



Mr. Everett DeLano
DeLano & DeLano
104 W. Grand Ave., Suite C
Escondido, CA 92025

Re: Safari Highlands Ranch DEIR Analysis

Dear Mr. Delano,

The attached is an analysis of the Safari Highlands Ranch Aesthetics and Visual Resources Section of the Draft Environmental Impact Report (DEIR).

Background:

The City's General Plan recognizes that hillsides and ridgelines "provide a visual resource and aesthetic value to Escondido that contributes to the community's sense of identity." It further states that "a primary objective of viewshed policies is to preserve and protect existing internal and external view corridors in Escondido, with particular emphasis on ridgelines, unique landforms, visual gateways and edges of the community. It goes on to state that by maintaining policies that limit development in these sensitive areas, the General Plan can ensure that primary objectives of preserving and protecting key viewsheds.

The DEIR acknowledges these resources within the project viewshed and describes the surrounding hillsides as prominent in views from the valley floor and as key elements contributing to the region's visual character, of high importance, and protected by the City's General Plan and Zoning Ordinance.

Project Setting:

The project viewshed lies within the picturesque San Pasqual Valley and defined along its eastern edge by a backdrop of hillsides, ridgelines, and visual resources characteristic of the Escondido area. These landforms are highly valued and their conservation considered highly important by the community because of their contribution to Escondido's overall quality of life and conserving and sustaining these resources are vital keys for maintaining a healthy and vibrant community, according to the City of Escondido's General Plan.

The Aesthetics and Visual Resources Section of the DEIR addresses potential aesthetic and visual resource impacts that may result from implementation of the Safari Highlands project (Project). Part of that analysis involves the Project's compliance with applicable policies pertaining to visual resources. Relevant policies, warranting emphasis and/or not adequately addressed in the DEIR, are noted below:

Policy Framework

City of Escondido General Plan

E. Community Context and Vision / 3. Perimeter Areas

To retain Escondido's visual backdrop of mountains and hillsides and preserve its natural terrain, *General Plan policies call for strong measures to protect environmentally sensitive habitats, ridgelines and steep slopes.*

VII. Resource Conservation Element / E. Visual Resources

Hillsides and ridgelines provide a visual resource and aesthetic value to Escondido that contributes to the community's sense of identity. A primary objective of viewshed policies is to preserve and protect existing internal and external view corridors in Escondido, with particular emphasis on ridgelines, unique landforms, visual gateways and edges of the community.

II. Land Use and Community Form / Goals and Policies

Community Character Policy 1.3

Focus development into areas where land use changes achieve the community's long-term goals.

VII. Resource Conservation / Goals and Policies

Visual Resources Goal 3

Preservation of significant visual resources such as ridgelines, hillsides, and viewsheds that serve as a scenic amenity and contribute to the quality of life for residents.

Visual Resources Policy 3.1

Preserve significant visual resources that include unique landforms (e.g., skyline ridges, intermediate ridges, hilltops, and rock outcroppings), creeks, lakes, and open space areas in a natural state, to the extent possible.

Visual Resources Policy 3.2

Require new development to avoid obstructing views of, and to minimize impacts to, significant visual resources through the following: creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; clustering of development to preserve open space vistas and natural features; minimal disturbance of topography; and creation of contiguous open space networks.

Visual Resources Policy 3.3

Maintain density and development standards designed to protect significant visual resources such as existing terrain, steep slopes, floodways, habitat areas, and ridgelines, and to minimize visual impacts of grading and structures.

Visual Resources Policy 3.5

Regulate development on intermediate ridges, hilltops, and hillsides to preserve the natural appearance and landform, and minimize impacts on terrain with a slope greater than 15 percent subject to the following requirements:

1. Intermediate Ridges and Hilltops
 - a) *Concentrate development in subordinate or hidden locations, which shall not project above the natural landform;*
 - b) *Prepare grading plans that minimize disruption of the natural landform and vegetation; and*
 - c) Allow development on intermediate ridges only in association with the preservation of significant open space, habitat, cultural resources or agricultural uses within the same project.
2. Slopes Greater than 15 Percent
 - a) Locate development to avoid potentially hazardous areas and environmentally sensitive areas, as well as to avoid dislocation of any unusual rock formations or any other unique or unusual geographic features.
 - b) Design development to minimize grading requirements by incorporating terracing, padding, and cut-and-fill grading that conforms to the natural contours of the site and protects the visual continuity of the hillsides.
 - c) Minimize the visual impact of development on adjoining residential areas to the extent feasible.

City of Escondido Zoning Code

The City of Escondido Zoning Code (Chapter 33 of the Escondido Municipal Code) establishes regulatory standards relevant to aesthetic character and resources, as discussed below.

Article 5, Open Space Development Standards

The Open Space Development Standards establish standards for development of lands identified as having open space value to the community and having one or more of the following characteristics: (1) slopes greater than 15 percent; (2) vegetation conservation areas; or (3) natural drainage courses not otherwise defined as floodways. Development proposed on such lands is subject to the following development standards:

Natural features such as rock outcroppings, creeks and other natural drainage courses, and wooded areas shall be protected and preserved.

Article 55, Grading and Erosion Control

Article 55 is intended to guide grading activities to ensure protection of existing natural and topographic character, visual integrity of hillsides and ridgelines, sensitive species, unique geologic/geographic features, and public health, safety, and welfare. Section 33-1066 identifies design criteria for grading to ensure that the character of critical landforms and natural resources are maintained. Additionally, Sections 33-1067.A–F provide design criteria for the protection of hillsides with slopes over 15 percent, skyline ridges, and intermediate ridges. The City uses such criteria in the discretionary approval process to evaluate proposed grading designs for development projects.

Article 55 discourages grading in steep slope areas that are visible from surrounding (off-site) vantage points, fill slopes that restrict views from off-site properties, and grading designs that have the potential to extend into or otherwise disrupt properties in the vicinity. Other design measures are included to address controlling slope height and slope ratios to reduce potential effects on views from adjacent properties and/or other public vantage points, and to ensure that manufactured slopes reflect natural topography to the extent feasible to avoid a substantial change in the existing visual setting

(a) All grading designs must demonstrate visual sensitivity to surrounding properties and neighborhoods. Grading designs should have these characteristics:

(1) Extensive slope areas which are easily visible from outside the development shall be avoided.

(g) Preservation of natural and cultural features. Grading designs should be sensitive to natural topographic, cultural, or environmental features.

Proposed structures should be designed to conform to the terrain and should utilize pole, step or other such foundation that requires only limited excavation or filling.

Sec. 33-1067.F. Design guidelines for HRO district

(1) All development should be sited to avoid potentially hazardous areas and environmentally sensitive areas as identified in the open space element of the general plan or as part of the environmental review, as well as to avoid dislocation of any unusual rock formations or any other unique or unusual geographic features (see figure 6);

(3) Grading should be limited to the extent possible and designed to retain the shape of the natural landform (see figure 6).

Padded building sites are allowed, but site design and architecture techniques (such as custom foundations, split level designs, stacking and clustering) should be used to mitigate the need for large padded building areas. Grading must be designed to preserve natural features such as knolls or ridgelines. **In no case should the top of a prominent hilltop, knoll, or ridge be graded to create a large building pad (emphasis added);**

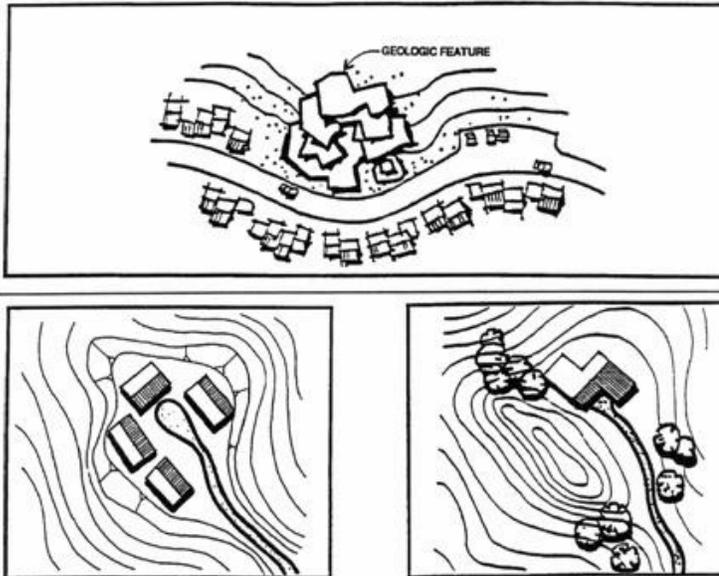


Figure 6: SENSITIVE AREAS

Policy Compliance:

The City's General Plan recognizes that hillsides and ridgelines provide visual resources and aesthetic value to Escondido that contributes to the community's sense of identity. To retain Escondido's visual backdrop of mountains and hillsides, General Plan policies call for strong measures to protect environmentally sensitive habitats, ridgelines and steep slopes. To accomplish this, policies were developed to preserve and protect existing internal and external view corridors in Escondido, with particular emphasis on ridgelines, unique landforms, visual gateways and edges of the community.

Among these requirements are the following

1. Concentrate development in **subordinate or hidden locations**, which shall not project above the natural landform.
2. Prepare grading plans that minimize disruption of the natural landform and vegetation.
3. Design development to minimize grading requirements by incorporating terracing, padding, and cut-and-fill grading that conforms to the natural contours of the site and protects the visual continuity of the hillsides.
4. Minimize the visual impact of development on adjoining residential areas to the extent feasible.

Intermediate ridgelines traverse the Project site, running generally from the southwest to the northeast (see Figures). As depicted in the simulations provided in the DEIR and on the figures that follow, intermediate ridgelines, and sensitive hillsides are anticipated to be impacted by project implementation. The Project does not appear to subordinate to the natural landforms but projects above them, nor does it minimize the visual impact of grading.

Furthermore, in accordance with **Sec. 33-1067.F. Design guidelines for HRO district**, Grading should be limited to the extent possible and designed to retain the shape of the natural landform (see figure 6 above).

Padded building sites are allowed, but site design and architecture techniques (such as custom foundations, split level designs, stacking and clustering) should be used to mitigate the need for large padded building areas. Grading must be designed to preserve natural features such as knolls or ridgelines. ***In no case should the top of a prominent hilltop, knoll, or ridge be graded to create a large building pad. Again, the Project does appear to grade the tops of prominent hilltops, knolls, and ridges to create large building pads.***

Compliance with the hillside protection policies, noted above, would reduce grading impacts and protect these visual resources to the greatest extent possible.

These resources are highly valued and their conservation considered important by the community because of their contribution to Escondido's overall quality of life. Conserving and sustaining Escondido's important resources are vital keys for maintaining a healthy and vibrant community as noted in the City's General Plan, Resource Conservation Element (RCE). Does facilitating development on highly visible ridgelines and steep slopes support the build out vision of the City, namely the preservation and protection of visual resources that are community defining and vital key for maintaining a healthy and vibrant community?

Key Observation Point Selection:

The Aesthetics analysis is confined to the detailed evaluation of 5 Key Observation Points (KOPs). Their selection was based on proximity, scenic quality, viewer sensitivity, duration of view, and number of viewers. The project viewshed, referred to as the visual sphere of influence in the DEIR, was divided into six landscape character unit (LCUs) within which only one KOP was selected for more detailed analysis. The landscape character units were chosen based on their "distinct character and relatively homogeneous visual receptors." In summary they consist of the following:

1. **Open Space LCU** (KOP 1)– representing the scattered rural residential land uses located where "the topography is mountainous with broad valleys that have historic ranches" and a "vegetative over cover (that) is primarily native vegetation."
2. **Agricultural LCU** (KOP 10) – representing the "southern and western quadrants" of the project viewshed that is an "extension of the larger San Pasqual Valley Agricultural Preserve. Its receptors are characterized by dispersed rural residences. The southern quadrant is dominated by intense agricultural operations and has a planar landform; the western quadrant has more topographic variation and more orchards." The San Diego Safari Park and SR-78 corridor, which defines the LCU's northern edge of the southern quadrant, are also included in this LCU.
3. **East Escondido LCU** (No KOP Selected) – representing the western quadrant of the project viewshed. It's described as "most of the receptors are residential and the vegetation is ornamental with many roads and streets." It neglects to mention that views from this area encompass scenic portions of the San Pasqual Valley and its scenic

backdrop of hillsides and ridgelines that define the sub-regions most sensitive visual resources.

4. **Ranchos LCU** (KOP 14) – representing the gated communities of Rancho San Pasqual, Rancho Vista Monte, and Eagle Crest Golf Club.
5. **Eagle Crest LCU** (KOP 19 & 20 per Table 4) – Located north of the Ranchos LCU and representing the Eagle Crest Golf Course users.
6. **State Park LCU** – Representing Battlefield State Historic Park.

The Key Observation Points chosen to evaluate adverse environmental effects that the Project may have to visual resources are supposed to be representative of areas sharing “distinct character and relatively homogeneous visual receptors” but in most cases, they’re not.

For example, the **Open Space LCU** includes the rural residential areas, accessed off W. Zoo Road, that are located on steep topographically diverse west facing slopes areas east of the project, to the *Second Priority Scenic Highway* designated corridor of SR-78. These areas represent distinctly different user groups within characteristically different areas. State Route 78, given its designation as a Secondary Scenic Highway in the County’s General Plan, should perhaps been given its own designation and studied in detail given the scenic resources in the area. Visibility of the project for motorists travelling on SR-78, durations of views, etc. should be discussed. Instead, KOP 10, located near the intersection of SR-78 and Cloverdale Rd. was chosen to represent the **Agricultural LCU** even though it depicts an iconic visual gateway view, that motorists experience, of the agricultural land uses backed by scenic hillsides and ridgelines.

The **Agricultural LCU** includes the KOP located near the intersection of San Pasqual Valley Road (SR-78) and Cloverdale, the Safari Park, and the trailhead kiosk located on Rockwood Road (KOP 17). The Safari Park, a visitor serving subarea located less than a mile from the Project, is visited by thousands of people a year and consists of a user group that is highly sensitive to change. The Rockwood Park trail, located close to the Project¹ (.63 miles), is distinctly different in character and is visited by a distinctly different user. It should be noted that unobstructed views toward the Project are available from the park’s trails. These views encompass the large cut and fill slopes associated with the project entry as well as portions of the ridgelines/hilltop residences along with their associated graded slopes (see Figures). These would be recreational views, considered highly sensitive, well used, and a third of the distance (.63 miles vs. 1.83 miles) from the Project as KOP 10, the SR-78/Cloverdale intersection.

The **East Escondido LCU**, representing the western edge of the Project viewshed, is not even represented yet it offers elevated views toward the project. These views are from primarily residential land uses, many of which are panoramic views to the east that encompass

¹ Location to Project refers to distance to closest residential structure as measured from visual receptor.

natural open space, the San Pasqual Valley, and the scenic backdrop of hillsides and ridgelines.

The **Eagle Crest LCU** represents the nearby residential and the recreational receptors associated with the golf course and the San Pasqual Union School (KOPs 19 and 20). It appears that trail users along Rockwood Rd. and Cloverdale Rd. are perhaps under represented. Views from these trail areas appear to encompass large manufactured slopes and hilltop homes backed by sky (see Figures). It is anticipated that views toward the ridgeline from these locations will be diminished by disruptions in the continuity of the landforms caused by these improvements.

The **State Park LCU** was not included as a KOP in the DEIR, in part because the trail was temporarily closed, but should have been. A public trail as well as a scenic vista point is located at the park, approximately 1.7 miles from the Project. These locations offer views toward the Project that encompass expansive views of the scenic ridgelines, hillsides and picturesque valleys characteristic of the project viewshed (see Figure 6). This Figure also shows the proximity of the San Diego Safari Park. As noted earlier, views may be available of the upper portions of project from actively used, topographically elevated, areas of the Safari Park. Impacts associated with the Project, with regard to nighttime lighting and scenic resources, should be evaluated. Given the proximity to the project, the value of the park to the region, and the importance of maintaining the integrity of the resources surrounding the Safari Park, further study should be conducted.

Analysis of Project Effects and Determination of Significance:

The DEIR analysis is based on California Environmental Quality Act (CEQA) Guidelines and City of Escondido Environmental Quality Regulations to evaluate adverse environmental effects that the Project may have to visual resources.

Specifically, the following questions, per CEQA Guidelines, are addressed to determine if a project would result in a significant impact:

1. Would the project have a substantial adverse effect on a scenic vista?
2. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
3. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?
4. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The table below shows the DEIR's findings, however the impact determinations under-represent these impacts and do not adequately consider adverse impacts to sensitive resources that comprise the views studied above nor do the KOPs adequately represent user groups found within the project viewshed.

Summary of Aesthetics and Visual Resources Impacts (per DEIR)

Threshold Number	Issue	Determination	Mitigation Measures	Impact After Mitigation
1	Scenic Vistas	Less than Significant Impact	None required	Less than Significant Impact
2	Scenic Resources	Less than Significant Impact	None required	Less than Significant Impact
3	Visual Character or Quality	Less than Significant Impact	None required	Less than Significant Impact
4	Light or Glare	Less than Significant Impact	None required	Less than Significant Impact

Summary of Aesthetics and Visual Resources Impacts (Recommended)

Threshold Number	Issue	Determination	Mitigation Measures	Impact After Mitigation
1	Scenic Vistas	Significant Impact	Required	Less than Significant Impact
2	Scenic Resources	Significant Impact	Required	Significant Impact
3	Visual Character or Quality	Significant Impact	Required	Significant Impact
4	Light or Glare	Less than Significant Impact	Required	Less than Significant Impact

1. Would the project have a substantial adverse effect on a scenic vista?

The City does not specifically designate scenic vistas; however, Section 33-1076.F of the Municipal Code, Design Guidelines for the HRO District, identifies major roadways and public open space (as) areas that should be considered as points of view in a visual analysis (General Plan Update EIR). The General Plan EIR further states that “New development could obstruct, interrupt, or detract from a scenic vista. For example, a new housing development would have the potential to interrupt the view of a large open space area from an existing roadway. The General Plan Update also acknowledged that some development would occur on the edge or outside of the urban core where new development is more likely to adversely impact a scenic vista.

The Project proposed will be located on and near protected hilltops and ridgelines that define the backdrop of the San Pasqual Valley (see Figures). These resources are prominent, memorable, and largely intact as viewed from the key views discussed in the DEIR and those recommended for further study. The Project as proposed will result in the grading of large flat pads above hilltops and ridgelines and the construction of large man-made cut and fill slopes, some more than 130’ in height. This will occur in conjunction with the removal of native vegetation and boulder outcroppings. In addition, thinning and removal of additional native vegetation will be required for brush management. These landform and resource alterations will be further exacerbated by proposed ridgeline/hilltop development visible

against a backdrop of sky and other areas of development located near undisturbed ridgelines. This will draw attention to differences in color, line, form, and texture to occur caused by project implementation which will disrupt the continuity of the ridgelines and hillsides and cause contrast to occur between the Project and its surroundings. This will change the character of these visual resources and degrade the quality of views available of them.

Specific Plan level measures related to architecture, engineering, and landscape architecture, are proposed, along with large areas of on-site open space, to reduce impacts associated with the Project however significant impacts to visual resources will remain. The visibility of improvements will continue to contrast to a large degree with the existing native hillsides and natural landforms surrounding the Project. These otherwise intact natural hillsides and ridgelines will be disturbed and impacted with man-made improvements, verdant irrigated slopes, and hilltop homes backed by sky, in conflict with City policies adopted to protect them. **It is anticipated therefore that changes, as a result of project implementation, will be adverse and significant, and will alter public views of the site and/or affect scenic vistas (see Figures 1-7).**

2. Would the project Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

As stated in the City's General Plan Update, if future development or redevelopment is inconsistent with the surrounding landscape, it would detract from the scenic elements of a vista. For example, new residential development in the eastern area of the City would have the potential to be located near ridgelines and detract from views of these resources.

As noted above, the Project proposed will be located on and near protected scenic resources consisting of hilltops and ridgelines that define the backdrop of the San Pasqual Valley. These resources are prominent, memorable, and largely intact as viewed from the key views discussed in the DEIR and those recommended for further study. The Project as proposed will result in the grading of large flat pads above hilltops and ridgelines and the construction of large man-made cut and fill slopes, some more than 130' in height. This will occur in conjunction with removal of native vegetation and boulder outcroppings. In addition, thinning and removal of additional native vegetation will be required for brush management. These landform and resource alterations will be further exacerbated by proposed ridgeline/hilltop development visible against a backdrop of sky and other areas of development located near undisturbed ridgelines. This will draw attention to differences in color, line, form, and texture to occur caused by project implementation which will disrupt the continuity of the ridgelines and hillsides and cause contrast to occur between the Project and its surroundings. This will change the character of these visual resources and degrade the quality of views available of them.

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them. **It is anticipated therefore that changes, as a result of project implementation, will alter public views of the site and substantially damage scenic resources, including, but not limited to, trees, rock outcroppings affect scenic vistas (see Figures 1-7)..**

3. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

The visual character and quality of the site and its surrounding is defined by high quality of the resources that surround it. As noted above, the Project proposed will be located on and near protected scenic resources consisting of hilltops and ridgelines that define the backdrop of the San Pasqual Valley. These resources are prominent, memorable, and largely intact as viewed from the key views discussed in the DEIR and those recommended for further study. The Project as proposed will result in the grading of large flat pads above hilltops and ridgelines and the construction of large man-made cut and fill slopes, some more than 130' in height. This will occur in conjunction with removal of native vegetation and boulder outcroppings. In addition, thinning and removal of additional native vegetation will be required for brush management. These landform and resource alterations will be further exacerbated by proposed ridgeline/hilltop development visible against a backdrop of sky and other areas of development located near undisturbed ridgelines. This will draw attention to differences in color, line, form, and texture to occur caused by project implementation which will disrupt the continuity of the ridgelines and hillsides and cause contrast to occur between the Project and its surroundings. This will change the character of these visual resources and degrade the quality of views available of them.

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Adam Gevanthor, Landscape Architect #3393

Principal, Development Design Services & GraphicAccess, Inc.

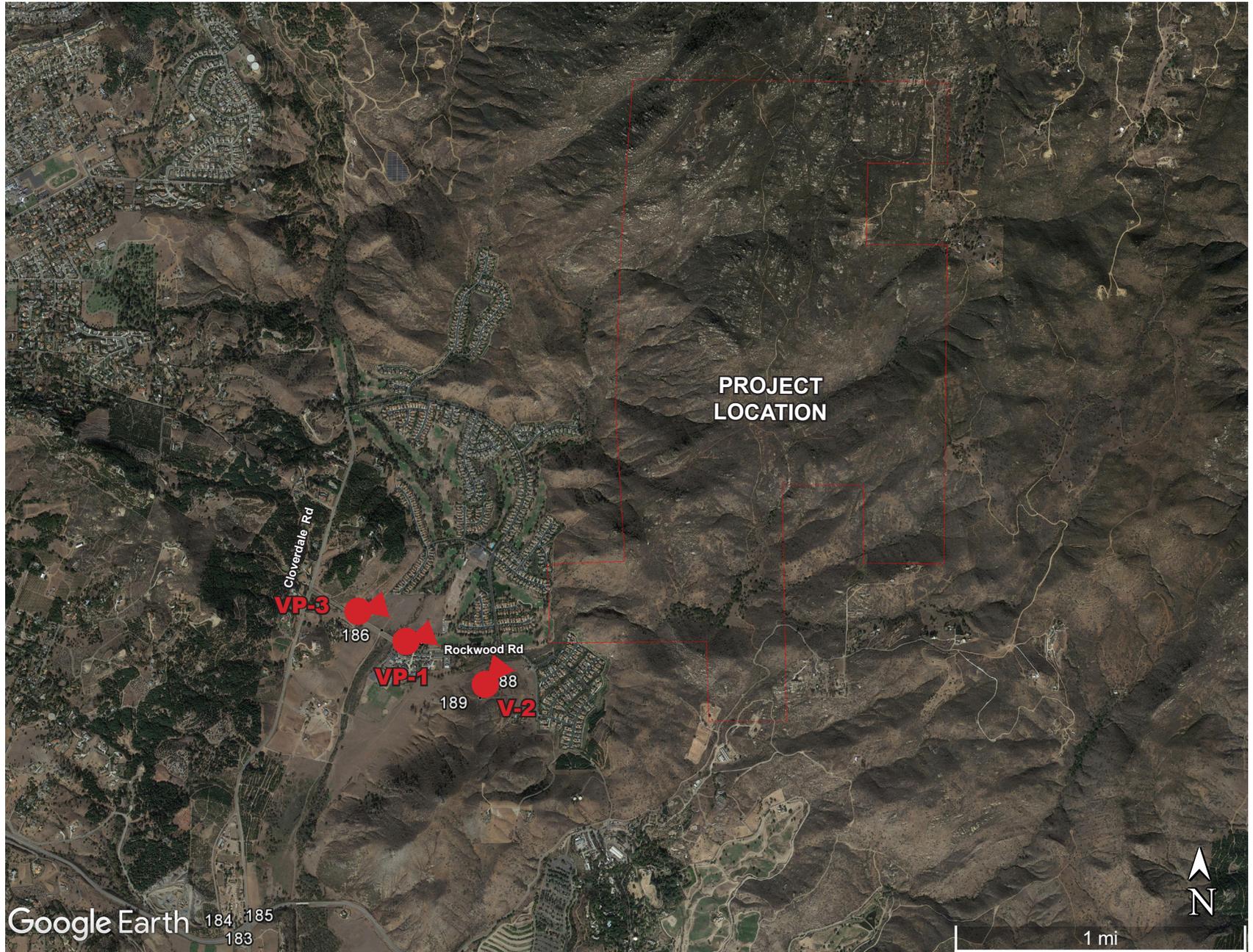


Figure I
Viewpoint Locations
Safari Highlands

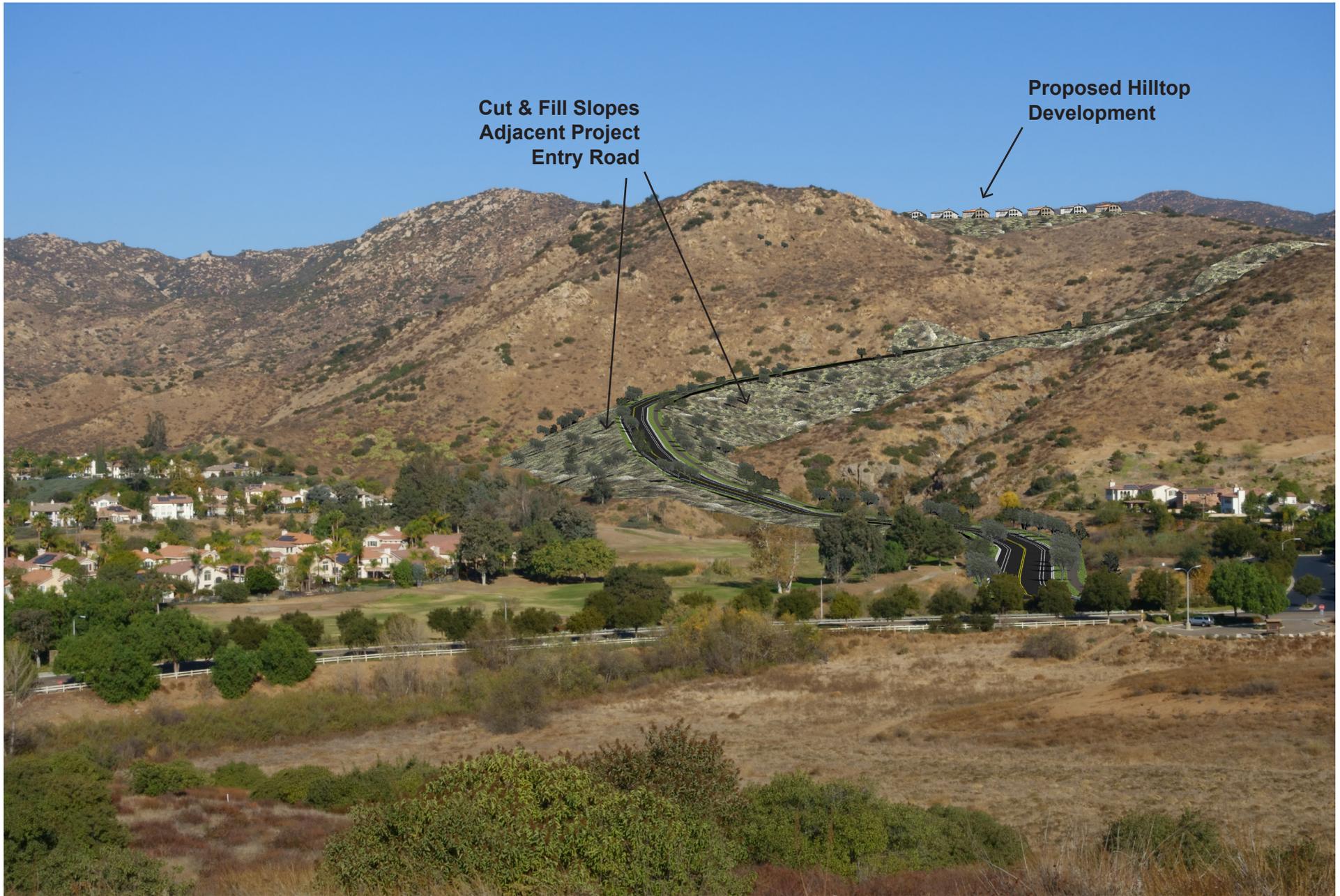


View from VP-1 looking northeast from a location west of Eagle Crest Golf Club's 15th Safari Highlands

Figure 2



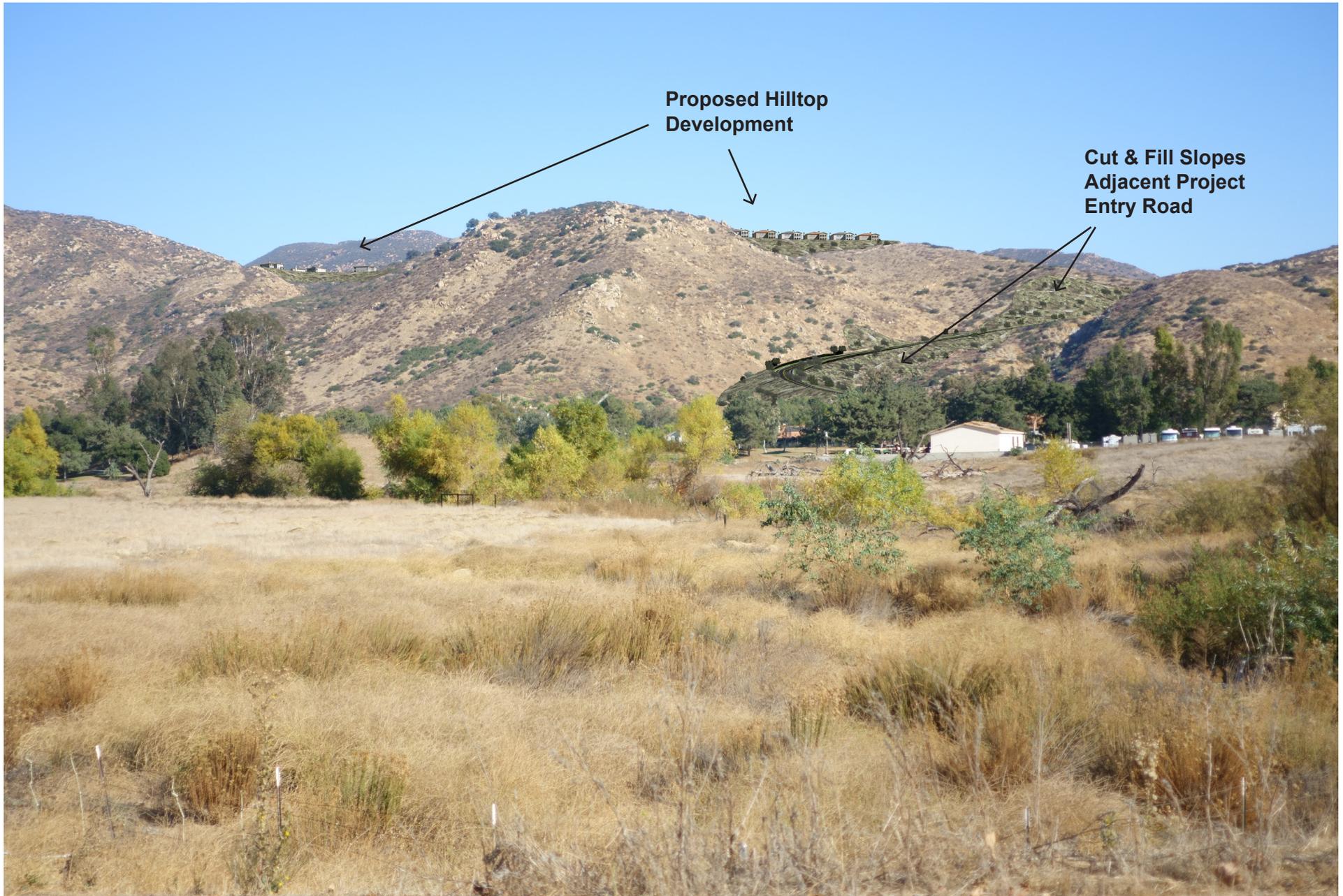






View from VP-3 looking northeast from Rockwood Road Multi-Purpose Trail Safari Highlands

Figure 6



Key Map



Existing Condition View looking northwest toward project from a location on West Zoo Road.



Proposed Condition Project linework draped on Google Earth aerial photo. Locations shown are approximate.

Existing Condition View looking northeast from Rockwood Road Park trail.



Key Map

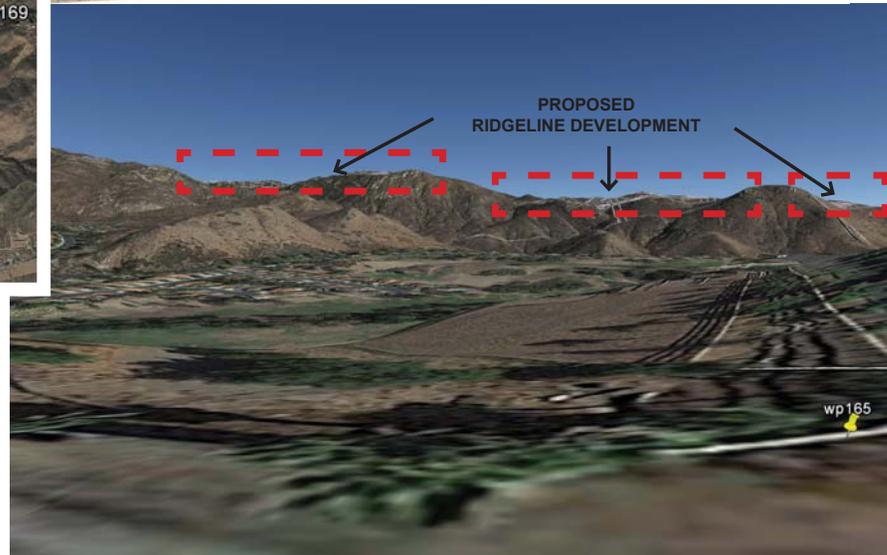
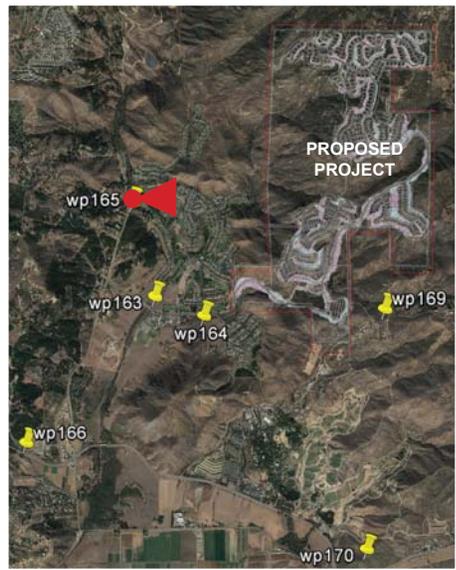


Proposed Condition Project linework draped on Google Earth aerial photo. Locations shown are approximate.

Existing Condition View looking east toward project from a location near the end of **Cloverdale Rd.**



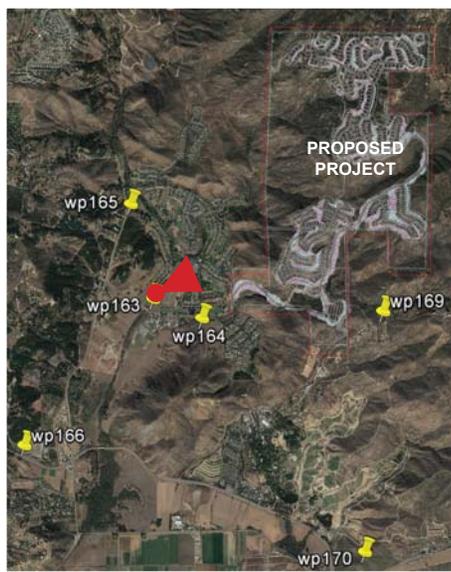
Key Map



Proposed Condition Project linework draped on Google Earth aerial photo. Locations shown are approximate.

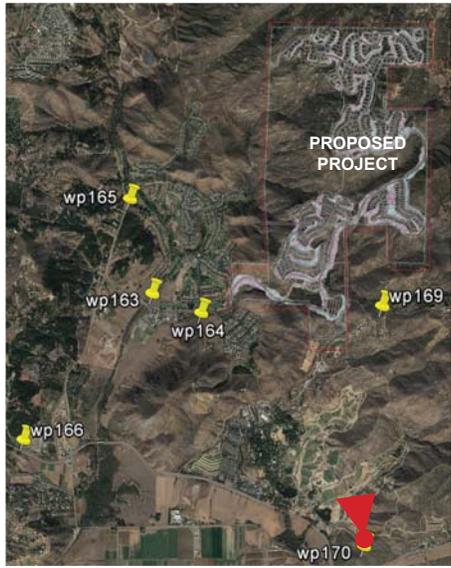
Existing Condition View looking northeast from trail located along Rockwood Rd., across from **San Pasqual Union Elementary School**.

Key Map



Proposed Condition Project linework draped on Google Earth aerial photo. Locations shown are approximate.

Key Map



Existing Condition

View looking northwest toward project from San Pasqual Battlefield State Historic Park.



Proposed Condition

Project linework draped on Google Earth aerial photo.
Locations shown are approximate.

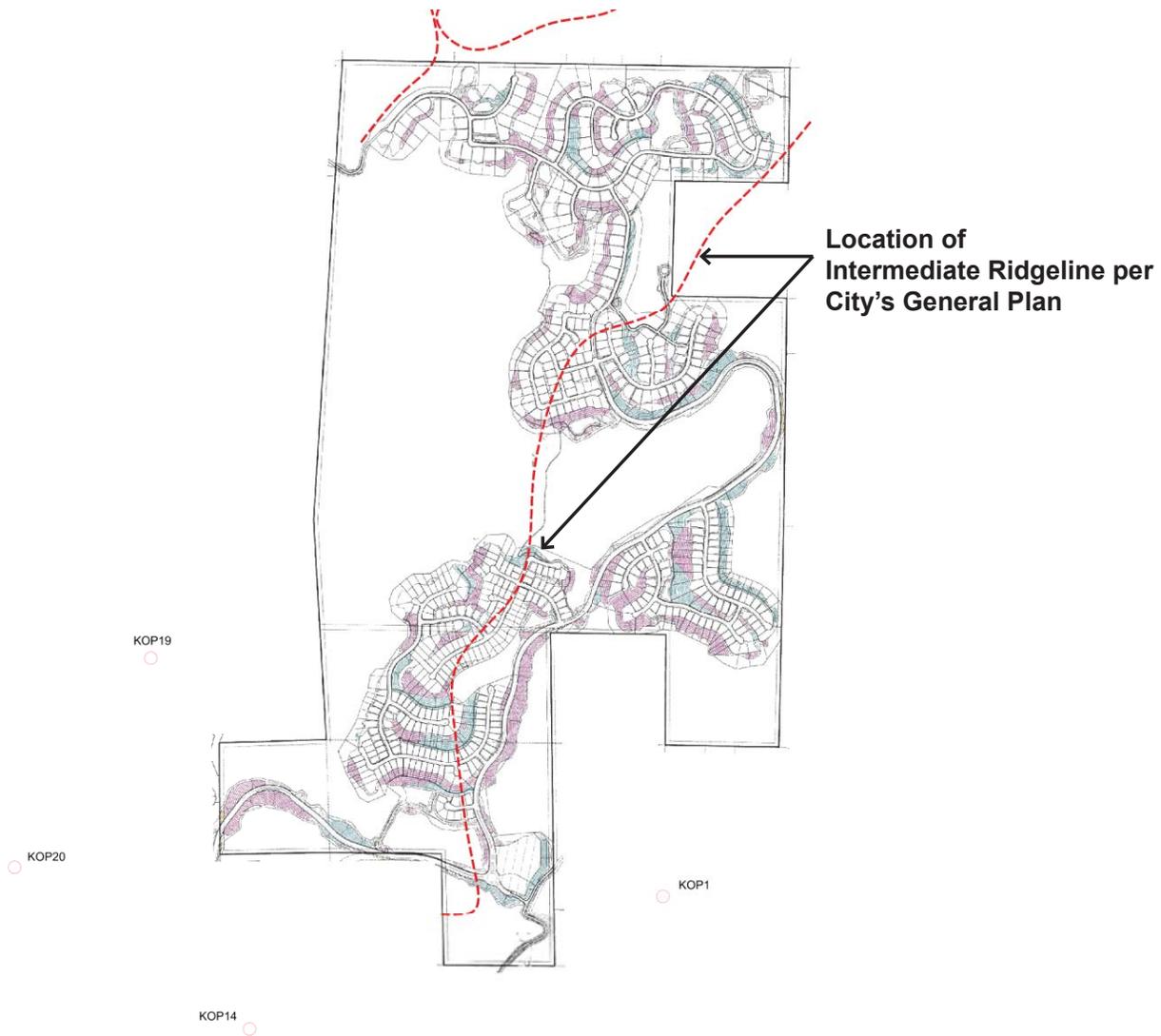
Key Map



Existing Condition View looking northeast toward project from a location near the intersection of San Pasqual Valley Rd and Cloverdale Rd



Proposed Condition Project linework draped on Google Earth aerial photo. Locations shown are approximate.



Intermediate Ridgelines Source: City of Escondido General Plan