



North County Group
Sierra Club San Diego
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January 2, 2018.

Mr. John Helmer Contract Planner
City of Escondido
201 North Broadway, Escondido, CA 92025
Via email: jhelmer@escondido.org

**RE: Sierra Club North County Group comments on Safari Highlands Ranch
DEIR # ENV 15-0009; SUB 15-0019**

Dear Mr. Helmer,

The North County Group (NCG) of the Sierra Club San Diego has a mission to promote the responsible use of the earth's ecosystems and resources and to protect and restore the quality of the natural and human environment. We represent over 2,600 members in the North County Inland region. We respectfully offer our comments on the Draft Environmental Impact Report (DEIR) for the proposed Safari Highlands Ranch (SHR) development.

The Safari Highlands Ranch (SHR) project proposes to up-zone 1,100 acres of pristine open space lands from 27 units to 550 dwelling units by annexing the property into the city of Escondido. The design of the project recommended by the DEIR maximizes the environmental impacts and is in violation of agreements made with the County and natural resources agencies. It will create over 19 miles of edge impacts, destroy 502.7 acres of habitat including 236 acres of Diegan coastal sage scrub (CSS), will destroy 417 established oak trees, impact 4.33 acres of wetlands, and reduce or eliminate important wildlife corridors.

The purpose of this letter is to provide comments on the DEIR. We support the filings on this documents of the Wildlife and Habitat Conservation Coalition, Endangered Habitats League, Sierra Club North County Group, and the San Pasqual Valley Preservation Alliance. In addition, please find our additional comments below.

1. Project does not comply with the current or projected Multiple Species Conservation Program (MSCP) plans.

This is the most significant failing of the DEIR and the proposed project. The SHR Project MSCP/MHCP Consistency Analysis Report is deeply flawed and does not include evidence upon which to base its conclusions. The December 7, 2017 comment letter on this project from the US Fish and Wildlife Service clearly states, "*...the proposed project is not consistent with the conservation goals of the Subarea Plan or the Interim Review Process.*" (USFWS_ DEIR_SFR letter at 2).

The DEIR notes the city of Escondido does not have an adopted Subarea plan. This is a major concern. Because the city has failed in its duty to adopt a Subarea plan, they must not be allowed to rely on it or allow developers to ‘earn’ favorable mitigation treatment as if they did have an adopted plan.

The DEIR cannot find compliance with the MSCP as it fails to meet at least 10 key criteria of in Multiple Species Conservation Plan (MSCP) and other regional plans, including the Hodges Reservoir-San Pasqual Valley and Metro-Lakeside-Jamul plans. These failings are detailed in other submittals on this DEIR.

2. The DEIR fails to properly designate the role of this property in the MSCP plans.

While the DEIR does state that virtually all of the site is designated an MSCP/MHCP Pre-Approved Mitigation Area (PAMA), it fails to recognize that this area also functions as a biological core resource area. These lands constitute large, undeveloped areas that are necessary to form the core of a preserve under regional habitat planning. The project design, which created miles of edge effects and development sprawled throughout the site, cannot be found to be preserving large core areas. The Project must be significantly revised in order to meet the habitat planning criteria and Planning Agreement with the natural resource agencies.

3. DEIR fails to designate the 128 acres of FMZ-II areas as a permanent impact and to mitigate for it.

The DEIR attempts to designate the 128 acres of FMZ II as a ‘temporary’ impact not needing mitigation. It is not temporary. The impacts of the ‘management’ (thinning, cutting, clearing, etc...) is an impact (loss) to the habitat and will occur on a permanent basis. Further, the management of this area will not be directed by an HOA or even the city. Due to its primary function for fire suppression, the fire department will ultimately direct how the area will be managed. The DEIR must be significantly revised to list this area as a negative habitat impact and fully mitigate for such impact.

4. DEIR incorrectly tries to use the FMZ-II as mitigation for impacts, when it is, in fact, an impact.

Another significant error in the DEIR is the attempt to classify the FMZ-II **as a mitigation** for the indirect and edge effects. This is completely in violation of the rules of CEQA. This area will have significant impacts as it is thinned, manipulated, and otherwise impacted for fire suppression. In addition, it cannot serve as a mitigation since the DEIR states that the area is “*expected to support habitat function as a secondary goal to fire protection.*” (DEIR at 2.3-17, emphasis added). Further, the DEIR does not include performance standards of management or maintenance as habitat associated with these areas. This is not allowable for mitigation lands under CEQA. The DEIR must be significantly revised to provide for full mitigation of these impacted areas.

5. DEIR fails to avoid or protect over 300 Englemann oak trees

The Englemann oak tree, an increasingly rare and threatened tree, is proposed as a covered species in the NC-MSCP. This project intends to remove over 300 of them. The planning design clearly made no effort to avoid this species or the oak woodland areas. Overall, over 400 oak trees are proposed to be removed. These losses should be significantly avoided by a reduction and redesign of the project.

6. The DEIR mis-represents the amount of habitat impacted.

The DEIR states that the plan ‘preserves’ 760 acres of the site as undeveloped open space. (DEIR at 3.0-18) This is incorrect. There are impacts to at least 502 acres of the site, leaving 629 acres, at best, undeveloped. This is 44% of the site, not 31% as stated by the DEIR. The guidance for SD-MSCP states, “*The habitat values of a biological resources core area is significantly degraded if 25% of the biological core area...is impacted*”. This is substantially exceeded by this project of 44% destruction of core biological habitat.

7. DEIR allows destruction of most sensitive habitats and ‘preserves’ the least useful for species.

Another key failing of the plan is that most of the gentle sloping areas (0-15% slope) are developed and the steep, inaccessible and unusable slopes are preserved. It is well-documented that gnatcatchers and their habitat are found, not on steep canyon walls, but in gentle sloping areas. This is also a key area for Englemann oaks.

The design, as a whole increases, edge-effects and fragments habitats on site. These are both counter to the design requirements of protection of important habitat. It is clear that the planning designed the project, not for minimum impact or respect for the environment, but for what would be easiest to develop. In sensitive areas such as this, it is the wrong priority.

8. Trails and public access plan must be revised.

The NCG is very supportive of trails and public access in areas where it is appropriate and consistent with wildlife and habitat protection, however, we do not support the plan included here.

First, it allows considerable **private** trails and recreational assets. These should all be public. Second, the trail and overlook system is not designed for minimum impact on the wildlife and habitats. In several areas, proposed trail segments bisect core areas of habitat, reducing the use for species and corridors for their movement and isolating habitat areas. Third, the criteria for allowable uses is not disclosed and the project does not provide for long-term management and maintenance. All of these issues must be addressed prior to certification.

9. Increase in invasive species not accounted for or mitigated.

With this significant increase in human population and use, many invasive, non-native species will cause a toll on the local environment. Feral cats and dogs, pets on the loose, increase in Argentine ants (which push our Horned Toad prey base), and invasive plants can be reasonably anticipated to impact the habitat. These were not adequately addressed or mitigated in the DEIR.

10. DEIR fails to preserve wildlife corridors

A key criteria of the MSCP planning is the retention of functioning wildlife corridors. This project fails to implement the recommendations of the natural resource agencies regarding corridors and eliminates one of them altogether. Further, the areas left for corridor use are steep slopes and highly inaccessible lands which are not easily used by wildlife and will frustrate their travel through this site. This is unacceptable and the protection and (given other impacts) the enhancement of wildlife movement through this area must be improved.

11. Inadequate actions are required to offset and reduce greenhouse gas emissions.

Although the city of Escondido has an adopted Climate Action Plan, the measures required by this project are unclear. Further, no evidence is given that the measure allowed for compliance will actually reduce Greenhouse Gas (GHG) emissions from the project. It is noteworthy, that in a recent evaluation of the city of Escondido's Climate Action Plan, the Climate Action Campaign received the lowest score of seven city plans evaluated. (<https://www.climateactioncampaign.org/climate-action-plan-report-card/>). This does not inspire confidence that even meeting the CAP will actually reduce emissions.

Further, the allowance of wind turbines as a compliance measure in this high raptor use area, should not be allowed.

12. Significant cumulative impacts of opening backcountry to development and growth-inducing impacts unanalyzed in DEIR.

The SHR property is located in close proximity to 20,000-acre Rancho Guejito, the last remaining, intact, undeveloped land grant in the region. It is one of the most remote and pristine habitat areas in Southern California. SHR development, should it proceed, would open this most remote area to development intensity by providing roads and infrastructure to the edge of this property. Further, the increases in fire-risks and invasive plant and animal species pose a significant impact to the biological resources of the Rancho Guejito land. The DEIR also completely fails to address the growth-inducing impacts of this project on Rancho Guejito. These major cumulative and growth-inducing impacts are unaddressed in the DEIR rendering the document grossly insufficient. Further, Escondido has a history of wanting to annex Rancho Guejito. (<http://www.sandiegouniontribune.com/sdut-rancho-guejito-a-development-challenge-2007jan29-story.html>). Given Escondido's appetite and propensity to annex lands far beyond their ability to manage them adequately, the threats to Rancho Guejito are real and significant and must be fully analyzed in the DEIR.

13. Cumulative impacts not assessed; negative precedent set.

Importantly, should the city of Escondido certify this EIR and move forward with this plan, it would fatally undermine the habitat/development planning in the whole region. If a developer is allowed to merely find a ‘development friendly’ Council majority to annex their property with PAMA and BRCA designation, apply for a project that does not in any way comply with the MSCP criteria, and successfully secure entitlement, this will set a precedent and it is unclear why any developer would attempt to comply with this important program. It would put compliant developers at an economic disadvantage. This DEIR must evaluate the impacts of the loss of the future progress for regional habitat planning efforts if this, non-compliant, project is allowed to go forward.

Last, we want to be clear that the NCG does not oppose all housing developments. We support the appropriate development of needed housing in the region. This project, however, will not provide the housing stock needed in Escondido, is an example of a GHG generating, sprawl land-use pattern, increases fire risks and environmental losses.

In conclusion, the North County Group of the Sierra Club joins the many other organizations and individuals calling for this project to be withdrawn and, if any project is pursued, it should be limited under the current County zoning and consistent with the MSCP/MHCP and the County General Plan.

If you have questions about our comments, please contact Laura Hunter, NCG Conservation Chair, at 619-997-9983 or at earthlover@sbcglobal.net.

Thank you for the opportunity to comment on this important project.

In conservation,

Kelly Conrad, Chair
Sierra Club North County Group

Laura Hunter, Conservation Chair
Sierra Club North County Group