



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
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EDMUND G. BROWN JR., Governor  
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October 16, 2014

Mr. John Helmer, Planning Consultant  
City of Escondido Planning Division  
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**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

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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)

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