



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:

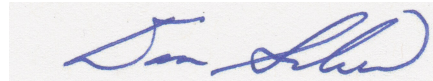
- 1) MSCP conformance is assured through an Annexation Agreement between Escondido, the County, and the wildlife agencies per Section 9.19 of the MSCP Implementing Agreement. This occurred, for example, in the case of an annexation to the City of Vista.

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,



Dan Silver  
Executive Director