmental Impact Report (EIR)  
for Safari Highlands Ranch Environmental Impact Report (ENV 15-0009)

Dear Ms. Redlitz/Mr. Petrek:

Thank you for the opportunity to provide scoping input for the upcoming EIR for the proposed Safari Highlands Ranch Project. The Ranchos at Vistamonte (Rancho Vistamonte Garden Society, RVGS HOA) is located immediately adjacent to the proposed project and its corresponding access from Rockwood Road. Our community is very concerned regarding the environmental impact the project will have on the surrounding area and our quality of life. During the preparation of the Environmental Impact Report (ENV 15-0009) for further project consideration, we ask that the following environmental issues be fully addressed if not included in any regulatory required impacts.

**1. Traffic Impacts** - Given the size of the proposed project consisting of 550 homes there will be a significant impact to the local rural traffic patterns. The road infrastructure is undersized and incapable of servicing the additional anticipated traffic (both long term and during the construction of the project). In addition, emergency access and egress out of our valley in the event of a wildfire would be severely constrained.

**2. Fire and Public Safety** - Given the additional development in an area already underserved by public services, there is significant concern that the additional development will only increase the need for fire and police services.

**3. School Safety** - The current ability to walk to the local school will be taken away from the community with the proposed additional multiple lanes on Rockwood Road, and the increased bus traffic required to service the additional students (if in fact they can be accommodated in the school as is).

RVIS EIR Scoping Letter 10-2-15

# Rancho Vistamonte Garden Society

C/O FirstService Residential  
5473 Kearny Villa Rd. Suite 200, San Diego, CA. 92123

**4. Air Quality Safety** - With the ongoing dry conditions, there is a significant possibility that the dust generated by the large volume of planned construction traffic and construction activities would negatively affect our air quality and have deleterious effect on our properties.

**5. Financial Impact** - The proposed project access cuts right in front of our community reducing property values as a result of negatively impacting our sight lines to the valley and golf course. The EIR needs to identify this impact and address accordingly. (Other access alternatives around Rancho Vistamonte also have major impact on the financial position of the community). Additionally, our community has a city-approved well adjacent to the proposed access road near our Vistamonte Avenue entry which may be negatively impacted by the projects road construction. RVGS spent significant funds to install the well. Any construction near this well needs to be studied.

**6. Noise Impacts** - Currently our community enjoys a quiet, rural level of natural noise. The negative noise impact of the construction and long term development is of concern. Any EIR would need to study the noise impact of such a development.

There is still much work to be done to ascertain the viability of this proposed project. Clearly, there are impacts to the environment and to our quality of life at the Ranchos of Vistamonte. We trust that the City of Escondido will direct and implement this environmental study and review process in accordance with all applicable state and federal regulations. Once again, thank you for the opportunity to provide our input.

Sincerely,



Michael C. Parris, P.E.  
President  
Rancho Vistamonte Garden Society

To Whom It May Concern:

We are writing to express our concerns over the proposed Safari Highlands Ranch Development. As the impact on the environment is studied, please take the following concerns into consideration.

This proposed area is the home to many wild species, both plant and animal. Some of these species are endangered. We have lived adjacent to this property for 42 years, and have been blessed to witness many of the animals that make this area their home. Foxes, deer, gnatcatchers, horned toads, rattlesnakes, mud swallows, coyotes, kangaroo rats, wild turkeys, roadrunners, quail, and mountain lions are just a few of the wild animals we have had the privilege of observing.

The undeveloped hills between our property and the Zoo Safari Park are a part of a unique and highly endangered habitat called coastal sage scrub. Native varieties of lilac, as well as manzanita, scrub oak, many species of wildflowers, and groves of beautiful Engelmann oaks are doomed to destruction if this housing development is allowed to replace this native plant and animal community.

San Diego County recently downgraded our rural property and the surrounding area to 40 acre minimum parcels. It doesn't make sense to cram 150 city sized lots directly adjacent to rural 40 acre zoning. High density housing causing urban sprawl in outlying areas is contrary to Escondido's general plan.

Thank you for taking our thoughts into consideration.

Kurt and Josie Ackermann

23456 Old Wagon Road

[ackerubble@gmail.com](mailto:ackerubble@gmail.com)

Escondido, CA 92027

Re: Scoping of Issues regarding Safari Highlands Project

Please accept the comments below as an official submission of concerns to be addressed by the developers of the proposed Safari Highlands Project during the Scoping Process.

I am a resident of the City of Escondido and attended both the community meeting held by the developer and the meeting of the City Council to consider the Sphere of Influence Proposal. At the community meeting, most of the difficult questions posed to the developer were met with a response that what was being requested was "not feasible" however not cost effective for the developer does not constitute "not feasible" for the City. As you are aware, a hard look at all factors, mitigation alternatives and safety issues by the City is necessary to avoid future litigation. The City Council should not be swayed by its desire for property tax revenue to approve residential development that puts existing taxpayers at risk due to an insufficient water supply and projected traffic, among other concerns.

### Traffic

An objective review of ALL access options to the Safari Highlands site including W. Zoo Road as the primary ingress and egress for the subdivision is needed. The cost to the developer of alternatives to Rockwood Rd. is not a satisfactory reason to discount as "not feasible".

Widening of San Pasqual Road from the intersection of HY 78 to Bear Valley Rd. at the High School/Kit Carson Park intersection is needed. This road is traveled at high speeds by very large trucks, commuters, construction vehicles and commercial trucks and there is no shoulder at all for vehicles needing to pull over or for bicyclists. Currently very dangerous, any increased traffic necessitates mitigation.

The safety of residents walking on Rockwood Rd. and accessing the school is critical. At present traffic levels, the safety of children walking, riding bicycles, scooters and being dropped off from vehicles during opening and closing times is questionable. Increased traffic during a 10-year construction period with large construction vehicles as well as the addition of thousands of daily vehicle trips by future residents long-term will significantly increase this risk. The safety of students attending the San Pasqual School will not be mitigated by the measures proposed thus far.

### Water

Water shortages in Southern California threaten the safety of residents. ANY additional development that does not mitigate impacts on water availability should not be considered by local officials. The identification of new sources, water desalinization or other means are needed. If not cost effective for the developer then the project may not be feasible. It is not the responsibility of the city to make the project feasible for the developer. If the costs of land + infrastructure (water, wastewater treatment, roads, drainage etc) + housing construction

are too high for the developer to make a profit on the development, the project may not be financially feasible.

The addition of a fire station adjacent to the community without adequate water supply and without manpower and equipment at the station 24/7 is not adequate mitigation.

### Emergency Services

Currently, emergency services are not able to serve the communities of Rancho San Pasqual and Vistamonte within a reasonable timeframe. The response time should be a consideration for the city as to whether the current number of patrol cars, for example, can adequately serve yet another remote residential subdivision.

### Financial Impacts

What are the financial implications to the existing taxpayers of Escondido of the extension of the Sphere of Influence and Annexation? Is it then the obligation of the taxpayers to pay the cost of water extension to the new development? Where is the cost/benefit analysis that demonstrates to the city council that the project is needed and will have benefits to the taxpayer? The full cost of water service extension to the site must be borne by the developer and included in its feasibility analysis.

A hard look by the City is necessitated by the scope and complexity of the proposed project.

Sincerely,

Andrea Lohneiss  
3288 Skyline View Glen  
Escondido, CA 92027  
[alohneiss@hotmail.com](mailto:alohneiss@hotmail.com)

Mr. Petrek and Mr. Helmer,

I'm unable to attend the meeting this afternoon due to the short notice and work obligations. However, I have several EIR concerns related to fire safety and emergency egress, natural habitat impacts, and demands on the local infrastructure. I plan to attend the meeting on 05 October, but wanted to bring up these issues as part of today's meeting.

Sincerely,

Bill Leininger

2285 Old Ranch Rd.

Escondido, 92027

1. Please clearly resolve the issue of W Zoo Road as being a public vs. a private road.

2. Please include a detailed safety analysis of using W Zoo Road vs. Rockwood as the primary and emergency access for Safari Highlands.

This should include:

a. The traffic on Rockwood - specifically safety of students, parents and staff with:

- 1) Rockwood as the primary access for Safari Highlands
- 2) W Zoo Road as the primary access for Safari Highlands
- 3) During construction as well

b. Fire evacuation via primary access and emergency access.

Note - Safety studies should be accomplished by a safety expert with robust modeling resulting in quantitative results/metrics (e.g., accidents pre school year)

3. Please include a detailed analysis of how the City of Escondido will find the additional water to service the Safari Highlands community.

Regards,

Bob Lohneiss  
3288 Skyline View Glen  
Escondido, CA 92027

**From:** [dbird45@cox.net](mailto:dbird45@cox.net) [<mailto:dbird45@cox.net>]

**Sent:** Friday, October 09, 2015 6:21 PM

**To:** Jay Petrek

**Subject:** The environment at Rancho San Pasqual

**Importance:** Low

I am sure more eloquent EIR statements have been sent to you, at least I hope so, but my statement is about the eagles, hawks and song birds that nest behind my home. It's about the coyotes and other wild life that live behind my home. It's about the quiet and the unpolluted air we breath in out backyard. The wild and diverse populations of life that would be destroyed by the Safari Highlands is frightening and we need the decision makers to care about this pristine environment they may elect to destroy for profit. Global warming puts our land at risk. Please ask them to consider the air, water and animal life before they annex this land and build this incompatible development that increases that risk.

Please do not take away our natural treasure and replace it with a sewer treatment facility.

Thank you.

Donna Bird

[760.470.0921](tel:760.470.0921)

[dbird45@cox.net](mailto:dbird45@cox.net)

Thank you, Jay. We appreciate your communication.

Six pm is too early. Working people are being excluded. It is very difficult and we think it was planned that way. I was SO glad to hear out was seven pm and disappointed that it is earlier

Donna Bird  
[760.470.0921](tel:760.470.0921)  
[dbird45@cox.net](mailto:dbird45@cox.net)

This is the wrong development at the wrong time and in the wrong community.

We have a peaceful, rural community which cannot accommodate the Safari Highlands development. They would steal our peace and quiet, disrupt our flow of traffic and safety and destroy our rural community. They would further deplete the dwindling access to water that we have left.

Our roads and schools cannot accommodate them. They need to stop now.

***Donna Bird***

**760.470.0921**

**[dbird45@cox.net](mailto:dbird45@cox.net)**

**From:** Edwin van Doorn [<mailto:bigdutch@cox.net>]

**Sent:** Tuesday, September 22, 2015 9:10 PM

**To:** Jay Petrek

**Cc:** 'Denise Van Doorn'

**Subject:** Concerns regarding the EIR and the impact of the proposed Safari Highlands Ranch.

To Whom it may concern:

Since I will not be able to attend the upcoming meeting the city has planned for the initial phase of the EIR, I wish to express my concerns regarding the impact of the proposed Safari Highlands Ranch development. My two main concerns are traffic related and specifically regarding the increase of traffic on Rockwood Rd. First I am very concerned about the traffic increase past the school which i.m.o. cannot be accommodated without major hazard risk increases for the children and the parents that drop them off. My 5 year old daughter will be going to this school for the coming 9 years and the traffic increase will require traffic measures that in their turn will reduce the traffic flow for people going to or coming from work and increase the difficulty to evacuate the entire area in case of wild fires. Given the young age of many of the children, the proposed "airport style pick-up and drop-off" is unthinkable as we cannot allow our children to walk from the crowded high traffic area without proper parental guidance. A major increase in traffic flow will also lead to problems on San Pasqual Rd to Via Rancho Pkwy which negatively impacts the commute for many people living in Rancho San Pasqual or Rancho Vistamonte as well as for high school students and their parents traveling to San Pasqual HS. Second, the evacuation of Rancho San Pasqual and Rancho Vistamonte in case of a wild fire is bad enough in the current situation. Adding an entire new development will make this only worse. I believe that the traffic load on Rockwood and Cloverdale in such a situation could lead to people and or animals getting stuck in those neighborhoods which in turn could result in injury or death while emergency response vehicles would be unable to access the area in a timely manner. Even the use of fire access roads to the North or Zoo Rd could easily be obstructed if the fire blocks those areas due to their high fire risk nature.

Aside from the traffic issues, my concerns are regarding the city's fiscal responsibilities. While the developer may provide a fire station, all other initial and ongoing expenses will need to be paid for from taxpayer money. I feel that it is the City Council's responsibility to make sure that all aspects in this regard are weighed properly to guarantee the people of Escondido that this will become the proverbial cash cow they claim it will be. Given the costs of the initial infrastructure expansion, increased services and maintenance costs, I feel that the City Council has the responsibility to the people of Escondido to show a proper plan for making this a net gain, not a burden on the people of Escondido only to help a few people make major profits over the backs of thousands. How will the City Council ensure that Concordia follows through all the way to the end and lives up to the promises it makes now? How will the City Council guarantee to the people of Escondido that Concordia will be unable to withdraw from any obligations or promises before they have been met completely and not sell a half finished project leaving Escondido with the burden to clean up the mess?

Another area of concern is the environmental impact. Building a new development in a currently protected area will negatively impact endangered species and/or protected habitats as well as destroy any and all cultural artifacts on the property. Wildlife living in the area will be displaced and forced to leave the area. Currently the area consists of native species, used to survive in draught situations. Concordia claims they will store rain water for watering the common grounds (70% of the 1100 acres will remain unbuilt) which in the draught we have experienced in the past decades is a joke. The remaining 30% will be used for construction of homes with yards. Where will the water come from for

those 550 homes and yards? We have a major water shortage as it is. How will the City Council provide for enough water to serve everyone? Or do they consider that the responsibility of the water districts?

We purchased our home in a peaceful environment which we feel will be impacted negatively by this SHR development. We feel that it will not only ruin the peace and quiet of our backyard but with that the quality of our lives and the value of our home. This is why we will watch very critically how the EIR is executed and whether all aspects of the environmental impact have been studied and addressed properly, including those not brought up in (the) upcoming meeting(s). The City Council has a responsibility to protect their constituents against the greed of any corporation or their own desires to drive development if it's not suitable.

Sincerely,  
Edwin, Denise and Olivia van Doorn  
3298 Walden Glen  
Escondido, CA 92027

Oct. 12<sup>th</sup>, 2015

Escondido Planning Department,

I am writing this letter to provide comments for the scoping effort underway to develop the EIR for the Safari Highlands Ranch development. My partner is a landowner in unincorporated San Diego County just north (separated by one parcel) from the northern boundary of the proposed development. We are part time residents there and conduct a business raising exotic birds that relies on the peace and quiet that the area offers. This development will destroy all the things we love about the area, this is non-mitigatable. We would like the EIR to analyze impacts to our lifestyle and our neighbor's lifestyle by examining:

- Viewshed impact, not just from the City of Escondido, but also from the unincorporated residences to the north, San Dieguito River Park lands, the San Pasqual Valley and the Safari Park.
- Noise impacts, both during construction and from residences. This includes vehicle noise, power equipment, barking dogs, etc. During construction there will need to be blasting and grading to get a very rough and rocky terrain flat enough for home development. How long will this last? Will we be compensated for this loss of our quality of life?
- Impacts to local wildlife, and impacts to the high quality bird life in the region from domestic cats and dogs, and impacts from noise and lights to wildlife.

**Fire:**

This area is mapped as VERY HIGH fire danger on County emergency planning sites. It is important to not understate this danger. This is a very high danger area in the most fire prone ecosystem on Earth. We have experienced three fires since acquiring property in the area, the first of which came so rapidly there was not time to escape and my partner sheltered in place. What are the dangers of bringing many more residents into the area, who may or may not have time to evacuate in a fire emergency? How will this endanger first responders? These issues need to be analyzed exhaustively. The proposal includes an open space between Safari Highlands Ranch and Rancho San Pasqual? New residents bring an increased risk of wildfire ignitions. The planned open space will provide plenty of fuel. The fact that this development will greatly increase fire danger to existing residents needs to be fully divulged in the EIR.

The proposal includes a side-slope escape route to the north, which would be a death trap and would also create a grading impact highly visible from all of Escondido. Would this escape route adequately serve residents in a Santa Ana style firestorm?

**Economics:**

At the City Council meeting concerning this project it was stated by one of the councilmembers that a goal for the City of Escondido is to expand its "high-end" housing options. I believe this is also stated in the Escondido General Plan. There seems to be a belief that such housing will help economic development in Escondido. This seems like wishful "trickle down economic" thinking. It does not seem responsible to make a precedent setting land use decision based on vague, unsupported economic goals.

I believe it is the responsibility of the Escondido Planning commission, in order to inform the decision makers and public, to conduct an objective study of exactly what the economic costs versus benefits of Safari Highlands Ranch would be. This study should look at:

- Whether high cost housing additions help economic development when low-cost affordable housing is already difficult to find in the region.
- Whether residents of Safari Highlands Ranch would actually drive business investment in Escondido, when they will have an equal, or shorter commuting distance to places like Rancho Bernardo, that already have high paying jobs.
- How distant, cul-de-sac style development will attract entrepreneurs when study after study have shown a trend towards young entrepreneurs and millennials preferring high density, urban style development with thriving city centers.
- Will the cost to the city to operate services (schools, fire, policing, water, sewage) for such a distant enclave be fully compensated by taxes from residents of the Safari Highlands Ranch? Without relying on hoped for economic development?
- How will average Escondido citizens benefit from the proposed community center and parks that are so far away from there homes?

In addition, the EIR should study how Safari Highlands Ranch will affect tourism to the Safari Park by altering views from the park and its attractions, and by increasing traffic and congestion in the area.

**Planning:**

The City needs to truly examine how this fits in with “Smart Growth” as described in the Escondido General Plan. This is a leap frog development with you incorporate the proposed open space. Mileage for residents to the nearest basic grocery store will be 7 mile drives each way.

In general, this EIR needs to really evaluate and argue why this type of development is suddenly considered appropriate in an area the County has rejected for similar development in the past and recently downzoned to 80 acre parcels due to concerns about environmental impacts and EXTREMELY high fire danger.

The Escondido Planning Department owes it to the citizens of Escondido and San Diego County to fully and objectively study this project. I’m confident that a full and impartial analysis will show that Safari Highlands Ranch would be a disaster for the local environment, with no economic benefit for the local community.

Thank You,  
 Lance Criley  
 3570 32<sup>nd</sup> St, San Diego, CA 92104  
[lcriley@gmail.com](mailto:lcriley@gmail.com)  
 619-851-0957

Dear Mr. Jay Petrek,

I would like to receive City of Escondido updates on the Safari Highlands Ranch (SHR). Could you please ensure my email ([beerwarrior72@yahoo.com](mailto:beerwarrior72@yahoo.com)) has been added to the email list?

Also, I want to express my opposition to the SHR development moving forward on any and every step in the process. The SHR is bad for the City of Escondido and for the local community where I live. I live in the Vistamonte Community and have 3 children (2 currently and 1 soon to be) going to the San Pasqual Union School on Rockwood Road. The amount of dangerous traffic that the construction will bring during the multi-year construction process will drastically increase the danger to school children walking/biking to and from school. My children walk and ride their bikes to and from school and I am deadly afraid of an impending accident that will occur.

The dangerous increase in traffic to the school kids listed above, is one of many reasons that I am against the SHR development. Many of the other items, sewage plant, dust, noise, increased fire danger, limited emergency egress, further unwanted urban sprawl, out house (for ongoing construction workers) sewage transportation trucks driving by my house and the school, loss of property value, loss of privacy, loss of wild life (road runners, mule deer, falcons, coyotes, etc.) coming through my back yard, further over crowding of the school, additional depletion of water resources, the potential of the elevated sewer treatment plant causing sewer backup into the gravity driven flow of sewage from the Vistamonte community, the sewer smell coming over the hill to my house (I live on the other side of the hill from the planned sewer plant), and false SHR promises (fire station, park, etc.) are some of the other issues that make the SHR bad for the City of Escondido and its community.

Thank you for taking the time to add me to the email list and for reading my list of concerns.

Sincerely,  
Michael Greer  
2752 Vistamonte Glen  
Escondido, CA 92027  
Cell: 858-864-2417

Dear Mr. Jay Petrek,

I would like to receive City of Escondido updates on the Safari Highlands Ranch (SHR). Could you please ensure my email ([beerwarrior72@yahoo.com](mailto:beerwarrior72@yahoo.com)) has been added to the email list?

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Thank you for taking the time to add me to the email list and for reading my list of concerns.

Sincerely,  
Michael Greer  
2752 Vistamonte Glen  
Escondido, CA 92027  
Cell: 858-864-2417

10/5/2015

**SAFARI HIGHLANDS**

**FISCAL IMPACTS ON EXISTING CITIZENS OF ESCONDIDO**

CITY OF ESCONDIDO UTILITY BILLING

The city of Escondido, within its Potable Water Distribution and Wastewater Collection systems experiences large costs associated with the maintenance and operation of pumping facilities.

Potable water pumping facilities appear to only impact the residents who live in expensive houses on top of hills. Wastewater pumping in the collection system appear to impact primarily the most recently developed, or wealthy parts of town. Wastewater lift stations for example, mostly serve luxurious estates in South Escondido.

The working poor in Escondido live predominantly in the area North of Felicita and South of El Norte. These areas are not served by any pump stations other than the systems required for all customers at the Treatment Plants.

A large part of the Wastewater and Potable Water budget, maintenance and operation is expended to operate these pumping systems.

UNFAIR BILLING PRACTICES

The leadership of Escondido has elected to spread the charges of these expensive pumping systems to all Utility customers. Other Utilities in the area including Rincon Water District and Valley Center only charge the residents for the pumping who need the pumping.

REQUIRED STUDY

Calculate the sum total of the expenditure by the city of Escondido on collection system lift stations and potable water booster pump stations. Re-calculate the customer bills of those who require pumps and those who do not.

Several areas of Escondido require more than one set of pumps. These areas should pay for all pumping that is required. Valley Center uses a pump zone criteria.

PUMPING REQUIREMENTS FOR SAFARI HIGHLANDS

Calculate the expenditure required to serve the proposed PROJECT. A new wastewater lift station will be required, existing Lift Station No. 13, Lift Station No. 1 and Lift Station No. 3 are needed to lift wastewater from the Project to the City Treatment Facility.

NCL GREENWOOD  
760. 749. 3808



For Potable water a booster pump station will be required to serve those at the top of the hill.

### CONCLUSION

After calculating the cost of maintenance, operation and capital replacement of these pumping systems we will see the massive financial injustice that is placed on the shoulders of the working poor of Escondido in order to help finance the lifestyles of the relatively rich. Should the poor citizens of Escondido help finance yet another rich estate?

Put the costs where they belong. If the PROJECT is built, let the future residents pay the whole cost of service.

NEW GREENWOOD  
760, 749, 3804

10/5/2015

**SAFARI HIGHLANDS**

**USE OF RECYCLED WATER/ ISSUES REQUIRING DETAILED STUDY**

RECYCLED WATER

There is currently some uncertainty regarding the modality of Recycled Water ("RW") service to the Safari Highlands Project ("PROJECT").

The developer has expressed that a wastewater treatment plant ("SEWER PLANT"), also referenced as a "Water Factory", is not a PROJECT requirement. Whether the SEWER PLANT becomes a final part of the PROJECT or not is unknown at this time, however, there are certain studies that will be required in either case.

A. DELIVERY OF RW USING EXISTING INFRASTRUCTURE

The existing City of Escondido RW distribution system does not serve the PROJECT area. There are currently two projects constructing RW facilities in the general direction of the PROJECT. It is conceivable that the PROJECT could extend those pipelines for service.

**STUDIES REQUIRED:**

a. Impact on the San Pasqual Basin

It has been known for some time that there is considerable groundwater degradation within the basin. An MWH study from 2007 identifies 10 compounds that exceed the Maximum Contaminant Levels and regional water quality objectives.

10 Contaminants in the San Pasqual Basin

- Chloride
- Fluoride
- Nitrate
- Selenium
- Sulfate
- Total Dissolved Solids
- Cadmium
- Aluminum
- Iron
- Zinc

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- Manganese

The introduction of RW from the City of Escondido will increase the already excessive levels of the above-mentioned contaminants. Manganese levels in the city of Escondido potable water and RW supply are known to be problematic during the usage of local water supplies. Study the compounds in the potable water and the RW, and note the impact on the already contaminated basin. Deliver a Basin Plan Amendment: Revise the Basin Management Plan.

At some time in the future, the city of San Diego will be required by the EPA to resolve the issue of groundwater contamination. Dischargers into the basin will be held accountable. Study the upcoming costs for property owners (prospective PROJECT residents) in the basin who add to the existing contamination.

#### B. DELIVERY OF RW USING ON-SITE SEWER PLANT

In addition to studies required under modality "A" additional studies are needed to uncover the impacts of an on-site SEWER PLANT, or "Water Factory" as the developer calls it. The environment impact of wastewater treatment facilities are relatively well known. Variables include location, power consumption (utilities are the largest consumer of power), and olfactory impacts.

##### STUDIES REQUIRED:

###### a. Process and Facility Off Gassing

A local plant that removes liquid from the wastewater stream and returns the solids is generally referred to as a "Scalping" plant. All SEWER PLANTS produce odors. Whereas the sealed process itself may not, the auxiliary equipment, fore-bays and maintenance do. RW rules require that the RW is used in irrigation during a time period when human activity is at it's lowest: at night. Wastewater produced during the day requires storage until night before it may be used. Storage of RW produces off gassing.

Study the localized wind patterns to determine whom the SEWER TREATMENT will impact.

Greetings,

The proposed Safari Highlands Ranch development would combine the 2<sup>nd</sup>, 3<sup>rd</sup>, and 11<sup>th</sup> largest single family home developments in the history of Escondido. Rancho San Pasqual consisting of 580 units, Safari Highlands Ranch with 550 units proposed, and Rancho Vistamonte with 80 units. That is a total of 1,210 homes with primary access being a single lane road in front of San Pasqual Union..

The most recent independent statistics (2012) from the California Office of Traffic Safety show that of the 56 cities of our size (comparing apples to apples), Escondido is the most dangerous overall and is the second worst of all 56 cities in pedestrians killed and injured less than 15 years of age.

Our current parking and pick-up and drop-off situation is not ideal but it is workable. Concordia's plan calls for elimination of street parking fronting the school and a reduction of parking in the east and west lots. There are no bike lanes, no public transportation and a minimum increase of an additional 145 students. Concordia is seeking a school district boundary adjustment to make it a total of 257 additional students added to San Pasqual Union and Escondido Union high school districts. Keep in mind that specific planning area number four (SPA#4) can have as many as 800 homes (SPA#4 includes SHR - 550 and Rancho Vistamonte -80). That leaves another 170 potential homes on the table. If those 170 homes were to be built using the SPU generation rate of 0.467, that would add yet another 79 students for a potential total of 336 additional students. In calculating LOS or VMT please consider future development with the entire 800 units that SPA#4 is zoned for.

I have concerns that traffic generated by SHR will result in long delays with idling cars and thus additional pollution. Large trucks ascending and descending a 14% grade with a reduced radius will create an abundance of noise as well as safety concerns.

Thank you for considering the below issues during the Environmental Impact Report,

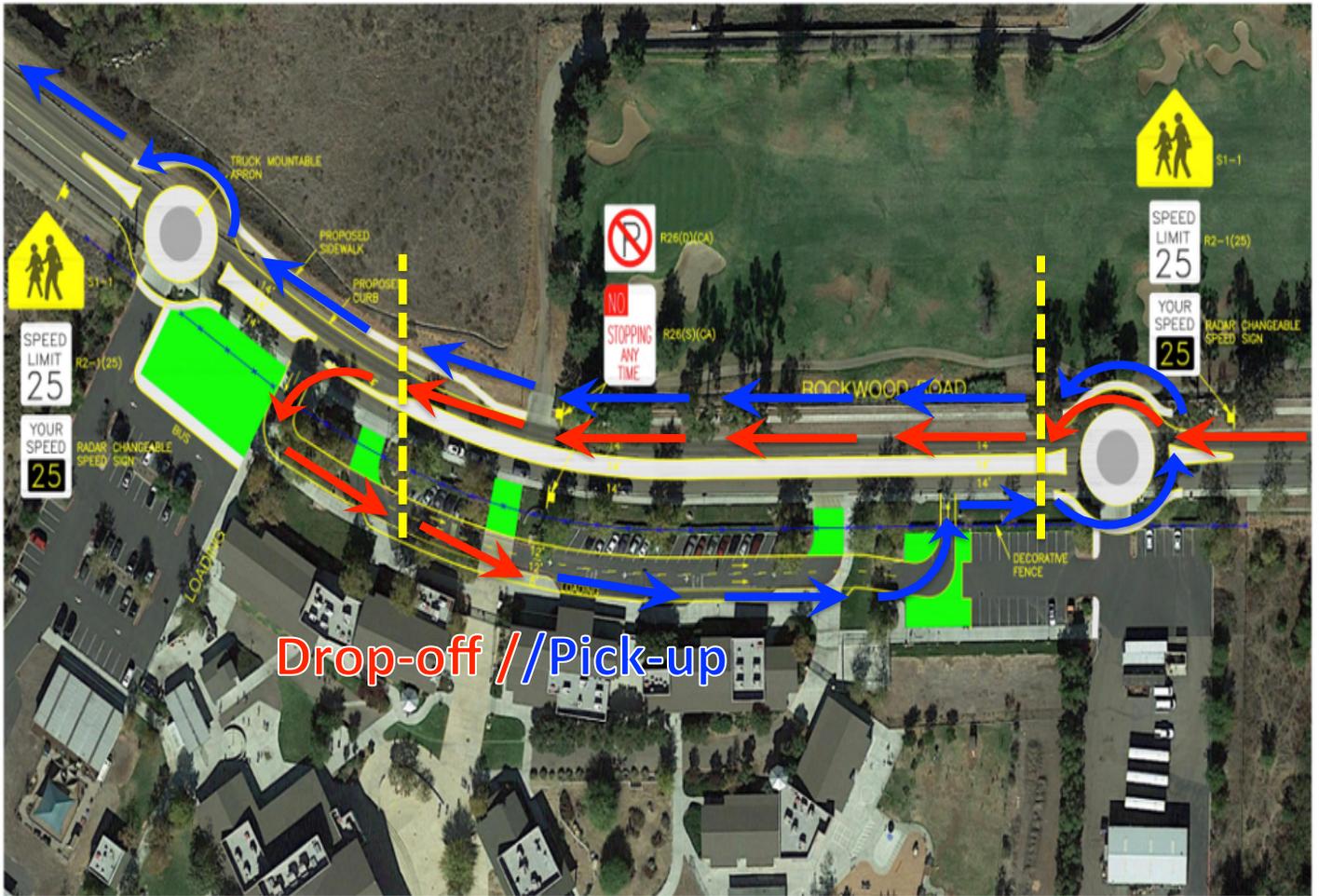
Scott Graves

[srgravesucd@hotmail.com](mailto:srgravesucd@hotmail.com)

858-248-7853



Pictures of Rockwood road extending from the western border of the school all the way past RSP to the proposed entrance to SHR. This is representative of traffic during school events.



The new “traffic calming” improvements and “airport style” pick-up and drop-off will now require a majority of parents traveling west outbound on Rockwood road dropping their kids off at school on the way to work during AM peak hours to traverse the same segment of road **twice**.

San Diego’s trip generation manual defines ADT (Average Daily Traffic) as:

**“Two-direction, 24-hour total count of vehicles crossing a line on an average weekday.”**

<http://www.sandiego.gov/planning/documents/pdf/trans/tripmanual.pdf> Appendix A-1

I’ve added yellow dashed lines adjacent to the eastern most traffic circle, which according to the trip generation manual demonstrates that Concordia has drastically undercounted the ADT on Rockwood during peak hours.

The left turn pocket in the median westbound on Rockwood only requires 9-10 cars waiting to turn left to block **all** westbound traffic. Please account for these delays when evaluating pollution of idling cars.

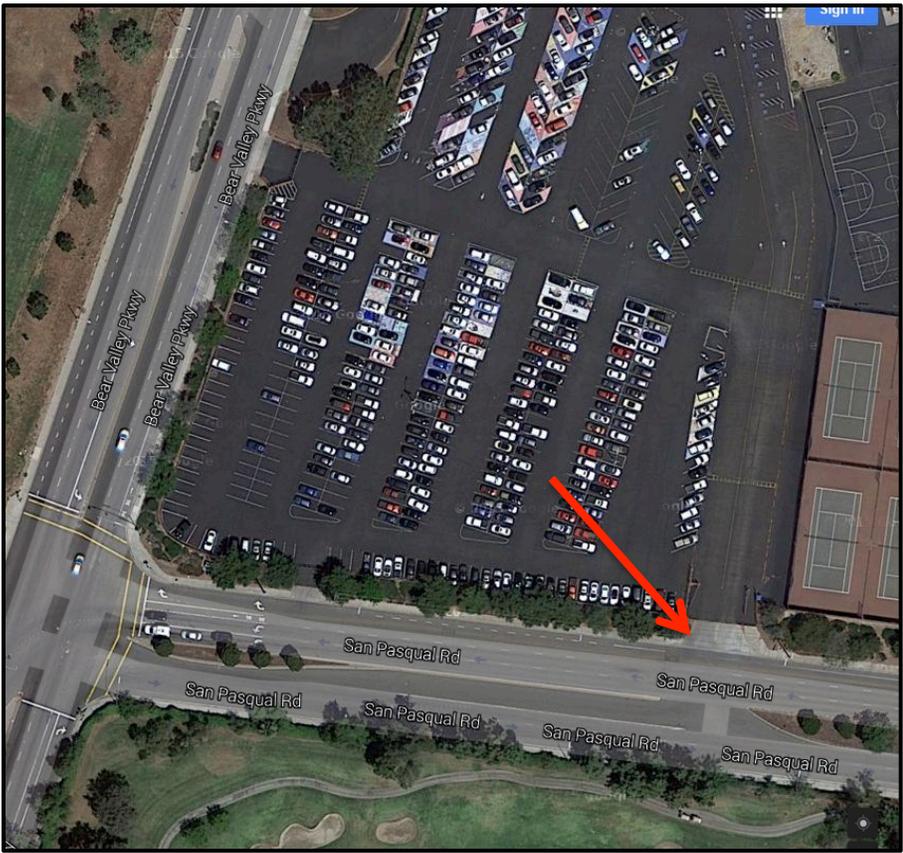
See the below images of the current state of San Pasqual Road:



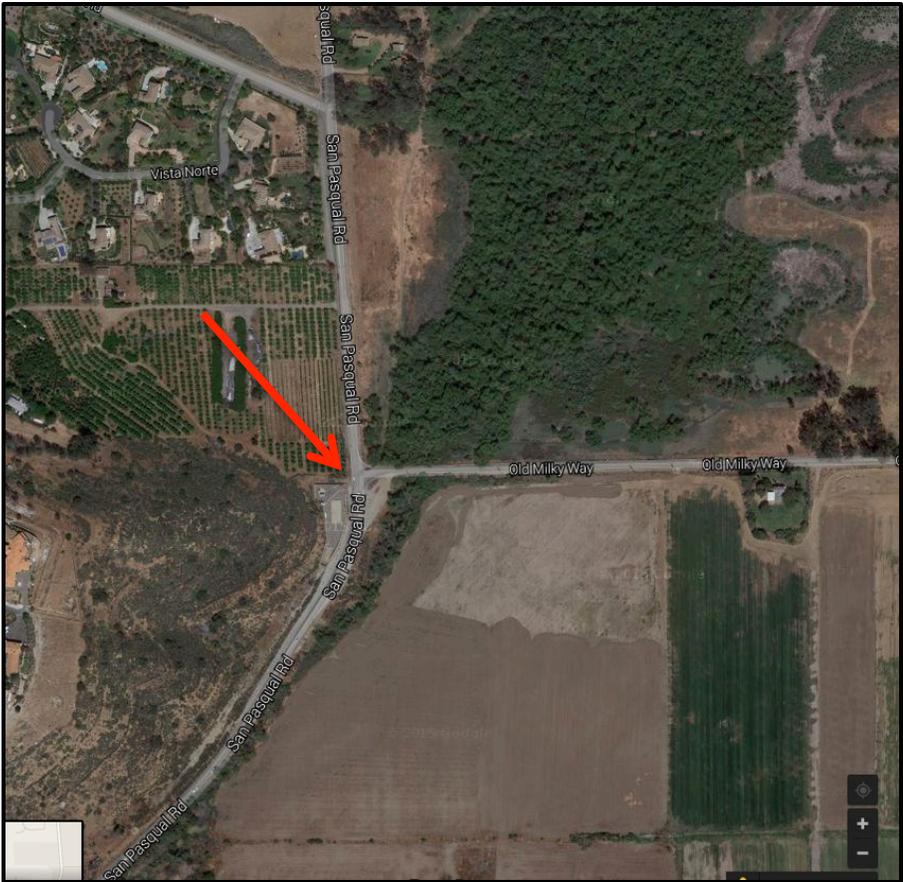
**General Plan Classification:** San Pasqual Road, 4 lane major road with intermittent turn lanes  
**Functional Classification:** Local Collector 2 lanes (NP)



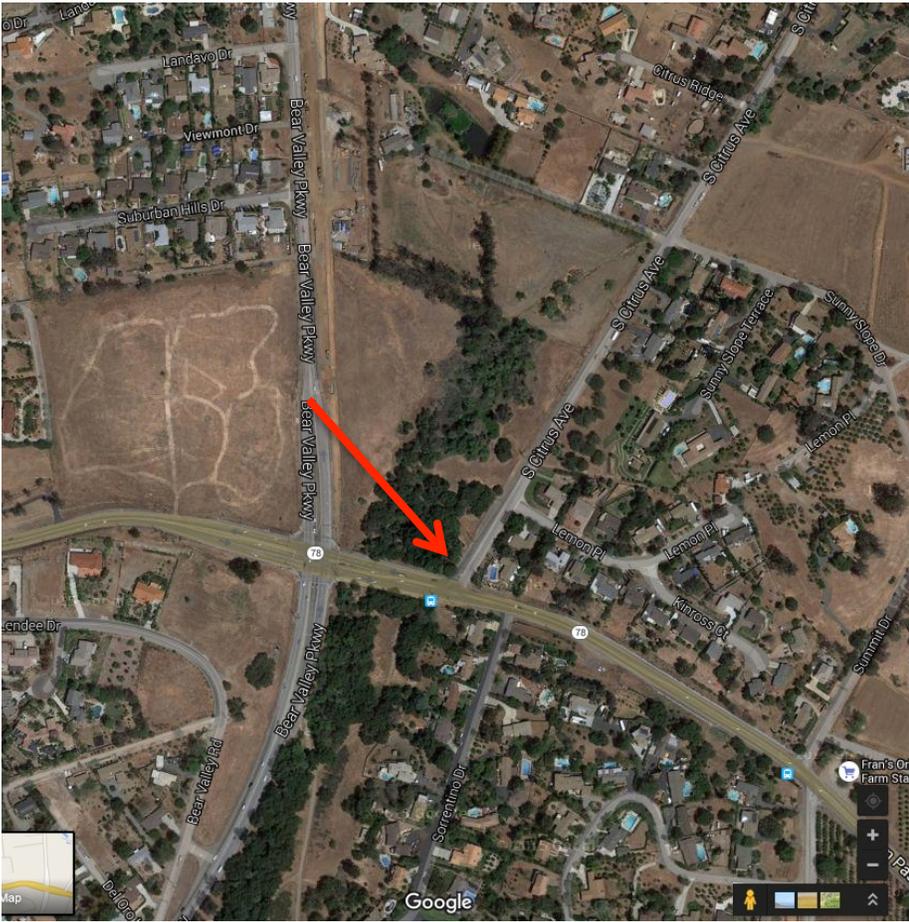
The City of San Diego maintains two segments of San Pasqual Road. “These two segments are currently on our unfunded street resurfacing backlog.” -City of San Diego. Pavement Condition Index (failing). Reliable Circulation/Infrastructure? Can Escondido compel San Diego to build a four lane major road when they can’t afford resurfacing? Currently no bike lane, no shoulder. ROW, minimum radius. 4/16/15 Communication with City of San Diego.



San Pasqual Road into San Pasqual High School will need a new traffic light. Parking effects?



The intersection of Old Milky Way Road and San Pasqual Road will also need a traffic light.



Citrus Avenue and San Pasqual Valley Road will need a traffic light and how will this work in such close proximity to the signalized intersection at Bear Valley Parkway.



## 2012 OTS RANKINGS

[Home](#) → [Media and Research](#) → [Rankings](#)

| Agency    | Year | County           | Group | Population (Avg) | DVMT      |
|-----------|------|------------------|-------|------------------|-----------|
| Escondido | 2012 | SAN DIEGO COUNTY | B     | 145,638          | 1,370,244 |

| TYPE OF COLLISION                | VICTIMS KILLED & INJURED | OTS RANKING |
|----------------------------------|--------------------------|-------------|
| Total Fatal and Injury           | 959                      | 6/56        |
| Alcohol Involved                 | 102                      | 3/56        |
| Had Been Drinking Driver < 21    | 15                       | 6/56        |
| Had Been Drinking Driver 21 - 34 | 48                       | 6/56        |
| Motorcycles                      | 30                       | 11/56       |
| Pedestrians                      | 70                       | 7/56        |
| <b>Pedestrians &lt; 15</b>       | <b>20</b>                | <b>2/56</b> |
| Pedestrians 65+                  | 8                        | 12/56       |
| Bicyclists                       | 66                       | 15/56       |
| Bicyclists < 15                  | 11                       | 15/56       |
| <b>Composite</b>                 |                          | <b>1/56</b> |



## City of Escondido

### Major Residential Subdivisions

1. Emerald Heights (Palos Vista) – 692 units

2. Rancho San Pasqual – 580 units

← Safari Highlands Ranch – 550 units

3. Eureka Springs – 340 units

4. Hidden Trails – 291 units

5. Lomas Del Lago West – 256 units

6. Brookside – 223 units

7. Lomas Del Lago East - 158 units

8. Kent Ranch – 148 units

9. Washington Hills – 124 units

10. Rancho Vista Monte – 80 units

**1,210 homes with primary access passing in front of San Pasqual Union on a one-lane street.**

## Additional Concerns:

View shed from 2043 Cloverdale Rd in front of dairy.



Concerning light pollution Concordia should provide nighttime representations of their published view sheds. I am concerned automobile headlights pointing upward on a road with a 14% grade will cause significant glare. Conversely, I am also concerned that automobiles descending a 14% grade will project light into the yards and homes of Rancho San Pasqual. Please consult with Caltech and the Palomar Mountain Observatory to make sure that SHR is in compliance with the dark sky initiative.

Scott- Jay Petrek asked me to get back to you regarding your questions about Safari Highlands Ranch. I've broken your email down to what I see as four questions. See below.

1. Who approves exemptions/exceptions to grading and road standards? The City Engineer in consultation with other City staff will make recommendations to the Planning Commission and City Council regarding any proposed deviations to adopted City engineering standards. The City Planning Commission will act in an advisory role regarding all aspects of this project, including City engineering standards, and will provide their recommendation to the City Council. The ultimate authority to approve, disapprove or modify the project rests with the City Council. If the City Council votes to approve the project, they must make specific findings supporting their decision relative to conformance with City standards as well any environmental impacts found to be significant in the EIR process.
2. Traffic analysis for Rockwood Road. The applicant's current proposal is that the extension of Rockwood Road would be dedicated to the City and become a City public road up to the proposed private entry gate. This public road would provide access to the development as well as to the proposed City fire station and public park area. It would be maintained by the City. All roads inside the entry gate serving the development would be private and would be maintained by the Home Owners Association. The EIR will address the adequacy of these roads and how they conform to City standards.
3. EIR traffic analysis. The EIR will analyze the impacts to all roads affected by this project including those within the City of Escondido, the City of San Diego and the County of San Diego. This analysis will consider the other jurisdictions' standards if they vary from Escondido's.
4. Is an SOI determination needed for the other five study areas. Yes. The EIR will analyze the five SOI study areas including the Safari Highlands Ranch area as part of the City's five year SOI update process. Completion of SOI update would take place through the San Diego Local Agency Formation Commission (LAFCO) after EIR certification and SHR project approval by the City Council. LAFCO approval of SOI update and annexations/detachments are necessary for the SHR development to proceed. However, properties other than SHR considered in the SOI update may be included in a larger annexation, but such annexations are not a precondition of the SHR project.

I hope this responds to your questions. Please call me with any other questions.

John Helmer  
Consultant  
(760) 839-4543  
Planning Division  
201 North Broadway  
Escondido, CA 92025  
[www.escondido.org](http://www.escondido.org)



**From:** Scott Graves [<mailto:srgravesucd@hotmail.com>]  
**Sent:** Friday, September 11, 2015 3:44 PM  
**To:** Jay Petrek  
**Subject:** SHR Scott Graves

Hi Jay,

Thanks for giving us advanced notice on the SHR CEQA/NOP meeting on the 24th. I have a couple of quick questions regarding SHR. Who officially approves or rejects exemptions to the general plan regarding the requested 12% ->14% grade exemption, minimum road curve radius, level of service, etc. Is it solely politicians, or do planning engineers have a say? Looking at SPA#4 and as the EIR/SOI/Annexation moves forward, I've reviewed other developments and it appears that roads leading to an annexation are typically transferred over to the new city. Rockwood road fronting San Pasqual Union ( $\approx 300'$ ) is currently surrounded by Escondido on 3 sides and it essentially amounts to an irregular peninsula. Annexed cities frequently transfer over these cutout sections with the justification that why would they continue to maintain a road that serves no part of their city. I feel strongly that the traffic impact analysis of the EIR applies the Escondido standards (instead of just an "\*" next to significant impact) to the entire section of Rockwood road for continuity and for what will likely become a part of Escondido in the future. Would a separate SOI determination need to be made similar to the 5 areas currently under review or does the section of road just need a simple amendment?

See you at the CEQA/NOP meeting on the 24th.

Thanks,  
Scott Graves

October 1, 2015

Jay Petrek Assistant Planning Director  
201 N. Broadway  
Escondido, CA 92025



Re: Safari Highlands Ranch Project

Dear Mr. Petrek,

For 55 years we have lived on the section of Rockwood Road that is currently accessed through the Safari Park's Zoo Road. Our proximity to the Safari Highlands Ranch project presently being considered by the City of Escondido has raised a number of concerns.

**ACCESS TO HIGHWAY 78 .** (1) Would our access to Highway 78 continue to be through the Park's Zoo Road? If so, would the narrow, curved road from the Park's employee gate to the end of its Rockwood Road property be improved by the Project? to accommodate increased traffic from routine use by Project personnel? Also, if the Project were to provide access to that portion of Rockwood Road to people evacuating during a wild fire, the current Zoo Road would be impossibly clogged, preventing home owners like ourselves from reaching Highway 78. (2) If our access to Highway 78 would no longer be via Zoo Road, what alternative access would the Project provide?

**INCREASED TRAFFIC TO ESCONDIDO AND I-15.** The huge increase in traffic resulting from the hundreds of homes proposed to be built by the Project would inevitably result in significant delays and safety hazards on Highway 78, Bear Valley Parkway, and particularly on narrow, curved San Pasqual Road. How does the Project plan to address this problem?

**FIRE HAZARDS.** Any time areas where the risk of wild fires is great are developed, the likelihood of such fires is bound to increase. Two dreadful fires in our area in recent years caused extensive damage not only to people but to native wildlife and vegetation. The ongoing drought has also exacerbated the danger. We therefore have grave reservations concerning this issue and specifically what protection would be provided to property on our section of Rockwood Road.

**THREAT TO THE ENVIRONMENT.** The proposed Project would disrupt a beautiful unspoiled area, depriving diverse native wildlife of its habitat and destroying native vegetation.. Such areas are rapidly decreasing and should be preserved with development instead being concentrated in urban areas . The City of Escondido has previously been in agreement with this approach to increasing population and we hope it will continue to act accordingly.

We would appreciate receiving e-mail regarding the Project.

Thank you.

Two handwritten signatures in blue ink. The first signature is "Stan Yalof" and the second is "Gloria Yalof".

Stan & Gloria Yalof

17292 Rockwood Rd, Escondido CA 92027; 760-743-1560; smeerch@gmail.com

To: Jay Petrek in the Escondido City Planning Department  
Jay Petrek, City Planning Dept.: [safarihighlands@escondido.org](mailto:safarihighlands@escondido.org)

From:  
Suzanne & Dallas Keck  
2740 Vistamonte Glen, Escondido, CA 92027  
Phone: 858-435-4826 -- Email: [slkeck@ymail.com](mailto:slkeck@ymail.com)

---

RE: Safari Highlands Ranch – Environmental Impact Report – Concerns and areas we would like studied

We were out of the country and were not able to attend the public scoping meetings that were held. We were told we could submit our concerns and areas we wanted studied if we sent to you by email before October 12<sup>th</sup>.

Concerns we have about the SHR plan that we would like to be analyzed and studied in the Environmental Impact Report (EIR)

### **TRAFFIC AND SAFETY**

- Analyze traffic impacts to San Pasqual Road and Old Milky Way
- Analyze traffic impacts near the High School
- Analyze traffic impacts to San Pasqual Valley Road and Citrus
- Analyze traffic impacts to San Pasqual Valley Road and Cloverdale
- Do impacts from San Pasqual Valley Road impact adjacent Agricultural Preserves?
- Analyze traffic impacts to Felicita and Center City Parkway
- Ensure that all traffic counts are accurate, current and reflect typical driving day when school is in session.
- There is a concern about steep grades of access roads. Will these roads be accessible to bicycles and emergency vehicles?
- Analyze safety of increased traffic on the school.
- How will increased enrollment affect school parking?
- Analysis should consult Office of Traffic Safety accident data and ratings and evaluate increased accidents.
- How effective would the two emergency access routes be?
- What is the effect of area wide emergency evacuation?
- Would the development use the emergency access roads? How much?

- Rockwood Road is estimated to be used by more than 13,000+ cars/day (per Concordia's traffic analyst) on a road currently used by 3,500 cars/day – this creates dangerous traffic levels in front of a school and along a path many RSP/RV children use to walk to/from school
- Traffic congestion from 13,000 cars using Rockwood Road and trying to navigate two traffic circles in front of the school, removing much-needed parking spots on-campus, and building "airport style pick up and drop off" for the kids (effectively changing the character/charm of the school and adding additional safety concerns).
- Rockwood Road is not wide enough for raised median SHR plans – where is that land going to come from to widen the road?
- Impact to San Pasqual High School in terms of thousands of more cars passing daily - The Bear Valley route – increases traffic past two additional elementary/middle schools.

### **SCHOOL**

- The school would probably need to accommodate well over 200 new students. Need to find/create the classroom space and teachers to support that influx. How will that be done?
- How will school events handled with no parking?

### **EMERGENCY RESPONSE TIMES**

#### Analyze

- Police response time:
  - We are already outside of the 5 minute desired response time average.
- Fire evacuation:
  - Safari Highlands Ranch will still use the only entrance and exit for their development as RSP and RV (Rockwood to Cloverdale Road – there is NO second access planned (only adding a northern emergency exit similar to how Zoo Road functions currently). This is inadequate
  - Increased Fire danger – high fire danger area with lots of dry land that is currently inaccessible will have years of construction activity followed by thousands of future residents that both bring increased fire danger -sparks from construction equipment/landscape equipment, opening up currently inaccessible dense dry brush to accidental or intentional fire-setting. It is common knowledge that burning embers can travel a mile or more. Look at the possibility of putting a HUGE amount of additional fuel within a mile of the RSP and RV communities with a 500 ft elevation advantage. The winds blow towards these communities during a Santa Ana event. The so called SHR "fire experts" at the meeting at the school last year stated that

"this wouldn't be anything to worry about". Well, we are very worried about this.

- Will the fire station be built first? If not, at what time will the fire station be built and operational?
- Who will pay to provide equipment and personnel for the new fire station?

Very concerned about fire danger and evacuation times. In 2003 & 2007 evacuations were very very slow – what would it be like after adding 550 more homes here?

Would Zoo Road be able to handle those increased demands (mostly dirt, not wide) if the need arises?

SHR's planned northern emergency access through private land/avocado grove near East Valley Parkway. When asked why this couldn't be a primary access road alternative since Concordia is willing to pay the landowner for use of the land, their Traffic Consultant acknowledged that the grade (steepness) of the road was too high. Is this then not too high for emergency evacuation and fire/emergency vehicles?

### **ENVIRONMENTAL ISSUES**

- Grading of the proposed golf-course access – will a 14% grade require an exemption? What impact will it have?
- Grading of other roads – What impact will it have?
- Analyze mudslide/rockslide risk during short periods of heavy rain? Overall destabilization of those hillsides?
- Slope of the road/curves/safety of downhill speed?
- What kind of retaining walls, if any, will be used to hold in the mountainside and traverse the waterfall? Will they fit with the aesthetics of the surrounding natural environment?

### **Concerns for San Pasqual Agricultural Preserve & other designated open space areas surrounding this site**

- Endangered/protected habitats, animals, & cultural artifacts currently on the property
- Negative impact on wildlife that live in those hills; displaced animals and reptiles will be forced down into the valley, resident's yards and at risk of being hit by cars causing injury (to themselves and to the drivers).

### **WATER**

- Will this project require an update to the Water Master Plan?

- The construction phase will require lots of water use during a time when heavy water restrictions are in place.
- Ongoing occupancy of the land will require water use; the ability of Concordia's proposed water catchment/treatment plant/etc to be approved is debatable and its ability to fully service the needs of the development is unlikely.

## **POLLUTION**

### **Light Pollution**

- Homes, street lights, etc affect night sky/star viewing from Palomar Observatory and Safari Highlands Ranch project will be more elevated and likely more negatively impactful. Analyze total impact of light pollution.

### **Noise Pollution**

- During many years of construction (blasting road and leveling home sites will be a noise nuisance for residents and disruptive to San Diego Zoo's Safari Park.
- Ongoing noise from increase of thousands of "trips/day" in some areas that currently have no road access.
- What are the noise levels of the proposed sewage treatment plant?
- Analyze how noise will noise echo throughout the valley – into the RV and RSP communities and the San Diego Zoo's Safari Park.

### **Air Quality Impacts**

- EIR should analyze both construction phase and long term air quality impacts.
- Dust and other airborne particle from blasting roads and clearing home sites and building will be ongoing for years
- Additional pollution from 13,000 trips/day down Rockwood Road (per their traffic analysis)
- Analyze Air and odor/smell and chemical pollution from the proposed sewage treatment plant – satellite reclamation plant. How will this affect RSP and RV communities and the San Diego Zoo Safari Park which are downhill and downwind from the treatment plant?

## **AESTETICS**

- Analyze visual impacts of grading, new roads and retaining walls.
- Analyze impacts of ridgeline development
- Provide visual simulations of SHR as viewed from Cloverdale/Highway 78 and San Pasqual Valley Road and from RSP and RV communities.

- Will the community and roadways fit in with the aesthetics of the surrounding natural environment?

### **CULTURAL RESOURCES**

- Have all affected tribes been consulted and notified?
- How will cultural artifacts be handled?

### **SAN DIEGO ZOO SAFARI PARK**

- Fully analyze all of the effects on the San Diego Zoo's Safari Park. The Parks' breeding facilities and other sensitive areas would especially be adversely affected. Noise and light and air pollution would have a negative impact on the park and on the animals, some which are endangered species.

### **PUBLIC SERVICES**

- Will the full range of public services be adequate and how will they be impacted?
- How will the need for increased public services be paid for?
- There are not a lot of public services out here. This area requires longer driving times to go for groceries or other basic needs. Analyze effect of additional car trips by a large community such as SHR to get basic services as such.

### **COMMUNITY**

- What is the full range of community benefits?
- How will the community benefits be evaluated and weighed against project impacts?
- Does the project related sewage and drainage affect City of San Diego Basin Plan?

SHR completely goes against the City's General Plan updated in 2012 to focus on smart growth in the urban core where infrastructure already exists, and not in the outlying rural areas. This is not responsible development. It is dense urban sprawl in a biologically rich and protected area that is currently inaccessible,

I appreciate the opportunity to voice my opposition to the proposed Safari Highlands residential development. I live at 3180 Ferncreek Lane in the Rancho San Paqual neighborhood. I share my neighbors concerns over the adverse impact this development will have on our quality of life, specifically the unmitigatable traffic congestion along Cloverdale and Rockwood roads and the devastating overcrowding of our school.

Of greater importance is the potential safety and environmental issues this development presents. During the Witch Creek fire the evacuation of this development was a very slow process because of road congestion. The doubling of the volume of evacuees during a similar event is potentially disastrous. The proposed use of the Safari Park access road sounds good but it is always gated and locked.

The area proposed for the entry road for the development between Rockwood Road and the developments entry gate goes through, what is now untouched Coastal brush land. This area is home to numerous endangered species as well as native plant life. This area was also part of the Multi Species Conservation lands set aside as mitigation for the 4S housing project in Rancho Bernardo. The City of Escondido was a signatory to that plan.

On a personal level I purchased this home 3 years ago based on its location adjacent to the T box for the 14 hole of Eagle Crest golf course and the pristine open space which starts about 20 feet off the back of my house. I did my due diligence and there was no development or roadway planned on that land. While I find the development to be ill conceived I am completely dumbfounded by the change in the originally planned entry road which reached the project entry gate by a road that went south and east of the Vista Monte housing area. The new proposed alignment will place a roadway, carrying approximately 6,000 trips per day, 200 feet off my bedroom wall. This road will also destroy the T box adjacent to my lot.

If this development is allowed to proceed as currently planned I will have no choice but to take legal action against the city. It is difficult for me to accept that the City of Escondido values the interests of an out of town developer, trying to build on property outside the city above the rights of its citizens.

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Sent from my iPad