Summary of Technical Report Text Changes

Section (Page)	Change	Reason for Change
Table DD-1 (pg. DD-60)	Revisions to General Plan Goal COS-20 (Governance and Administration), which was updated as part of the County's Climate Action Plan effort in 2018. Updated project conformance discussion accordingly.	County amended General Plan Goal in 2018

APPENDIX DD Consistency Analysis

Guiding Principle	Project Conformance	Conformance Conclusion
	Guiding Principles	
1. Support a reasonable share of the projected regional population growth.	The proposed Newland Sierra Project (herein after referred to as "project" or "proposed project") would provide a mix of housing types and choices to meet the housing needs of a range of consumer life stages and income levels in a manner that would support a reasonable share of San Diego County's projected regional population growth to help the County of San Diego (County) meet its required Regional Housing Needs. The project's residential component includes 2,135 total homes, including 1,140 single-family homes on varying lot sizes and 995 multi-family homes. Of the 2,135 total homes, 325 would be age-qualified senior homes. Further, the Specific Plan contemplates several product types in the C34 and RS zones, including alley-loaded homes, row and grade-separated townhomes, clustered single-family homes and traditional single-family detached homes. In so doing, the project would provide a range of housing opportunities for existing and future residents of the County.	Consistent.
2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.	The project would promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development. Please see Figure 1-35, Regional Location Map, and Figure 1-36, Vicinity Map, in Chapter 1 of this EIR. Consistent with sustainable development principles, the project is a balanced Community with a mix of housing types and choices for a wide range of households including young professionals, growing families, empty nesters, and seniors structured around walkable and bikeable Community amenities, including neighborhood shopping, Community and neighborhood parks, Community centers with swim facilities, and a school site. Furthering the interest of health and sustainability, the project's land uses would be planned around a network of trails, pedestrian and multi-use pathways, and bike routes connecting between and integrated into the project's various neighborhoods, parks, retail uses, the school site, and other amenities. These multi-use pathways and bike routes would extend off Site along Sarver Lane and Deer Springs Road all the way into the City of San Marcos along Twin Oaks Valley Road enhancing the connectivity with the existing surrounding built environment and enabling both the project all the way into the City of San Marcos.	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	a number of sustainable development features, including solar on all residential and Community facilities and a greenhouse gas emissions offset program.	
	The project would also include a Transportation Demand Management (TDM) Program of mobility alternatives to private vehicle trips (e.g., single occupancy trips) including an electric bike-share program with kiosks throughout the project, support for car-share and ride-share programs within its Town Center, subsidized transit passes for the project's residents, shuttle services connecting the project's residential neighborhoods to its Town Center neighborhood and to the Escondido Transit Center which serves as a hub for public rail, bus, and shuttle services throughout the North County area, and marketing and educational services to residents and employees of the project's various mobility alternatives . The project's TDM Program would result in a significant reduction in both internal vehicle trips (trips that stay within the project Site).	
	The project would establish large contiguous blocks of on-site native habitat preservation and Community open space by creating a 1,209-acre habitat preserve on Site and a 212-acre habitat preserve off Site, by retaining an additional 235 acres of native habitat in Fuel Modification Zone 2 and Special Management Areas, and by concentrating the project's grading footprint into approximately 27% of the total Site. The project's on-site and off-site preserve areas would be subject to Resource Management Plans and managed in perpetuity by a preserve manager. The project's FMZ 2 areas and SMAs would be subject to periodic fuel thinning and weed and trash removal for fire protection purposes, however the native habitat structure of these areas would be retained. In total, the project would provide protection for 1,657 acres of native habitat.	
	In the context of the project's placement within the North San Diego County subregion and centers of employment, the project Site is connected via freeways, arterials, and local roads to several neighboring cities, making it less than three miles to the Cities of Escondido, San Marcos, and Vista, and approximately 10 miles to the Cities of Carlsbad and Oceanside, all North County cities serving as major centers of employment and regional shopping for North San Diego County. A jobs/housing market analysis prepared for the project by MarketPointe Realty Advisors shows that a total of 124,251 jobs exist with the Highway 78 Corridor Submarket, encompassing the Cities of Escondido, San Marcos, and Vista and certain portions of the unincorporated County. The MarketPointe Study shows that 63% (nearly 2/3rds) of these jobs are commuting into these Cities from outside the Highway 78 Corridor Submarket. Of these jobs commuting into the Submarket, 58% are coming from other parts of San Diego County and the balance (42%) are coming	

Guiding Principle	Project Conformance	Conformance Conclusion
Guiding Principle	Project Conformance primarily from the Counties of Riverside, Orange, and Los Angeles. Riverside County, the closest neighboring County and where over 8% of the total workers in the Highway 78 Corridor Submarket live, is at least 25 miles to the north of the project Site, over 30 miles from the center of the Highway 78 Corridor Submarket, and accessible via Interstate 15 (1-15). By comparison, the project would offer a range of housing options much closer to these North County regional employment and shopping centers within the Highway 78 Corridor Submarket. Falling near the center of the North County Metropolitan Subregional Area (North County Metro Area) and the northwest half of the Highway 78 Corridor Submarket, the project Site is near existing and planned infrastructure and services. The project Site falls within the service territory of the Vallecitos Water District for sever and water service and significant water infrastructure, including water transmission lines and water towers, exist on or immediately adjacent to the project Site. The project Site is bordered by the I-15 corridor to the east and Deer Springs Road to the south. Deer Springs Road turns into Twin Oaks Valley Road which connects to Buena Creek Road approximately one and a half miles (1.5 mi) from the project Site. Deer Springs Road, Twin Oaks Valley Road, and Buena Creek Road are all part of the Regional Arterial System providing direct connections between neighboring cities such as San Marcos and Vista, the Twin Oaks Community, and the project Site. All three of these Regional Arterial System roads are planned for capacity and signalization enhancements in both the County and City of San Marcos General Plans. To the south of the project Site is the I-15/SR-78 Interchange, the two major freeways that serve the North County Metro Area, the surrounding Cities of Escondido, San Marcos, Vista, and Carlsbad, and whose interchange effectively serves	
	future NCTD BREEZE or shuttle services to the project Site.	

Guiding Principle	Project Conformance	Conformance Conclusion
	In the context of the state's goals for sustainable communities and GHG reduction, the project's development plan complies with the critical objectives and mandates of Assembly Bill (AB) 32 and Senate Bill (SB) 375 by providing: (a) a mix of housing types and choices in neighborhoods that support a wide range of mobility options with parks, a school site, and commercial/retail uses in close proximity to housing; (b) a variety of recreational opportunities including active and passive parks with multi-purpose trails that connect the residential neighborhoods; and (c) mobility alternatives for residents that reduce energy consumption, air pollution, noise, and greenhouse gas emissions.	
	In summary, the project's parks, recreational opportunities, commercial/retail uses, and school site combined with its mix of housing types, including age-qualified (senior) and age-targeted (single story) housing, walkable and bicycle-friendly neighborhoods, multi-purpose trails and pedestrian pathways, large blocks of native habitat preserve and open space, Community sponsored electric bike-share program, and shuttle services within the project and to the Escondido Transit Center make it a complete Community that will promote and enhance the health and sustainability of its residents, guests, employees, and patrons. The project Site is also well situated to place a range of housing opportunities closer to existing regional employment centers. Finally, the project is well served by existing and planned infrastructure and services and would provide alternatives to driving both within and to/from its neighborhoods and nearby transit stations.	
3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.	The project Site is predominantly within the planning area of the existing unincorporated community of Twin Oaks with a small portion the project Site's most northern portion within the unincorporated community of Bonsall. All of the project's proposed neighborhoods are located in the community of Twin Oaks within the North County Metropolitan Subregional Community Planning Area. To the northeast of the project Site is the unincorporated community of Hidden Meadows. The incorporated cities of Vista, San Marcos, and Escondido reside within a few miles of the project Site and connect to the Site via major roads including Twin Oaks Valley Road and Deer Springs Road as well as I-15.	Consistent.
	The Twin Oaks community began as a predominantly agricultural community north of an area known originally as Vallecitos de San Marcos, today, what is the City of San Marcos. In 1963, San Marcos became an incorporated city, and since that time, various annexations of the southern portions of Twin Oaks have occurred to the City of San Marcos. Today, Twin Oaks supports a mix of land uses, including a range of housing types and lot sizes, small farms, nurseries, and ranchettes in its northern portions, the Twin Oaks Golf Course, an equestrian center and a handful of equestrian ranchettes, and retail, commercial, and light	

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

Guiding Principle	Project Conformance	Conformance Conclusion
	Industrial uses South of the project Site along the south side of Deer Springs Road is Golden Door Properties LLC, a resort featuring fitness, spa and nutrition. Directly to the east of the Twin Oaks community is the Mesa Rock community, a planned community of single-family homes on small lots surrounded by large blocks of open space/preservation built into the hills immediately north of the city of San Marcos. Approximately 3 miles south and southeast of the project Site are the incorporated cities of San Marcos and Escondido, cities supporting populations of approximately 90,000 and 150,000 residents, respectively. The I-15 exit south of the project Site, approximately 3 miles down the freeway, is the El Norte Parkway exit in northwestern Escondido featuring higher density single-family and multi-family neighborhoods and a community shopping center. Finally, approximately 97,000 residents. Refer to Figures 1-35 and 1-36 in Chapter 1 of this ElR. Approximately one mile to the northeast on the east side of I-15 along Old Highway 395/Champagne Boulevard is the Lawrence Welk Resorts, three separate vacation resorts offering family vacation homes, hotel accommodations, recreation centers, spas, pools, restaurants, and golf. Also along Old Highway 395/Champagne Boulevard just north of the Lawrence Welk Resorts is the Deer Park Winery and Auto Museum. Just south of the Lawrence Welk Resorts is the community of Champagne Village, an age- qualified community of 457 homes on small lots and narrow streets buffeted by chaparral covered hills to the east. In the hills above Champagne Village and the Lawrence Welk Resorts is the Rimrock Estates community, a gated community of estate homes and lots clustered together in discrete enclaves and surrounded by large blocks of open space. Just to the southeast of Rimrock, Champagne Village, and Lawrence Welk is the community of Hidden Meadows, a community of mostly single-family homes spanning a range of lot sizes and densities, from your typical suburban densitise of four to eig	Conclusion

Guiding Principle	Project Conformance	Conformance Conclusion
	When looking across the vicinity of the project Site, no one archetypal land use pattern or community emerges, but instead a broad range of neighborhoods, land uses, and communities all unique and well integrated into their surroundings but also complementary to each other and the larger area. The newer communities are well-planned with more environmentally sensitive development patterns surrounded by large blocks of open space, striking an important balance between accommodating housing while also preserving the natural character of the area. The unincorporated communities support a mix of housing types and lot sizes intermixed with limited commercial/retail, some light industrial uses, and small farms and ranches. The Lawrence Welk resorts provide an important tourism boost to the local area while the nearby cities provide critical regional employment centers and shopping opportunities. Finally, the more semi-rural areas, small farms and ranches, and other land uses within the vicinity of the project Site help to complete the complex and balanced character of the surrounding area, an area that includes everything from small towns to dense urban cities just down the road and planned communities, resorts, rural estate homes, and small farms and ranches to the south, north, west, and east.	
	To reinforce the vitality, local economy, and individual character of these existing neighborhoods, communities, and surrounding land uses, the project incorporates various elements of each. Like the newly planned communities discussed above and to reinforce the more dramatic natural elements of the area such as the chaparral covered hills and open space, the project uses environmentally sensitive development patterns to preserve large blocks of native habitat with nearly three quarters of the project Site remaining its natural condition. Like the surrounding communities, the project provides a range of housing types and lot sizes. Like the more semi-rural areas, the project incorporates limited agriculture along the perimeter of some of its neighborhoods. Like the more developed areas surrounding the project, the project incorporates commercial/retail uses, including an anticipated neighborhood grocery store at the Town Center, and a school Site with a joint-use park. The Town Center would provide employment opportunities and the mix of uses within the project will reinforce and enhance the vitality and local economy of the existing communities and land uses around the project.	
	Ultimately, the project will support over 6,000 residents, a variety of local jobs within and as a result of the project, and a school Site which will help support the surrounding local economy. These residents, workers, and parents will shop in local stores and markets, play golf at nearby golf courses (Twin Oaks, Castle Creek, Lawrence Welk, and Boulder Oaks), stay or have their friends and family stay at the nearby resorts, visit the nearby Deer Park Winery along Old Highway 395, eat at local restaurants, and work and shop in	

Guiding Principle	Project Conformance	Conformance Conclusion
	the nearby cities. Finally, the project's proposed large blocks of open space preserve would serve to reinforce a major feature of these existing communities near the project Site, serving as an amenity to both the project and these existing communities. A Community-wide network of public parks, pedestrian pathways, and trails with connections to open space areas would act as the connective thread uniting the project's various neighborhoods and creating pedestrian and bicycle-friendly streets throughout the project for the benefit of the project and existing communities.	
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.	The project would preserve and permanently protect a wide-range of natural resources and sensitive native habitats that support wildlife habitat and movement with connectivity between the project's proposed preserve areas and existing, surrounding off-site open space areas supporting the same and similar habitat types. The proposed preserve design would consist of two large, contiguous blocks of open space preserve situated within the project Site's northern and eastern areas and a third large block of open space preserve located in the southern half of the project Site. The project's open space preserve areas would connect to open space located west, east, and south of the project's preserve areas would be managed by a preserve management entity in perpetuity. Preserve management responsibilities would include an array of preserve maintenance and monitoring responsibilities including fencing, signage, trash removal, prevention of runoff and fugitive irrigation, weed and non-native vegetation abatement, and biological monitoring of sensitive species and habitat types found within the project's preserve areas.	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	Section 2.4, Biological Resources.	

Guiding Principle	Project Conformance	Conformance Conclusion
5. Ensure that development accounts for physical constraints and the natural hazards of the land.	Key natural elements and constraints of the project Site influenced the design of the project's neighborhoods and road network, including the project's hills, ridgetops, boulder outcroppings, and sensitive native habitat areas, the surrounding road network off Site of the project, and the wildfire risk posed to virtually all new development in San Diego County. The project has been designed to preserve many of the hills, ridgetops, boulder outcroppings, and, as discussed above in the project's conformance with <i>Guiding Principle 4</i> , large blocks of native habitat by concentrating development into the flatter, less constrained areas of the Site and by incorporating a network of internal roads connecting these neighborhoods planned around the project Site's key natural features.	Consistent.
	In addition to building safety, the project's FPP identified Fuel Modification requirements for the project's development areas where those areas interface with native habitat, restrictions on the types of plants and trees that can be planted within the project, and requirements for primary and secondary access. For example, the project would include two primary access roads and one secondary access road and a two zone fuel modification strategy for all structures adjacent to native habitat. The project's FPP would require routine maintenance with periodic inspections by the Fire Marshall of the project's fuel modification zones. The project would also be required to address any geologic conditions or hazards that exist or would arise through grading and development of the Site and with any off-site improvements, and likewise construct all roads, improvements, structures, and walls in accordance with the requirements as specified in the final geotechnical report or reports generated for these improvements. These grading and development-level	

Guiding Principle	Project Conformance	Conformance Conclusion
	reports, which are generated for the project during the construction phases, contain detailed specifications and requirements for grading, road, utility, storm drain improvements, structures, and walls. These detailed specifications and requirements are placed on grading and improvement plans to ensure compliance, and the Geotechnical Engineer of Record must sign improvement plans verifying they comply with the detailed requirements in such reports. Such reports address issues such as Site-specific soil conditions, remediation of any on-site geologic hazards or constraints in areas planned for development, and any seismic standards unique to the project Site.	
	Finally, the project would be required to avoid the creation of any new flooding condition or exacerbation of an existing flooding condition. Detailed hydrological analysis has been prepared for the project (please see the project's drainage study, Appendix Z to this EIR), as well as the project's off-site improvements to address any changes in impervious surface and natural drainage patterns that would result from the project. During the construction phases of the project, additional analysis and design of the project's various improvements will be required to ensure consistency with the design of grading and improvements shown on the Tentative Map and consistency with the drainage study prepared for the project.	
	In summary, the project would fully mitigate geologic, fire, flooding, and other natural hazards and constraints. Please see EIR Section 2.6, Geology, Soils, and Seismicity, and Section 2.8, Hazards and Hazardous Materials.	
6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.	The project would provide and support a multi-modal transportation network by serving as a true multi-use project with a mix of housing types and choices, commercial/retail uses, parks and recreation, and a school site supported by a TDM Program including an internal network of pedestrian pathways, bicycle lanes and bicycle-friendly streets, and multi-use trails, a Community-sponsored electric bike-share program with kiosks throughout the project, support for ride-share and car-share programs, subsidized transit passes for the project's residents, shuttle services between the project's individual neighborhoods and to the Escondido Transit Center, and marketing and educational services to residents and employees of the project's various mobility alternatives . The project would be required to implement its TDM Program measures as conditions of development.	Consistent.
	The project's TDM Program, particularly shuttle service within and around the project and to the Escondido Transit Center, a north county transit hub, would support a range of public transportation services operated by the North County Transit District, including six Sprinter stations within six miles of the project Site and	

Guiding Principle	Project Conformance	Conformance Conclusion
	BREEZE Bus and Flex Shuttle routes providing access to and between various North County cities and unincorporated communities as well as the Camp Pendleton Marine Corps Base and the Fallbrook Naval Weapons Station. These transit services connect to the Coaster rail service, which provides access between Oceanside Transit Center and the Santa Fe Train Station in downtown San Diego. By providing shuttle service connections to North County transit centers and space for a potential NCTD transit stop in its Town Center neighborhood, the project would support and reinforce the provision of public transportation in the North County Metropolitan Subregional Planning Area.	
	In support of public transportation, and in addition to providing shuttle services throughout the project to the Escondido Transit Center, and the Town Center neighborhood, the project would include a location to accommodate a future transit stop for potential future NCTD BREEZE and/or other NCTD shuttle services to the project Site. The project applicant is also coordinating with Caltrans, SANDAG, and NCTD on a potential future expanded park-and-ride at the I-15/Deer Springs Road Interchange. Presently, there are two park-and-ride lots at the Interchange, one on the west side and one on the east side of the freeway. The project applicant has met with Caltrans, SANDAG, and NCTD about whether Caltrans plans to improve or expand the park-and-ride lots, either as stand-alone projects or as part of the process of improving the Interchange. The project applicant supports and will advocate for the incorporation of alternative transportation modes such as electric vehicle charging stations, bicycle facilities, storage lockers for travelers, accommodations for ride-share and car-share services, and a possible future transit stop as part of any project to expand or improve the park-and-ride facilities at the Interchange.	
	With incorporation of these multimodal features and a commitment to support and coordinate with public transportation agencies on the same, the project would support a range of mobility alternatives to single occupancy vehicle trips.	
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.	The proposed project would maintain an environmentally sustainable Community and reduce greenhouse gas (GHG) emissions that contribute to climate change through a variety of project planning and design features and mitigation measures. The project has committed to offset all of its greenhouse gas emissions to achieve and maintain carbon neutrality (i.e. net zero emissions) for the life of the project. This initiative would make the project the first large-scale planned community in San Diego County to achieve a 100 percent reduction in the project's construction and operational GHG emissions through the life of the project, and one of the first master-planned communities in the United States to commit to carbon neutrality.	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	In terms of planning and design, the project would feature walkable and bicycle-friendly neighborhoods and streets; a balance of housing types and other land uses including a school, commercial/retail uses; well-integrated pocket, neighborhood, and Community parks, and a network of trails and pedestrian pathways that would interconnect the project's various neighborhoods; a Community-sponsored electric bike-share program; shuttle services to transit centers in neighboring cities, a car-share program, a ride-share program, and transit fare passes for residents; water efficient landscapes and buildings throughout the project along with a commitment to pre-plumb single-family homes in the project for greywater systems; compliance with California Title 24 building and energy efficiency standards (e.g., the CalGreen Building Code and the California Energy Code); solar on all residential uses; solar-powered street lights, and other project design features which reduce GHG emissions. For more information on these project planning and design features, please see EIR Section 2.7, Greenhouse Gas Emissions.	
	In terms of project objectives, the project would locate new residents near existing and planned infrastructure, services, and employment and regional shopping centers in an environmentally sensitive, balanced development pattern while preserving large blocks of natural open space on Site that connect to open space off Site. For more information on the project's connectivity and proximity to employment and regional shopping centers as well as how it fits within and benefits the neighborhoods, communities, and land uses that surround the project Site, please see the project's conformance with Guiding Principles 2, 3, 4 and 6 above.	
8. Preserve agriculture as an integral component of the region's economy, character, and open space network.	The project Site does not presently support any agricultural uses, however, building upon the North County subregion's agricultural heritage, the project proposes to include two types of neighborhood/Community-scale agriculture uses, community gardens and grape vineyards. In so doing, the project would create agriculture uses on a site that does not presently support them, thereby contributing to the preservation of agriculture as an integral component of the region's economy, character, and open space network.	Consistent.
	The project's proposed Community gardens would be integrated into individual neighborhoods to promote sustainable Community-based agriculture. Both the project's residents and the general public would be allowed to reserve or rent garden plots within these Community gardens, with first priority given to the project's residents. Additionally, on some of the project's more visible slopes within Fuel Modification Zone 1 areas along the edge of certain neighborhoods, productive grape vineyards would be planted and maintained. These productive landscapes would be maintained by the Homeowners' Association and add to the aesthetic appeal of the project's individual neighborhoods. These vineyards would include a variety of	

Guiding Principle	Project Conformance	Conformance Conclusion
	species of grapes that are drought tolerant, resistant to wildfire, and thrive in the local microclimate. The vineyards would be expected to produce 3 to 4 tons of grapes per acre.	
	By including the Community gardens and vineyards in the project, the project would increase the amount of agriculture in the region and enhance the availability of locally grown organic food sources, thereby contributing to the preservation of agriculture as an integral component of the region's economy, character, and open space network.	
9. Minimize public costs of infrastructure and services and correlate their timing with new development.	The project would be conditioned to work with the County and public agencies to provide new and expanded infrastructure, facilities, and public services to and within the vicinity of the project Site. These new infrastructure, facilities, and services would be sized to serve the project and/or address existing impacted facilities such as roads and would be in areas already planned for new and/or expanded infrastructure and facilities. The project's proposed improvements would include improvements to road capacity, sewer and water infrastructure, public parks, fire service, undergrounding of utilities in on- and off-site areas, and a school site.	Consistent.
	The project would be conditioned to require delivery, construction and/or funding of these improvements commensurate with the various phases of project development. The payment of impact fees or the equivalent would be required at the time of building permit issuance. Relevant policies and responses addressing various infrastructure, facilities, and public services can be found throughout this table, including for schools, parks, fire protection (Deer Springs Fire Protection District), and sewer and water services (Vallecitos Water District). Refer also to EIR Section, 2.14, Utilities and Service Systems, and EIR Section 3.5, Public Services.	
10. Recognize community and stakeholder interests while striving for consensus.	The applicant held four private workshops and numerous meetings with interested stakeholders. The applicant also met with the Twin Oaks, Hidden Meadows, and Bonsall sponsor groups to solicit their input, and the applicant held a public scoping meeting to determine the scope of the environmental document. A CEQA-compliant 60-day public review period will also solicit public input as part of the County's environmental review process. Finally, the County will conduct public hearings as part of the approval process of the project.	Consistent.
Conservation and Open Space Element		
COS-1 Inter-Connected Preserve System. A regionally managed, inter-connected	The project would dedicate and permanently preserve approximately 1,209 acres of on-site open space, and an additional 212 acres of off-site open space for a total preserve acreage of 1,421 acres (72 percent of the project Site acreage). The onsite preservation includes large contiguous blocks of preserve dominated	Consistent.

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Guiding Principle	Project Conformance	Conformance Conclusion
preserve system that embodies the regional biological diversity of San Diego County.	by native habitats including chaparral, oak and riparian woodlands, and grasslands. These native habitats are internally connected to each other either directly or through linkages within the project Site and support a variety of sensitive native flora and fauna, including five special-status plant species and 16 special-status wildlife species observed on the project Site. In addition to creating a 1,209-acre biological preserve area on Site, the project proposes to maintain an additional 235 acres of native habitat as Fuel Modification Zone 2 and Special Maintenance Areas whereby the native habitat would be thinned up to 50% of its existing density, and weeds, other flash fuels, and dead or dying vegetation would be removed to reduce the fuel load of the vegetation but preserve the integrity and certain of the habitat functionality and benefits of these areas.	
	In support of the goal to have a regionally-managed, inter-connected preserve system that embodies the regional biological diversity of San Diego County, the project's proposed 1,209 acres of preserve areas would also be contiguous with large off-site open space areas located to the north, south, and west of the project Site containing high-quality native habitat, including chaparral, woodlands, riparian areas, wetlands, and grasslands,. Many of these areas are designated as "Pre-Approved Mitigation Areas" (PAMAs) in the County's Draft North County Multiple Species Conservation Program (MSCP) Plan or, in some cases, already in permanent preservation. Preserving the northwestern, northern and eastern areas of the project Site would provide a contiguous block of habitat connected to mostly undeveloped lands and lands designated as PAMA, including the San Marcos Mountains, and lands already in preservation. The project's proposed preserve areas in the southern portion of the project Site would also connect to off-site areas designated as PAMA, including the high-quality wetland and riparian habitat immediately south of Deer Springs Road, an important drainage area for native flora and fauna.	
	While a regional preserve system has not yet been adopted in the unincorporated areas of North San Diego County, the primary goal of the Draft North County MSCP Plan is to create this regional preserve. The preserve areas of the project would be an important and significant contribution of preserve land to the North County MSCP preserve. It is anticipated that the MSCP will contain a regional preserve management component for the various lands that are added to the Plan's preserve. The project has prepared on-site and off-site Resource Management Plans (RMPs) that include contracting with a preserve management entity for the project's on-site preserve areas. In addition to performing important biological monitoring functions, the project's preserve manager would keep trespassers from dumping trash, camping, driving off-road-vehicles, graffiti/tagging boulders, and participating in other illegal activities that disturb and threaten the	

Guiding Principle	Project Conformance	Conformance Conclusion
	flora and fauna found on Site. The management of the project's preserve areas would be accomplished in coordination with the management of the larger preserve system ultimately created via the North County MSCP when that is adopted and implemented.	
	In addition to the proposed on-site preservation, the project would preserve approximately 212 acres off Site. The mitigation site is comparable to or better than the habitat that is being impacted on the Site. The mitigation site includes a variety of topographic relief, a comparable suite of vegetation communities, and rock resources. It provides better wildlife movement potential than the Newland Sierra Site because it connects segments of the Cleveland National Forest and San Diego County Parks properties. This Site supports more Engelmann oak resources (100+ trees versus the three on the Newland Sierra Site) and other sensitive resources (e.g., ringtail). Preservation of the mitigation site through acquisition would also benefit the PAMA and draft North County MSCP because it eliminates any potential of development for agricultural production or residential use. Further, the Site could benefit from management, since there is currently easy access to the Site and there are wild boar concerns.	
	Please also refer to EIR, Section 2.4, Biological Resources, for additional information on the project's proposed preserve areas and preserve management component.	
COS-1.1 Coordinated Preserve System. Identify and develop a coordinated biological preserve system that includes Pre-Approved Mitigation Areas, Biological Resource Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges.	Please see the response to the above Goal/Policy/Objective COS-1. The project proposes to create a 1,209-acre preserve area on Site that supports sensitive native flora and fauna. The project's proposed preserve would connect to large blocks of native habitat and open space areas proposed as PAMA in the Draft North County MSCP Plan as well as preserve areas that are off Site of the project Site. The project's proposed on-site preserve areas and these off-site PAMA and preserve areas support a wide range of sensitive native flora and fauna, wildlife corridors and linkages, and what would become Biological Resource Core Areas if the North County MSCP Plan is implemented. Please also refer to EIR, Section 2.4, Biological Resources, for additional information on the project's proposed preserve areas.	Consistent.
COS-1.2 Minimize Impacts. Prohibit private development within established preserves. Minimize impacts within established preserves when the construction of public infrastructure is unavoidable.	The entire project Site and the project's off-site improvements are not located within an established preserve. Consistent with this policy, the project would also not place new development within established preserves or construct new public infrastructure within established preserves; thus, this policy is not applicable. Please also refer to EIR Section 2.4, Biological Resources.	Not applicable.

Guiding Principle	Project Conformance	Conformance Conclusion
COS-1.3 Management. Monitor, manage, and maintain the regional preserve system facilitating the survival of native species and the preservation of healthy populations of rare, threatened, or endangered species.	Please see the response to the above Goal/Policy/Objective COS-1. The County's Draft North County MSCP Plan will include a regional preserve management component with the overarching goal of managing the regional preserve system created through implementation of the Plan in a manner that ensures the preservation and survival of healthy populations of native species, including rare, threatened, and endangered flora and fauna, found within the Plan area. The project proposes a Resource Management Plan for its proposed preserve areas that would likewise be managed with the same overarching goal; therefore, the project is consistent with this Policy. For more information on the project's proposed preserve management objectives and requirements, please also refer to EIR Section 2.4, Biological Resources and the project's Conceptual Resource Management Plan.	Consistent.
COS-1.4 Collaboration with Other Jurisdictions. Collaborate with other jurisdictions and trustee agencies to achieve well-defined common resource preservation and management goals.	The project applicant supports the County's collaboration with other jurisdictions and trustee agencies; however, this policy is not applicable. Nonetheless, for the past 10 years, the project applicant, previous property owners of the project Site, and the County have coordinated and consulted with the wildlife agencies (California Department of Fish and Wildlife and U.S. Fish and Wildlife Service), the federal and state agencies with purview over the preservation and management of native habitat areas, on preserve management objectives and requirements, preserve design, wildlife movement, corridors, and linkages, and other factors that relate to the project's proposed preserve design and preserve management framework.	Not applicable.
COS-1.6 Assemblage of Preserve Systems. Support the proactive assemblage of biological preserve systems to protect biological resources and to facilitate development through mitigation banking opportunities.	The project does not propose mitigation banking; therefore, this policy is not applicable.	Not applicable
COS-1.7 Preserve System Funding. Provide adequate funding for assemblage, management, maintenance, and monitoring through coordination with other jurisdictions and agencies.	Please see the response to Goal/Policy/Objective COS-1, above. The project applicant would provide the necessary funding for the preservation, maintenance, and management of the project's on-site habitat preserve areas. The project proposes to contract with a preserve management entity for the project's on-site habitat preserve areas. In addition to performing important biological monitoring functions, the project's preserve manager would keep trespassers from dumping trash, camping, driving off-road-vehicles, graffiti/tagging boulders, and participating in other illegal activities that disturb and threaten the flora and fauna found on Site.	Consistent.
COS-1.8 Multiple-Resource Preservation Areas. Support the acquisition of large tracts of land that have multiple resource	Please see the response to Goal/Policy/Objective COS-1, above. This objective applies to the County in the context of forming multiple resource preserve areas. Consistent with the spirit and intent of this objective, the project's proposed open space areas, which are predominantly native habitat preserve areas, contain	Consistent.

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preservation benefits, such as biology, hydrology, cultural, aesthetics, and community character. Establish funding mechanisms to serve as an alternative when mitigation requirements would not result in the acquisition of large tracts of land.	multiple resource preservation benefits, benefits to County objectives pertaining to biology, hydrology, cultural resources, aesthetics, and Community character. As it relates to biology and open space, the project proposes to create a 1,209-acre native habitat preserve and an additional 235 acres of project open space supporting native habitat (managed for fuel modification purposes), pedestrian pathways and trails, approximately 20 acres of Community grape vineyards, and 35.9 acres of Community, neighborhood, and pocket parks. The project's proposed habitat preserve areas connect to large off-site open space areas dominated by native habitat and designated as "Pre-approved Mitigation Areas" (PAMA) in the Draft North County MSCP Plan on its southern, western, and northern boundaries.	
	As it relates to hydrology, the proposed project would leave nearly three quarters of the project Site, in its existing natural (ungraded) topographic condition, ensuring that the project Site's existing sub-watersheds and drainage patterns are largely maintained. Additionally, the project's development areas have been designed to conform to the existing terrain and to utilize the Site's existing natural drainages such that runoff from graded and developed areas is treated and detained in full compliance with the applicable Regional Water Quality Control Board storm water quality and hydromodification detention requirements and then discharged into these existing natural drainages. Finally, prior to leaving the Site, runoff from the project's various drainages would undergo detention where necessary such that post-development flows are less than or equal to pre-development flows in accordance with County flood control requirements. Of the 8.2 acres of RPO wetlands within the project Site, approximately 2.13 would be impacted by the proposed project, with a large majority of those impacts resulting from fuel modification activities. Additional direct impacts would result from off-site improvements to Deer Springs Road and Camino Mayor. The amount of impact depends on the Deer Springs option chosen for development, with Option B generating greater impacts. In addition, RPO buffers would be impacted by road improvements. On-site and off-site impacts are unavoidable given the project goals of concentrating development in the southern portion of the property to create a Biological Open Space area in the northern portion of the property, and providing a core habitat block in the Merriam Mountains. Improvements to Deer Springs Road are required by the General Plan and, therefore, impacts to RPO wetlands are unavoidable. Improvements to Camino Mayor are necessary to provide secondary access to the project Site for emergency purposes.	
	As it relates to cultural resources, the project has been designed to avoid significant cultural resources to the greatest extent feasible. However, several significant cultural sites would be impacted by the widening of Deer Springs Road (an essential public facility). These impacts have been minimized through the use of soldier pile walls, which would avoid much of the resource. Impacts to these significant cultural sites will be	

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	mitigated to less than significant levels via Phase III data recovery efforts pursuant to an approved treatment plan. In addition, to the extent grading activities uncover previously unknown or unanticipated cultural resources, all such activities will stop until the significance of the resources is determined. In the event the affected resources are deemed significant, the project grading will be adjusted to avoid them if such avoidance is feasible. If avoidance is not feasible, the uncovered resource will be subject to data recovery. With respect to cumulative impacts, the project's effects on the three significant cultural sites constitute a cumulatively considerable contribution to a significant cumulative impact. The proposed mitigation measures, however, reduce this impact to less than cumulatively considerable.	
	As it relates to aesthetics, the project's proposed open space design would preserve key natural features found on the project Site, including ridgetops, hilltops, drainages, and rocky outcrops. The majority of these areas consist of dense chaparral, riparian forest and scrub, coastal sage scrub, non-native grassland, and oak woodland. The two largest riparian areas located within the project Site, the South Fork of Gopher Canyon and the South Fork of Moosa Canyon, would also be included in the open space. In total, the project would avoid altering nearly three quarters of the topography and other natural features of the Site.	
	By preserving large portions of the project's Site's biological, hydrological, cultural, and natural aesthetic features, in the context of these features being necessary components of Community character, the project achieves the Community character aspect of this objective. For more information on how the project is consistent with the land use components (including development patterns, densities, and uses) of Community character, please refer to COS-1 above. Please also refer to EIR Section 2.4, Biological Resources and the project's Conceptual Resource Management Plans.	
COS-1.9 Invasive Species. Require new development adjacent to biological preserves to use non-invasive plants in landscaping. Encourage the removal of invasive plants within preserves.	The project would be conditioned to require the use of non-invasive plants in all landscaping areas that are adjacent to preserve areas. The project's Specific Plan proposes the use of low-water use native and naturalized plants and trees throughout its various landscape areas, including parkways, slopes, Fuel Modification Zone 1, and parks. To ensure compliance with this requirement, prior to any permanent landscaping being installed, the project's various landscape construction documents would be reviewed and permitted in compliance with the project's Conditions of Approval, Specific Plan, the Fire Protection Plan, and the County's Water Efficient Landscape Design Manual. The project also proposes a Conceptual Resource Management Plan for its 1,209-acre biological preserve implemented by a County and wildlife agency pre-approved preserve management entity that would require the removal of exotic and invasive plants and trash and debris, among preserve management responsibilities, within preserve areas.	Consistent.

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COS-2 Sustainability of the Natural Environment. Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.	The project is a balanced project supporting a range of housing types along with shopping, Community and neighborhood parks, Community pathways and trails, bicycle-friendly streets, and a school site connected together in an environmentally sensitive development pattern surrounded by 1,209 acres (approximately 61% of the Site) of native habitat preserve areas, 128.9 acres of Fuel Modification Zone 1, and 241 acres of Fuel Modification Zone 2 and Special Maintenance Areas. The project's proposed 1,209 acres of permanently preserved, managed, and dedicated preserve would sustain the on-site natural environment, including the natural processes, sensitive lands, and sensitive and common native species found on Site. The project's proposed preserve areas would connect to existing open space areas and areas designed as Pre-approved Mitigation Areas (PAMA) in the vicinity of the project, areas which support natural processes, sensitive lands, and sensitive as well as common native species. 235 acres of the 241 acres of FMZ 2 and Special Maintenance Areas would be left as native habitat areas, thinned and managed for fuel modification purposes. It should also be noted that the project would dedicate and permanently preserve an additional 212 acres of off-site open space for a total preserve acreage of 1,421 acres (72 percent of the project Site acreage). To help the project's preserve areas to control access and minimize human encroachment. The open space would not be developed, and human use would be limited to passive recreation along designated trail areas and staging areas. Please also refer to EIR Section 2.4, Biological Resources.	Consistent.
COS-2.1 Protection, Restoration and Enhancement. Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate. The preservation of existing native plants and the planting of a variety of native (genetically locally adapted) or compatible non- native, non-invasive plant species enhance wildlife habitat areas.	The proposed project protects natural wildlife habitat outside of preserves as project development occurs, and would limit degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, and within the Village designation where appropriate. In the context of limiting the degradation of regionally important natural habitats, the project would permanently preserve and manage approximately 1,209 acres of dedicated preserve onsite (approximately 61% of the Site) and thin but maintain as native habitat an additional 235 acres of native habitat in Fuel Modification Zone 2 and Special Management Areas. FMZ 2 and SMAs would be thinned up to 50% and maintained free of weeds and exotic and invasive plants and would continue to support wildlife movement, nesting, and foraging. More broadly, the overall design of the project would protect and preserve significant natural areas and features of the Site, including nearly three quarters of the Site's existing natural terrain, 61% of the Site in a habitat preserve, and areas not within the project's proposed habitat preserve areas that provide for additional wildlife movement and connectivity throughout the Site.	Consistent.

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	It should also be noted that an additional 212 acres of off-site open space would be preserved, for a total preserve acreage of 1,421 acres (72 percent of the project Site acreage). In the context of preserving native plants, the project's proposed preserve design consists of two large continuous blocks of native habitat situated within the project's northern half and eastern boundary, as well as a large third block of native habitat in the center of the proposed development that connects the abovementioned blocks of open space to open space and Pre-approved Mitigation Areas (PAMA) located off the project Site. The project's preserve areas contain a diversity of environmental characteristics, including representative populations of special-status plant and animal species observed on Site; existing dirt trails and canyon bottoms currently used by wildlife for movement across the Site; and the north/south trending tributary to Gopher Canyon along Twin Oaks Valley Road, which provides linkage opportunities to	
	the San Marcos Mountains. Please also refer to EIR Section 2.4, Biological Resources, and the associated Conceptual Resource Management Plan (Appendix H).	
COS-2.2 Habitat Protection Through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.	The project proposes to locate its various neighborhoods in the least biologically sensitive areas of the Site and minimize the loss of natural habitat found on Site. The most biologically sensitive areas are located in the northern portion of the Site and would be included in the project's biological preserve. The project would limit disturbance and development to only those areas on Site or off Site as needed for grading, roads, utilities, and infrastructure, thereby preserving nearly three-quarters of the Site's natural terrain. The project would also create a 1,209-acre native habitat preserve on Site connected to off-site areas supporting native habitat. The project would also maintain an additional 235 acres of native habitat within Fuel Modification Zone 2 and Special Maintenance Areas. Please also refer to EIR Section 2.4, Biological Resources.	Consistent.
COS-3 Protection and Enhancement of Wetlands. Wetlands that are restored and enhanced and protected from adverse impacts.	The project Site contains freshwater marsh and southern willow scrub wetlands under the jurisdiction of the U.S. Army Corps of Engineers (ACOE), the Regional Water Quality Control Board (RWQCB), the California Department of Fish and Wildlife (CDFW), and the County (Appendix H). The project Site also supports wetland and riparian habitat that fall within the jurisdiction of CDFW and the County RPO but outside the jurisdiction of the ACOE and RWQCB. The project proposes avoidance, mitigation, and long-term preservation management of wetland and riparian resources. Impacts to all jurisdictional resources will require permits from the regulatory agencies and any additional measures required for restoration, enhancement and/or protection/preservation of these resources will be identified through those permitting processes. Please also refer to the response to Goal/Policy/Objective COS-1.8, EIR Section 2.4, Biological Resources, and the On-Site Conceptual Resource Management Plan (in Appendix H, Biological Resources Technical Report).	Consistent.

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COS-3.1 Wetland Protection. Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.	Please see the responses to Goal COS-3 and Goal/Policy/Objective COS-1.8 above. The riparian areas to be preserved primarily occur within the stream channel west of North Twin Oaks Valley Road, and the tributary just west of I-15 with additional scattered areas throughout the proposed preserve area. These locations are surrounded by upland habitat and will be preserved and protected as discussed in the On-Site Conceptual Resource Management Plan (in Appendix H, Biological Resources Technical Report). In addition, the project would preserve non-wetland waters, which include the tributaries to the two main riparian areas. Please also refer to EIR Section 2.4, Biological Resources.	Consistent.
 COS-3.2 Minimize Impacts of Development. Require development projects to: Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species. 	Please see the response to Goal/Policy/Objective COS-3.1 above. The proposed project mitigates impacts to wetlands through avoidance, minimization, and mitigation in the form of preservation of high quality wetland and riparian habitat within the project's proposed preserve areas. Exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species would be mitigated through the following measures: construction monitoring (M-BIO-1), construction fencing (M-BIO-2), invasive species prohibition (M-BIO-4), preservation of on-site and off-site habitat (M-BIO-8A), and control of invasive species (M-BIO-10). Refer to EIR Section 2.4.15, Mitigation Measures, for the full description of these mitigation measures. As previously stated, impacts to all jurisdictional resources will require permits from the regulatory agencies (M-BIO-12) and any additional measures required for restoration, enhancement and/or protection of these resources will be identified through those permitting processes.	Consistent.
COS-4 Water Management. A balanced and regionally integrated water management approach to achieve the long-term viability of the County's water quality and supply.	The project Site is located within the service territory of the Vallecitos Water District (VWD), the water and sewer service provider for the project Site and much of the surrounding area. An extensive network of water lines and facilities currently exist within the project Site, including water lines ranging in size from 8 inches to 16 inches in diameter and a 1.3 million-gallon water reservoir that would be used to serve the project as well as adjacent properties. The project proposes the relocation of some existing water mains, the construction of new water mains, and the construction of two new water tanks, one to serve the project and one to support VWD's implementation of their approved Water, Wastewater, and Recycled Water Master Plan. The applicant would equitably finance all on-site services and facilities and pay capital facility fees to VWD and the County Water Authority (CWA) to fund local and regional water storage, treatment, and delivery facilities, saltwater desalination facilities, and other facilities, which create new water supply, and water conservation and reuse programs, which collectively ensure the long-term viability of drinking water quality and supply for the project, VWD, and the San Diego County region as a whole.	Consistent.

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	Further, while the project would result in an increase in demand for water from VWD, the project proposes extensive mandatory and project design water conservation measures that would reduce the project's projected water demand by 52% below what VWD has programmed for the project Site in their Urban Water Management Plan (UWMP), including: a plant palette comprised predominantly of low water use drought-tolerant plants, water efficient irrigation systems with the extensive use of efficient drip irrigation; weather-based "smart" irrigation controllers that adjust the irrigation schedule in respond to rain events; prohibitions on planting turf in the front yard areas of private residences; restricting backyard and side yard turf to "warm season" turf varieties only; low water use fixtures in all new construction as required by Title 24 (i.e., the California Green Building Standards Code/CalGreen), and provisions in the project's Specific Plan to require pre-plumbing for greywater systems in all of the project's single-family homes. Collectively, the project's proposed indoor and outdoor water conservation measures exceed the latest requirements imposed by the state and the County, including California Title 24 and the County's "Water Conservation in Landscape" Ordinance and the County's Water Efficient Landscape Design Manual.	
	The project's contribution to local and regional water supply and transmission facilities, its aggressive indoor and outdoor water conservation measures that exceed state and local requirements (requirements which were recently tightened as a result of 2015 drought conditions in the state), and its commitment to pre- plumbing greywater systems in the project's single family residential residences, ensure that the project is consistent with the goal of having a balanced and regionally integrated water management approach to achieve the long-term viability of the County's water quality and supply. See also EIR Section 2.14, Utilities and Service Systems; EIR Appendix T, GSI's technical memorandum; EIR Appendix S, Water Supply Assessment and Verification Report; and Section 3.7 of the Specific Plan.	
COS-4.1 Water Conservation. Require development to reduce the waste of potable water through use of efficient technologies and conservation efforts that minimize the County's dependence on imported water and conserve groundwater resources.	Please see the response to Goal/Policy/Objective COS-4 above. The proposed project would reduce potable water waste through the use of efficient technologies and conservation efforts that minimized the County's dependence on imported water, including: a plant palette comprised predominantly of low water use drought-tolerant plants, water efficient irrigation systems with the extensive use of efficient drip irrigation; weather-based "smart" irrigation controllers that adjust the irrigation schedule in respond to rain events; prohibitions on planting turf in the front yard areas of private residences; restricting backyard and side yard turf to "warm season" turf varieties only; low water use fixtures in all new construction as required by Title 24 (i.e., the California Green Building Standards Code/CalGreen), and provisions in the project's Specific Plan to require pre-plumbing for greywater systems in all of the project's single-family homes.	Consistent.

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	Collectively, the project's proposed indoor and outdoor water conservation measures exceed the latest requirements imposed by the state and the County, including California Title 24 and the County's "Water Conservation in Landscape" Ordinance and the County's Water Efficient Landscape Design Manual. As the project does not use any groundwater, the project would have no effect on groundwater resources. The project's aggressive indoor and outdoor water conservation measures that exceed state and local requirements and its commitment to pre-plumbing for greywater systems further the goal of minimizing the County's dependence on imported water and, indirectly, benefit the goal of conserving groundwater resources. For further responsive information, please see Appendix T of the EIR for GSI Water Solutions' technical memorandum substantiation the project's under conservation and Section 3.7 of the Specific Dian	
COS-4.2 Drought-Efficient Landscaping. Require efficient irrigation systems and in new development encourage the use of native plant species and non-invasive drought tolerant/low water use plants in landscaping.	memorandum substantiating the project's water conservation and Section 3.7 of the Specific Plan. Please see the response to Goal/Policy/Objective COS-4 above. The project's Specific Plan and the County's Water Efficient Landscape Design Manual would require the use of efficient irrigation systems (i.e., drip irrigation), weather based "smart" irrigation controllers, and the use of native plant species and non- invasive drought-tolerant/low water use plants in landscaping, including a plant palette comprised mostly of low water use drought-tolerant plants and native or naturalized plants. To ensure compliance with this requirement, prior to any permanent landscaping being installed, the project's various landscape construction documents would be reviewed and permitted in compliance with the project's Conditions of Approval, Specific Plan, the Fire Protection Plan, and the County's Water Efficient Landscape Design Manual. For further responsive information, please see Appendix T of the EIR for GSI Water Solutions' technical memorandum substantiating the project's water conservation and Section 3.7 of the Specific Plan.	Consistent.
COS-4.3 Stormwater Filtration. Maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces. This policy shall not apply in areas with high groundwater, where raising the water table could cause septic system failures, moisture damage to building slabs, and/or other problems.	The project would maximize stormwater filtration and infiltration by preserving natural drainage patterns and the retention of natural vegetation and other pervious surfaces. The project would avoid grading impacts to nearly three quarters of the project Site, preserving much of the natural terrain, drainages, and native vegetation found on Site. The project proposes to preserve approximately 61% (1,209 acres) of the native vegetation on Site and thin an additional 235 acres (12%) of native vegetation such that nearly three-quarters of the Site will retain its native vegetative cover and root system. It should also be noted that an additional 212 acres of off-site open space would be preserved, for a total preserve acreage of 1,421 acres (72 percent of the project Site acreage).	Consistent.

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	Stormwater quality and hydromodification impacts are addressed through a system of Site design best management practices (BMPs), low-impact development (LID) BMPs, structural BMPs, and source control BMPs (collectively, LID and water quality BMPs). The Site design BMPs are largely reflected in the three quarters of the Site, which will remain pervious resulting in extensive preservation of the Site's existing natural terrain and drainages. The project's roadway-adjacent bioswales (in landscaped medians and parkways) and its separation of impervious surfaces with pervious surfaces, and use of pervious walking paths reflect the implementation of LID BMPs. The project's bioretention swales and bioretention basins, which treat and detain runoff, constitute the project's structural water quality and hydromodification BMPs. The project's Stormwater Quality Management Plan source control BMPs would restrict the use of fertilizers, pesticides, and herbicides in common areas, commercial areas, and parks, prohibitions on dumping or discharges of any kind into the storm drain system, and educational material provided to new homebuyers and Community residents as a whole constitute the project's source control BMPs.	
	The project's proposed stormwater capture, detention, and treatment system and associated water quality Best Management Practices (BMPs) have been designed to provide high-quality stormwater treatment, hydromodification detention, and flood control detention to mitigate flows to pre-development levels for storm events in compliance with the applicable San Diego RWQCB requirements for stormwater runoff, discharges, and pollutants as contained in the National Pollution Discharge Elimination System (NPDES) Permit for Municipal Separate Storm Sewer Systems (MS4s), Order Numbers R9-2015-0001 and R9-2015-0100, as well as in compliance with the County of San Diego Hydrology Manual.	
	The project also proposes to minimize grading impacts for off-site improvements and has been designed to meet the same applicable RWQCB and County Hydrology Manual requirements applicable to on-site improvements. See also EIR Section 3.2, Hydrology and Water Quality; Appendix Y, the project's Stormwater Quality Management Plan (SWQMP); and Sections 2 and 3 of the project's Specific Plan.	
COS-4.4 Groundwater Contamination. Require land uses with a high potential to contaminate groundwater to take appropriate measures to protect water supply sources. Potential sources of groundwater contamination include, but are not limited to, landfills, fertilizer, pesticide, manure storage	The project's proposed land uses, which include residential and non-residential uses, do not create the high potential to cause groundwater contamination. The project does not propose and would not permit any land uses, which involve the use of landfills, manure storage and sales, petroleum product storage tanks, or manufacturing plants. The project's Stormwater Quality Management Plan includes stringent source control BMPs to limit the use of fertilizers, pesticides, and herbicides in all common areas, commercial areas, and parks within the project. Therefore, the use of pesticides, fertilizers, and herbicides would be minimal and not have a high potential to contaminate groundwater. Finally, while the project would require the pre-	Consistent.

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and sales, petroleum product storage tanks, manufacturing plants, and on-site wastewater treatment systems.	plumbing of greywater systems in its single-family homes, each greywater system includes a complex treatment unit and will be individually permitted and inspected by the County's Department of Health consistent with all applicable state laws governing the use of greywater systems. Therefore, the use of greywater systems in the project would not create a high potential to contaminate groundwater. See also EIR Section 2.8, Hazards and Hazardous Materials.	
COS-4.5 Recycled Water. Promote the use of recycled water and gray water systems where feasible.	 The project does not propose the use of recycled water because Vallecitos Water District (VWD) does not currently provide any recycled water service within its sphere of influence. According to VWD's Urban Water Management Plan (UWMP) adopted in June 2016: "VWD produces up to 5 MGD of recycled water at MRF (Meadowlark Reclamation Facility) and maintains the 54 million-gallon (MG) Mahr Reservoir for recycled water storage, (however) VWD does not maintain a recycled water service area within its sphere of influence. All of the recycled water produced is sold to the (Carlsbad Municipal Water District) CMWD and the (Olivenhain Municipal Water District) OMWD. CMWD originally contracted for up to 2.0 MGD during peak summer months, and in 2003, increased that amount to 3.0 MGD. As part of that agreement, VWD also provides CMWD with 32 MG of recycled water storage in the Mahr Reservoir. Also in 2003, the OMWD contracted for up to 1.5 MGD of recycled water and 16 MG of recycled water storage in the Mahr Reservoir." Wastewater in VWD's service territory is directed to the Meadowlark Reclamation Facility where up to 74% of that water is converted into recycled water and then distributed to the neighboring districts of CMWD and OMWD and used for irrigation at places like Legoland, the Carlsbad Flower Fields, and the Aviara Golf Course. WWD is presently evaluating whether to begin extending recycled water service to portions of its service territory, with its focus being on the downtown area of San Marcos. VWD presently has no plans to extend recycled water service to the northern portions of its territory, including the community of Twin Oaks or the project Site. More broadly, VWD is currently working with other North County water districts to determine the best approach to water reuse, including examining the viability of potable reuse, the water reuse solution the city of San Diego is now implementing. WWD and other North County water districts may determine that potabl	Consistent.

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	water treatment facilities. In such case, VWD and other North County water districts may shift their focus away from providing or expanding recycled water services and toward developing potable water reuse infrastructure, including potentially restructuring treatment facilities and building new reservoirs. Potable reuse infrastructure and facilities would be funded through VWD's and other water districts' water capacity/capital facility fees and service charges.	
	Currently, where it is made available to projects, existing state regulations limit the use of recycled water to common areas, parkways, medians, and parks due to the concern about cross-connections were it extended into private lots and buildings. However, recent state legislation, Assembly Bill 2282 passed in 2014, directs the Building Standards Commission to develop plumbing code requirements for indoor and outdoor recycled water as part of the 2019 California Building Code cycle. As this code development process is underway now, it remains to be seen how it will ultimately be applied to new construction. AB 2282, however, is clear about when these new code requirements would apply, adding Section 17921.5(c)(2) to the Health and Safety Code to read:	
	"When developing the application provisions for the mandatory building standards, the department (Department of Housing and Community Development) shall limit the mandate to install recycled water systems within residential buildings and building site landscaped areas to only those areas within a local jurisdiction that have feasible and cost-efficient access to a water recycling facility, or that have been identified by the local jurisdiction within a planned service area for the provision of recycled water for which a specific implementation timeline has been identified by the public water system in its most recent urban water management plan."	
	In the event that VWD were to eventually develop and extend recycled water service to the project Site, the code requirements that are promulgated out of AB 2282 may be triggered for any remaining construction in the project depending on the proximity of that remaining construction to the recycled water service being extended to the project Site. Under such a scenario, the County and VWD would be able to exercise their regulatory authority in determining how these remaining portions of the project Site would be required to implement recycled water systems.	
	Finally, while the project does not propose the use of recycled water, as stated previously, the project would require the pre-plumbing for greywater systems in all of its single-family homes subject to the permitting	

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	requirements of the County of San Diego for greywater systems. In the same fundamental way that recycled water serves as a form of water reuse, greywater use in the project would as well.	
	See also EIR Section 2.14, Utilities and Service Systems and the project's Specific Plan.	
COS-5 Protection and Maintenance of Water Resources. Protection and maintenance of local reservoirs, watersheds, aquifer-recharge areas, and natural drainage systems to maintain high-quality water resources.	The project is consistent with the goal of protecting and maintaining local reservoirs, watersheds, aquifer- recharge areas, and natural drainage systems to maintain high-quality water resources. As discussed in the response to COS-4.3, the project proposes to conserve nearly three quarters of the existing natural terrain, drainages, and native vegetation on Site. In addition to this high level of on-site conservation, to protect both on-site and off-site drainage systems and the larger San Luis Rey-Escondido Watershed in which the project Site sits, the project proposes stormwater facilities (e.g., bioretention basins, bioswales; and other low impact development features) to manage stormwater quality, hydromodification impacts, and peak flow attenuation.	Consistent.
	No local reservoirs exist within the vicinity of the project Site. The nearest drinking water reservoir (Dixon Lake) is approximately 6 miles to the southeast and separated from the project Site by the I-15 corridor and within a different watershed. See also EIR Section 3.2, Hydrology and Water Quality.	
COS-5.1 Impact to Floodways and Floodplains. Restrict development in floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element. Development in floodways and floodplains has the potential to alter	The project would restrict development in floodways and floodplains. Any areas of proposed development improvements located in a flood hazard area would be designed for adequate structural safety for flooding hazards in compliance with the County's Flood Control development regulations and permitting. All grading that occurs and any structural improvements in or adjacent to or affecting a floodplain must comply with these requirements.	Consistent.
natural hydrologic flow and cause soil erosion and increased stormwater runoff—including loss of wetland and health issues related to surface and groundwater contamination.	In addition, a drainage study, hydromodification study, and stormwater study were prepared and incorporated into the project design to analyze impacts regarding stormwater runoff, and to ensure proposed stormwater runoff control facilities are adequately sized, hydrology generally follows the existing drainage pattern, and impacts to drainage and flooding are minimized to the extent feasible, as described within EIR Section 3.2, Hydrology and Water Quality. Issues related to wetland habitat are addressed in the responses to Goal/Policy/Objective COS-3, COS-3.1, and COS-3.2, and issues related to groundwater contamination are addressed in the response to COS-4.4.	
COS-5.2 Impervious surfaces. Require development to minimize the use of directly connected impervious surfaces and to retain	The proposed project requires Site development to minimize the use of directly connected impervious surfaces, and to retain stormwater runoff generated by impervious surfaces in the project's development footprint. For example, to minimize the impacts from impervious surfaces during peak storm events,	Consistent.

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stormwater run-off caused from the development footprint at or near the site of generation. Impervious surface area impairs groundwater recharge and contributes to stormwater runoff and heat retention.	stormwater detention would be provided prior to runoff exiting the project Site. The project proposes to preserve nearly three quarters of the project Site's natural terrain and drainages. Please see the response COS-4.3 for a detailed discussion of the project's water quality BMPs. See also EIR Section 2.9, Hydrology and Water Quality.	
COS-5.3 Downslope Protection. Require development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources.	The proposed project implements Site design, on-site preservation and conservation of natural features, and a complex suite of water quality BMPs that retain the Site's natural flow regimes to protect downslope areas from erosion, capture, filter, and infiltrate stormwater runoff, and to protect downstream biological resources. For example, the project proposes development in the least environmental sensitive areas of the Site, retains nearly three quarters of the existing natural terrain and drainages, and implements water quality BMPs, including bioswales and bioretention basins, to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources. See also EIR Section 3.2, Hydrology and Water Quality.	Consistent.
COS-5.4 Invasive Species. Encourage the removal of invasive species to restore natural drainage systems, habitats, and natural hydrologic regimes of watercourses.	Please see the response to Goal/Policy/Objective COS-1.9. The project would require the use of non- invasive plants in all landscaping areas that are adjacent to preserve areas. The project proposes the use of low-water use native and naturalized plants and trees throughout its various landscape areas, including parkways, slopes, Fuel Modification Zone 1, and parks and these areas would be subject to ongoing maintenance and removal of invasive species. The project is conditioned to submit and includes a Resource Management Plan for its 1,209-acre biological preserve implemented by a preserve management entity that would require the removal of exotic and invasive plants and trash and debris, among other preserve management responsibilities, within these preserve areas. The active management of the project's internal landscape areas, development perimeter areas (e.g., Fuel Modification Zones), and preserve areas to prevent the use of invasive plant species and to ensure the removal of any that occur would ensure compliance with the goal of removing invasive species to restore natural drainage systems, habitats, and hydrologic regimes.	Consistent.
COS-5.5 Impacts of Development to Water Quality. Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.	The project would require Site development to avoid water quality impacts to local reservoirs, groundwater resources, recharge areas, watersheds, and other local water sources through implementation of stormwater quality BMPs and storm water runoff detention, attenuation, and, in certain locations, infiltration. The project's Drainage Study, Hydromodification Study, Critical Coarse Sediment Analysis, and a Storm Water Quality Management Plan analyzed impacts related to water quality, flooding, hydromodification, and sediment supply from stormwater runoff. The project's storm water facilities, including BMPs, would be	Consistent.

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Protecting reservoir water quality requires that the quality of the water entering the reservoirs is maintained or improved. Pollutants of high concern are nutrients and related algae, total organic carbon, and total dissolved solids.	designed to ensure that stormwater BMPs are located and sufficiently sized to remove pollutants and attenuate flows for hydromodification and flood control purposes, that runoff within and from developed areas generally follows the existing drainage patterns, and that impacts to downstream drainages and flooding are mitigated to less than significant. To that end, the project has been designed to comply with the San Diego RWQCB requirements for stormwater runoff, discharges, and pollutants as contained in the NPDES Permit for Municipal Separate Storm Sewer Systems (MS4s), Order Numbers R9-2015-0001 and R9-2015-0100 as well as in compliance with the County of San Diego Hydrology Manual. The project has also completed a "No Rise" flood control analysis related to off-site improvements to Deer Springs Road and Twin Oaks Valley Road. See also the responses above to COS-4.3 and COS 5 and EIR Section 3.2, Hydrology and Water Quality.	
COS-6 Sustainable Agricultural Industry. A viable and long-term agricultural industry and sustainable agricultural land uses in the County of San Diego that serve as a beneficial resource and contributor to the County's rural character and open space network.	The project Site does not support any agricultural uses and the project would not reduce the viability of the long-term agricultural industry or sustainable agricultural land uses in the County that serve as beneficial contributors to the County's rural character and open space network. Instead, the project proposes Community gardens and vineyards within certain of the project's individual neighborhoods and Fuel Modification Zones to further the tradition of agriculture in the area surrounding the project Site and the larger unincorporated County. Please see the response to <i>Guiding Principle 8</i> , above.	Consistent.
 COS-6.2 Protection of Agricultural Operations. Protect existing agricultural operations from encroachment of incompatible land uses by doing the following: Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses 	The proposed project would protect existing agricultural operations from encroachment by limiting and minimizing impacts between Site development and existing agriculture; providing a buffer between development and these existing agriculture operations, designing the project to facilitate agriculture uses within the project, specifically through the incorporation of Community gardens and vineyards, and consolidating development areas in the project to avoid grading/landform alteration impacts to nearly three quarters of the project Site. A few small family-run citrus and avocado groves exist to the west and southwest of the project Site. These types of agricultural operations are generally found to be compatible with residential land uses. Certain portions of the project's Valley, Knoll, and Summit neighborhoods would be adjacent to these existing groves, with the closest lots being within approximately 150 to 200 feet and the majority of the lots being 500 feet or more from the edges of these off-site groves. These groves would be buffered by a combination Fuel Modification Zones and Special Maintenance Areas in conjunction with intervening topography. By locating only residential land uses within proximity to these existing groves and providing buffers, the proposed project would not result in the fragmentation or substantial interruption of surrounding agricultural land uses.	Consistent.

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 Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development. Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture Supporting local and State right-to-farm regulations Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process. Discourage development that is potentially incompatible with intensive agricultural uses, including schools and civic buildings where the public gather, daycare facilities under private institutional use, private institutional uses (e.g., private hospitals or rest homes), residential densities higher than two dwelling units per acre, and offices and retail commercial. 	Finally, the project Site does not presently support agricultural uses, however, the project would incorporate Community gardens and vineyards within and around certain neighborhoods in the project to establish agricultural uses within the project in a manner that is compatible with the project's neighborhoods that would surround these uses. The project's Community gardens and vineyards would serve as sustainable and locally grown forms of agriculture in the Twin Oaks community and surrounding area.	

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COS-6.3 Compatibility with Recreation and Open Space. Encourage siting recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses. Recreational and open space uses can serve as an effective buffer between agriculture and development that is potentially incompatible with agriculture uses.	Please see the response to Goal/Policy/Objective COS-6.2 above. The project would provide adequate buffers (portions of which that would act as Fuel Modification Zones and Special Maintenance Areas) between proposed development and existing adjacent off-site agricultural land uses. Consistent with this policy, the project proposes 1,209 acres of preserve, an additional 235 acres of Fuel Modification Zones and Special Management Areas that will retain their native vegetative cover, other project open space areas, parks, and an extensive system of pedestrian pathways and trails, including pedestrian pathways along its loop road, internal pathways within its individual neighborhoods, and multi-use and secondary trails within its neighborhoods and open space areas.	Consistent.
COS-7 Protection and Preservation of Archaeological Resources. Protection and preservation of the County's important archeological resources for their cultural importance to local communities, as well as their research and educational potential.	The proposed project would protect and preserve the County's important archaeological resources from loss or destruction, and require development appropriate mitigation to protect the quality and integrity of these resources. The project's Cultural Resources Technical Report was prepared in accordance with the County's CEQA Guidelines for Determining Significance, Cultural Resources: Archeological and Historical Resources. The report assesses the presence of cultural and archaeological resources within the project, their significance (including from the perspective of Native American tribes), and means of mitigation, if necessary. In addition, the applicant discussed the proposed project's design and development impacts with local Native Americans identified by the Native American Heritage Commission (NAHC). Mitigation includes, preservation in place (open space), where possible, data recovery or index & capping, recording, curation or repatriation, fencing (temporary and permanent), pre-grade survey, and monitoring. Specifically, as analyzed in the Cultural Resources. Technical Report, the project would preserve a large portion of the Sites that include significant cultural resources.	Consistent.
	cultural resource mitigation requirements. The proposed project's impacts to significant cultural resources would be reduced to less than significant through mitigation measures that include the placement of significant sites within an avoidance area (open space), curation or repatriation of all artifacts obtained during the testing and data recovery and archaeological monitoring programs. The archaeological monitoring program would include avoidance or data recovery at new discoveries. Additionally, as stated in the RPP, Sites CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822 are located within an off-site improvement area (Deer Springs Road improvements) that is proposed to include public projects	

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	(roadway improvement and utilities), and, as such, complete avoidance will not be possible. These types of public projects are considered essential and include public use, and are, therefore, considered exempt from the RPO, according to Article V of the RPO (County of San Diego 2007). The County has determined that the Deer Springs Road improvement is an essential public facility (as determined in the General Plan Update 2011), and that sites CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822 are exempt from RPO compliance. Mitigation is provided as detailed in EIR Section 2.5, Cultural Resources, and the Cultural Resources Report included as Appendix I to the EIR.	
COS-7.1 Archaeological Protection. Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources. The importance of archaeological resources must be evaluated from the perspective of the affected community, including local tribes, in addition to the definitions contained in the California Public Resources Code. Input from the affected community on the importance of cultural resources through the consultation process is important in determining what resources should be preserved and what constitutes appropriate mitigation.	Please see the response to Goal COS-7 above regarding preservation of important resources, and response to COS-7.4 regarding consultation with affected communities.	Consistent.
COS-7.2 Open Space Easements. Require development to avoid archeological resources whenever possible. If complete avoidance is not possible, require development to fully mitigate impacts to archaeological resources. Avoidance of archaeological resources is normally achieved through the design of the development project in conjunction with the use of open space easements that protect the resources. If complete avoidance is not	 Please see the response to Goal COS-7 above. The proposed project would require development to avoid archeological resources, where possible, and require development to reduce impacts to significant archaeological resources through mitigation (including preservation in place measures). Additionally, as stated in the RPP, Sites CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822 are located within an off-site improvement area (Deer Springs Road improvements) that is proposed to include public projects (roadway improvement and utilities), and, as such, complete avoidance will not be possible. These types of public projects are considered essential and include public use, and are, therefore, considered exempt from the RPO, according to Article V of the RPO (County of San Diego 2007). The County has determined that the Deer Springs Road improvement is an essential public facility (as determined in the General Plan) 	Consistent.

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possible, other forms of mitigation, including data recovery excavations and the incorporation of archaeological features into the project design on a case-by-case basis may be appropriate. The determination of what constitutes adequate mitigation should be based on meaningful consultation with the affected community, including local tribes.	Update 2011), and that sites CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822 are exempt from RPO compliance. Mitigation is provided as detailed in EIR Section 2.5, Cultural Resources, and the Cultural Resources Report included as Appendix I to the EIR.	
COS-7.3 Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner. The determination of what constitutes appropriate treatment and preservation of archaeological collections should be based on existing federal curation standards in combination with consultation with the affected community, such as the tribes. Many collections should be placed in a local collections curation facility that meets federal standards per 36 CFR Part 79. The proper storage and treatment of these collections should also be based on consultation with the affected community, such as the tribes. In addition, existing federal and state law governs the treatment of certain cultural items and human remains, requires consultation, and in some circumstances, repatriation. The County is committed to conduct an inventory of collections it holds or are held by cultural resources consulting firms.	 Please see responses to Goal/Policy/Objective COS-7 and COS-7.2, above. The proposed project would require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner. For instance, when significant cultural sites cannot be placed within open space easements, information would be preserved through recordation, test excavations, and data recovery programs that would be presented in reports and filed with the County and the South Coastal Information Center. The cultural materials collected from any potentially significant site would be transferred to a curation facility within San Diego County or to an affiliated tribal curation facility. Alternatively, the collections may be repatriated to a tribe of appropriate affiliation. All cultural materials excavated or removed from prehistoric or historic sites during testing and/or data recovery programs, along with associated project data, would be premanently curated at a San Diego County curation facility or culturally affiliated tribal curation facility in accordance with federal standards per 36 C.F.R. Part 79. In lieu of curation, the cultural materials may be repatriated to a culturally affiliated triba. If curation is selected as the method for the disposition of artifacts, then any burial-related cultural materials— unless otherwise required by law—would be repatriated. Curation would include field notes, photographs, catalogues, and final reports. Mitigation is provided as detailed in EIR Section 2.5, Cultural Resources, and the Cultural Resources Report included as Appendix I to the EIR. 	Consistent.

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COS-7.4 Consultation with Affected Communities. Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources. Consultation should take place with the affected communities concerning the appropriate treatment of cultural resources, including archaeological sites, sacred places, traditional cultural properties, historical buildings and objects, artifacts, human remains, and other items. The County is required by law, Senate Bill 18 Protection of Traditional Tribal Cultural Places (SB-18), to consult with the appropriate tribes for projects that may result in major land use decisions including General Plans, General Plan Amendments, Specific Plans and Specific Plan Amendment. In addition to these types of permits, it is County policy to consult with the appropriate tribes on all other projects that contain or are likely to contain, archaeological resources.	Consultation for the project has been conducted with affected communities, including local tribes (Rincon, Pauma, Pechanga, and San Luis Rey) to determine the appropriate treatment of cultural resources. As background, the County contacted the Native American Heritage Commission to request information and/or input regarding Native American concerns either directly or indirectly associated with the proposed project, as well as names of individuals in the area who may have information regarding cultural resources at the Site. Letters were sent to the individuals identified by the Native American Heritage Commission, along with a request for any other individuals who may possess information concerning cultural resources within the project. The project applicant as well as the County have been involved in several meetings with the local tribes to discuss the project.	Consistent.
COS-7.5 Treatment of Human Remains. Require human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains	The potential to discover additional human remains inadvertently during ground-disturbing activities would necessitate compliance under CEQA, Public Resources Code Section 15064.5 and Public Resources Code Section 5097.98. Accordingly, if human remains are encountered, work in the area of the find must stop until the County Coroner has made the necessary findings as to origin. Native American remains require	Consistent.

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will be done in consultation with the Most Likely Descendant (MLD) and under the requirements of Federal, State and County Regulations. Human remains, including ancestral Native American remains, should be left undisturbed and preserved in place whenever possible. For most development permits, this is required by the County's Resource Protection Ordinance. In the event that human remains are discovered during any phase of an archaeological investigation, the requirements of State and local laws and ordinances, including notification of and consultation with appropriate tribal members, must be followed in determining what constitutes appropriate treatment of those remains.	consultation with the Most Likely Descendants. The Most Likely Descendants may make recommendations and engage in consultations concerning the treatment of the remains. As a result, the project would comply with Public Resources Code Sections 5097.98 and 15064.5.	
	The proposed project would require that human remains be treated and disposed with the utmost dignity and respect in consultation with the Most Likely Descendant and under federal, state, and County requirements. Mitigation Measure M-CR-3 governs the treatment of human remains, and requires the following:	
	If human remains are found during evaluations, data recovery, construction monitoring, or any project- related ground-disturbing activity, the remains shall be treated pursuant to the requirements of California Public Resources Code Sections 5097.98 and 15064.5(e). The discovery of human remains shall trigger the following requirements:	
	 The project manager shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards, is not damaged or disturbed by further development activity until the project manager has discussed and conferred with the Most Likely Descendants about preferences for treatment, as describe below, of the discovered remains. 	
	2. The County approved consultant on behalf of the project manager shall contact the San Diego County Coroner to determine that no investigation of the cause of death is required. If the discovered remains are determined by the Coroner, or an authorized representative, to be Native American, the Medical Examiner shall contact the NAHC.	
	The San Diego County Coroner, in consultation with the NAHC and the Most Likely Descendant, may develop an agreement that applies to the discovery of human remains that meets the requirements of California Public Resources Code Sections 5097.98 and 15064.5(e).	
	The NAHC shall identify and contact the person or persons it believes to be the Most Likely Descendant from the deceased Native American.	
	4. The landowner shall provide the Most Likely Descendant with access to the discovery location for inspection. The Most Likely Descendant must complete their inspection and make a recommendation for treatment of the remains within 48 business hours of their notification by either the NAHC or the project manager, whichever is earlier.	

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	Options for treatment include, but are not limited to:	
	 Preservation of Native American human remains and associated items in place and avoidance of the adjacent area defined by a 100-foot radius. 	
	 b. Nondestructive removal and analysis of the Native American human remains and associated items by a qualified archaeologist, osteologist, or physical anthropologist. 	
	c. Relinquishment of the Native American remains and associated items to the Most Likely Descendant for treatment.	
	 Reburial of the remains on the property by the project applicant at a location mutually agreeable to the Most Likely Descendant and the project applicant. 	
	5. If the Most Likely Descendant does not make a recommendation within 48 business hours, or if the recommendations are not acceptable to the County of San Diego following extended discussions and mediation pursuant to California Public Resources Code Sections 5097.98(b)(2) and 5097.94(k) respectively, the project applicant shall reinter the Native American remains and burial items with appropriate dignity on the site in a location not subject to further subsurface disturbance. The location of reinternment shall be protected by one or more of the following:	
	a. Record the site location with the NAHC or the CHRIS Information Center at San Diego State University.	
	b. Utilize an open space or conservation zoning designation or easement.	
	c. Record a document with the County of San Diego Recorder's Office.	
	6. If multiple human remains are found, discussions shall be held with the Most Likely Descendant. If agreement on the treatment of these remains is not reached, the remains shall be reinterred in compliance with California Public Resources Code Section 5097.98(e).	
	If Native American human remains are found during project implementation, then soils associated with the remains shall not be removed from the site.	
COS-7.6 Cultural Resource Data Management. Coordinate with public agencies, tribes, and institutions in order to build and maintain a central database that includes a notation whether collections from each site are being curated, and if so, where,	All cultural materials excavated or removed from prehistoric or historic sites during testing and/or data recovery programs, along with associated project data, would be permanently curated at a San Diego curation facility or culturally affiliated tribal curation facility in accordance with federal standards per 36 C.F.R. Part 79. In lieu of curation, the cultural materials may be repatriated to a culturally affiliated tribe. If curation is selected as the method for the disposition of artifacts, then any burial-related cultural materials— unless otherwise required by law—would be repatriated. Curation would include field notes, photographs,	Consistent.

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along with the nature and location of cultural resources throughout the County of San Diego.	catalogues, and final reports. Mitigation is provided as detailed in EIR Section 2.5, Cultural Resources, and the Cultural Resources Report included as Appendix I to the EIR.	
This database should be accessible to all qualified individuals while maintaining the confidentiality of the location and nature of sensitive cultural resources, such as archaeological sites. The County maintains a partnership with the local repository of the database, the South Coastal Information Center at San Diego State University, which provides direct access by qualified County personnel to the database so that the information it contains may be used to design development projects to avoid cultural resources at an early point in the process.		
COS-8 Protection and Conservation of the Historical Built Environment. Protection, conservation, use, and enjoyment of the County's important historic resources.	The project Site does not contain any important historic resources. This policy is not applicable.	Not Applicable.
COS-8.1 Preservation and Adaptive Reuse. Encourage the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historic resources as part of the discretionary application process, and encourage the preservation of historic structures identified during the ministerial application process. Historic buildings, objects, trails, landscapes and districts are important parts of the multi-	The only potentially significant historic structure is the remains of the 1901 homestead. However, efforts to re-locate the homestead based on surface survey proved unsuccessful, and, thus, it is not possible to predetermine if the project would come into contact with resources at this site, nor could the structure be preserved or reused. The project Site does not contain any other identified specific historic site, structures, or historic landscapes.	Not Applicable.

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cultural heritage of San Diego County and should be preserved for the future enjoyment and education of the County's diverse populations. Preservation and adaptive reuse of these resources should be encouraged during the planning process and an emphasis should be placed on incentives for preservation, such as the Mills Act property tax program, in addition to restrictions on development, where appropriate.		
COS-8.2 Education and Interpretation. Encourage and promote the development of educational and interpretive programs that focus on the rich multicultural heritage of the County of San Diego.	As detailed in the County's General Plan, this policy is directed at the County and relates to the County's ongoing efforts to develop programs that focus on the history of San Diego County. To that end, the project applicant will work with the County to facilitate any such efforts to incorporate educational and interpretative signage, monuments, and the like that the County deems appropriate for inclusion in Sierra's public parks and/or at public trail heads within the project as part of the County's review and approval of Sierra's construction documents for these facilities.	Not Applicable.
COS-9 Educational and Scientific Uses. Paleontological resources and unique geologic features conserved for educational and/or scientific purposes.	Boulders and other geologic features would be conserved and used to establish a distinctive landscape identity throughout the project that reflects the character of the surrounding landscape and the area's geologic history. Please also refer to EIR Section 2.11, Paleontological Resources, and the associated Paleontological Mitigation Measure M-PR-1, which required paleontological resources monitoring during ground disturbing activities.	Consistent.
COS-9.1 Preservation. Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes.	Please see the responses to Goal/Policy/Objective COS-9. In addition, the proposed project would require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes. The project applicant would be conditioned to ensure the proper handling of any paleontological resources encountered during the grading operation for development of the project. Such methods would include construction monitoring, recordation, and curation by a qualified paleontologist and facility.	Consistent.
	County guidelines state projects within areas of potential high or moderate paleontological resources that propose excavation equal to or greater than 2,500 cubic yards require the services of a project Paleontologist and a Paleontological Resources Monitor. Excavation in areas underlain by Quaternary or older alluvium and younger alluvial deposits (Town Center, the Valley, Sierra Farms Park, and Sarver Lane)	

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	would comply with County guidelines for monitoring paleontological resources during excavation to minimize impacts, and require salvage and preservation of any discovered paleontological resources. Please refer to EIR Section 2.11, Paleontological Resources, and the associated Paleontological Mitigation Measure M-PR-1	
COS-9.2 Impacts of Development. Require development to minimize impacts to unique geological features from human related destruction, damage, or loss.	The project has been designed to minimize impacts to unique geological features from human-related destruction, damage, or loss. The project proposes protection of prominent landforms, boulder outcroppings, and other natural features in the project's proposed preserve areas and, in certain cases, within the project's development footprint. In accordance with the requirements of the Specific Plan, numerous boulders would be salvaged during grading and reused to provide visual identity within the Community landscape. The project would avoid grading/landform alteration to nearly three quarters of the Site, minimizing impacts to much of the Site's natural geologic features. Please refer to EIR Section 2.6, Geology, Soils, and Seismicity	Consistent.
COS-10 Protection of Mineral Resources. The long-term production of mineral materials adequate to meet the local County average annual demand, while maintaining permitted reserves equivalent to a 50-year supply, using operational techniques and site reclamation methods consistent with SMARA [Surface Mining and Reclamation Act of 1975] standards such that adverse effects on surrounding land uses, public health, and the environment are minimized.	The project would not interfere with the long-term production of mineral materials adequate to meet the local County annual demand and requirements under SMARA. Although portions of the project have been categorized as containing Mineral Resource Zone (MRZ) 2 resources, the property is not currently being used for extraction, and previous attempts to re-initiate extraction operations at the abandoned quarry site and to mine other portions of the project Site were unsuccessful. In addition, no mining activities have occurred within the Sycamore Ridge area. For more information on the project Site's mineral resources, see EIR Section 2.9, Mineral Resources.	Consistent.
COS-10.1 Siting of Development. Encourage the conservation (i.e., protection from incompatible land uses) of areas designated as having substantial potential for mineral extraction. Discourage development that would substantially preclude the future development of mining facilities in these areas. Design development or uses to minimize the potential conflict with existing or potential future mining facilities. For purposes	Please see the response to Goal/Policy/Objective COS-10 above. Although portions of the project have been categorized as containing MRZ-2 resources, the property is not currently being used for extraction, and previous attempts to re-initiate extraction operations at the abandoned quarry site and to mine other portions of the Site were unsuccessful. In addition, no mining activities have occurred within the Sycamore Ridge area. For more information on the project Site's mineral resources, see EIR Section 2.9, Mineral Resources.	Consistent.

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of this policy, incompatible land uses are defined by SMARA Section 3675.		
COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.	Please see the response to Goal/Policy/Objective COS-10.1, above.	Consistent.
COS-10.3 Road Access. Prohibit development from restricting road access to existing mining facilities, areas classified MRZ-2 or MRZ-3 by the State Geologist, or areas identified in the County Zoning Ordinance for potential extractive use in accordance with SMARA Section 2764.a.	The proposed project would not restrict road access to existing mining facilities classified as MRZ-2 by the State Geologist or areas identified in the County Zoning Ordinance for potential extractive use in accordance with SMARA. The quarry area zoned S-82 for extractive use would not be developed, and the proposed project would not affect its access (from the west). The northeast portion of the project Site classified as MRZ-2 has access from Lawrence Welk Court.	Consistent.
COS-10.4 Compatible Land Uses. Discourage the development of land uses that are not compatible with the retention of mining or recreational access to non- aggregate mineral deposits. See Policy COS- 10.1 for a definition of incompatible land uses.	The abandoned quarry site is situated on a west-facing slope adjacent to North Twin Oaks Valley Road, which provides access to the quarry site. A large topographic summit (1,630 feet above mean sea level) separates the quarry from the Sycamore Ridge parcel. The quarry area currently zoned S-82 for extractive use would not be developed, and its access (from the west) would not be affected by the proposed project.	Consistent.
COS-10.6 Conservation of Construction Aggregate. Encourage the continued operation of existing mining facilities and streamline the permitting of new mining	The proposed project does not contain a mining operation or propose the permitting of any new mining operation. Past attempts to re-initiate extraction at the abandoned quarry site and to mine other portions of the Site were unsuccessful.	Not Applicable.

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facilities consistent with the goal to establish permitted aggregate resources that are sufficient to satisfy 50 years of County demand.		
COS-10.7 Recycling of Debris. Encourage the installation and operation of construction and demolition (C&D) debris recycling facilities as an accessory use at permitted (or otherwise authorized) mining facilities to increase the supply of available mineral resources.	The proposed project does not propose a construction and demolition recycling facility and nor does the project propose a mining operation or support an active mining facility, therefore the policy is not applicable in this context. On the subject of recycling demolition and construction debris, during project construction, demolition and construction debris would be recycled in compliance with the County's Construction and Demolition Debris Recycling Ordinance which requires that 90% of inert construction debris and 70% of all other construction debris be recycled from the project. As a condition of building permit issuance, the project would be required to obtain County approval of a Construction and Demolition Debris Management Plan and a fully refundable Performance Guarantee.	Consistent.
COS-10.8 New Mining Facilities. Develop specific permit types and procedures for the authorization of new mining facilities that recognize the inherent physical effects of mining operations and the public necessity for available mineral resources adequate to meet local demand, in accordance with PRC Section 2762.	The proposed project does not propose new mining facilities.	Not applicable.
COS-10.9 Overlay Zones. Provide zoning overlays for MRZ-2 designated lands and a 1,300-foot-wide buffer area adjacent to such lands. Within these overlay zones, the potential effects of proposed land use actions on potential future extraction of mineral resources shall be considered by the decision makers.	The proposed project does not propose new overlay zones and does not have the authority establish MRZ-2 designations. The one area of the Site that supported a mining operation in the past is more than 1,300 feet away from the project's proposed development areas.	Not applicable.
COS-11 Preservation of Scenic Resources. Preservation of scenic resources, including	The proposed project would preserve scenic resources, including vistas of important natural and unique features, and would minimize visual impacts of Site development. Presently, no known designated scenic	Consistent.

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vistas of important natural and unique features, where visual impacts of development are minimized.	vistas exist in the immediate vicinity of the project. Nevertheless, to ensure consistency, a County approved visual resources consultant has prepared a Visual Resources Report in accordance with County of San Diego Guidelines and specifications. The Visual Resources Report identifies project development impacts on scenic and aesthetic resources. Impacts to scenic resources would be minimized to the extent feasible. The proposed project would integrate, maintain, and preserve the property's unique landscape character and distinct natural landforms into the development of each of the project's neighborhoods.	
COS-11.1 Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.	The proposed project would comply with the requirement to protect scenic highways, corridors, regionally significant scenic vistas, and natural features. Notably, there are no designated or eligible state scenic highways on the project or in the immediate vicinity of the project and no regionally significant scenic vistas were identified in the central and southern portions of the Site that would support the project's new neighborhoods.	Consistent.
	As demonstrated in EIR Section 2.1, Aesthetics, project Site development would comply with the applicable visual resource policies of the I-15 Corridor Scenic Preservation Guidelines concerning excessive building or Site lighting and use of mirror glass. Further, with the exception of the modification of a hillside to accommodate a proposed Vallecitos Water District water tank, the majority of the project's proposed development would be located off visually prominent terrain. Instead, the project proposes to concentrate development into individual neighborhoods in a way that preserves the surrounding landform, thereby avoiding substantial alteration of prominent ridgelines and, likewise, protecting the mountainous terrain and dominant landforms located within the northern and eastern portions of the project Site.	
	Development within the Town Center and Terraces planning areas would be temporarily visible to northbound I-15 motorists as they approach and pass Deer Springs Road at the prevailing travel speed (approximately 70 miles per hour) on I-15. In addition, existing hillside and ridgeline residential development within the Hidden Meadows area and residential and golf course development on the valley floor (e.g., Jesmond Dene, Champagne Village Mobile Homes, Lawrence Welk Village Resort, and north of Old Castle Road) currently occur within the project viewshed along the I-15 corridor.	
	As demonstrated in EIR Section 2.1, Aesthetics, and the Visual Resources Technical Report (Appendix E), project impacts to valued and/or panoramic vistas from public roads, trails within an adopted County trail system, scenic highways, and recreational areas would be less than significant and no mitigation is required.	

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COS-11.2 Scenic Resource Connections. Promote the connection of regionally significant natural features, designated historic landmarks, and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.	Please see responses to Goal/Policy/Objective COS-11.1 and 11.3, above. The project Site does not support any existing, or propose any new, scenic highways, regional trails, or scenic corridors, however, the project would promote the connection of the significant natural features found on the project Site through 1,209-acre preserve and avoidance of grading/landform alteration impacts to nearly three quarters of the project Site.	Consistent.
 COS-11.3 Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following: Creative site planning Integration of natural features into the project Appropriate scale, materials, and design to complement the surrounding natural landscape Minimal disturbance of topography Clustering of development so as to preserve a balance of open space vistas, natural features, and community character Creation of contiguous open space networks Potential measures for promoting scenic compatibility may include limiting or avoiding soundwalls, placing utilities underground, minimizing grading, and providing scenic vista points. 	The proposed project has been designed to minimize impacts and to preserve unique or special visual features through the use of: creative Site planning; integration of natural features into the project; the use of appropriate scale, materials, and design to complement the surrounding natural landscape; minimizing disturbance of topography; clustering development to preserve a balance of open space vistas, natural features, and Community character; and creating contiguous open space networks. In terms of creative Site planning, integrating natural features into the project design, clustering development to preserve a balance of open space vistas, natural features, and Community character, and minimizing disturbance of the Site's existing topography, the project proposes to retain approximately three quarters of the existing natural terrain on the project Site, including many of the peaks and outcroppings along the Site's main north-south ridgeline. This high level of topographic preservation is accomplished by concentrating (clustering) development within the central and southern portions of the project Site into discrete neighborhoods, and locating and designing the project's various neighborhoods around the more prominent ridgelines and peaks found on Site such that the visibility of the project's development areas are minimized. Where possible, streets were designed to parallel topography and were guided by watershed patterns on the Site. Also, existing landforms and ridgelines immediately north of Deer Springs Road would buffer the proposed project's visibility from Deer Springs Road and adjacent properties. Site grading was designed as a balance operation in a way that would minimize grading into areas supporting the Site's more prominent geologic features, including ridgelines, rock outcroppings and peaks, and areas that are visible from adjacent property.	Consistent.

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	project, implement a rustic, Mediterranean theme that draws on the more rural and natural elements of the area, utilize grade-adaptive architecture and Site design that results in terraced pads that are context sensitive and conform to the underlying slope of the home Site. Similarly, materials and design of residential and commercial/retail structures generally would be consistent with existing residential and commercial structures throughout the I-15 corridor in keeping with the Community character of the area. The project would be conditioned to comply with the Tentative Map/Preliminary Grading Plan and the various project design objectives and requirements of the Specific Plan throughout implementation of the project.	
	For more information on the project Site's development siting and design details, see EIR Chapter 1 and the Newland Sierra Specific Plan.	
COS 11.7 Underground Utilities. Require new development to place utilities underground and encourage "undergrounding" in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and to keep pace with current and future technologies.	As a condition of the issuance of grading and construction permits, all new electric distribution lines, gas lines, and communication lines serving the project would be undergrounded within the project's network of streets. Overhead electric lines and an underground gas line that feed businesses and residences in the project vicinity are located along Deer Springs Road and Mesa Rock Road. The project applicant will be required to provide utility easements to locate power and natural gas services underground within the proposed roadways as part of the development and final engineering process.	Consistent.
The concept of "undergrounding" in the initial phases of a project not only increases the aesthetic value of the surrounding viewshed,		

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

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but can also reduce costs in the long run since less infrastructure is exposed to the elements.		
COS-12 Preservation of Ridgelines and Hillsides. Ridgelines and steep hillsides that are preserved for their character and scenic value.	The proposed project would preserve ridgelines and steep hillsides by avoiding impacts to nearly three quarters of the existing natural terrain on Site. As shown on the Tentative Map, the project's proposed neighborhoods are designed around the dominant topographic features found on Site. Prominent ridgelines and landforms were mapped during the design phases. The project proposes to concentrate development into individual neighborhoods designed around major ridgelines and peaks to limit Site disturbance and visually soften the development edge. Where possible, streets were designed to parallel topography and were guided by watershed patterns on the project's visibility from Deer Springs Road and adjacent properties. Site grading was designed to be balanced within the boundaries of the project Site and the improvements to Deer Springs Road and Sarver Lane immediately off-site. The project's proposed preserve design would include an array of environmental features, including ridgetops, hill tops, rocky outcrops, and large-scale preservation of on-site native habitat. For more information, see EIR Section 2.4, Biological Resources, and the Newland Sierra Specific Plan.	Consistent.
COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.	The proposed project would protect undeveloped ridgelines and steep hillsides by protecting nearly three quarters of the project Site in preserve and project open space. The project proposes to change a portion of the current Rural Lands General Plan designation on the project Site through a General Plan Amendment (GPA) to implement a Specific Plan. While the GPA would change a portion of the Rural Lands designation on the property, implementation of the project's proposed Specific Plan and Tentative Map would concentrate development and maximize preservation of the native habitat and existing ridgelines and steep hillsides on Site. Under the Specific Plan, the areas proposed for protection would be redesignated OS-C (Open Space-Conservation), the General Plan's most restrictive land use designation. Please see the responses to Goal/Policy/Objective COS-11.3 and COS-12, and the Newland Sierra Tentative Map and Specific Plan.	Consistent.
COS-12.2 Development Location on Ridges. Require development to preserve the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.	The proposed project would require preservation of physical features such that structures would be located down and away from ridgelines and not silhouetted against the sky. The project proposes to avoid grading/landform alteration impacts to nearly three quarters of the Site, preserve many of the project Site's ridgelines and peaks, and use grade adaptive architecture and Site design that results in terraced pads that are context sensitive and conform to the underlying slope of the home Site. Please see the responses to Goal/Policy/Objective COS-11.3, COS-12 and COS-12.1, and the Newland Sierra Specific Plan.	Consistent.

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COS-13 Dark Skies. Preserved dark skies that contribute to rural character and are necessary for the local observatories.	The proposed project would preserve dark skies. The project EIR concluded that potential development- related impacts to dark skies associated with highly reflective building materials (Guideline d) and conflicts with federal, state, or local statutes or regulations (including San Diego County Light Pollution Guideline (e)) would be less than significant. The proposed project would comply with all required lighting codes and standards intended to minimize light pollution. Please see responses to Goal/Policy/Objective COS-13.1 and COS-13.2 below.	Consistent.
COS-13.1 Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.	The proposed project would be conditioned to restrict outdoor light and glare from development to retain the quality of night skies, and to minimize light pollution. In particular, although new sources of lighting within the proposed project Site would illuminate portions of the Site during nighttime hours, the potential for light trespass onto adjacent properties would be reduced through compliance with the lamp type and shielding requirements for San Diego Light Pollution Code, Class I, II, and II lighting within Zone B. Further, Site lighting would be limited to that necessary for security, safety, and identification, and would operate within the timeframe permitted by Section 59.107, Hours of Operation, of the County Light Pollution Code. Excessive building or Site lighting for decorative purposes is not proposed in any of the planning areas. Lighting levels will be regulated by the project's CC&Rs and compliance with the County's lighting standards will be enforced through the Site Plan and building permit approval processes which will require adherence to Specific Plan Section 3.4.7, Site Lighting. For more information, please see EIR Section 2.1, Aesthetics, and Specific Plan Section 3.4.7.	Consistent.
COS-13.2 Palomar and Mount Laguna. Minimize, to the maximum extent feasible, the impact of development on the dark skies surrounding Palomar and Mount Laguna observatories to maintain dark skies which are vital to these two world-class observatories by restricting exterior light sources within the impact areas of the observatories.	Please see project conformance analysis above for Goal/Policy/Objective COS-13.1. The project Site is not within the vicinity of the Palomar or Mount Laguna Observatories.	Not Applicable.
COS-14 Sustainable Land Development. Land use development techniques and patterns that reduce emissions of criteria pollutants and GHGs [greenhouse gases] through minimized transportation and energy	Please see the responses to <i>General Plan Guiding Principles 2, 3, 4, 6, and 7</i> , above. The project would implement land use development techniques and patterns that reduce emissions of criteria pollutants and GHGs through minimized transportation and energy demands, while protecting public health and contributing to a more sustainable environment.	Consistent.

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demands, while protecting public health and contributing to a more sustainable environment. [See also Goal LU-6].	In terms of land use development techniques and patterns that minimize transportation and energy demands, the project would feature walkable and bicycle-friendly neighborhoods and streets; a balance of housing types and other land uses including a school, commercial/retail uses; well-integrated pocket, neighborhood, and Community parks, and a network of trails and pedestrian pathways that would interconnect the project's various neighborhoods; a Community-sponsored electric bike-share program; shuttle services to transit centers in neighboring cities, a car-share program, a ride-share program, and transit fare passes for residents; water efficient landscapes and buildings throughout the project along with a commitment to pre-plumb single-family homes in the project for greywater systems; compliance with California Title 24 building and energy efficiency standards (e.g., the CalGreen Building Code and the California Energy Code); solar on all residential uses; solar-powered street lights, and other project design features which reduce GHG emissions. The project would locate new residents near existing and planned infrastructure, services, and employment and regional shopping centers in an environmentally sensitive, balanced development pattern while preserving large blocks of natural open space on Site that connect to open space off Site. For more information on these project planning and design features, please see EIR Section 2.7, Greenhouse Gas Emissions.	
COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.	The project Site is located and designed to reduce vehicular trips (and associated air pollution). The project would support the use of internal roads and alternative modes of travel to reduce single-occupancy vehicle trips. Specifically, the project would facilitate non-vehicular modes of transportation through the inclusion of a shuttle service to major North County transit centers, bike lanes, and an extensive trail system consisting of pedestrian pathways connecting the project's various neighborhoods, multi-use trails, an electric bike-share program, a ride-share program, a car-share program, and transit fare passes for residents. These features would help reduce vehicle trips and associated air pollution through Community-level design patterns. The project would include a mix of land uses surrounding a Town Center and a school site to locate places of shopping, limited employment, and education in close proximity to housing. The project's Transportation Demand Management (TDM) Program would be implemented by Project Design Features (PDFs) 1 through 20 and would reduce vehicle miles traveled associated with the project.	Consistent.
COS-14.2 Villages and Rural Villages. Incorporate a mixture of uses within Villages and Rural Villages that encourage people to walk, bicycle, or use public transit to reduce air pollution and GHG emissions.	The proposed project incorporates a mixture of uses within its Village designated area (the Town Center Neighborhood), including 81,000 square feet of commercial/retail uses, a school site, 95 multi-family housing units, and three public parks. The Town Center is immediately adjacent and within walking distance of the project's Terraces Neighborhood which is planned with an additional 446 multi-family housing units.	Consistent.

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	More broadly, the project is a true multi-use project with a variety of housing types and choices to accommodate a wide range of household types planned around pocket, neighborhood, and Community parks. Additionally, the project proposes a TDM Program that would include the following: a network of pedestrian pathways and multi-use trails connecting the project's various neighborhoods to each other, its parks and open space, the school site, and the commercial/retail area as well as to off-site pathways and bicycle routes with connections all the way into Twin Oaks and San Marcos; a Community sponsored electric bike-share program linking the neighborhoods to one another; a system of streets designed to support bicycles and walking; support for car-share and ride-share services; and shuttle services within and around the project with a TDM Program offering viable alternatives to driving, the project would provide residents the opportunity to access its Town Center as well as employment, education, recreation, and commercial uses via walking, bicycling, and/or transit. With implementation of the project's various land uses and its TDM Program, the project would significantly reduce air pollution and GHG emissions.	
COS-14.3 Sustainable Development. Require design of residential subdivisions and nonresidential development through "green" and sustainable land development practices to conserve energy, water, open space, and natural resources.	The proposed project would implement a multitude of green and sustainable development practices in the layout and design of the project's various residential and non-residential neighborhoods, its conservation of the natural terrain and habitat on Site, and other project design features that conserve energy, water, open space, and natural resources. In particular, the project's proposed green and sustainable development practices include an environmentally sensitive land use pattern with a variety of housing types, trails, and parks in every neighborhood; a balanced Community that includes a mix of residential, commercial/retail, and educational uses as well as 35.9 acres of pocket, neighborhood, and Community parks and multi-purpose trails; preservation of nearly three quarters of the Site's natural terrain and a 1,209-acre habitat preserve. Further, the project incorporates mobility alternatives including Community pathways, bicycle-friendly streets, an electric bike-share program, a ride-share program, a car-share program, transit passes for residential uses in the project; low water use through water conservation, high-efficiency landscape requirements with restrictions on the use of turf for all development in the project consistent with the County's Landscape Ordinance; and Community gardens and vineyards to support local and sustainable agricultural practices. Further, the project's Specific Plan requires the pre-plumbing of greywater systems in single-family residential homes, and compliance with the most current edition of the California Building Standards Code (Title 24) for indoor energy and water efficiency (e.g., CalGreen). These conditions would be enforced at the	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	time of construction/building permit issuance. Finally, the project Site is in close proximity to major employment centers and major transportation facilities (I-15, State Route 78 (SR-78), and the North County Transit System), including the cities of Escondido, San Marcos, Vista, Carlsbad, and Oceanside.	
COS-14.4 Sustainable Technology and projects. Require technologies and projects that contribute to the conservation of resources in a sustainable manner, that are compatible with community character, and that increase the self-sufficiency of individual communities, residents, and businesses.	The proposed project would require technologies that contribute to the conservation of resources in a sustainable manner, which are compatible with Community character, and which increase the self-sufficiency of individual communities, residents, and businesses. Examples include solar-powered lighting for all communal areas and solar on the project's residential units; high-efficiency low water use irrigation systems with weather-based "smart" irrigation controllers; roadside swales, bioretention basins, and other Low Impact Development design features designed to capture, treat, and infiltrate stormwater runoff; Community gardens and grape vineyards within and adjacent to individual neighborhoods to facilitate sustainable Community-scale agricultural practices; a Community-based electric bike-share program and shuttle services to major transit centers for the project's residents to use as an alternative to driving, and other multi-modal/transit based project design features. Additionally, the project would meet the most recent Title 24 energy-efficiency standards, feature drought-tolerant landscaping, and require the pre-plumbing of greywater systems in all single-family residential homes.	Consistent.
	conservation of resources in a sustainable manner that are compatible with Community character and that increase the self-sufficiency of individual communities, residents, and businesses.	
COS-14.5 Building Siting and Orientation in Subdivisions. Require that buildings be located and oriented in new subdivisions and multi-structure non-residential projects to maximize passive solar heating during cool seasons, minimize heat gains during hot periods, enhance natural ventilation, and promote the effective use of daylight.	The project would require all new construction, including residential and commercial, to comply with the latest applicable edition of the California Building Standards Code (e.g., the California Green Building Code/CalGreen and the California Energy Code), applicable at the building permit stage. CalGreen contains mandatory measures that address Site development, material resource conservation, energy and water conservation, and indoor environmental quality. The California Energy Code contains mandatory measures that govern the energy efficiency of windows, doors, exterior walls, attics, and roofs; and energy efficiency associated with the performance of heating and air conditioning systems and lighting systems.	Consistent.
	The California Building Standards Code has a regular code cycle with a history of increasing energy and water efficiency and indoor air quality requirements applying with subsequent code cycles. In this way, construction permitted under subsequent code cycles must meet the latest, most stringent code requirements.	

Guiding Principle	Project Conformance	Conformance Conclusion
	In exceedance of the current California Energy Code requirements, the project would be conditioned to require solar on all new residential construction. To take advantage of passive solar cooling and heating and to enhance natural ventilation, in compliance with Title 24, all buildings in the project would be required to meet stringent indoor air quality requirements; and the project's ventilation, heating, and cooling systems would take advantage of the nighttime and daytime passive cooling and heating effect to more efficiently cool and heat interior spaces. Larger buildings would also incorporate air conditioning zones and/or multiple air condition systems to heat and cool only those spaces and rooms in the building being used, thereby reducing energy demand. By requiring solar on all new residential construction, the energy-offsetting benefits of solar are maximized during the hottest periods of the year.	
	In, addition the project's Specific Plan requires that each neighborhood and each non-residential use implement a Site plan, approved by the County, which would address building orientation and layout, compliance with architectural standards, landscape standards, and other design guidelines that apply to the project's various neighborhoods and uses, including single-family residential lots, multi-family sites, and commercial sites. For example, the Specific Plan's Commercial Development Standards and Design Guidelines provide that commercial buildings would offer pedestrian-level features such as awnings, large windows, and first-floor building articulations, design details intended to support the pedestrian scale of the project's commercial uses but also support the passive solar heating and cooling of the commercial/retail buildings in the project.	
COS-14.7 Alternative Energy Sources for Development projects. Encourage development projects that use energy recovery, photovoltaic, and wind energy.	The project would be conditioned to require solar on all residential development and HOA Community buildings and would use solar to power the project's street lights.	Consistent.

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COS-14.8 Minimize Air Pollution. Minimize land use conflicts that expose people to significant amounts of air pollutants.	The project does not propose any land uses, such as certain industrial uses, which would create air pollutants which have the potential to create land use conflicts with surrounding uses. Further, as a condition of approval, the project would be required to implement extensive use of solar, a Transportation Demand Management (TDM) Program, a GHG offset program, and project design features which would collectively substantially reduce air pollutants and greenhouse gas emissions associated with electric energy generation and automobile trips. An Air Quality Technical Report has been prepared for the proposed project in accordance with County guidelines. The report identifies on-and off-site sensitive receptors to potential pollutant concentrations that may be generated by the proposed project, such as carbon monoxide, diesel particulate matter, and other reasonably foreseeable toxic air contaminants. Such pollutant concentrations have been minimized to the extent feasible. Please see EIR Section 2.7, Greenhouse Gas Emissions.	Consistent.
COS-14.9 Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design. The recovered methane from landfills can be pumped through turbines to generate power. This provides a mutual benefit by generating energy and reducing the amount of CO ₂ and methane being released from landfills. Other uses for closed facilities include photovoltaic (solar) panels, wind, and microturbines, as appropriate for the area they would be located in.	The proposed project would require and incorporate renewable energy, and the best available control technologies and practices into the project design. Solar would be installed on all residences and Community facilities and be used to power the project's street lighting to offset electrical usage and thereby reduce GHG emissions.	Consistent.

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COS-14.10 Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.	The proposed project would be conditioned to require the use of low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions. Site grading would be balanced within the boundaries of the project Site and the improvements to Deer Springs Road and Sarver Lane immediately off-site and thereby reduce off-site truck trips during construction. Additionally, where feasible, Tier 4 low-emission equipment would be used during construction activities. These conditions would be enforced at the time of grading/construction permit issuance.	Consistent.
COS-14.11 Native Vegetation. Require development to minimize the vegetation management of native vegetation while ensuring sufficient clearing is provided for fire control. Plants use photosynthesis to remove carbon from the atmosphere by incorporating it into biomass and releasing oxygen into the atmosphere.	The proposed project would minimize the vegetation management of native vegetation while requiring sufficient clearing for fire control through the implementation of a two-zone fuel modification approach along the edge of its development areas. Fuel Modification Zone 1 would constitute 100 feet of vegetation clearing and maintenance from the edge of all development areas that interface with open space areas supporting native vegetation. Fuel Modification Zone 2 would constitute 150 feet of vegetation thinning (up to 50% of the vegetative density) between Zone 1 and the edge of the project's proposed 1,209-acre preserve areas. The Zone 2 thinning would maintain the structure and much of the functionality of the native vegetation. The Fuel Modification Zones as well as vegetation inside the project's development areas would be maintained in accordance with the Fire Protection Plan (FPP). Specifically, the FPP requires several vegetation management measures, including a 20-foot vegetation management zone around driveways, the removal of highly flammable species and dead and dying plants, the inclusion of vineyards in some fuel modification zones, and the proper spacing of trees in vegetation management zones.	Consistent.
COS-14.12 Heat Island Effect. Require that development be located and designed to minimize the "heat island" effect as appropriate to the location and density of	The proposed project has been located and designed to minimize the "heat island" effect by incorporating landscape islands, parkways, 36 acres of pocket, neighborhood, and Community parks, vegetated roadside swales and bioretention areas, and shade-producing trees along parkways, adjacent to streets, and within parking areas to reduce the solar heat island effect. The project would also require all residential buildings to	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
development, incorporating such elements as cool roofs, cool pavements, and strategically placed shade trees. Heat islands formed as urbanized areas replace natural land cover with pavement, buildings, and other infrastructure, resulting in significantly higher average temperatures than the rural areas surrounding them.	install solar on the roof, turning roofs into a source of electrical energy instead of a contributor to the heat island effect. Please also see Chapter 3 of the Specific Plan.	
COS-14.13 Incentives for Sustainable and Low GHG Development. Provide incentives such as expedited project review and entitlement processing for developers that maximize use of sustainable and low GHG land development practices in exceedance of State and local standards.	Please see the responses to Goal/Policy/Objective COS-14.7 and COS-14.9, above.	Consistent.
COS-15 Sustainable Architecture and Buildings. Building design and construction techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment.	Please see the response to Goal/Policy/Objective COS-15.1. The project would implement building design and construction techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment through Site design, compliance with Title 24 (e.g., California Green Building Standards Code/CalGreen), and the use of solar on all residential and Community facilities.	Consistent.
COS-15.1 Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with green building programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants. Green building programs include the Leadership in Energy and Environmental Design (LEED) standards set	Please see responses to Goal/Policy/Objective Nos. COS-14.5, 14.7, and COS-14.9, above. All new construction, including residential and non-residential (e.g., commercial) would comply with the latest applicable edition of Title 24 at building permit application. Title 24 constitutes the California Building Standards Code, which contains the California Green Building Standards Code (CalGreen), the California Energy Code, the California Plumbing Code, and other code sections applicable to all new construction. CalGreen contains mandatory measures that address Site development, material resource conservation, energy and water conservation, and indoor environmental quality. The California Energy Code contains mandatory measures that govern the energy efficiency of windows, doors, exterior walls, attics, and roofs; the performance of heating and air conditioning systems, and lighting systems.	Consistent.

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by the U.S. Green Building Council, the Green Point Rated system standards set by Builditgreen.org, or equivalent programs.	In exceedance of the current California Energy Code requirements, the project would be conditioned to require solar on all new residential construction. To take advantage of passive solar cooling and heating and to enhance natural ventilation, in compliance with Title 24, all buildings in the project would be required to meet stringent indoor air quality requirements; and the project's ventilation, heating, and cooling systems would take advantage of the nighttime and daytime passive cooling and heating effect to more efficiently cool and heat interior spaces. Larger buildings would also incorporate air conditioning zones and/or multiple air condition systems to heat and cool only those spaces and rooms in the building being used, thereby reducing energy demand. By requiring solar on all new residential construction, the energy-offsetting benefits of solar are maximized during the hottest periods of the year. The California Building Standards Code has a regular code cycle with a long history of increasing energy and water efficiency requirements applying with subsequent code cycles. In this way, construction permitted under subsequent code cycles must meet the latest, most stringent code requirements. Future editions of the California Energy Code and/or the California Green Building Code are expected to include requirements for renewable energy such as solar.	
	See also EIR Section 2.7, Greenhouse Gas Emissions.	
COS-15.4 Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.	Please see the response to Goal/Policy/Objective COS-15.1, above.	Consistent.
COS-15.6 Design and Construction Methods. Require development design and construction methods to minimize impacts to air quality.	Please see the response to Goal/Policy/Objective COS-15.1, above. Additionally, Site grading would be balanced within the boundaries of the project Site and the improvements to Deer Springs Road and Sarver Lane immediately off-site, which would minimize off-Site truck trips during project construction, and the grading and construction equipment used in the project would be required to meet stringent CARB off-road diesel emission standards. To reduce CO and NO _x emissions from construction activities, M-AQ-2 would be implemented. Following implementation of M-AQ-2, emissions would not be reduced to a level below the thresholds. As such, effects regarding NO _x and CO emissions during construction activities would be significant and unavoidable. M-AQ-3 and M-AQ-4 would be implemented to reduce fugitive dust emissions; however, following implementation of M-AQ-3 and M-AQ-4, fugitive dust emissions would remain above the threshold. PM ₁₀ impacts would be significant and unavoidable during grading, blasting and rock crushing activities. Following completion of grading, blasting and rock crushing, fugitive dust emissions would be below the thresholds of significance. See also EIR Section 2.3, Air Quality.	Consistent.

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COS-16 Sustainable Mobility. Transportation and mobility systems that contribute to environmental and human sustainability and minimize GHG and other air pollutant emissions.	The proposed project would incorporate transportation and mobility systems that contribute to environmental and human sustainability and minimize GHG and other air pollutant emissions. The project would be conditioned to implement a Transportation Demand Management (TDM) Program that would include an electric bike-share program, a car-share program, a ride-share program, and shuttle services as alternatives to driving a car, significantly reducing daily motor vehicle trips as well as vehicle miles traveled, thereby reducing GHGs and other air pollutants from the single largest contributor of those emissions, single occupancy vehicle trips in automobiles. Further, the project would include bike lanes, an extensive trail system consisting of pedestrian pathways and multi-use trails, and a balanced Community with housing, parks, a school, commercial/retail uses, and large blocks of open space preserve planned around a network of pedestrian and bicycle-friendly streets.	Consistent.
COS-16.1 Alternative Transportation Modes. Work with SANDAG [San Diego Association of Governments] and local transportation agencies to expand opportunities for transit use. Support the development of alternative transportation modes, as provided by Mobility Element policies.	The proposed project would encourage alternative modes of transportation through implementation of a TDM Program including an electric bike-share program with kiosks throughout the project, support for car- share and ride-share programs within its Town Center, subsidized transit passes for the project's residents, shuttle services connecting the project's residential neighborhoods to each other and to the Escondido Transit Center, which serves as a hub for bus and rail connections throughout the North County area, and marketing of the project's various mobility alternatives. The project's TDM Program would result in a significant reduction in both internal vehicle trips (trips that stay within the project Site) and external vehicle trips (trips that leave and return to the project Site) and support the alternative transportation modes. The project applicant has had several meetings with SANDAG, NCTD, and Caltrans to discuss these PDFs and how they can benefit these agencies' transportation planning efforts related to I-15 and existing and potential future NCTD transit-related services. The project applicant is also coordinating with these agencies on a potential future expanded park-and-ride at the I-15/Deer Springs Road Interchange. Presently, there are two park-and-ride lots at the Interchange, one on the west side and one on the east side of the freeway. The project applicant has met with Caltrans, SANDAG, and NCTD about whether Caltrans plans to improve or expand the park-and-ride lots, either as stand-alone projects or as part of the process of improving the Interchange. The project applicant supports and will advocate for the incorporation of alternative	Consistent.

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	transportation modes such as electric vehicle charging stations, bicycle facilities, storage lockers for travelers, accommodations for ride-share and car-share services, and a possible future transit stop as part of any project to expand or improve the park-and-ride facilities at the Interchange.	
	These PDFs are part of a broader strategy and commitment by the project to reduce air pollution and offset GHG emissions related to the project. Please see PDF-1 through PDF-32 in Section 2.7, Greenhouse Gas Emissions, of the project's EIR. Please also see Section 2.13, Transportation and Traffic, of the project's EIR.	
COS-16.2 Single-Occupancy Vehicles. Support transportation management programs that reduce the use of single- occupancy vehicles.	The project would support transportation management programs that reduce the use of single-occupancy vehicles by implementing a Transportation Demand Management (TDM) Program that includes a network of bicycle and pedestrian friendly streets striped with bike lanes and multimodal trails and pedestrian pathways linking all of the project's neighborhoods as well as a host of alternative mobility options including an electric bike-share program, a car-share program, a ride-share program, and shuttle services. Please see also EIR Section 2.7, Greenhouse Gas Emissions.	Consistent.
COS-16.3 Low-Emissions Vehicles and Equipment. Require County operations and encourage private development to provide incentives (such as priority parking) for the use of low- and zero-emission vehicles and equipment to improve air quality and reduce GHG emissions. [Refer also to Policy M-9.3 (Preferred Parking) in the Mobility Element.]	The project would provide priority parking for zero-emission and low-emission vehicles and electric vehicle charging stations in its commercial/retail parking areas. The project would also include an EV charging unit in each single family garage in the project to encourage its residents to drive an electric vehicle. The project would also include an electric bike-share program, coordinate car-share and/or ride-share program(s), implement shuttle services within the project and to the Escondido Transit Center and the project applicant will continue to coordinate with Caltrans, SANDAG, and NCTD on a potential future expanded or improved park-and-ride facilities that could include electric vehicle charging stations and priority parking for low and zero-emission vehicles, among other transportation related features that would reduce air quality impacts and GHG emissions. Please see also EIR Section 2.7, Greenhouse Gas Emissions.	Consistent.
COS-16.5 Transit-Center Development. Encourage compact development patterns along major transit routes.	The project's proposed Town Center and Terraces neighborhoods provide mixed-uses including commercial/retail uses, a school site, parks, and multi-family residential planned in an environmentally sensitive development pattern and immediately adjacent to the Deer Springs Road/I-15 Interchange with I-15 serving as a major transportation corridor and a planned transit route. In furtherance of this policy, the project also proposes shuttle services between and among its seven neighborhoods and to major North County transit centers.	Consistent.
COS-17 Sustainable Solid Waste Management. Perform solid waste management in a manner that protects	The project would comply with the County's reduction, re-use, and recycling requirements contained in their Recycling and Construction and Demolition Debris (C&D Debris) Recycling Ordinances. These ordinances were adopted by the County in order to comply with state legislation pertaining to solid waste reduction and	Consistent.

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natural resources from pollutants while providing sufficient, long term capacity through vigorous reduction, reuse, recycling, and composting programs.	diversion from landfills. In 1989, the state passed AB 939, the Integrated Waste Management Act, requiring cities and counties to achieve a 50% diversion rate from landfills. In 2011, the state passed AB 341, increasing the diversion requirement to 75% and expanding the requirement to recycle to multi-family and commercial development. In accordance with state law, the County's Recycling Ordinance requires homes, apartments, condos, and businesses to recycle paper, plastic, cardboard, glass, and metals found in solid waste for disposal and the project would be in full compliance with this County's ordinance. In addition, the HOA would maintain a green waste compost area within the maintenance yard in the Sierra Farms Neighborhood Park for landscape trimming from common areas. Finally, the project would meet the requirements of the County's C&D Debris Recycling Ordinance throughout the construction process.	
COS-17.1 Reduction of Solid Waste Materials. Reduce greenhouse gas emissions and future landfill capacity needs through reduction, reuse, or recycling of all types of solid waste that is generated. Divert solid waste from landfills in compliance with State law.	See above response. AB 341 requires a diversion of 75% of solid waste by 2020, and the project would comply with all requirements of state law.	Consistent.
COS-17.2 Construction and Demolition Waste. Require recycling, reduction and reuse of construction and demolition debris.	The proposed project would be required to comply with the County's Construction and Demolition Debris Ordinance and divert the required 90% of inert construction debris and 50% of all other construction debris from landfills. See also Section 2.14, Utilities and Service Systems.	Consistent.
COS-17.4 Composting. Encourage composting throughout the County and minimize the amount of organic materials disposed at landfills.	The project would create an area within the maintenance yard of the Sierra Farms Neighborhood Park designated for collection of common area landscape trimmings. These landscape trimmings shall be chipped and ground into either mulch or compost and used to return organic matter and nutrients to the project landscape areas. The green waste collection area would be designed to collect approximately 30 to 40 yards of material at a time. A buffer of screening shrubs would be planted between the collection area and the street.	Consistent.
COS-17.6 Recycling Containers. Require that all new land development projects include space for recycling containers.	As a condition of Site Plan approval (see Specific Plan), the project would be conditioned to include space for recycling containers for all residential and commercial uses as well as parks and common areas, which facilitates the recycling of cans, bottles, paper, plastic, and similar materials in accordance with the County's recycling ordinance and the Community's waste management strategy.	Consistent.
COS-18 Sustainable Energy. Energy systems that reduce consumption of non-renewable resources and reduce GHG and other air	The proposed project would include energy systems that reduce consumption of non-renewable resources and reduce GHG and other air pollutant emissions while minimizing impacts to natural resources and communities. For example, the project would require installation of solar panels on all residential buildings	Consistent.

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pollutant emissions while minimizing impacts to natural resources and communities.	and Community facilities, and all street lights would be solar powered, thereby reducing GHG and other air pollutant emissions related to the electric energy generation that would otherwise be required to power these buildings and lights. In addition, the proposed project would implement project design features and/or mitigation measures aimed at the reduction of pollutants. Those measures include environmentally sensitive design and development, energy efficient appliances, the use of natural gas-fired fireplaces, an electric bike-share program, compliance with Title 24, mobility alternatives to single-occupancy vehicle trips, and dedicated parking for low- and zero-emission vehicles in the commercial/retail and public park parking areas of the project.	
COS-19 Sustainable Water Supply. Conservation of limited water supply supporting all uses including urban, rural, commercial, industrial, and agricultural uses.	As described in the Specific Plan and as conditions of construction/building permit issuance, the project proposes extensive mandatory and project design indoor and outdoor water conservation measures that would reduce the project's projected water demand by 52% below what VWD has programmed for the project Site in their UWMP, including: a plant palette comprised predominantly of low water use drought-tolerant plants, water efficient irrigation systems with the extensive use of efficient drip irrigation; weather-based "smart" irrigation controllers that adjust the irrigation schedule in respond to rain events; prohibitions on planting turf in the front yard areas of private residences; restricting backyard and side yard turf to "warm season" turf varieties only; low water use fixtures in all new construction as required by Title 24 (i.e., the California Green Building Standards Code/CalGreen)), and the requirement to pre-plumb for greywater systems in all of the project's single-family homes. Collectively, the project's proposed indoor and outdoor water conservation measures exceed the latest requirements imposed by the state and the County, including California Title 24 and the County's "Water Conservation in Landscape" Ordinance and the County's Water Efficient Landscape Design Manual.	Consistent.
COS-19.1 Sustainable Development Practices. Require land development, building design, landscaping, and operational practices that minimize water consumption.	Please see the response to Goal/Policy/Objective COS-19 above. The project's design features would require on-site development, building design, landscaping, and operational practices that minimize water consumption. Please see also GSI Water Solutions' technical memorandum, which quantifies the project's water savings (see EIR Appendix T).	Consistent.
COS-19.2 Recycled Water in New Development. Require the use of recycled water in development wherever feasible. Restrict the use of recycled water when it increases salt loading in reservoirs. A permit is required from the County Department of Environmental Health for the use of recycled	Please see the response to Goal/Policy/Objective COS-4.5. The project does not propose the use of recycled water because Vallecitos Water District (VWD) does not currently provide any recycled water service within its sphere of influence. According to VWD's Urban Water Management Plan (UWMP) adopted in June 2016: "VWD produces up to 5 MGD of recycled water at MRF (Meadowlark Reclamation Facility) and maintains the 54 million-gallon (MG) Mahr Reservoir for recycled water	Consistent.

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water.	storage, (however) VWD does not maintain a recycled water service area within its sphere of influence. All of the recycled water produced is sold to the (Carlsbad Municipal Water District) CMWD and the (Olivenhain Municipal Water District) OMWD. CMWD originally contracted for up to 2.0 MGD during peak summer months, and in 2003, increased that amount to 3.0 MGD. As part of that agreement, VWD also provides CMWD with 32 MG of recycled water storage in the Mahr Reservoir. Also in 2003, the OMWD contracted for up to 1.5 MGD of recycled water and 16 MG of recycled water storage in the Mahr Reservoir."	
	Wastewater in VWD's service territory is directed to the Meadowlark Reclamation Facility where up to 74% of that water is converted into recycled water and then distributed to the neighboring districts of CMWD and OMWD and used for irrigation at places like Legoland, the Carlsbad Flower Fields, and the Aviara Golf Course. VWD is presently evaluating whether to begin extending recycled water service to portions of its service territory, with its focus being on the downtown area of San Marcos. VWD presently has no plans to extend recycled water service to the northern portions of its territory, including the community of Twin Oaks or the project Site.	
	More broadly, VWD is currently working with other North County water districts to determine the best approach to water reuse, including examining the viability of potable reuse, the water reuse solution the city of San Diego is now implementing. VWD and other North County water districts may determine that potable reuse (indirect or direct) may be the best long-term strategy related to the water reuse capability of their water treatment facilities. In such case, VWD and other North County water districts may shift their focus away from providing or expanding recycled water services and toward developing potable water reuse infrastructure, including potentially restructuring treatment facilities and building new reservoirs. Potable reuse infrastructure and facilities would be funded through VWD's and other water districts' water capacity/capital facility fees and service charges.	
	Currently, where it is made available to projects, existing state regulations limit the use of recycled water to common areas, parkways, medians, and parks due to the concern about cross-connections were it extended into private lots and buildings. However, recent state legislation, Assembly Bill 2282 passed in 2014, directs the Building Standards Commission to develop plumbing code requirements for indoor and outdoor recycled water as part of the 2019 California Building Code cycle. As this code development process is underway now, it remains to be seen how it will ultimately be applied to new construction. AB	

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	2282, however, is clear about when these new code requirements would apply, adding Section 17921.5(c)(2) to the Health and Safety Code to read:	
	"When developing the application provisions for the mandatory building standards, the department (Department of Housing and Community Development) shall limit the mandate to install recycled water systems within residential buildings and building site landscaped areas to only those areas within a local jurisdiction that have feasible and cost-efficient access to a water recycling facility, or that have been identified by the local jurisdiction within a planned service area for the provision of recycled water for which a specific implementation timeline has been identified by the public water system in its most recent urban water management plan."	
	In the event that VWD were to eventually develop and extend recycled water service to the project Site, the code requirements that are promulgated out of AB 2282 may be triggered for any remaining construction in the project depending on the proximity of that remaining construction to the recycled water service being extended to the project Site. Under such a scenario, the County and VWD would be able to exercise their regulatory authority in determining how these remaining portions of the project Site would be required to implement recycled water systems.	
	Finally, while the project does not propose the use of recycled water, as stated previously, the project would require the pre-plumbing for greywater systems in all of its single-family homes subject to the permitting requirements of the County of San Diego for greywater systems. In the same fundamental way that recycled water serves as a form of water reuse, greywater use in the project would as well. See also EIR Section 2.14, Utilities and Service Systems, and the project's Specific Plan.	
COS-20 Governance and Administration. Reduction of local GHG emissions contributing to climate change that meet or exceed requirements of the Global Warming Solutions Act of 2006. <u>(original)</u> Reduction of community wide (i.e.,	The proposed project would reduce GHG emissions contributing to <u>alobal</u> climate change by <u>meeting or</u> exceeding the statewide reduction targets established by AB 32 and SB 32, neither of which require that <u>new development achieve a net zero emissions level</u> requirements of the Global Warming Solutions Act of 2006 (AB 32). <u>Specifically, t</u> The project has committed to offset all of its greenhouse gasGHG emissions to achieve and maintain carbon neutrality (i.e. net zero emissions) for the life of the project <u>through</u> <u>implementation of a suite of on-site reduction strategies and the purchase of off-site carbon offsets</u> . This initiative-commitment would make the project the first large-scale planned community in San Diego County	Consistent.

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unincorporated County) and County Operations greenhouse gas emissions contributing to climate change that meet or exceed requirements of the Global Warming Solutions Act of 2006, as amended by Senate Bill 32 (as amended, Pavley, California Global Warming Solutions Act of 2006: emissions limit). (as amended in 2018)	to achieve a 100 percent reduction in the project's construction and operational GHG emissions through the life of the project. Please see also EIR Section 2.7, Greenhouse Gas Emissions, and supporting technical report (EIR Appendix K). <u>Please also see Topical Response GHG-1: Use of Carbon Offsets and Appendix JJ-21 in the Final EIR for additional information regarding the County's interpretation of this General Plan Goal and its applicability to the project. As provided therein, the County did not intend for and does not interpret this Goal as requiring that projects achieve all identified GHG reductions locally, within the boundaries of the County of San Diego. Because of the scientific basis for global climate change, which recognizes that a metric ton of carbon dioxide equivalents is not directly linked to localized effects, the County – like many other agencies with expertise in the field – has determined that the reduction of GHG emissions in off-site locations serves to effectively reduce, minimize and avoid the effects of global climate change.</u>	
COS-21 Park and Recreational Facilities. Park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of County residents and visitors, protect natural resources, and foster an awareness of local history, with approximately 10 acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County.	The project would include park and recreational facilities that enhance the quality of life and meet the diverse active and passive recreational needs of the project's County residents and visitors. The project's 35.9 acres of parkland, 1,209-acre habitat preserve, and a project-wide network of pedestrian pathways and trails would weave through the project's various neighborhoods and to the surrounding Community of Twin Oaks off Site, linking to open space trails, neighborhood trails and parks, and pedestrian pathways throughout the project. The project's 35.9 acres of pocket, neighborhood, and Community parks have been sized, designed, and designated as a combination of public and private parks in compliance with the County's Parkland Dedication Ordinance (PLDO), which serves as the County's implementation ordinance to comply with the Quimby Act and to provide parks for its residents. The project's Saddleback Park would serve as a staging area for equestrian enthusiasts to horseback ride through the project and along the project's multi-use trails. The project's proposed 35.9 acres of active and passive parks and its system of trails and pedestrian pathways would address an established public need for recreation, and would provide quality-of-life enhancing benefits associated with hiking, biking, and horseback riding to both its future residents and visitors, and existing and future residents of the surrounding communities, such as Twin Oaks.	Consistent.
COS-21.1 Diversity of Users and Services. Provide parks and recreation facilities that create opportunities for a broad range of	The proposed project would provide parks and recreation facilities that create opportunities for a broad range of recreational experiences to serve user interests. A network trails would extend throughout the neighborhoods and the open space preserve, and includes off-site improvements and connections on Deer	Consistent.

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recreational experiences to serve user interests.	Springs Road which would be accessible to outside users. The project also includes 14 parks, of which 11 would be available for public use, and six pocket parks, all of which would be public. Each uniquely-themed park in the project would respond to the surrounding neighborhood and would include a variety of amenities. Parks and open space areas would accommodate the needs of differing ages and physical abilities. In addition, structures within parks and open space would exhibit a high level of quality and design on all visible sides of structures. Refer to the project's Specific Plan for more information.	
COS-21.2 Location of Parks. Locate new local parks and recreation facilities near other community-oriented public facilities such as schools, libraries, and recreation centers where feasible, so that they may function as the "heart" of a community.	The project would locate proposed parks and recreation facilities near the project's other Community- oriented facilities. In particular, parks are proposed for the Town Center planning area. Also, all centrally- located neighborhood parks would be accessible from the loop road and connected to the loop road and surrounding area by on-street bike routes and the pathway and trail network. Each neighborhood would include strategically located park and open space amenities.	Consistent.
COS-21.3 Park Design. Design parks that reflect community character and identity, incorporate local natural and cultural landscapes and features, and consider the surrounding land uses and urban form and cultural and historic resources.	The project Site's landscape character and distinct landforms would inspire the project's park themes. Each park in the project would respond to the surrounding neighborhood and its surrounding natural environment. Parks and open space areas would accommodate the needs of differing ages and physical abilities. In addition, parks and open space structures would exhibit high quality and design on all visible sides of structures. The design theme for the project's Community and neighborhood parks would draw from the rustic character of the Twin Oaks area and the natural character of the Site. Further, consistent with Policy COS-21.3, residential areas and active-use amenities would be separated by pools, dog parks, and children's play areas. A minimum setback of 15 feet between residential areas and active-use amenities would be provided.	Consistent.
COS-21.4 Regional Parks. Require new regional parks to allow for a broad range of recreational activities and preserve special or unique natural or cultural features when present.	There are no proposed regional parks within the project Site; and, therefore, this policy is not applicable. Instead, the project would comply with the County's Parklands Dedication Ordinance to satisfy this goal.	Not applicable.
COS-21.5 Connections to Trails and Networks. Connect public parks to trails and pathways and other pedestrian or bicycle networks where feasible to provide linkages and connectivity between recreational uses.	The proposed project would connect public parks to trails, pathways, and other pedestrian or bicycle networks where feasible to provide linkages and connectivity between recreational uses. More specifically, the project proposes pedestrian pathways and a network of multi-purpose trails for walkers, joggers, and equestrians to act as the connective thread that unites the various neighborhood parks, creating a link to open space trails as well as a sense of walkability throughout the Community. The proposed project includes bike lanes and an extensive trail system with multi-use pathways along the loop road, primary and	Consistent.

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	secondary internal trails within neighborhoods, and multi-purpose and secondary trails through the open space area. This network of approximately 16 total linear miles of trails would extend throughout the neighborhoods and the open space preserve. Along Community trails, parks, and within open space, key landforms and boulders would be identified at scenic vistas and trail rest points to increase the public's connection to the natural features found throughout the Site, as shown on Figure 82 of the Specific Plan.	
COS-22 Park and Recreational Services. High-quality parks and recreation programs that promote the health and well-being of County residents while meeting the needs of a diverse and growing population.	Please see the response to Goal COS-21 above. The project would incorporate combination of Community parks, neighborhood parks, pocket parks, overlooks, pathways, and trails. Each neighborhood would include strategically located park and open space amenities. As detailed in Section 3.5.4 of the project's Specific Plan, the project would provide a variety of recreational amenities and facilities that meet the needs of and benefit County residents and the project's neighborhood and Community parks would be sized, designed, and amenitized in compliance with the County's Parkland Dedication Ordinance (PLDO). Proposed amenities throughout the project Site include loop trails, exercise circuits, children's play areas, electric bike stations, amphitheater seating, public restroom areas, active fields, and picnic areas. A dog park and a large recreational lawn area are also proposed as part of Peak's Park. Potential amenities include a Community building, pool, and outdoor gathering spaces.	Consistent.
COS-22.1 Variety of Recreational Programs. Provide and promote a variety of high quality active and passive recreation programs that meet the needs of and benefit County residents.	The project's proposed park and trail amenities would accommodate the needs of a range of age groups and physical abilities, from children to seniors. Please refer to the Park Standards and Design Guidelines as set forth within the Specific Plan.	Consistent.
COS-23 Recreational Opportunities in Preserves. Acquisition, monitoring, and management of valuable natural and cultural resources where public recreational opportunities are compatible with the preservation of those resources.	To protect the project's proposed preserve areas from human encroachment and other anthropogenic impacts, signage and designated routes would establish designated public access trails. The project would protect large patches of habitat that do not currently contain trails. The proposed trails predominantly would be located along pre-existing dirt roads and trails. A preserve manager would monitor the use of these trails and would visit the Site on a semi-weekly basis to document and reinforce these efforts. Management of the preserve areas would keep the many current trespassers from dumping trash, camping, riding off-road vehicles, graffiti/tagging boulders, and participating in other illegal activities. Refer to the On-Site Conceptual Resources Management Plan included as Appendix J to the Biological Resources Technical Report (Appendix H to this EIR) for more details of preserve manager duties.	Consistent.
COS-23.1 Public Access. Provide public access to natural and cultural (where allowed) resources through effective planning that	The proposed project would provide public access to natural resources through effective planning that conserves the County's native wildlife, enhances and restores a continuous network of connected natural habitat, and protects water resources. Significant cultural resources will be protected or mitigated; and their	Consistent.

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conserves the County's native wildlife, enhances and restores a continuous network of connected natural habitat and protects water resources.	location will be kept confidential as required by law. The project's location and design preserves natural areas and provides for wildlife movement and connectivity. The project would permanently preserve and manage 1,209 acres of the Site that includes a diverse array of environmental features including sensitive native habitat, vegetation communities, ridgetops, hilltops, and rocky outcrops. Also, the two largest riparian areas within the project Site would be included in the preserve: the South Fork of Gopher Canyon and the South Fork of Moose Canyon. The South Fork of Gopher Canyon holds water part of the year. Please see the response to Goal COS-23 above.	
COS-24 Park and Recreation Funding. Adequate funding for acquisition, development, maintenance, management, and operation of parks, recreation facilities, and preserves.	Please see the response to Goals COS-22 and COS-23 above. The project would provide adequate funding for the development, management, and operation of the project's proposed parks, recreational facilities, trails, and preserve areas consistent with the County's Parkland Dedication Ordinance (PLDO), the County's Trails Master Plan, the project's Specific Plan, and the project's Resource Management Plan and Resource Protection Plans.	Consistent.
COS-24.1 Park and Recreation Contributions. Require development to provide fair-share contributions toward parks and recreation facilities and trails consistent with local, state, and federal law.	Please see the response to Goal COS-21 above. The proposed project would meet its fair-share contributions toward parks and recreation facilities and trails consistent with applicable law through the provision of 35.9 acres of public and private parks and a Community-wide system of pedestrian pathways and trails. The project's recreational facilities have been sized, designed, and designated a combination of public and private in compliance with the County's Park Lands Dedication Ordinance (PLDO), which in turn satisfies compliance with the state's Quimby Act, and in compliance with the County's Trails Master Plan. Please see Section 3.5.4 of the Specific Plan.	Consistent.
 COS-24.2 Funding Opportunities. Maximize funding opportunities for the following: The acquisition, expansion, and development of parks, recreation facilities, preserves, and trails The operation, maintenance, and management of parks, recreation facilities, preserves, and trails. 	Please see the response to Goal/Policy/Objective COS-24, above.	Consistent.
Housing Element		
H-1 Housing Development and Variety. A housing stock comprising a variety of housing and tenancy types at a range of prices, which	The proposed project includes housing stock comprising of a variety of housing and tenancy types, which would meet the varied needs of existing and future unincorporated County residents representing a spectrum of age, income, and other demographic characteristics. To illustrate this point, the project includes seven planning areas, each	Consistent.

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meets the varied needs of existing and future unincorporated County residents, who represent a full spectrum of age, income, and other demographic characteristics.	representing a unique neighborhood consisting of a variety of housing types, lot sizes, and amenities to provide housing for a broad range of age groups, family formations, and income levels. The broad range of lot sizes and housing types provide options for existing and future North County residents. The applicant completed a consumer survey indicating preferences for a wide range of homes and lot sizes for different age groups and income levels. The residential component of the project includes 1,140 single-family dwelling units, of which 325 would be age-qualified in the Mesa neighborhood. The project includes 995 multi-family dwelling units. Additionally, the project is conveniently located at the Deer Springs Road interchange with direct access to I-15, providing regional access to existing job centers in San Marcos, Vista, Rancho Bernardo, Escondido, Poway, and along the SR-78 corridor accessing Carlsbad and Oceanside. The project is located close to California State University San Marcos and Palomar College. Commuting options for project residents would be enhanced with proximity to four Sprinter stations within 8 miles of the project: the San Marcos Civic Center Sprinter Station, the Buena Creek Station, Escondido Transit Center, and Palomar College Station.	
H-1.1 Sites Inventory for Regional Housing Needs Assessment (RHNA). Maintain an inventory of residential sites that can accommodate the RHNA.	The amount and type of housing and lot sizes was assessed in the context of the County's Regional Housing Needs Assessment, housing sites inventory, and other housing projects within the County's jurisdiction. The proposed project provides a range of housing types and 2,135 housing units that would help the County meet required regional housing needs for projected population growth.	Consistent.
H-1.2 Development Intensity Relative to Permitted Density. Encourage a development intensity of at least 80 percent of the maximum permitted gross density for sites designated at 15 to 30 dwelling units per acre in development projects.	The proposed project includes a Specific Plan that would allow for residential densities between 15 and 30 dwelling units per acre in its Town Center, Terraces, and Valley neighborhoods.	Consistent.
H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.	The proposed project would be located at the Deer Springs Road interchange with direct access to I-15, providing regional access to existing job centers in San Marcos, Vista, Rancho Bernardo, Escondido, and Poway. Additionally, commuting options for project residents would be enhanced with proximity to four Sprinter stations within 8 miles of the project: the San Marcos Civic Center Sprinter Station, the Buena Creek Station, Escondido Transit Center, and the Palomar College Station. The project would provide shuttle services to its residents between these transit stations and the project's neighborhoods.	Consistent.
H-1.4 Special Needs Housing near Complementary Uses. Encourage the location of housing targeted to special needs	The offered housing choices do not target a particular special needs group; however, the Community would promote housing opportunities for all persons regardless of race, religion, gender, marital status, ancestry, national origin, familial status, or disability, and the broad range of lot sizes and housing types would provide	Consistent.

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groups, in close proximity to complementary commercial and institutional uses and services.	options for a range of buyers and renters in proximity to job centers. See Goal/Policy/Objective H-1.3, above.	
H-1.5 Senior and Affordable Housing near Shopping and Services. Provide opportunities for senior housing and affordable housing development within town centers, transit nodes, and other areas that offer access to shopping and services.	The project would provide a range of housing types and choices, including age-qualified (senior) housing, age-targeted housing (e.g., single story homes), and multi-family housing which is more naturally affordable to renters, first-time homebuyers, and young families. The project's Town Center neighborhood and its adjacent Terraces neighborhood would provide a total of 541 multi-family housing units within walking distance of the project's commercial area, the school site, and parks. The project's proposed age-qualified housing would be within walking distance of parks. The project proposes a Transportation Demand Management (TDM) Program with a host of mobility alternatives, including shuttle services within and around the project Site and to the Escondido Transit Center.	Consistent.
H-1.6 Land for All Housing Types Provided in Villages. Provide opportunities for small-lot single-family, duplex, triplex, and other multi- family building types in Villages.	The proposed project would provide opportunities for small-lot single-family and multi-family building types in Villages. Specifically, within the Village, the Specific Plan designated a number of multi-family building types to create a range of housing opportunities, including townhomes, small lots, family lots, large lots, and age-qualified lots.	Consistent.
H-1.7 Mix of Residential Development Types in Villages. Support the design of large-scale residential developments (generally greater than 200 dwelling units) in Villages that include a range of housing types, lot sizes, and building sizes.	The project would implement a Specific Plan for the Site to develop a range of housing types, lot sizes, and building sizes and types through the design of seven distinct planning areas: the Sierra Town Center, Sierra Terraces, Sierra Valley, Sierra Hillside, Sierra Knoll, Sierra Mesa, and Sierra Summit neighborhoods. Each planning area represents a unique neighborhood consisting of a variety of housing types, lot sizes, and Community amenities to provide housing for a range of age groups, family formations, and income levels.	Consistent.
H-1.8 Variety of Lot Sizes in Large-Scale Residential Developments. Promote large- scale residential development in Semi-Rural that include a range of lot sizes to improve housing choice.	The project would accommodate a mix of lot sizes, ranging from 3,000 to 7,500 square feet, and promote diverse housing choices. See also the responses to Goal/Policy/Objective Nos. H-1.5 through H-1.7, above.	Consistent.
H-1.9 Affordable Housing through General Plan Amendments. Require developers to provide an affordable housing component when requesting a General Plan amendment for a large-scale residential project when this is legally permissible.	The County does not presently have or enforce a requirement that projects include an affordable housing component when proposing a General Plan Amendment, however, the project's various neighborhoods have been planned to accommodate the housing needs of a wide range of consumer life stages and income levels. For example, the project would include 325 age-qualified housing units, 15% of the total housing proposed in the project, in its Sierra Mesa neighborhood. In addition to these age-qualified units, the project would include 762 multi-family townhome and row townhome-style units in its Town Center, Terraces, and	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	Valley neighborhoods and 173 units in family clusters in its Valley, Knolls, and Summit neighborhoods. Finally, the project's Hillside neighborhood will include age-targeted housing units, including single-story units and units with the master living space on the ground floor. In combination, these housing types constitute over 60% of the project's proposed units, providing an important housing type for young professionals, first-time homebuyers, growing families, empty-nesters, retirees, and seniors. The balance of the project's housing would be in the form of more traditional single-family homes and accommodate many of these same demographic groups. Collectively, the project's mix of housing types includes sufficient housing options for a wide range of consumer life stages and income levels.	
	In conjunction with providing a diversity of housing options, the project would include 35.9 acres of parks, a school site, and a neighborhood shopping center in conjunction with mobility alternatives including shuttle services and electric bikes for its residents to use to access these project amenities. In so doing, the project would provide both a wide range of housing options and affordable mobility alternatives to fit with its approach to housing needs.	
H-2 Neighborhoods That Respect Local Character. Well-designed residential neighborhoods that respect unique local character and the natural environment while expanding opportunities for affordable housing.	The proposed project provides well-designed residential neighborhoods that respect unique local character and the natural environment while expanding opportunities for affordable housing. Relatedly, the neighborhoods would be crafted to include diverse housing types and styles, with homes that incorporate natural materials and building forms respecting the traditional ranch style homes and rural character of the project area. Development would be clustered in a series of neighborhoods in a manner to conserve natural resources.	Consistent.
H-2.1 Development That Respects Community Character. Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element. [See applicable community plan for possible relevant policies.]	The proposed project requires that development be designed so as not to degrade or detract from the character of the surrounding development. To that end, natural open space would buffer the development from existing residential development. Existing surrounding residential development includes large-lot single-family homes, agricultural uses, and higher-density master-planned communities along the I-15 corridor. The project's land use plan balances development of a range of housing types and densities with conservation of open space and natural resources. In addition, the architectural character would incorporate natural, rusting materials and fundamental building forms that respect the traditional ranch style homes and rural character of the area, including farmhouse, ranch house and mountain themes.	Consistent.
H-2.2 projects with Open Space Amenities in Villages. Require new multi-family projects in Villages to be well-designed and include	The project would require its multi-family housing units to be well-designed and include amenities and common open space areas that enhance overall quality of life. For example, the Specific Plan provides private open space for multi-family units in addition to the public open space provided in the Village. Within	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
amenities and common open space areas that enhance overall quality of life.	the planning areas, Sierra Town Center would include approximately 5 acres of parks. Oak Grove Park would highlight the existing oak and boulder landscape found along Deer Springs Road. Suggested offerings include picnic areas, trails, and fitness nodes, and preservation of large oak trees. Village Green would be located in the heart of the Town Center commercial area. The park would be accessible from the adjacent businesses and provide a gathering space for Community events. More "refined" in character, this park may include game tables, flexible turf, an electric bike station, and plaza seating. The Joint Use Park would be located adjacent to the school site to allow for joint uses. Proposed amenities include turf for active and passive play, a backstop for T-ball and little league practice and games, bike racks, and a children's play area.	
H-3 Housing Affordability for All Economic Segments. Affordable and suitable housing for all economic segments, with emphasis on the housing needs of lower income households and households with special needs.	Please see the response to Goal/Policy/Objective H-1.9 above. The project's mix of housing types includes sufficient housing options for a wide range of consumer life stages and income levels, including entry-level buyers, young professionals, growing families, and seniors, often times with limited ability to afford housing in the San Diego Region. In conjunction with providing a diversity of housing options, including age-qualified and age-targeted units to accommodate the special needs of buyers such as empty-nesters and seniors, the project would include 35.9 acres of parks, a school site, and a neighborhood shopping center in conjunction with mobility alternatives including shuttle services and electric bikes for its residents to use to access these project amenities and off-site North County transit centers. In so doing, the project would provide both a wide range of housing options and affordable mobility alternatives to fit with its approach to housing needs.	Consistent.
H-3.4 Housing for Moderate-Income Families in Villages. Facilitate the production of housing for moderate income families within Villages by permitting developments that offer affordable housing to incorporate other compatible housing types within areas zoned for single-family residential development.	The project would offer a range of residential densities to create a mix of housing choices by creating a variety of housing types, lot sizes, and amenities to provide housing for a broad range of age groups, family formations, and income levels. The project would also implement a TDM Program of free and subsidized mobility alternatives to single-occupancy vehicle driving, would locate shopping and school uses within walking distance of residential, and would require solar on all residential units in the project, thereby significantly reducing the cost of these major living expenses (energy and transportation) for its residents.	Consistent.
H-5.3 Fire Protection. Work with local fire agencies to improve fire protection for multi- story construction.	A Fire Protection Plan (FPP) has been prepared for the proposed project and approved by the Deer Springs Fire Protection District (DSFPD) and the San Diego County Fire Authority (SDCFA). The FPP evaluates the potential fire risk to the project's proposed land uses and identifies requirements for water supply, fuel modification, defensible space, emergency access, building ignition and fire resistance, fire protection systems, and wildfire emergency pre-planning. The FPP complies with the fire safety requirements of DSFPD and SDCFA, along with project-specific measures based on the Site, its intended uses, the types of structures proposed including multi-story structures, and its fire environment. The project applicant has	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	coordinated with DSFPD to ensure adequate fire and emergency medical services would serve the project, and proposed structures are designed for fire safety. All structures, including multi-story structures, within the project Site would be constructed in accordance with California Building Code, Chapter 7A.	
	Land Use Element	
LU-1 Primacy of the Land Use Element. A land use plan and development doctrine that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories.	By locating the proposed project near existing and planned infrastructure, services, and jobs in an environmentally sensitive pattern of development, while promoting health and sustainability among its residents, the project is designed around the guiding principles of the General Plan. Consistent with the Community Development Model, the densest neighborhood on Site, the Town Center, would consist of a range of commercial uses that are supported by a network of local roads containing bicycle lanes and pathways linking the neighborhoods with parks, a school site, and public areas. Spanning out from the Village, the proposed project's semi-rural areas would contain low-density residential neighborhoods. Farther out, the neighborhoods would be surrounded by rural lands characterized by open space, habitat conservation areas, recreation areas, and other uses associated with rural areas.	Consistent.
LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map. [Refer to Guiding Principle 2 for an explanation of the Community Development Model.]	The project assigns land use designations in accordance with the Community Development Model and boundaries established by the Regional Categories Map. The proposed General Plan Amendment assigns land use designation according to the three regional categories, with the highest-intensity uses located in the Village category, surrounded by medium-density and residential neighborhoods in the Semi-Rural category. Farther out, rural lands characterized by open space, habitat conservation, and recreation areas would surround the neighborhoods.	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]	The Community Development Model is implemented by three Regional Categories: Village, Semi-Rural, and Rural lands. The project as proposed is consistent with the Community Development Model, because the Community Development Model has already applied an established Village Regional Category designation to a portion of the project Site. The project does not propose to create a new Village, or expand or reconfigure the existing Village area. The project is also within the established boundaries of the Vallecitos Water District.	Not applicable.
LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.	Village Core Mixed-Use, Semi-Rural 1, and Open Space-Conservation land use designations were assigned based on the underlying regional category. The project would promote sustainability by focusing on an environmentally sensitive pattern of development. The project would integrate a range of housing types and densities while conserving open space and natural resources.	Consistent.
 LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met: Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding Potential Village development would be accommodated by the General Plan road network 	The project is located in an area where the Community Development Model has already applied the Village Category to a portion of the project Site; therefore, the project does not propose to create a new Village, or expand or reconfigure the existing Village area.	Not Applicable.

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

Guiding Principle	Project Conformance	Conformance Conclusion
 Public facilities and services can support the expansion without a reduction of services to other County residents The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area 		
LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.	The policy is not applicable because the project's proposed land use designations are based on the County's Community Development Model and the County's provisions for utilizing Specific Plans to implement projects with a variety of housing types, lot sizes, land uses, project-specific development standards, and other project objectives, including conservation. The project has coordinated with the cities of San Marcos and Escondido, as well as the Vallecitos Water District, to ensure that the project's proposed land uses are consistent with existing and planned infrastructure capacities and capabilities.	Not applicable.
LU-1.7 Maximum Residential Densities. Determine the maximum number of dwelling units permitted within the boundaries of any subdivision or single lot based on the applicable land use designation(s). When the total number of dwelling units is less than one, this shall be interpreted as permitting one dwelling unit. When more than one dwelling unit is permitted, fractional dwelling units are rounded down to the nearest whole number of dwelling units.	Table LU-1 in the General Plan was used to calculate the residential yield for the project, and Table LU-2 was used to calculate the gross density allowed on all property, with slope-dependent land use designations. Presently, the maximum number of dwelling units permitted within the boundaries of the project based on applicable land use designations is 99. The Specific Plan proposed land use designations that would allow for approximately 2,199 residential dwelling units. The project proposes a more restrictive maximum of 2,135 residential dwelling units.	Consistent.
LU-1.8 Density Allocation on project Sites. Permit changes in density within a project site with parcels that have more than one land use	This policy states that a project with more than one land use designation and that is subject to a Specific Plan is allowed to transfer densities within the project, including across land use designation boundaries to provide flexibility in project design. The proposed Specific Plan includes more than one land use	Consistent.

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

Guiding Principle	Project Conformance	Conformance Conclusion
designation to provide flexibility in project design only when approved by Major Use Permit or Specific Plan. The policy does not allow a project to receive more units than is established by the Land Use Maps nor to supersede Housing Element requirements related to achieving the County's Regional Housing Needs Allocation. [See applicable community plan for possible relevant policies.]	designation, and, therefore, is allowed to transfer densities within the project.	
LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.	The project would implement a Specific Plan with various land uses designations, allowable densities, and development regulations to plan for 2,135 dwelling units. Subdivision maps for the project would be consistent with the densities allowed for under the proposed land use designations as described in the Specific Plan.	Consistent.
LU-2 Maintenance of the County's Rural Character. Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.	The project would enhance the rural setting and character of the surrounding unincorporated area through its context sensitive land use plan in conjunction with its design guidelines and incorporation of key project features and amenities that build off the surrounding area. The Twin Oaks Community began as a predominantly agricultural community north of an area known originally as Vallecitos de San Marcos, today, what is the City of San Marcos. Today, Twin Oaks supports a mix of land uses, including a range of housing types and lot sizes, small farms, nurseries, and ranchettes in its northern portions, the Twin Oaks Golf Course, an equestrian center and a handful of equestrian ranchettes, and retail, commercial, and light industrial uses. In keep with this character, the project includes over 20 acres of Community gardens and vineyards interspersed throughout the project as a locally grown, sustainable source of agriculture; an equestrian staging area and pathways and trails that connect all the way into the City of San Marcos and to the project's eastern edge designed to accommodate equestrian users; conservation of nearly three quarters of the Site's existing natural terrain, including prominent ridgelines, peaks, rock outcroppings, and drainages; a range of housing options to meet the needs of the	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	North County Metro's growing population; a variety of parks, including the Oak Grove Park, the Sierra Farms Park, and several other neighborhood parks, and a system of pedestrian pathways and trails that incorporate the more natural elements of the surrounding area, including oaks, clusters of boulders, and scenic vistas; and architectural design guidelines that draw from the character of the Site as well as the surrounding community.	
LU-2.1 Community Plans. Maintain updated Community Plans, as part of the General Plan, to guide development to reflect the character and vision for each individual unincorporated community, consistent with the General Plan.	This policy represents the County's direction to maintain updated Community Plans. The proposed project would not impede County's achievement of this policy. The North County Metropolitan Subregional Plan area provides several goals for growth within this growing area, including accommodating urban development in appropriate areas; promoting agriculture in non-urban areas; and preserving scenic, rugged terrain not suitable for urbanization. The densest on-site neighborhood, the Town Center, would consist of a network of local roads containing bicycle lanes and pathways linking various commercial uses to the neighborhoods, parks, a proposed school site, and public areas. The proposed project would consist of urban development in the areas consistent with the North County Metropolitan Subregional Plan. Community agriculture would be promoted through the incorporation of over 20 acres of Community gardens and vineyards. The public would rent or reserve garden plots with first priority given to Community residents. This would promote locally grown organic food sources for residents, and provide a link to the region's agricultural heritage. In addition, scenic resources would be permanently conserved and managed in an open space system encompassing approximately 1,209 acres. The majority of the proposed open space would be located within the northern half of the project. The northern half has the greatest potential to support wildlife due to the east/west connection with the San Marcos Mountains. Therefore, the proposed project would accommodate urban development and preserve scenic rugged terrain and be consistent with the environmental goals of the North County Metropolitan Subregional Plan.	Consistent.
LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character	The project assigns densities and minimum lot sizes in a manner that is compatible with the character of the unincorporated communities surrounding the project Site. Proposed project densities and lot sizes are consistent and compatible with the Community Development Model, which influences the North County Metropolitan	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
of each unincorporated community.	Subregional Plan area and surrounding areas. Please see the responses to Guiding Principle 3.	
LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.	The proposed project proposes a General Plan Amendment to replace a portion of the project's regional category designation from Rural Lands to Semi-Rural, consistent with General Plan goals and policies. Please see also the above responses to the <i>General Plan Guiding Principles</i> .	Consistent.
LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.	The project would create a 1,209 acre preserve and protect an additional 235 acres of native habitat as Fuel Modification Zones/Special Management Areas, establishing large green belts between the project's individual neighborhoods and surrounding off-site areas.	Consistent.
LU-2.6 Development near Neighboring Jurisdictions. Require that development in the proximity of neighboring jurisdictions retain the character of the unincorporated community and use buffers or other techniques where development in the neighboring jurisdiction is incompatible.	The project would retain the character of the unincorporated community. Please see responses to <i>Guiding Principle 3</i> , Goal LU-2, and Goal/Policy/Objective LU-2.5, above.	Consistent.
LU-2.7 Commercial Viability. Ensure that new commercial centers maintain or enhance the viability of existing commercial areas.	The Twin Oaks and Hidden Meadows communities presently lack basic commercial services, requiring residents to travel to Escondido and San Marcos for goods and services. The proposed Town Center would serve as a town square and the commercial hub for the surrounding area. An anticipated neighborhood grocery store at the Town Center would serve Twin Oaks Valley and the surrounding community. The Town Center would provide employment opportunities for future residents and for the surrounding area and would be walkable, as well as visually appealing and compatible with surrounding development. Further, the Town Center would be accessible due to its location, reinforcing the local vitality and economy of the Twin Oaks Valley community. Please see the response to <i>Guiding Principle 3</i> .	Consistent.
LU-2.8 Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or	The project would require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment, and/or are detrimental to human health and safety. The project would ensure that noise considerations are incorporated into the land use	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.	decision-making process. The quality of life for project residents and for nearby residents is important to the project applicant who considered noise-generating uses such as traffic and construction in project design. Project construction would be conducted to minimize disturbance to adjacent sensitive receptors. Blasting (and the associated drilling that precedes blasting) would only occur between 7 a.m. and 7 p.m. Construction blasting generates a maximum noise level of approximately 94 dBA at a distance of 50 feet (FHWA 2006). This noise level is used in the analysis because it provides a reasonable estimate of the construction blasting noise level. However, the noise level would vary depending on various factors. The blast is generally perceived as a dull thud rather than as a loud explosion. Additionally, to conduct blasting, a blasting permit must be obtained from the County Sheriff's Department prior to any blasting activities. Potentially significant blasting noise impacts would be mitigated to a level below significance through implementation of mitigation measure M-N-5, which require the preparation and implementation of a blast drilling and monitoring plan. See also the response to Goal/Policy/Objective LU-2.1.	
LU-2.9 Maintaining Rural Character. Consider level of service criteria, in accordance with Policy M-2.1, to determine whether adding lanes to a Mobility Element road would adversely impact the rural character of a community or cause significant environmental impacts. In those instances, consider other options to mitigate LOS where appropriate.	Consistent with this Policy, Policy M-2.1, and the County's CEQA Guidelines for Determining Significance, the project includes a Traffic Impact Analysis that analyzes the project's estimated traffic impacts to existing off-site roads and identifies measures in the form of road and intersection capacity enhancing improvements to mitigate these impacts to less than significant. The project's EIR also analyzes the potential environmental impacts associated with these improvements and concludes that impacts to biological resources, cultural resources, aesthetic/visual resources (e.g., rural character), drainage and water quality, air quality, and related subject areas would be less than significant with mitigation.	Consistent.
	In the context of rural character, the project proposes two options for the County Board of Supervisors' consideration for the improvements to Deer Springs Road between Sarver Lane and Mesa Rock Road. Option A would widen and upgrade Deer Springs Road to a two-lane Community Collector Road. Option B would widen and improve this same segment of Deer Springs Road to a four-lane Major Road. Both of these Options would improve the capacity of Deer Springs Road, both Options include bike lanes and a 10-foot-wide multi-use pathway along the road to accommodate alternative modes of transportation not accommodated today along the road, including bicyclists, walkers, joggers, and horseback riding, and both Options have been designed to substantially follow the existing alignment of the road to minimize impacts to biology, cultural resources, the existing natural terrain surrounding the road, and existing residences and properties along the road. Under both of these options, the other portions of Deer Springs Road would be widened and improved consistent with the County's four-lane Major Road standard and include the same	

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	bicycle and multi-use pathway improvements connecting all the way into the City of San Marcos. The improvements under Option B would provide sufficient capacity to achieve a Level of Service (LOS) D or better for the entire set of improvements to Deer Springs Road (from I-15 to its terminus with Twin Oaks Valley Road). The improvements under Option A would improve the existing capacity of the road, however that segment between Sarver Lane and Mesa Rock Road would not achieve an acceptable LOS under this Option such that the road would continue to experience a deficient LOS during the peak hours of traffic congestion. Both Options A and B have been designed to minimize impacts and would require mitigation to address impacts to biological, cultural, and aesthetic resources. For both Options, these impacts would be mitigated to less than significant. Both Options would also address the existing flooding condition (i.e., overtopping of the roadway) that results during major rainfall events and both Options would install drainage, hydromodification, and water quality improvements along the improvements to the road where limited to no improvements exist today, significantly improving the water quality and drainage outcome along the road when compared to the existing condition.	
LU-3 Diversity of Residential Neighborhoods. A land use plan that accommodates a range of building and neighborhood types suitable for a variety of lifestyles, ages, affordability levels, and design options.	The Specific Plan includes development regulations for single-family detached and a range of multi-family residential types of various lot sizes and square footages. The project applicant completed a consumer survey that vetted buyer preferences and demand by consumer life stage to inform the mix of residential products proposed in each neighborhood. The survey resulted in seven planning areas that would provide housing for a broad range of age groups, family formations, and income levels.	Consistent.
LU-3.1 Diversity of Residential Designations and Building Types. Maintain a mixture of residential land use designations and development regulations that accommodate various building types and styles.	The Specific Plan includes development regulations for single-family detached and cluster, and a range of multi-family residential lot sizes and square footages. The buyer survey informed the project applicant's land planning for the neighborhoods, resulting in a mix of housing types. The broad range of lot sizes and housing types would provide significant options for North County buyers. The seven designations of building types each contain their own design regulations.	Consistent.
LU-3.2 Mix of Housing Units in Large projects. Require new large residential developments (generally greater than 200 dwelling units) to integrate a range of housing types and lot and building sizes. [See	The proposed project requires integration of a range of housing types, lot sizes, and building sizes. The project offers various housing types, including a range of single-family lot sizes, detached cluster housing types, age-qualified (senior/55+) and age-targeted (single story) housing choices, and multi-family building types of various lot sizes and square footages. Several planning areas would be composed of lots ranging in size from 3,000 square feet to 7,500 square feet. The Specific Plan's range of housing types, lot sizes, and	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
applicable community plan for possible relevant policies.]	building sizes would implement this policy. Please see also response to <i>General Plan Guiding Principles</i> 1, <i>2, and 3</i> .	
LU-3.3 Complete Neighborhoods. Require new development sufficiently large to establish a complete neighborhood (typically more than 1,000 dwelling units) to include a neighborhood center within easy walking distance of surrounding residences. [See applicable community plan for possible relevant policies.]	The proposed project includes a neighborhood center (Town Center) within walking distance of surrounding residences. The Town Center is centrally located between the residential development and the existing road network and I-15. By locating the project near existing and planned infrastructure, services, and jobs in an environmentally sensitive pattern of development, the project is designed around the <i>Guiding Principles</i> of the General Plan. Consistent with the County's Community Development Model, the densest neighborhoods on Site, the Town Center and Terraces, would consist of a range of commercial uses. A dense network of local roads containing bicycle lanes and pathways linking the neighborhoods with parks, a school site, and public areas.	Consistent.
LU-5 Climate Change and Land Use. A land use plan and associated development techniques and patterns that reduce emissions of local greenhouse gases in accordance with state initiatives, while promoting public health.	The proposed project includes a land use plan and associated development techniques and patterns that reduce emissions of greenhouse gases in accordance with state initiatives, while promoting public health. The project would incorporate a walkable Town Center to create a central core in the community of Twin Oaks. Neighborhood serving retail uses in the Town Center would serve the existing communities of Twin Oaks, Hidden Meadows, and Champagne Village as well as the Sierra Community. On the north end of the Town Center, a planned school site would include a joint-use field open to the public during weekends and after school hours during weekdays. The Town Center would be close to the school site and to new homes and be linked via bicycle lanes and multi-use trails to all of the remaining neighborhoods within the Community. The project would include parks, pedestrian pathways, and multi-use trails within one quarter mile or less from each residence in the project, emphasizing walkability and deemphasizing individual motorized transportation, thereby promoting public health and reducing GHG emissions. In the same vein of promoting public health, reducing individual motorized transportation, and reducing GHG emissions, the project proposes a number of TDM Program measures including: an electric bike-share program, support for ride-share and car-share programs, subsidized transit passes for the project's residents,;; and shuttle services within and around the project and to the Escondido Transit Center. The land use pattern and TDM Program measures would reduce overall GHG emissions and promote public health. This manner of project development complies with the objectives and meets the mandates of the California Global Warming Solutions Act of 2006 (AB 32), and SB 375, and meets the County's land use goals.	Consistent.
LU-5.1 Reduction of Vehicle Trips within	Please refer to the response to Goal/Policy/Objective LU-5, above. The project would incorporate a mix of	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
Communities. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that support multi-modal transportation, including walking, bicycling, and the use of public transit, when appropriate.	residential, commercial, recreational, and education uses within its Village (the Town Center Neighborhood) and proposes residential densities in its Terraces and Valley neighborhoods along with a Transportation Demand Management (TDM) Program that would support multi-modal transportation, including walking, bicycling, and the use of transit. The project's TDM Program would include a number of mobility alternatives to single occupancy vehicle driving, including pedestrian pathways, multi-use trails, bicycle routes, an electric-bike share program, support for car-share and ride-share services within the project, subsidized transit passes, and shuttle services around the project and to the Escondido Transit Center, a north county transit hub with access to the Sprinter and NCTD Breeze bus services and FLEX shuttle services. Collectively, the project's mixture of land uses and its TDM Program would support multi-modal transportation.	
LU-5.2 Sustainable Planning and Design. Incorporate into new development sustainable planning and design.	 The County's General Plan emphasizes sustainable design principles. The proposed project is designed to implement these General Plan principles. The project would locate design elements near existing and planned infrastructure, services, and jobs in an environmentally sensitive pattern of development while promoting health and sustainability among its residents. Proposed project Site planning accounts for existing landforms and topography and concentrating development between and away from ridge lines. Prominent ridges and landforms were mapped, and each neighborhood would minimize disturbance to prominent peaks and landforms. Each neighborhood would be developed to minimize impacts to the Site's existing natural terrain. Where possible, streets would parallel topography and be guided by on-site watershed patterns. Additionally, Section 2.1.3 of the Specific Plan identifies the "Sustainable Planning and Design Goals" to promote sustainability through sensitive Site design that conserves energy, water, open space, and other natural resources. Sustainable Planning and Design Policies include the following: a. Develop a Community Development Model based project that provides a more environmentally sensitive land use pattern, where residents live closer to jobs, businesses, schools, parks, services and their neighbors. b. Provide mobility alternatives for the residents to reduce energy consumption, air pollution, noise, and GHG emissions. c. Integrate the Site's natural features into the development (ecosystems, topography, rock formations, agriculture and views), which would improve resident quality of life. 	Consistent.

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	construction, water conservation measures that meet the County's Water Efficient Landscape Design Manual requirements, pre-plumbing for greywater systems in all single-family residential construction, and a carbon neutrality program that offsets all greenhouse gas emissions (i.e., net zero GHG emissions) associated with the project's construction and operational stages for the life of the project.	
LU-5.3 Rural Land Preservation. Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations. Open space and rural lands are primary areas that provide carbon sequestration benefits for the Region.	As stated in the Land Use Element of the Specific Plan, the project's semi-rural areas would contain lower- density residential neighborhoods. Farther out, open space, habitat conservation areas, recreation areas, and other uses associated with rural areas would surround the neighborhoods. The Community's homes and neighborhoods would represent diverse housing types in each planning area to respond to the needs of anticipated residents, reflect the rural character, maximize on-site natural resources with indoor/outdoor living opportunities, and use density as a tool to reinforce place-making within the Town Center and other neighborhoods. Each neighborhood is designed with an enhanced parkway that includes landscaping, a trail, and often a decorative "dry creek" drainage swale that further enhances the rural character of the Community. Section 2.1.7 of the Specific Plan states the project would promote environmental stewardship by dedicating large blocks of biological open space into the North County Metropolitan Subregional Plan to protect natural resources and habitant. The following Open Space and Conservation Policies apply: a. Conserve large blocks of environmentally sensitive lands using easements to ensure permanent conservation, consistent with the draft North County Multiple Species Conservation Program.	Consistent.
	 b. Avoid construction and grading in dedicated open space areas. Fuel modification and drainage for pads, slopes and roads shall be restricted as provided in the easement dedication or conservation agreement. c. Limit disturbance and development to only those areas shown on this Specific Plan or areas off Site needed for grading, roads, utilities, or infrastructure. d. Manage dedicated open space areas through the County or another qualified third-party. Much of the project Site is designated Rural Lands (RL-20) under the General Plan. The proposed project would permanently preserve and manage approximately 1,209 acres of land as open space. Currently, approximately 35 acres of the project Site is identified as Farmland of Local Importance and Unique Farmland and approximately 189 acres are zoned as agricultural. The project would retain approximately 6 acres of this agricultural land because the on-site terrain of steep slopes and rock outcroppings are not 	

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	conducive to agricultural use. Additionally, existing, nominal agricultural land uses on Site consist of encroachments from adjacent properties. These encroaching agricultural operations would remain with proposed project implementation.	
LU-5.5 projects that Impede Non-Motorized Travel. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented. Examples include large parking areas that cannot be crossed by non-motorized vehicles, and new developments that block through access on existing or potential bicycle and pedestrian routes.	The proposed project would not impede existing bicycle and pedestrian access during construction by implementing a Construction Traffic Control Plan that outlines ways to access affected rights-of-way safely throughout construction. The proposed project also would result in increased opportunities for non-motorized travel.	Consistent.
LU-6 Development–Environmental Balance. A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.	The proposed project would include a built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities by integrating the property's natural character, primary landforms, view corridors, and agricultural heritage into the Community fabric using the following methods: an environmentally sensitive development pattern, creating cohesive open space networks, grading in response to topography and hydrology, and using materials and forms that reflect the region's agrarian history.	Consistent.
LU-6.1 Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.	The proposed project requires the protection of intact or sensitive natural resources in support of the long- term sustainability of the natural environment by proposing an open space conservation easement to the County or third party conservation entity or organization to protect sensitive biological natural resources. The land dedicated under the easement would be permanently preserved to protect wildlife, existing vegetation, and the on-site natural features. For example, planning area location and design would preserve natural areas and provide for wildlife movement and connectivity throughout the project. The proposed open space design consists of two large, continuous blocks of key biological resources situated within the Site's northern half and along the eastern boundary; a large third block of open space in the center of the proposed development would connect the abovementioned blocks of open space to open space located east and south of the project Site. The project would permanently preserve and manage approximately 1,209 acres of open space. Please see also <i>General Plan Guiding Principles 4 and 8</i> .	Consistent.

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LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.	The proposed project assigns lowest-density or lowest-intensity land use designations to areas with sensitive natural resources. In particular, the project assigns the Open Space–Conservation land use designation to more than 50% of the project, protecting natural resources in perpetuity.	Consistent.
LU-6.3 Conservation-Oriented project Design. Support conservation-oriented project design when appropriate and consistent with the applicable Community Plan. This can be achieved with mechanisms such as, but not limited to, Specific Plans, lot area averaging, and reductions in lot size with corresponding requirements for preserved open space (Planned Residential Developments). Projects that rely on lot size reductions should incorporate specific design techniques, perimeter lot sizes, or buffers, to achieve compatibility with community character. [See applicable community plan for possible relevant policies.] Approval of Conservation-Oriented projects is	Planning area location and design would preserve natural areas and provide for wildlife movement and connectivity throughout the project. The proposed project includes buffers between residences and open space. Goal/Policy/Objective LU-1.8 provides flexibility in project design by allocating density to provide contiguous blocks of habit as opposed to fragmented open space.	Consistent.
not guaranteed by-right but shall be allowed to process if consistent with applicable minimum lot sizes, design guidelines, and regulations.		
LU-6.4 Sustainable Subdivision Design. Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and,	Please see Goal/Policy/Objectives LU-6.1 through LU-6.3. In addition, the proposed project requires that planning areas be planned to conserve open space and natural resources, protect agricultural operations, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and provide public amenities consistent with the applicable community plan. The project would permanently preserve and manage 1,209 acres of native habitat and other natural resources found on-Site, achieving a planned preservation of 61% of the project Site native habitat. The project would protect an additional 235 acres of native habitat in Fuel Modification Zone 2 and Special Management Areas, areas that will retain	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
when appropriate, provide public amenities consistent with the applicable community plan. [See applicable community plan for possible relevant policies.]	their native vegetative cover but be subject to periodic thinning and weed abatement for fire protection purposes. It should also be noted that an additional 212 acres of off-site open space would be preserved, for a total preserve acreage of 1,421 acres (72 percent of the project Site acreage). The project would incorporate open space buffers between its neighborhoods and off-site agricultural and other uses. The project would include a Fire Protection Plan addressing fire safety and defensibility, including fuel modification zones, the latest fire safety construction practices, and emergency response and evacuation. The project would include extensive use of Low Impact Development BMPs and project design features, including minimizing and disconnecting impervious surfaces. The project would provide 36 acres of pocket, neighborhood, and Community parks with a wide range of amenities consistent with the Twin Oaks Community Plan to meet the needs of the project's future residents as well as the existing residents of surrounding communities.	
LU-6.5 Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.	The proposed project would incorporate stormwater facilities to manage stormwater quality, hydromodification impacts, and peak flow attenuation. Integrated bioretention swales and basins, as well as LID features and roadside swales, would address stormwater quality and hydromodification impacts.	Consistent.
LU-6.6 Integration of Natural Features into project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.	Please see Goal/Policy/Objective Nos. LU-6.1 through LU-6.6. In addition, the proposed project requires incorporation of natural features and avoidance of sensitive environmental resources. For example, parks would incorporate natural features such as mature oaks, indigenous trees, and rock formations. The proposed Oak Grove and Sierra Farms Parks would incorporate large existing oak trees. More broadly, the project would integrate the Site's natural features (e.g., ecosystems, topography, rock formations, and views), which are important design elements that enhance resident quality of life, into various neighborhoods.	Consistent.
LU-6.7 Open Space Network. Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.	Please see Goal/Policy/Objective Nos. LU-6.1 through LU-6.6. In addition, the proposed project requires a contiguous open space design that protects wildlife habitat and corridors, preserves scenic vistas and areas, and connects to existing or planned recreational opportunities. Planning area location and design would preserve natural areas and provide for wildlife movement and connectivity throughout the Site. The proposed open space design consists of two large, continuous blocks of key biological resources situated within the Site's northern half and along the eastern boundary, and a large third block of open space in the	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	center of the proposed development that connects the abovementioned blocks of open space to open space located east and south of the project Site. In total, the project would preserve approximately 1,209 acres of native habitat in a habitat preserve. The majority of the proposed open space design would be located within the northern and eastern halves of the project Site. The northern half of the Site has the greatest potential to support wildlife due to the east/west connection with the San Marcos Mountains. The open space design also includes environmental features such as ridgetops, hill tops, and rocky outcrops. Although the majority of this area consists of dense chaparral, the area incorporates a diverse representation of the vegetation communities that occur on Site and in the vicinity, including riparian forest and scrub, coastal sage scrub, non-native grassland, and oak woodland. The two largest riparian areas located within the project Site would be included in the open space: the South Fork of Gopher Canyon and the South Fork of Moosa Canyon.	
	The project's proposed habitat preserve area will support multi-use trails that connect into the project' individual neighborhoods and to the project's Community and neighborhood parks. The project's circulation system is built around accommodating alternatives to vehicle travel (such as walking, bicycling, and transit/shuttle services). This circulation system connects seamlessly through the project's individual neighborhoods, parks, and open space areas. The project's residents and visitors can go from their home to the local park to a hike in the habitat preserve area to a shuttle stop in the Town Center without ever using a car.	
 LU-6.8 Oversight of Open Space. Require that open space associated with future development that is intended to be preserved in perpetuity either be: Retained in private ownership of the property owner or a third party with a restrictive easement that limits use of the land as appropriate; or Transferred into public ownership of an agency that manages preserved open space. The owner of the open space will be responsible for the maintenance and any 	The project's proposed 1,209-acre preserve areas would be preserved in perpetuity, maintained, and managed by a preserve management entity per the requirements of the project's Resource Management Plan in accordance with this policy and the County's related requirements. Please see also <i>General Plan Guiding Principles 4 and 8</i> .	Consistent.

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

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necessary management unless those responsibilities are delegated through an adopted plan or agreement. Restrictive easements shall be dedicated to the County or a public agency (approved by the County) with responsibilities that correspond with the purpose of the open space. When transferred to a third party or public agency, a funding mechanism to support the future maintenance and management of the property should be established to the satisfaction of the County.		
LU-6.9 Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.	The project would require development to conform to the natural topography to limit grading, incorporate and not significantly alter the dominant physical characteristics of the Site, and utilize natural drainage and topography in conveying stormwater to the maximum extent practicable. Specifically, the project would avoid grading/landform alteration impacts to nearly three quarters of the project Site and would integrate the property's natural character, primary land forms, view corridors, and agricultural heritage by using the following methods: clustering development, creating 1,209 acres of a cohesive open space network, and conforming grading in response to topography and hydrology.	Consistent.
LU-6.10 Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.	The proposed project requires development be located and designed to protect property and residents from the risks of natural and man-induced hazards. For example, the Geotechnical Report and the Rock Fall Hazard Report include recommendations and design considerations to minimize geologic, seismic, soils, slopes, and other hazards. The project would conform to the most recent building code standards for geologic and seismic safety. The project's Hazardous Materials Environmental Site Assessment is designed with the recommendations to minimize potential natural and human-induced hazards. Please also see the response to <i>Guiding Principle 5</i> .	Consistent.
LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high hazard fire areas or other unmitigable hazardous areas.	The proposed project's FPP evaluates and identifies the potential fire risks associated with the proposed project's land uses, and identifies requirements for water supply, fuel modification, defensible space, emergency access, building ignition and fire resistance, fire protection systems, and wildfire emergency pre- planning, among other pertinent fire protection criteria. The FPP complies with the fire safety requirements of the DSFPD and SDCFA, and includes project-specific measures based on the Site, its intended use, and its fire environment. Please see other fire-related responses for additional details. Please also see the	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
LU-7 Agricultural Conservation. A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character.	response to <i>Guiding Principle 5</i> . The project would create agricultural uses on the Site where there are none today, thereby retaining and protecting farming and agriculture as beneficial resources that contribute to the County's rural character. The project would include more than 20 acres of Community gardens and vineyards within and around certain neighborhoods and in the Sierra Farms Park. Vineyard plantings located on slopes along the loop road would create a unique visual identity, establish a connection to the region's agrarian history, and provide a productive landscape. Vineyards are low-water-use crops that provide a productive agricultural use of the irrigated open space. They have a low fuel volume and are thereby resistant to fire, serving as an effective fuel break between the project's preserve areas and its neighborhoods.	Consistent.
LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.	 Please see the responses to <i>Guiding Principles 3</i> and <i>8</i>, and Policies COS-6.2, LU-2, LU-7, and S-11.5. The project Site does not support any existing agricultural operations. Small family-run avocado orchards exist off Site near the southwestern and western boundaries of the project Site. The project would buffer these existing off-site orchards with open space and habitat preserve where these existing orchards are adjacent to the project's proposed neighborhoods. Although the project Site does not support any agricultural operations, inside the project, sustainable agriculture would be promoted through the creation of Community gardens and vineyards dispersed throughout the project. These Community gardens and vineyards would be placed in Community open space lots (outside of habitat preserve areas) and managed by the HOA. Both the project's residents and people from the surrounding neighborhoods would be allowed to reserve space in the Community gardens to plant and manage their own plot of fruits and vegetables, serving as an important contribution to sustainable agriculture practices within the Community of Twin Oaks and larger the North County Metro Area, an area with a strong agricultural history. 	Consistent.
LU-9 Distinct Villages and Community Cores. Well-defined, well-planned, and well- developed community cores, such as Villages and Town Centers, that contribute to a community's identity and character.	The project's Town Center proposes a range of commercial, residential, educational, and park uses that would serve as the hub of the Community. Local roads, bike lanes, and pathways would link the Town Center to the neighborhoods.	Consistent.
LU-9.1 Village and Community Core Planning. Encourage the delineation of and development of more detailed planning direction for the character, design, uses,	The Town Center would create a central core in Twin Oaks Valley. An anticipated neighborhood grocery store at the Town Center would serve the Twin Oaks Valley and the Sierra neighborhoods. On the north end of the Town Center, a planned school site would include a joint-use field open to the public during weekends and after school hours during weekdays. The Town Center would be close to the school site and to new	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
densities, and amenities of Village areas, Town Centers, and other community cores in Community Plans to assist in the future planning of residences, infrastructure, businesses, and civic uses.	residential dwelling units, and be linked via bicycle lanes and multi-use trails to all neighborhoods within the Community.	
LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]	The proposed project assigns the Village land use designation in a manner consistent with the Community character of the North County Metro Area and surrounding existing development patterns as well as the project Site's environmental constraints. To that end, the Village designation is assigned presently to the project Site abutting the I-15/Deer Springs Road intersection. The Village regional category designation would remain unchanged from its existing configuration. Outside the Village, the project proposes to use a Specific Plan to focus development of According to the Land Use Element of the County's General Plan, approximately 19.6 acres of the existing property are designated Semi-Rural 10, which allows one dwelling unit per 10 gross acres on land with slopes of less than 25%, and one dwelling unit per 20 gross acres on land with slopes greater than 25%.	Consistent.
LU-9.3 Village and Community Core Guidelines and Regulations. Support the development and implementation of design guidelines, Village-specific regulations for roads, parking, and noise, and other planning and regulatory mechanisms that recognize the unique operations and character of Villages, Town Centers, and transportation nodes. Ensure that new development be compatible with the overall scale and character of established neighborhoods.	Please see response to Goal/Policy/Objective LU-1.8 above. The project's Specific Plan includes design guidelines for architecture, landscaping, and the project's network of roads that would establish the character while recognizing the intended operations of its Town Center. The project's various neighborhoods would be compatible with the overall scale and character of established neighborhoods. Also, please see response to Guiding Principle 3 for more information on the project's compatibility with the surrounding area.	Consistent.
LU-9.4 Infrastructure Serving Villages and Community Cores. Prioritize infrastructure improvements and the provision of public facilities for Villages and community cores as sized for the intensity of development allowed by the Land Use Map.	Infrastructure serving the Community would be constructed concurrent with need and be sized for the proposed land uses.	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.	The Specific Plan designates a mix of land uses for the Town Center and adjacent higher-density residential neighborhood. Each village within the Community would have a mix of uses, parks, and trail access to the Town Center.	Consistent.
LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors. In this reference, a transportation node is intended to be the intersection of two high traffic volume Mobility Element roadways, along with a transit stop.	The project would locate commercial, educational, recreational, and higher-density residential land uses in the project's Village designated area, its Town Center neighborhood The Town Center would be designated Village Core Mixed Use and zoned with General Commercial/Residential Use Regulation. It would provide both shopping and employment opportunities for future residents as well as for the surrounding area, be walkable and bikeable, and support car-share and ride-share programs as well as a shuttle stop for the project's shuttle services and space for a potential future NCTD transit stop (e.g., BREEZE or FLEX services) at the project. The project applicant is also coordinating with Caltrans SANDAG, and NCTD on potential future expanded or improved park-and-ride facilities at the I-15/Deer Springs Road Interchange. Presently, there are two park-and-ride lots at the Interchange, one on the west side and one on the east side of the freeway. The project applicant has met with Caltrans, SANDAG, and NCTD about whether Caltrans plans to improve or expand the park-and-ride lots, either as stand-alone projects or as part of the process of improving the Interchange. The project applicant supports and will advocate for the incorporation of alternative transportation modes such as electric vehicle charging stations, bicycle facilities, storage lockers for travelers, accommodations for ride-share and car-share services, and a possible future transit stop as part of any project to expand or improve the park-and-ride facilities at the Interchange.	Consistent.
LU-9.7 Town Center Planning and Design. Plan and guide the development of Town Centers and transportation nodes as the major focal point and activity node for Village areas. Utilize design guidelines to be compatible with the unique character of a community. Roadways, streetscapes, building facades, landscaping, and signage within the town center should be pedestrian oriented. Wherever possible, locate public facilities, such as schools, libraries, community centers, and parks in Town Centers and	The project would plan and guide the development of its Town Center and Terraces neighborhoods as a major focal point and activity node for the project. These two neighborhoods would support a mix of residential and commercial uses, a school site, parks, including a joint-use ball field, a system of pedestrian pathways and bicycle-friendly streets, a shuttle stop for shuttle services within and to and from the project Site. The project's Town Center would include multi-modal connections, including a pedestrian pathway and dedicated bicycle routes, to the balance of the project's neighborhoods, making it a major focal point and activity node as the Village area of the project. The project's Specific Plan contains detailed design guidelines for the architecture of the various buildings, the landscaping, the roads and pedestrian pathways, the signage, and other project components to be built in these neighborhoods, as well as the balance of the project, that draw upon the natural and semi-rural character of the Community the project would create.	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
Villages. LU-9.8 Village Connectivity and Compatibility with Adjoining Areas. Require new development within Villages to include road networks, pedestrian routes, and amenities that create or maintain connectivity; and site, building, and landscape design that is compatible with surrounding areas. [See applicable community plan for possible relevant policies.]	The project would require its Village-designated area (i.e., the Town Center neighborhood) along with the rest of its neighborhoods to include road networks, pedestrian routes, and amenities like parks and neighborhood shopping to create connectivity. As detailed in the project's Specific Plan, the project would also require Site, building, and landscape design guidelines that are compatible with its surroundings. The project's network of roads, dedicated bike lanes and bicycle-friendly streets, and pedestrian pathways would link its Town Center to the project's other neighborhoods. The project would include multi-use trails for walkers, joggers, mountain bikers, and equestrians that connect the project's various neighborhoods to the surrounding off-site areas. The project's off-site improvements to Deer Springs Road and Twin Oaks Valley Road would include multi-use pathways and Class II bicycle lanes with connections from the project all the way into the community of Twin Oaks and the City of San Marcos.	Consistent.
LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.	The project would plan and support an efficient residential development pattern that enhances established neighborhoods and creates new neighborhoods within the project Site. The project Site is located in North San Diego County immediately west of Interstate 15, within approximately 1 mile from the municipal boundary of the City of San Marcos, and within a few miles of the city centers for the Cities of San Marcos, Escondido, and Vista, North County cities that have experienced steady population and job growth over the last several decades. The project would create efficient residential development patterns on the project Site by planning each of its seven distinct neighborhoods in a manner that minimizes impacts to the Site's existing natural terrain, native habitats, and features. The project would avoid landform alteration impacts to nearly three quarters of the Site and create a 1,209-acre habitat preserve on Site, a 212-acre habitat preserve off Site, and protect an additional 235 acres of open space on Site supporting native habitat managed as Special Maintenance Areas and Fuel Modification Zone 2.	Consistent.
LU-9.10 Internal Village Connectivity. Require that new development in Village areas are integrated with existing neighborhoods by providing connected and continuous street, pathway, and recreational open space networks, including pedestrian and bike paths.	The proposed project requires the development is integrated with existing neighborhoods by providing connected and continuous street, pathway, and recreational open space networks, including pedestrian and bike paths. For example, the Town Center would be linked to the project's other neighborhoods and the proposed preserve areas by a network of bicycle-friendly streets, multi-purpose trails, and pedestrian pathways. The Community would include miles of trails for walkers, joggers, mountain bikers, and equestrians that would connect the Community to the surrounding areas. Please see also <i>General Plan Guiding Principle 6</i> .	Consistent.
LU-9.11 Integration of Natural Features in Villages. Require the protection and integration of natural features, such as unique	The proposed project requires the protection and integration of natural features, such as unique topography or streambeds. As shown in the Preliminary Grading Plan, each proposed neighborhood would integrate with the surrounding topography and preserve significant knolls and ridgelines. Environmentally sensitive	Consistent.

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topography or streambeds, into Village projects.	development patterns are proposed below and away from major ridgelines to limit Site disturbance and visually soften development edges. In addition, the project would integrate into its various neighborhoods and retain the Site's natural features, including native habitat, rock outcroppings, ridgelines, peaks, and other unique topographic features, wetland and riparian areas, and much of the Site's natural drainages. In addition to protecting much of the Site's natural features, boulders and other natural landforms would be integrated as principal features in each Community park and at entry points into and within the project's various neighborhoods.	
LU-9.12 Achieving Planned Densities in Villages. In villages, encourage future residential development to achieve planned densities through multi-family, mixed use, and small-lot single-family projects that are compatible with the community character.	The Specific Plan establishes the project's maximum number of dwelling units, and allocates those units among the seven neighborhoods based on location and product type. The Town Center would include commercial retail space, townhomes, and a school. The Town Center would be designated Village Core Mixed Use (C-5) on the Twin Oaks Community Plan and zoned with the General Commercial/Residential (C34) Use Regulation.	Consistent.
LU-10 Function of Semi-Rural and Rural Lands. Semi-Rural and Rural Lands that buffer communities, protect natural resources, foster agriculture, and accommodate unique rural communities.	The Community Development Model shaped the project's development pattern. A 1,209-acre habitat preserve, an additional 241 acres of Fuel Modification Zone 2 and Special Management Areas, and agricultural uses would buffer the neighborhoods outside of the Village designation.	Consistent.
LU-10.1 Residential Connectivity. Require residential development in Semi-Rural areas to be integrated with existing neighborhoods by providing connected and continuous street, pathway/trail, and recreational open space networks.	The proposed project would integrate a connected and continuous network of streets, pedestrian pathways, multiuse trails, and recreational open spaces into and between the project's various neighborhoods and surrounding off-site areas. For example, a local road network, bike lanes, and pathways would link the neighborhoods located in the project's Semi-Rural zoned areas to each other and to the project's Village designated area. The project's Town Center and Valley neighborhoods would have pedestrian pathway and bicycle-friendly roadway connections out to Deer Springs Road, which provides connectivity to the community of Twin Oaks to the south.	Consistent.
LU-10.2 Development—Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.	The proposed project requires development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas. The project would avoid grading/landform alteration to nearly three quarters of the Site and protect 61% of the Site as permanent preserve. It should also be noted that an additional 212 acres of off-site open space would be preserved, for a total preserve acreage of 1,421 acres (72 percent of the project Site acreage).	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.	The project is designed in accordance with the Community Development Model. Lower density residential areas would be outside of the Village core area. Because a Village core does not exist currently in the Twin Oaks Valley area of the North County Metropolitan Subregional Plan area, the Village core is sited on the southeastern boundary of the project Site, adjacent to transportation infrastructure, to serve the larger North County Metropolitan Subregional Plan area.	Consistent.
LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.	Commercial uses are designated in the existing Village zoned area and not in the Semi-Rural or Rural zoned areas of the project Site to minimize vehicle trips and environmental impacts to those areas.	Consistent.
LU-11 Commercial, Office, and Industrial Development. Commercial, office, and industrial development that is appropriately sited and designed to enhance the unique character of each unincorporated community and to minimize vehicle trip lengths.	Commercial uses are sited closest to the I-15 and Deer Springs Road interchange to result in shorter trips on local roads.	Consistent.
LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.	The proposed project locates the commercial portion of the Town Center development with high connectivity and accessibility to the surrounding residential planning area neighborhoods proposed within the project. In particular, the Village designated land is adjacent to I-15 and Deer Springs Road, providing accessibility to the Town Center directly to the Terraces planning areas' residential neighborhoods. Multimodal connections extend from the project's Village designated area out to the other neighborhoods.	Consistent.
LU-11.2 Compatibility with Community Character. Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.	The project would require that the Town Center neighborhood be located, scaled, and designed to be compatible with the unique character of the Community. Specifically, the Town Center would be walkable, as well as visually appealing and compatible with the surrounding regional character. The Specific Plan's Commercial Development Standards and Design Guidelines state commercial buildings would offer pedestrian-level features such as awnings, large windows, and first-floor building articulations. Please see Specific Plan, Section 3.5.1, Commercial Development Standards and Design.	Consistent.
LU-11.3 Pedestrian-Oriented Commercial Centers. Encourage the development of commercial centers in compact, walkable	The project's Specific Plan would require that commercial buildings would be clustered and would incorporate plazas and pedestrian areas, avoiding "strip" commercial development. The Town Center would be walkable, and include commercial retail space, townhomes, a school site, and employment opportunities	Consistent.

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configurations in Village centers that locate parking in the rear or on the side of the parcel, use transparent storefronts with active retail street-fronting uses, minimize setbacks, and discourage "strip" commercial development. "Strip" commercial development consists of automobile-oriented commercial development with the buildings set back from the street to accommodate parking between the building and street.	for future residents and the surrounding area. Parking areas would be designed to be buffered and softened with landscaping areas, separating them from the network of streets and sidewalks supporting the project's proposed commercial area. The Specific Plan's Commercial Development Standards and Design Guidelines state commercial buildings would offer pedestrian-level features such as awnings, large windows, and first- floor building articulations. Please see Specific Plan, Section 3.5.1, Commercial Development Standards and Design Guidelines, Site Design.	
LU-11.4 Town Center Intensity and Vitality. Encourage revitalization of Town Center areas to strengthen neighborhoods, expand local employment opportunities, and establish or enhance a sense of place.	No Town Centers exist in Twin Oaks Valley or the surrounding area; rather, the area has scattered retail, general commercial, and light industrial development. The project's proposed Town Center would create a new gathering place for the Community and would include a number of amenities and uses that would foster a sense of place in the Town Center, including three separate parks (Oak Grove Park, Village Green Park, and the Joint Use Park at the school site), a school site, 81,000 square feet of neighborhood serving retail uses, and multi-family neighborhoods within and immediately adjacent to the Town Center. This mixture of uses and amenities will create a vibrant and active Town Center where residents, students, and visitors can live, work, play, and interact. The Town Center would be walkable and accommodate stops for the project's shuttle services and stations for the project's electric bike-share program to reinforce the Town Center's pedestrian, transit, and bicycle-oriented structure	Consistent.
LU-11.5 Large-Format Retail Stores. Allow large-format retail uses, typically referred to as "big box stores," only where the scale of the use and design is compatible with the surrounding areas. Large-format retail typically means retail stores with floor plans that are larger than 65,000 sq. ft.	Large-format retail stores are not proposed in the project's proposed Town Center.	Not applicable.
LU-11.6 Office Development. Locate new office development complexes within Village areas where services are available, in proximity to housing, and along primary vehicular arterials (ideally with transit access)	The Specific Plan does not allow office development within the Community.	Not applicable.

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with internal vehicular and pedestrian linkages that integrate the new development into the multi-modal transportation network where feasible.		
LU-11.7 Office Development Compatibility with Adjoining Uses. Require new office development, including office parks, to be compatible to the scale, design, site layout, and circulation patterns of adjacent existing or planned commercial and residential development.	The Specific Plan does not allow office development within the proposed Community.	Not applicable.
LU-11.8 Permitted Secondary Uses. Provide a process where secondary land uses may be permitted when appropriate and compatible with the primary commercial, office, and light industrial uses, in order to better serve the daily needs of employees and to reduce the frequency of related automobile trips. This policy is not intended for high impact industrial uses.	The Specific Plan identifies the zoning requirements for each permitted use within its various neighborhoods, including the Town Center neighborhood which supports the project's proposed neighborhood commercial uses. The project proposes to zone the Town Center Neighborhood as C-34. Accordingly, primary and secondary uses would be subject to the County's Zoning Ordinance requirements and permitted uses for the C-34 zone as well as the project's Specific Plan and Tentative Map.	Consistent.
LU-11.9 Development Density and Scale Transitions. Locate transitions of medium- intensity land uses or provide buffers between lower intensity uses, such as low-density residential districts and higher intensity development, such as commercial or industrial uses. Buffering may be accomplished through increased setbacks or other techniques such as grade differentials, walls, and/or landscaping but must be consistent with community design standards.	The proposed project locates transitions of medium intensity land uses and provides buffers between lower intensity uses. For instance, the project proposes the use of large-scale blocks of open space with moderate to steep sloping terrain between its individual neighborhoods. Further, on-site elevations range from approximately 660 feet to 1,750 feet above mean sea level. The Town Center and other medium-density neighborhoods would be sited at the lower elevations and be buffered from the low-density residential neighborhoods by preserved open space and, in limited instances, vineyards. Each neighborhood would be nestled into the natural topography of the Site, offering physical and visual separation between the project's various neighborhoods. The Town Center, the school site, and the multi-family housing would be located closer to project's two main entry roads, and single-family residential neighborhoods would be located more within the interior of the project, each separated by large blocks of open space.	Consistent.
LU-12 Infrastructure and Services Supporting Development. Adequate and sustainable	The proposed project provides adequate and sustainable infrastructure, public facilities, and essential services that meet the project's needs and are provided concurrent with growth and project development.	Consistent.

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infrastructure, public facilities, and essential services that meet community needs and are provided concurrent with growth and development.	The project would phase, construct, and extend appropriately sized infrastructure, public facilities, and essential services to the project's proposed neighborhoods commensurate with the grading and construction of those neighborhoods.	
LU-12.1 Concurrency of Infrastructure and Services with Development. Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing. In addition to utilities, roads, bicycle and pedestrian facilities, and education, police, and fire services, transit-oriented infrastructure, such as bus stops, bus benches, turnouts, etc., should be provided, where appropriate.	The proposed project requires the provision of necessary infrastructure, facilities, and services prior to Site development, either directly or through fees. The Specific Plan ensures that necessary infrastructure, public facilities, and essential services would be provided prior to development or phased to coincide with other construction. Please see Specific Plan Section 4.4, Public Facilities/Infrastructure, and General Plan Guiding Principle 9.	Consistent.
LU-12.2 Maintenance of Adequate Services. Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved LOS but do not achieve a LOS of D or better.	The proposed project requires Site development to mitigate significant impacts to existing services levels of public facilities or services for existing residents and businesses. For example, the proposed project would pay all required public facility impact fees per the County Code of Regulatory Ordinances. As related to transportation and traffic impacts, project design includes off-site roadway improvements on public roads (Deer Springs Road, Twin Oaks Valley Road, Sarver Lane, and Mesa Rock Road). The project would also participate in the County's Traffic Impact Fee program, as necessary. The participation in the County TIF Program and the project's proposed off-site roadway improvements would mitigate impacts to public facilities and Mobility Element roadways.	Consistent.
LU-12.3 Infrastructure and Services Compatibility. Provide public facilities and services that are sensitive to the environment with characteristics of the unincorporated	The proposed project provides public facilities and services that are sensitive to the environment with characteristics of the unincorporated communities. To achieve this policy, the project would take advantage of existing and planned infrastructure and services in an efficient manner, and would require less-extensive infrastructure and services than if the project were sited outside of service district boundaries.	Consistent.

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communities. Encourage the collocation of infrastructure facilities, where appropriate. Public services and facilities in Village areas are expected to differ from those in rural lands. Development standards in the Implementation Plan, Zoning Ordinance, and community-specific planning documents may reflect this 'context-sensitive' approach.		
LU-12.4 Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Element roads identified in Table M-4, an LOS D or better may not be achieved.	The proposed project's public utilities and facilities infrastructure would be compatible with Community character, and implement context sensitive road design compatible with Community character, where feasible and when allowed by the County. Where possible, the project's internal streets are designed to parallel topography and were guided by drainage patterns on the Site. All new wet and dry utility lines would be undergrounded to minimize visual impacts. The project includes an option to improve but maintain Deer Springs Road as a two-lane road (Option A) that would reduce grading impacts, thereby minimizing grading, visual, and cultural resource impacts from the road widening. The four-lane option for improving Deer Springs Road (Option B) would minimize grading, visual, and cultural resource impacts as a four-lane road. Both of these options include design exceptions to minimize grading, visual, and cultural resource impacts.	Consistent.
LU-13 Adequate Water Quality, Supply, and Protection. A balanced and regionally integrated water management approach to ensure the long-term viability of San Diego County's water quality and supply.	The project is located within the Vallecitos Water District (VWD) service area for water service. An extensive network of water mains exists within the project ranging in size from 8 to 16 inches in diameter. An existing 1.3 million gallon water reservoir within the project serves the project area. VWD would provide the project's water supply and not require annexation into the water district. The water supply would be established through the expansion/extension of existing supply pipelines and reservoirs located within and adjacent to the project.	Consistent.
	The applicant has worked closely with VWD to determine the ultimate sizes and locations of water facilities. The detailed sizing, layout, and design of the water facilities necessary to serve the project would occur as part of the construction permitting process. As project design features, the project would include extensive indoor and outdoor water conservation measures in excess of state and County requirements and require	

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	the pre-plumbing of greywater systems in its single-family residences which collectively would reduce the project's water demand substantially below the demand projection specified in the project's Water Supply and Verification (WSAV) Report approved by VWD on October 5, 2016, ensuring the long-term viability of San Diego County's water quality and supply. Please see EIR Section 3.2, Hydrology and Water Quality, and Appendix T, the GSI Water Conservation Demand Study for Newland Sierra.	
LU-13.1 Adequacy of Water Supply. Coordinate water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water supply. Ensure that new development includes both indoor and outdoor water conservation measures to reduce demand.	The water supply would be established through the expansion/extension of existing supply pipelines and reservoirs located within and adjacent to the project. The applicant has worked closely with VWD to determine the ultimate sizes and locations of water facilities. The detailed sizing, layout, and design of the water facilities necessary to serve the project would occur as part of the construction permitting process. As project design features, the project would include extensive indoor and outdoor water conservation measures in excess of state and County requirements and require the pre-plumbing of greywater systems in its single-family residences which collectively would reduce the project's water demand substantially below the demand projection specified in the project's approved WSAV Report, ensuring the long-term viability of San Diego County's water quality and supply. Please see the response to Goal/Policy/Objective COS-19.2, EIR Section 3.2, Hydrology and Water Quality, and Appendix T, the GSI Water Conservation Demand Study for Newland Sierra.	Consistent.
LU-13.2 Commitment of Water Supply. Require new development to identify adequate water resources, in accordance with State law, to support the development prior to approval.	Prior to approval, the proposed project requires the identification of adequate water resources, in accordance with state law, to support the project. VWD would provide the project's water service and approved a WSAV Report for the project on October 5, 2016, ensuring water supplies are adequate to support the project's projected water demand as outlined in the WSAV. As project design features, the project would include extensive indoor and outdoor water conservation measures and require the pre-plumbing of greywater systems in its single-family residences which collectively would reduce the project's water demand projection substantially below the demand projection specified in the project's approved WSAV. Please see EIR Section 3.2, Hydrology and Water Quality, and Appendix T, the GSI Water Conservation Demand Study for Newland Sierra.	Consistent.
LU-14 Adequate Wastewater Facilities. Adequate wastewater disposal that addresses potential hazards to human health and the environment.	The proposed project provides adequate wastewater disposal that addresses potential hazards to human health and the environment. The project's Sewer Master Plan ensures the proper sizing of wastewater facilities. The Vallecitos Water District would treat wastewater from the Site. The project applicant would work with Vallecitos Water District to ensure sufficient and appropriated sized facilities are constructed to convey and treat all sewage flows from the project concurrent with the development of the project.	Consistent.
LU-14.1 Wastewater Facility Plans. Coordinate with wastewater agencies and	The project applicant is coordinating with Vallecitos Water District staff and will abide by VWD's Conditions of Approval for the project based on the analysis presented in the project's Sewer Master Plan, which has	Consistent.

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districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and assure consistency with the County's land use plans.	been approved by VWD. VWD has also issued a Will Serve letter for sewer service, indicating the District has adequate capacity to serve the project.	
LU-14.2 Wastewater Disposal. Require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands.	The project's Sewer Master Plan was prepared by Dexter Wilson Engineering, Inc., in coordination with the Vallecitos Water District. The County of San Diego and the Vallecitos Water District would require that sewer systems are installed and made operation concurrent with the development of the project. The County further requires that extension of the sewer system occurs prior to issuance of a Certificate of Occupancy for a given residential unit or non-residential building to be connected to that sewer system.	Consistent.
LU-14.3 Wastewater Treatment Facilities. Require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. Coordinate the planning and design of such facilities with the appropriate agency to be consistent with applicable sewer master plans.	The proposed project requires wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. The applicant proposes no on-site wastewater treatment facilities. The Vallecitos Water District would treat all project wastewater. The applicant is coordinating with VWD to ensure adequate treatment capacity is available.	Consistent.
 LU-14.4 Sewer Facilities. Prohibit sewer facilities that would induce unplanned growth. Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map. Sewer systems and services shall not be extended beyond either Village boundaries or extant Urban Limit Lines, whichever is more restrictive, except: When necessary for public health, safety, or welfare; When within existing sewer district boundaries 	The project does not propose sewer facilities that would induce unplanned growth. The project would require its sewer systems to be planned, developed, and sized to serve the project's land uses, densities, and demand. The project is within the VWD sewer district boundaries and VWD has issued a Will Serve letter indicating sewer services are available to serve the entire project.	Consistent.

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 When necessary for a conservation subdivision adjacent to existing sewer facilities; or Where specifically allowed in the Community Plan. An Urban Limit Line is a growth boundary that can be used in Community Plans to define the maximum extent of urban and suburban development. An Urban Limit Line may be the basis for containment of growth inducing urban infrastructure or community-specific goals and policies. 		
LU-17 Adequate Education. Quality schools that enhance our communities and mitigate for their impacts.	A proposed school site would be sited within the Town Center to serve the Community's educational needs.	Consistent.
LU-17.1 Planning for Schools. Encourage school districts to consider the population distribution as shown on the Land Use Map when planning for new school facilities.	The project Site is located in the Escondido Elementary School District, Escondido Union High School District, and San Marcos Unified School District boundaries. The school districts take the lead on planning new school facilities.	Consistent.
LU-17.2 Compatibility of Schools with Adjoining Uses. Encourage school districts to minimize conflicts between schools and adjacent land uses through appropriate siting and adequate mitigation, addressing such issues as student drop-off/pick up locations, parking access, and security.	The proposed school site would be sited at the north end of the Town Center with two access points and be buffered from the commercial area by medium-density residential and parkland. The school site would located along the project's backbone road and include its own internal circulation that would address student drop-off/pick-up locations, parking requirements, and security. Actual Site planning of the school facility would occur once an agreement is reached with school officials. The school district would be responsible for the processing of Site planning approvals, building permits, and other construction approvals.	Consistent.
LU-17.3 Priority School Locations. Encourage school districts to locate schools within Village or Rural Village areas wherever possible and site and design them in a manner that provides the maximum opportunity for students to walk or bicycle to	The proposed school would be sited in the project's Town Center neighborhood and be linked to the other development areas by bicycle lanes and pedestrian pathways.	Consistent.

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school.		
LU-17.4 Avoidance of Hazards. Assist school districts with locating school facilities away from fault zones, flood or dam inundation zones, and hazardous materials storage areas in conformance with State statutes.	The proposed school would be sited in the project's Town Center neighborhood in the southeastern corner of the project Site to avoid potential natural and human-caused hazards to the extent feasible. The school is part of the proposed project and, therefore, is included in the geologic, hazard, and hydrology assessments. Detailed geotechnical analysis, flood zone mapping and analysis, and a Phase 1 Environmental Assessment have been prepared for the project. No known fault zones, flood or dam inundation zones, or hazardous materials storage areas exist or are known to have historically existed on or within the vicinity of the project's proposed school site.	Consistent.
LU-18 Adequate Civic Uses. Civic uses that enhance community centers and places.	See project conformance analysis above for Guiding Principle 3.	Consistent.
	Mobility Element	
M-1 Balanced Road Network. A safe and efficient road network that balances regional travel needs with the travel requirements and preferences of local communities.	The proposed project's off-site circulation plan provides access to the Community from Deer Springs Road, a Mobility Element Road, which connects to Mountain Meadow Road on the east and Twin Oaks Valley Road to the south. Primary Community access is at two points off Deer Springs Road, Mesa Rock Road on the east and Sarver Lane on the west. The Community will dedicate and construct one of the two scenarios for Deer Springs Road: Option A or Option B as shown on the project's tentative map. The Community also proposes to dedicate and install a Community Trails segment along the north side of Deer Springs Road from Mesa Rock Road to the city of San Marcos limits. This public trail will be built as a Type D – Pathway (Typical).	Consistent.
	The proposed project's on-site mobility network plays an important role in the functional aspects and visual character of the Community (see Figure 14, Road Sections Key Map, of the Specific Plan). Street character is intended to be semirural in nature, reflecting the greater community, while addressing fire and traffic safety. This design must minimize road widths where possible, incorporating stormwater features, and respond to existing Site topography. The Specific Plan provides the following standards and guidelines for road design and layout:	
	 Road design must accommodate a range of mobility options, including vehicular, bicycle, equestrian, and pedestrian options and reduce pavement widths to the minimum allowed. Road sections are to be designed with cross slopes to drain into basins and swales that act as neighborhood landscape design features where possible. 	

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	 Streetscapes throughout the Community are to be designed using consistent elements such as landscaping, street furniture, lighting, and signage to create a unified aesthetic— these elements should be appropriately scaled according to the street hierarchy. Enhanced paving details are to be used at significant intersections and important pedestrian crossings such as stamped concrete or unit pavers. 	
M-1.1 Prioritized Travel within Community Planning Areas. Provide a public road network that accommodates travel between and within community planning areas rather than accommodating overflow traffic from State highways and freeways that are unable to meet regional travel demands.	The proposed project provides a public road network that accommodates travel between and within community planning areas rather than accommodating overflow traffic from state highways and freeways that are unable to meet regional travel demands. Specifically, the project proposes a network of roads, pedestrian trails, and bicycle pathways to link the project's seven neighborhoods and provide alternatives to single vehicle trips. The project also proposes off-site improvements to Deer Springs Road and Twin Oaks Valley Road (that portion within the City of San Marcos). The project proposes two options for Board of Supervisors' consideration for the improvements to Deer Springs Road between Sarver Lane and Mesa Rock. Option A would widen and upgrade Deer Springs Road to a two-lane Community Collector Road. Option B would widen and improve the capacity of Deer Springs Road, both Options include bike lanes and a 10-foot-wide multi-use pathway along the road to accommodate alternative modes of transportation not accommodated today along the road, including bicyclists, walkers, joggers, and horseback riding, and both Options have been designed to substantially follow the existing alignment of the road to minimize impacts to biology, the existing natural terrain surrounding the road, and existing residences and properties along the road. Under both of these options, the other portions of Deer Springs Road would be widened and improved consistent with the County's four-lane Major Road standard and include the same bicycle and multi-use pathway improvements connecting all the way into the City of San Marcos.	Consistent.
M-1.2. Interconnected Road Network. Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.	The proposed project provides an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies. For example, the project would have two primary access roads along Deer Springs Road at Mesa Rock Road and Sarver Lane, with an additional access point at Camino Mayor off Twin Oaks Valley Road to the north. The primary access road at Mesa Rock Road would be a four-lane entry road with a median that transitions into a four-lane undivided road, then a two-lane undivided road farther into the project Site, and then to a three-lane road. On-site roadways would be constructed within and between the different planning	Consistent.

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	areas where development would occur. Primarily, these roadways would consist of main roads with a pavement width of 34 feet that travel between the planning areas, residential streets approximately 32 to 40 feet wide that traverse within a planning area, and private paseo roads that typically end at smaller clusters of residential units within a planning area. The roadways would accommodate safe emergency services access. A planned electric bike-share program would link the neighborhoods to each other and would reduce motorized vehicle trips. Additionally, the project would include bike lanes, an extensive trail system consisting of roadside pathways within the linear greenbelts, and multi-use trails. Incorporating the internal circulation features would provide project residents the opportunity to access employment, education, and recreational and commercial uses via multiple modes of transportation. Refer to Figures 14 through 30 and 28 and 83 of the Specific Plan.	
M-1.3 Treatment of High-Volume Roadways. Consider narrower rights-of-way, flexibility in design standards, and lower design speeds in areas planned for substantial development in order to avoid bisecting communities or town centers. Reduce noise, air, and visual impacts of new freeways, regional arterials, and Mobility Element roads, through landscaping, design, and/or careful location of facilities.	The project's street network would embrace the rural character of the surrounding area. Street widths would be narrow and bike lanes would be integral to the street network. Appropriately sized rights-of-way would be provided to incorporate landscaped setbacks and pedestrian pathways that reinforce the rural identity of the Community.	Consistent.
M-2 Responding to Physical Constraints and Preservation Goals. A road network that provides adequate capacity to reasonably accommodate both planned land uses and regional traffic patterns, while supporting other General Plan goals such as providing environmental protections and enhancing community character.	The proposed project would include off-site roadway improvements to accommodate anticipated project- related growth. Such improvements would occur to Deer Springs Road, Twin Oaks Valley Road, Sarver Lane, and Camino Mayor. Option B for Deer Springs Road would improve Deer Springs Road to four lanes and fully mitigate the project's direct traffic impacts and provide capacity to better accommodate existing and future regional traffic. The project would also contribute the County's Transportation Impact Fee Program to mitigate cumulative impacts to the County's roadway network. Appropriately sized rights-of-way would be provided to incorporate landscaped setbacks and pedestrian pathways that reinforce the rural identity of the Community.	Consistent.
M-2.1 Level of Service Criteria. Require development projects to provide associated road improvements necessary to achieve a level of service of "D" or higher on all Mobility	The proposed project requires associated road improvements necessary to achieve a level of service of "D" or higher on all roadways except for those where a failing level of service has been accepted by the County. However, the proposed project requires feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program.	Consistent.

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Element roads except for those where a failing level of service has been accepted by the County pursuant to the criteria specifically identified in the accompanying text box (Criteria for Accepting a Road Classification with Level of Service E/F). When development is proposed on roads where a failing level of service has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network. Refer to the Background Material section (Road Segments Where Adding Travel Lanes is Not Justified) at the end of this chapter for list of road segments accepted to operate at LOS E/F.	To demonstrate consistency with this goal, project-related traffic modeling indicates that the levels of service (LOS) for Deer Springs Road would be acceptable save for the center two-lane segment, following construction of the east and west legs of Deer Springs Road to four lanes and keeping the center leg between Mesa Rock Road and Sarver Lane as a 2.1B Community Collector with Continuous Turn Lane (Option A). The center two-lane segment would remain at its current failing level of service during peak hours, as it is today. However, a reduction in cut-through trips may occur since traffic on I-15 may be discouraged from using Deer Springs Road. Option A reduces environmental impacts (biological resources, cultural resources, aesthetics) and preserves of the rural character of this segment. Option A would require a Mobility Element reclassification of Deer Springs Road. This approach is consistent with General Plan Goal M-2 (and, more specifically, Policy M-2.1), which addresses roadways where adding capacity can induce additional traffic and growth.	
M-2.2 Access to Mobility Element Designated Roads. Minimize direct access points to Mobility Element roads from driveways and other non-through roads to maintain the capacity and improve traffic operations.	The project does not propose new access points along Deer Springs Road. The Mesa Rock Road intersection at Deer Springs Road would be signalized and would be 102 feet wide north of the intersection in the project Site providing two northbound lanes and five southbound lanes that transition to 58 feet wide and then to 34 feet wide within the project Site. No parking would remain along Mesa Rock Road. The Sarver Lane intersection at Deer Springs Road would be signalized and would be 52 feet wide at the intersection to provide one northbound lane and two southbound lanes that transition to 38 feet wide, and then to 32 feet wide within the project Site. No parking would remain along Sarver Lane. All of Sarver Lane would include an enhanced parkway with a linear greenbelt and multi-use trail. The Camino Mayor intersection at Twin Oaks Valley Road would not be signalized and would be 28 feet wide at the intersection to provide one travel lane in each direction.	Consistent.
M-2.3 Environmentally Sensitive Road Design. Locate and design public and private roads to minimize impacts to significant biological and other environmental and visual resources. Avoid road alignments through	The proposed project locates and designs public and private roads to minimize impacts to significant biological and other environmental and visual resources. The project also would avoid road alignments through floodplains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. The project also would design new roads to maintain wildlife movement, and would utilize fencing to reduce road kill and direct animals under crossings.	Consistent.

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floodplains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. Design new roads to maintain wildlife movement and retrofit existing roads for that purpose. Utilize fencing to reduce road kill and to direct animals to under crossings.	For example, the internal backbone roads would minimize impacts to grading, environmental resources, and visual resources by following the existing natural topography, thereby minimizes the need for large cut and fill slopes. Options A and B for Deer Springs Road are sensitive to environmental and Community character issues. Project development and roadways would promote land stewardship and avoid the most sensitive biological, cultural, and topographical resources. The proposed project would consist of a series of neighborhoods that integrate the Site's landscape character and distinct landforms to ensure each neighborhood individually responds to its topographical setting.	
	Further, the project's open space area contains a diversity of environmental characteristics including representative populations of special-status plant and animal species observed on Site; existing dirt trails and canyon bottoms currently used by wildlife for movement across the Site; and the north–south-trending tributary to Gopher Canyon along Twin Oaks Valley Road, which provides linkage opportunities to the San Marcos Mountains. As a result, the majority of the project's proposed open space design will be located within the northern half of the project Site. The northern half of the Site has the greatest potential to support wildlife movement due to the east–west connection with the San Marcos Mountains. In addition, the northern half of the project Site is positioned to take maximum advantage of interconnected blocks of habitat. The northern portion of the proposed open space design provides a diverse representation of the natural and environmental conditions that occur within the larger project area. Open space will also be designated along the eastern boundary of the project Site adjacent to I-15, which serves as important habitat for California gnatcatcher and many other wildlife species, as well as internal to the project Site which would enhance connectivity to the south.	
M-2.4 Roadway Noise Buffers. Incorporate buffers or other noise reduction measures consistent with standards established in the Noise Element into the siting and design of roads located next to sensitive noise-receptors to minimize adverse impacts from traffic noise. Consider reduction measures such as alternative road design, reduced speeds, alternative paving, and setbacks or buffers, prior to berms and walls. Sensitive noise-receptors	The proposed project incorporates buffers or other noise reduction measures consistent with the General Plan Noise Element into the siting and design of roads located next to sensitive noise-receptors to minimize adverse impacts from traffic noise. To that end, the project's Traffic Impact Analysis and Acoustical Analysis Report ensures that cumulative traffic noise is minimized to the extent feasible (EIR Sections 2.10 – Noise and 2.13, Transportation and Traffic, and Appendices Q and R). Several available methods exist to attenuate traffic noise, including noise barriers, road surface improvements, regulatory measures (such as lower speed limits), and traffic-calming devices (such as speed bumps); but these potential mitigation measures may be beyond the proposed project's authority because the project cannot mandate measures on off-site private property in perpetuity (i.e., such as constructing barriers on private property where the issues of liability and maintenance in perpetuity become a concern). Further, assuming noise barriers could	Consistent.

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are described in the Noise Element.	be constructed within the County right-of-way, noise barriers at existing land uses must be broken for access points, such as pathways and driveways, creating short lengths with many openings, or they must be limited in height for safety reasons when close to a travel way. Local residents may object to some measures, such as noise barriers; and some measures may not be effective because driveways and other access points would limit continuity of the sound barrier. Moreover, although measures such as reduced speed limits and traffic-calming devices are within the County's control, such measures may result in unacceptable traffic impacts. Therefore, mitigation to reduce off-site direct noise impacts resulting from the proposed project is infeasible, and impacts would be significant and unavoidable, but overridden due to the project's significant public benefits.	
M-2.5 Minimize Excess Water Runoff. Require road improvements to be designed and constructed to accommodate stormwater in a manner that minimizes demands upon engineered stormwater systems and to maximize the use of natural detention and infiltration techniques to mitigate environmental impacts.	The project requires the design and construction of both on- and off-Site road improvements to minimize demands on engineered stormwater systems and maximize natural detention and infiltration techniques to mitigate environmental impacts. The project would incorporate a variety of structural, Site design, and source-control stormwater Best Management Practices (BMPs) to address the stormwater quality and hydromodification requirements as defined in the applicable San Diego RWQCB requirements for stormwater runoff, discharges, and pollutants as contained in the National Pollution Discharge Elimination System (NPDES) Permit for Municipal Separate Storm Sewer Systems (MS4s), Order Numbers R9-2015-0001 and R9-2015-0100, as well as in compliance with the County of San Diego Hydrology Manual. The project's BMPs include a system of bioretention swales and bioretention basins along with additional "low impact development" project design features such as landscaped roadside swales in extended parkways . These features provide high quality stormwater treatment and mitigate flows to pre-development levels for storm events that could contribute to hydromodification of receiving channels. Stormwater detention of runoff exiting the Site would eliminate potential flooding impacts during peak storm events. Drainage improvements would also be constructed for the off-site road improvements. Please see the response to Goal/Policy/Objective COS-4.3 Refer also to the Preliminary Drainage Study (Appendix Z) and the Stormwater Quality Management Plan (Appendix Y) to this EIR.	Consistent.
M-3 Transportation Facility Development. New or expanded transportation facilities that are phased with and equitably funded by the development that necessitates their construction.	The proposed project would phase new or expanded transportation facilities, and would equitably fund those facilities commensurate with the project's impacts to existing and planned facilities. Specifically, the Traffic Impact Analysis recommends mitigation measures and off-Site road improvements that would be implemented based on impacts to both road segments and intersections. For example, the project proposes improvements to Deer Springs Road and Twin Oaks Valley Road (that portion within the City of San Marcos). The project proposes two options for Board of Supervisors' consideration for the improvements to Deer Springs Road between Sarver Lane and Mesa Rock. Option A would widen and upgrade Deer Springs	Consistent.

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	Road to a two-lane Community Collector Road. Option B would widen and improve this same segment of Deer Springs Road to a four-lane Major Road. Both of these Options would improve the capacity of Deer Springs Road, both Options include bike lanes and a 10-foot-wide multi-use pathway along the road to accommodate alternative modes of transportation not accommodated today along the road, including bicyclists, walkers, joggers, and horseback riding, and both Options have been designed to substantially follow the existing alignment of the road to minimize impacts to biology, the existing natural terrain surrounding the road, and existing residences and properties along the road. Under both of these options, the other portions of Deer Springs Road would be widened and improved consistent with the County's four-lane Major Road standard and include the same bicycle and multi-use pathway improvements connecting all the way into the City of San Marcos.	
M-3.1 Public Road Rights-of-Way. Require development to dedicate right-of-way for public roads and other transportation routes identified in the Mobility Element roadway network (see Mobility Element Network Appendix), Community Plans, or Road Master Plans. Require the provision of sufficient right-of-way width, as specified in the County Public Road Standards and Community Trails Master Plan, to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians.	Consistent with the County's Public Road Standards and Board Policy J-36, the project would dedicate sufficient right-of-way for new or improved public roads and other transportation routes internal to the project Site. The project would facilitate dedication of sufficient right-of-way on off-Site properties for public roads and other transportation routes identified in the General Plan's Mobility Element roadway network to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians. For example, the project would either dedicate or initiate the acquisition of sufficient right-of-way for Deer Springs Road so that it can be improved with Class II bicycle lanes on both sides of the road and a 10-foot-wide pathway. Internal to the project Site, the project's public roads would incorporate bicycle lanes and pedestrian pathways along its loop road as well as multi-purpose trails connecting its individual neighborhoods and equestrian and hiking trails into its open space preserve areas. The applicant has discussed future transit facilities with Caltrans, SANDAG, and NCTD as part of a potential future expansion of or improvements to the existing park-and-ride facility located I-15/Deer Springs Road Interchange and will continue to pursue this planning effort with NCTD and Caltrans to accommodate a transit stop and related facilities in the park-and-ride if and when NCTD determines that such facilities are warranted.	Consistent.
M-3.2 Traffic Impact Mitigation. Require development to contribute its fair share toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, pedestrian	The proposed project requires construction of transportation facilities (e.g., physical road and intersection improvements to Deer Springs Road and Twin Oaks Valley Road) to mitigate direct impacts and requires fair share contributions (e.g., payment of County TIF and RTCIP Fees) toward financing transportation facilities to mitigate cumulative impacts. Consistent with this policy, the Traffic Impact Analysis identified significant direct and cumulative traffic impacts, and incorporated mitigation to reduce those impacts. Mitigation includes physical widening, fair-share contributions, and traffic impact fee contributions. Please refer to EIR Section 2.13, Transportation and Traffic, and the Traffic Impact Analysis (Appendix R).	Consistent.

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and bicycle facilities, and equestrian.		
M-3.3 Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with State law and local regulations.	The project has been designed to include multiple ingress/egress routes into, out of, and through the project Site conforming to state law and County regulations. Specifically, the project would provide three fully improved access points (Mesa Rock Road, Sarver Lane, and Camino Mayor) that would meet state and local regulations, including the California Fire Code, the County's Consolidated Fire Code, and the County's Public Road Standards for fire apparatus access roads, second access, and dead-end road lengths. The project's internal road network would also comply with these same applicable state and local regulations.	Consistent.
M-4 Safe and Compatible Roads. Roads designed to be safe for all users and compatible with their context.	The proposed project has been designed to include safe roads for all users and compatible with their context designed in compliance with the County's Public Road Standards. For example, the project proposes an internal network of bicycle and pedestrian friendly streets, sidewalks separated from the streets by parkways, and pedestrian pathways linking the project's various neighborhoods and parks to each other. The project includes private streets, including a portion of Camino Mayor, which have been designed in compliance with the County's Private Street Standards.	Consistent.
M-4.1 Walkable Village Roads. Encourage multi-modal roads in Villages and compact residential areas with pedestrian-oriented development patterns that enhance pedestrian safety and walkability, along with other non-motorized modes of travel, such as designing narrower but slower speed roads that increase pedestrian safety.	Each neighborhood includes an enhanced parkway that would include landscaping, a trail, and often a decorative "dry creek" drainage swale to further enhance the Site's rural character. These greenbelts would include a multi-use pathway for equestrian uses and provide connectivity through the project Site between the equestrian facility at Walnut Grove Park, located in the City of San Marcos, and an equestrian staging area that is proposed on Camino Mayor. Internally within neighborhoods, open space greenbelts would include a loop trail and be wider in some areas to accommodate integrated water quality basins. These basins would provide a buffer between homes and streets, and reinforce the uniqueness of each neighborhood. A designated park or open space area would be situated within 0.25 mile of each residence, recognizing the importance of walkable access to open space for Community health and well-being. An electric bike-share program would be included to further link the neighborhoods; and multi-purpose and secondary trails through the open space area. The project's network of pathways and dedicated bike lanes connects to the multi-use pathway and Class II bike lanes along Deer Springs Road and Twin Oaks Valley Road, providing multi-modal connectivity into the community of Twin Oaks and all the way into the City of San Marcos.	Consistent.
M-4.2 Interconnected Local Roads. Provide an interconnected and appropriately scaled local public road network in Village and Rural	The proposed project provides an interconnected and appropriately scaled local public road network that reinforces the project's environmentally sensitive development pattern. For example, two primary access roads and one secondary access road would serve the Community, and backbone roads would connect the	Consistent.

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Villages that reinforces the compact development patterns promoted by the Land Use Element and individual community plans.	Community's individual neighborhoods. In addition, each neighborhood would have an interconnected street system that would provide different routes in and out of the neighborhood and different modes of travel within the neighborhood. The project would include a Community-sponsored electric bike-share program supported with marked bicycle lanes along its backbone roads and bicycle friendly neighborhood streets. Additionally, the project would include multi-purpose trails and pedestrian pathways connecting through and between the project's individual neighborhoods.	
M-4.3 Rural Roads Compatible with Rural Character. Design and construct public roads to meet travel demands in Semi-Rural and Rural Lands that are consistent with rural character while safely accommodating transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Where feasible, utilize rural road design features (e.g., no curb and gutter improvements) to maintain community character. [See applicable community plan for possible relevant policies.]	The proposed project has been designed and would construct public roads to meet travel demands in Semi- Rural and Rural land uses that are consistent with rural character while safely accommodating transit stops, bicyclists, pedestrians, and equestrians. For example, all internal roadways, bicycle lanes, trails, and other portions of the proposed project's internal circulation network, as described in Section 1.2.1.2 of the EIR, comply with the County Department of Public Work's <i>Design Standards</i> (County of San Diego 2012) to ensure adequate safety of travel and use by motorists, cyclists, and pedestrians. Also, the project includes a number of design exception requests for on-Site road standards that provide safety and sufficient capacity while maintaining the semi-rural character of the area. A discussion of the project's consistency with the North County Metropolitan Community Plan is provided below; however, the North County Metropolitan Community Plan does not call out any special road considerations for any project roadways.	Consistent.
M-4.4 Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.	The proposed project has been designed and would construct public and private roads to allow necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. The project includes turn-out bays for emergency vehicle parking, and interior street connections to provide appropriate access for emergency vehicles and evacuating residents. The County and DSFPD have both approved the FPP. In addition to the project's overall FPP, an additional FPP was prepared for the Sierra Farms park site due to its location within the service area of the San Marcos Fire Department, which was approved on June 7, 2016.	Consistent.
M-4.5 Context Sensitive Road Design. Design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. Provide wildlife crossings in road design and construction where it would minimize impacts in wildlife corridors.	The proposed project would design and construct roads compatible with the local terrain and the uses, scale, and pattern of the surrounding development. The project's road network has been designed around the natural topography of the Site, minimizing grading impacts and impacts to native habitat and wildlife corridors. Impacts to habitat connectivity for larger wildlife species are mitigated by measures which provide for habitat management and conservation of open space areas and allow for unimpeded wildlife movement and use. The open space design consists of two large continuous blocks of key biological resources situated within the northern half, along the eastern boundary of the project Site, and open space in the	Consistent.

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	center of the development which connects the above-mentioned blocks of open space to regional open space located east and south of the project Site. There is adequate habitat available for wildlife to utilize on Site, or to move to available habitat areas outside of the project Site; thus, such crossings are not required to minimize impacts to wildlife corridors.	
M-4.6 Interjurisdictional Coordination. Coordinate with adjacent jurisdictions so that roads within Spheres of Influence (SOIs) or that cross jurisdictional boundaries are designed to provide a consistent cross- section and capacity. To the extent practical, coordinate with adjacent jurisdictions to construct road improvements concurrently or sequentially to optimize and maintain road capacity.	The applicant has coordinated with the City of San Marcos on Twin Oaks Valley Road and Deer Springs Road improvements to minimize inconsistencies between the County and San Marcos regarding each jurisdiction's Public Road Standards for these roads. For example, the project would maintain travel lanes, bicycle lanes, and a pedestrian pathway along Deer Springs Road as the road crosses over into the City of San Marcos and becomes Twin Oaks Valley Road.	Consistent.
M-5 Safe and Efficient Multi-Modal Transportation System. A multi-modal transportation system that provides for the safe, accessible, convenient, and efficient movement of people and goods within the unincorporated County.	The project would be conditioned to implement a Transportation Demand Management (TDM) program that would provide for the safe, accessible, convenient, and efficient movement of people and goods within the unincorporated County. The project's proposed off-site improvements to Deer Springs Road and Twin Oaks Valley Road would include dedicated Class II bike lanes on both sides of the road and a ten-foot-wide multi-use pathway connecting from the project's Town Center and Valley Neighborhoods all the way into the Community of Twin Oaks and the City of San Marcos.	Consistent.
 M-5.1 Regional Coordination. Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following: Sufficient capacity consistent with the County General Plan Land Use Map Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing vehicle miles traveled Facilities sited and designed to be compatible with the differing scales, 	 The applicant continues to coordinate with the County of San Diego, the City of San Marcos, the San Diego Association of Governments (SANDAG), California Department of Transportation (Caltrans), and North County Transit District (NCTD) in planning transportation facilities serving the project. The project's internal transportation system and off-Site transportation improvements are sized and designed to: accommodate existing and future traffic volumes, including project generated traffic; include a Transportation Demand Management program that would provide multi-modal travel choices and alternatives to single-occupancy vehicle trips; be compatible with the project's and the surrounding community's differing scales, intensities, and characteristics by incorporating landscaped medians, extended parkways, pedestrian pathways, and roadside swales that weave the on-Site and off-Site roadway improvements into the natural terrain to fit with the character of the surrounding area; and maximize efficiency of connectivity between different modes of travel, for example, by including a 	Consistent.

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 intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands Maximized efficiency to enhance connectivity between different modes of travel 	Community-sponsored electric bicycle program with stations throughout the Community, and identifying a location for a potential future transit stop and park and ride facility in the project's Town Center neighborhood.	
M-5.2 Impact Mitigation for New Roadways and Improvements. Coordinate with Caltrans to mitigate negative impacts from existing, expanded, or new State freeways or highways and to reduce impacts of road improvements and/or design modifications to State facilities on adjacent communities.	The project continues to coordinate with Caltrans to mitigate impacts from existing, expanded, or new state freeways or highways and to reduce impacts of road improvements and/or design modifications to state facilities on adjacent communities. For example, the project proposes improvements to the I-15/Deer Springs Road interchange and has initiated a three-phase approval process with Caltrans. The project applicant is currently in the first phase of that process, the Project Initiation Document (PID) process which requires the preparation of a Project Study Report/Project Development Support (PSR/PDS) document for the new interchange. During this process, Caltrans would examine alternative configurations for the interchange as well as not improving the existing interchange (the "No Build Alternative"). The draft interchange alternatives consist of a diamond interchange, roundabouts on Deer Springs Road at the two I-15 ramp intersections and the two frontage roads, and a diverging diamond interchange configuration. Consistent with this policy, the interchange design alternatives are examining the potential to improve the functionality of the adjoining the road network (e.g., Deer Springs Road, Mesa Rock Road, and N. Centre City Parkway).	Consistent.
M-8 Public Transit System. A public transit system that reduces automobile dependence and serves all segments of the population.	The proposed project's Town Center would accommodate future transit use and the project would include shuttle services to North County Transit Centers. Additionally, the project would include bike lanes, an electric bike share program, an extensive trail system consisting of roadside pathways within the linear greenbelts, and multi-use trails to reduce automobile dependence. With incorporation of these internal circulation features, the project would provide residents the opportunity to access employment, education, recreational areas, and commercial uses via multiple modes of transportation.	Consistent.

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 M-8.1 Maximize Transit Service Opportunities. Coordinate with SANDAG, the CTSA [Consolidated Transportation Service Agency], NCTD, and MTS [Metropolitan Transit System] to provide capital facilities and funding, where appropriate, to: Maximize opportunities for transit services in unincorporated communities Maximize the speed and efficiency of transit service through the development of transit signal priority, transit queue jump lanes, and dedicated transit only lanes Provide for transit-dependent segments of the population, such as the disabled, seniors, low income, and children, where possible Reserve adequate rights-of-way to accommodate existing and planned transit facilities including bus stops 	This policy does not apply to a specific project, but memorializes the County's intent to coordinate with transit/transportation agencies. The applicant had discussions with NCTD to adjust the routes to add stops at the Community to serve residents. The applicant would continue to plan for this adjustment option as design alternatives for I-15 proceed.	Not applicable.
M-8.2 Transit Service to Key Community Facilities and Services. Locate key County facilities, healthcare services, educational institutions, and other civic facilities so that they are accessible by transit in areas where transit is available. Require those facilities to be designed so that they are easily accessible by transit, whenever possible.	The policy addresses the location of key County community facilities and services. Aside from the school site, such facilities are not proposed as part of the project. Nonetheless, the Town Center would be located adjacent to the existing Caltrans park-and-ride lot and includes the school site. In addition to the school site, commercial, residential, and park uses would be located in the Town Center, and accessible by shuttle services, pedestrian pathways, and bicycle routes. The project would also provide space within the Town Center to support a potential future transit stop should NCTD decide to extend either BREEZE or FLEX service to project Site, and the project's shuttle service would include service to the Escondido Transit Center, a north county transit hub with access to the Sprinter, BREEZE bus service, FLEX shuttle service, and other public transportation options for the project's residents to access County facilities, healthcare services, and civic facilities.	Not applicable.
M-8.3 Transit Stops That Facilitate Ridership. Coordinate with SANDAG, NCTD, and MTS	The project applicant is coordinating with Caltrans SANDAG, and NCTD on potential future expanded or improved park-and-ride facilities at the I-15/Deer Springs Road Interchange. Presently, there are two park-	Consistent.

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to locate transit stops and facilities in areas that facilitate transit ridership, and designate such locations as part of planning efforts for Town Centers, transit nodes, and large-scale commercial or residential development projects. Ensure that the planning of Town Centers and Village Cores incorporates uses that support the use of transit, including multi- family residential and mixed-use transit– oriented development, when appropriate.	and-ride lots at the Interchange, one on the west side and one on the east side of the freeway. The project applicant has met with Caltrans, SANDAG, and NCTD about whether Caltrans plans to improve or expand the park-and-ride lots, either as stand-alone projects or as part of the process of improving the Interchange. The project applicant supports and will advocate for the incorporation of alternative transportation modes such as electric vehicle charging stations, bicycle facilities, storage lockers for travelers, accommodations for ride-share and car-share services, and a possible future transit stop as part of any project to expand or improve the park-and-ride facilities at the Interchange. The Town Center would also include land uses that place jobs, shopping, recreation, and schooling within walking distance of each other, including multi-family residential, commercial, educational, and park uses connected to the balance of the project by shuttle service, pedestrian pathways, and bicycle routes. The Town Center includes a location to accommodate a potential future NCTD transit stop to accommodate either BREEZE or FLEX service to the project. The project includes a Transportation Demand Management (TDM) Program that will reduce single occupancy vehicle trips by replacing these trips with mobility alternatives, including shuttle services within the project and to the Escondido Transit Center, an electric- bicycle share program, ride-share and car-share programs, and subsidized transit passes for its residents.	
M-8.4 Transit Amenities. Require transit stops that are accessible to pedestrians and bicyclists; and provide amenities for these users' convenience.	Please see response to Goal/Policy/Objective M-8.3, above. A future transit stop planned as part of the expanded park and ride facility would be accessible to pedestrians and bicyclists and provide amenities for these users' convenience, such as bicycle racks and storage lockers. The joint involvement of NCTD and Caltrans in the planning and design of such a transit stop would address the need for these amenities and other applicable design issues.	Consistent.
M-8.5 Improved Transit Facilities. Require development projects, when appropriate, to improve existing nearby transit and/or park and ride facilities, including the provision of bicycle and pedestrian facilities, provisions for bus transit in coordination with NCTD and MTS as appropriate including, but not limited to, shelters, benches, boarding pads, and/or trash cans, and to provide safe, convenient, and attractive pedestrian connections.	Please see response to Goal/Policy/Objective M-8, and M-8.1 through M-8.4, above.	Consistent.

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M-8.6 Park and Ride Facilities. Coordinate with SANDAG, Caltrans, and tribal governments to study transit connectivity and address improving regional opportunities for park-and-ride facilities and transit service to gaming facilities and surrounding rural areas to reduce congestion on rural roads.	This policy is not subject to project-specific application, but memorializes the County's intent to coordinate with other jurisdictions concerning transit service and facilities to reduce congestion on rural roads. Nevertheless, the project applicant would continue to coordinate with Caltrans, SANDAG, and NCTD on a potential expansion of or improvements to the existing park-and-ride at the I-15/Deer Springs Road Interchange. Please see the response to Goal/Policy/Objective M-8.3 above.	Not applicable.
M-8.7 Inter-Regional Travel Modes. Coordinate with SANDAG, Caltrans, and the California High-Speed Rail Authority, where appropriate, to identify alternative methods for inter-regional travel to serve the unincorporated County residents.	The policy does not apply to specific project, but memorializes the County's intent to coordinate with other jurisdictions on interregional travel. Please see the responses to Goal/Policy/Objective M-8.3 and M-8.6 above.	Not applicable.
M-8.8 Shuttles. Coordinate with Tribal governments, the Reservation Transportation Authority, and other large employers to provide shuttles and other means of connecting transit stops with job locations, civic, and commercial uses, where appropriate.	Please see response to Goal/Policy/Objective M-8.7.	Not applicable.
M-9 Effective Use of Existing Transportation Network. Reduce the need to widen or build roads through effective use of the existing transportation network and maximizing the use of alternative modes of travel throughout the County.	The project would reduce the need to widen or build new roads through effective use of the existing transportation network and maximizes the use of alternative modes of travel. The project's internal circulation plan would include a linked road network, bicycles lanes, pedestrian pathways, and multi-use trails in conjunction with a Transportation Demand Management (TDM) Program that will reduce single occupancy vehicle trips by replacing these trips with mobility alternatives, including shuttle services, an electric-bicycle share program, ride-share and car-share programs, and subsidized transit passes for its residents. Off-Site, the project proposes road improvements to Deer Springs Road and Twin Oaks Valley Road that would incorporate dedicated bike lanes in both directions and a separate multi-use pathway for walking, jogging, and equestrian uses all the way into the City of San Marcos. The off-Site road improvements would be sized and designed to safely accommodate existing and project buildout traffic volumes and would fall substantially within the existing footprint of these roads.	Consistent.

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M-9.1 Transportation Systems Management. Explore the provision of operational improvements (i.e. adding turn lanes, acceleration lanes, intersection improvements, etc.) that increase the effective vehicular capacity of the public road network prior to increasing the number of road lanes. Ensure operational improvements do not adversely impact the transit, bicycle, and pedestrian networks.	Please see the response to Policy LU-2.9. The project proposes operational and physical improvements to increase vehicular capacity at a number of intersections within the surrounding roadway network. For example, the project would make operational improvements to the Buena Creek Road/Monte Vista Drive and Buena Creek Road/South Santa Fe Avenue intersections to improve traffic circulation through those two intersections. The project also proposes improvements to Deer Springs Road and Twin Oaks Valley Road (that portion within the City of San Marcos). The project proposes two options for Board of Supervisors' consideration for the improvements to Deer Springs Road between Sarver Lane and Mesa Rock Road. Option A would widen and upgrade Deer Springs Road to a two-lane Community Collector Road. Option B would widen and improve the capacity of Deer Springs Road, both Options include bike lanes and a 10-foot-wide multi-use pathway along the road, including bicyclists, walkers, joggers, and horseback riding, and both Options have been designed to substantially follow the existing alignment of the road to minimize impacts to biology, the existing natural terrain surrounding the road, and existing residences and properties along the road. Under both of these options, the other portions of Deer Springs Road standard and include the same bicycle and multi-use pathway improvements connecting all the way into the City of San Marcos. The EIR analyzes impacts associated with operational improvements to ensure that adverse impacts to transit, bicycle, and pedestrian ways do not occur.	Consistent.
M-9.2 Transportation Demand Management. Require large commercial and office development to use TDM programs to reduce single-occupant vehicle traffic generation, particularly during peak periods to maximize the capacity of existing or improved road facilities.	The project would implement a TDM program, including an electric bike share program, ride-share and car- share programs, shuttle services within the project and to the Escondido Transit Center, subsidized transit passes for residents, and mobility hubs as a means of resident outreach and education. The applicant would also continue to coordinate with SANDAG, NCTD, and Caltrans on a potential expansion of or improvements to the existing park-and-ride that can accommodate future transit and other mobility alternatives.	Consistent.
M-9.3 Preferred Parking. Encourage and provide incentives for commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles and flex cars. [Refer also to Policy COS-16.3 (Low-Emission Vehicles) in	The project would provide preferred parking and electric vehicle charging stations within its commercial area and public parking areas. The project would also include an EV charging unit in each single family garage in the project to encourage its residents to purchase an electric vehicle. The project also proposes a TDM Program which includes ride-share and car-share ("flex-car") programs, shuttle services to the Escondido Transit Center, and subsidized transit passes for residents. Please see the responses to Goal/Policy/Objective M-8, M-8.1 through M-8.4, M-8.6, M-8.7, and M-9.2.	Consistent.

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

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the Conservation and Open Space Element.] Encourage parking cash out programs to reimburse employees for the cost of "free" on- site parking to provide incentives to use alternate modes of travel and to reduce parking requirements (see also Policy M- 10.5).		
M-9.4 Park-and-Ride Facilities. Require developers of large projects to provide, or to contribute to, park-and-ride facilities near freeway interchanges and other appropriate locations that provide convenient access to congested regional arterials. Require park- and-ride facilities that are accessible to pedestrians and bicyclists, and include bicycle lockers and transit stops whenever feasible.	The project applicant is coordinating with Caltrans SANDAG, and NCTD on potential future expanded or improved park-and-ride facilities at the I-15/Deer Springs Road Interchange. Presently, there are two park-and-ride lots at the Interchange, one on the west side and one on the east side of the freeway. The project applicant has met with Caltrans, SANDAG, and NCTD about whether Caltrans plans to improve or expand the park-and-ride lots, either as stand-alone projects or as part of the process of improving the Interchange. The project applicant supports and will advocate for the incorporation of alternative transportation modes (i.e., mobility alternatives to single occupancy vehicle driving) such as electric vehicle charging stations, bicycle facilities, storage lockers for travelers, accommodations for ride-share and car-share services, and a possible future transit stop as part of any project to expand or improve the park-and-ride facilities at the Interchange.	Consistent.
M-10 Parking for Community Needs. Parking regulations that serve community needs and enhance community character.	The Design Guideline section of the Specific Plan contains the parking regulations consistent with the overall vision of the project.	Consistent.
 M-10.1 Parking Capacity. Require new development to: Provide sufficient parking capacity for motor vehicles consistent with the project's location, use, and intensity Provide parking facilities for motorcycles and bicycles Provide staging areas for regional and community trails 	The proposed project includes sufficient parking for motor vehicles consistent with the project's location, use, and intensity. For example, the Specific Plan includes appropriate parking requirements for the proposed land uses. Residential parking will be provided through garages, residential streets, and a combination of on-site parking areas for attached residential homes. Parking facilities for motorcycles and bicycles would be included in the overall parking design. Sufficient parking capacity would be provided for each land use consistent with the zoning ordinance. For commercial and other public uses, parking spaces would be provided either on the street or within parking lots. Additionally, space would be provided for bicycle parking. The Community's pathway network also would reduce reliance on single-occupant vehicle trips. The applicant also would implement several TDM measures, which include measures to reduce vehicle trips. Finally, the project would include multi-purpose Community trails supporting hikers and equestrians. The project's Saddleback Park in the northwestern half of the project Site would include an equestrian staging area and parking lot.	Consistent.

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M-10.2 Parking for Pedestrian Activity. Require the design and placement of on-site automobile, motorcycle, and bicycle parking in Villages and Rural Villages that encourages pedestrian activity by providing a clear separation between vehicle and pedestrian areas and prohibit parking areas from restricting pedestrian circulation patterns.	Please see response to Goal/Policy/Objective M-10.1, above. Further, the Specific Plan integrates parking into the overall design in a manner that does not detract from the pedestrian orientation of the project Site. For instance, the project would ensure other transportation modes do not impede pedestrian-oriented facilities. The Site design of the project's commercial area would provide a clear separation between vehicle parking areas and pedestrian areas, including gathering spaces. Safe and convenient pedestrian circulation would be integrated into the parking lots serving the commercial uses as well as the parking areas for the project's multi-family residential uses.	Consistent.
M-10.3 Maximize On-street Parking. Encourage the use of on-street parking in commercial and/or high-density residential town center areas to calm traffic and improve pedestrian interaction. Traffic operations and pedestrian safety must not be compromised.	The Town Center would provide appropriate on-street parking. On-street parking is encouraged where possible to reduce the need for large parking areas and to provide traffic calming along streets to improve the pedestrian environment.	Consistent.
M-10.4 Shared Parking. Support town center plans when desired by the community that incorporate on-street and/or shared vehicular parking facilities to reduce on-site parking requirements.	The project proposes a TDM Program that includes coordinating for ride-share and car-share programs and other mobility alternatives that would reduce the need for parking within its Town Center. In the project, on- street parking would be incorporated into the design of its internal road network, including within the Town Center, where appropriate to reduce the need for large off-street parking areas and to provide traffic calming along streets to improve the pedestrian environment. See also response to Goal/Policy/Objective M-10.5, below.	Consistent.
 M-10.5 Reduced Parking. Accommodate appropriate reductions in on-site parking requirements in situations such as Development of low-income and senior housing Development located near transit nodes Employment centers that institute Transportation Demand Management programs Development that integrates other 	Please see response to Goal/Policy/Objective M-10.1. In addition, Community trails linked to the commercial areas would encourage residents to walk to the Town Center. The project would accommodate pedestrians, bicycles, electric vehicles, and other alternative transportation modes by linking trail systems and pedestrian pathways with parks, open space areas, residential, commercial, and schools. A planned electric bike-share program would link the neighborhoods to each other and reduce motorized vehicle trips. Additionally, the project would include bike lanes, an extensive trail system consisting of roadside pathways within the linear greenbelts, and multi-use trails. With incorporation of these internal circulation features, the project would provide residents the opportunity to access employment, education, recreation, and commercial uses via multiple transportation modes while reducing the need for additional parking around the Town Center.	Consistent.

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parking demand reductions techniques such as parking cash out, when ensured by ongoing permit conditions Transportation Demand Management programs are described in the previous section.		
M-10.6 On-Street Parking. Minimize on-street vehicular parking outside Villages and Rural Villages where on-street parking is not needed, to reduce the width of paved shoulders and provide an opportunity for bicycle lanes to retain rural character in low- intensity areas. Where on-street parking occurs outside Villages and Rural Villages, require the design to be consistent with the rural character. [See applicable community plan for possible relevant policies.]	The proposed project minimizes on-street vehicular parking outside the Village where on-street parking is not needed. For example, the loop road would not offer on-street parking, but would integrate a bike lane. In addition, shoulder-designated bike routes are proposed to provide connections to each neighborhood, neighborhood park, and the Town Center.	Consistent.
M-10.7 Parking Area Design for Stormwater Runoff. Require that parking areas be designed to reduce pollutant discharge and stormwater runoff through site design techniques such as permeable paving, landscaped infiltration areas, and unpaved but reinforced overflow parking areas that increase infiltration. Require parking areas located within or adjacent to preserve areas to also include native landscaping and shielded lighting.	Parking lot and street parking within the Community have been designed with integrated treatment swales and basins. Treatment would be provided along the loop road with planted swales that contribute to the Site's stormwater management plan. Native landscaping and shielded lighting are proposed.	Consistent.

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M-11 Bicycle and Pedestrian Facilities. Bicycle and pedestrian networks and facilities that provide safe, efficient, and attractive mobility options as well as recreational opportunities for County residents. See also Goals and Policies in the Conservation and Open Space Element, Biological Resources section, which address the protection of sensitive biological resources and habitat areas.	The project proposes bicycle and pedestrian networks and facilities that provide safe, efficient, and attractive mobility options as well as recreational opportunities for residents and visitors. To that end, the project would incorporate a network of trails and pedestrian pathways connecting the project's various neighborhoods together and creating a safe, efficient, and attractive option to link open space trails and walkability throughout the project. The project would include bike lanes; multi-use pedestrian pathways along the project's loop road; internal and secondary trails within neighborhoods; and multi-purpose and secondary trails through the open space preserve areas, forming a network of approximately 16 linear miles of trails and pedestrian pathways that would extend throughout the project's individual neighborhoods and the open space preserve. Please see responses to COS-11.1, -11.2, -11.3,, -16, and -16.1.	Consistent.
M-11.1 Bicycle Facility Design. Support regional and community-scaled planning of pedestrian and bicycle networks.	Please see response to Goal/Policy/Objective M-11. Further, the bicycle network and trail network would connect to the surrounding area and to the open space trail network to the north.	Consistent.
M-11.2 Bicycle and Pedestrian Facilities in Development. Require development and Town Center plans in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation, such as comprehensive bicycle and pedestrian networks and facilities, including both on-street facilities as well as off-street bikeways, to safely serve the full range of intended users, along with areas for transit facilities, where appropriate and coordinated with the transit service provider.	Please see response to Goal/Policy/Objective M-11. Further, the proposed project requires alternative modes of transportation, such as a planned electric bike-share program linking the neighborhoods to one another and reducing internal vehicle trips. The electric bike-share program would include kiosks within a number of planning areas to allow electric bikes to be taken from one kiosk and left at another, encouraging sustainable transportation between planning areas. Additionally, the project would include bike lanes, an extensive trail system consisting of roadside pathways within the linear greenbelts, and multi-use trails. With incorporation of these internal circulation features, the project provides residents the opportunity to access employment, education, and recreational and commercial uses via multiple modes of transportation.	Consistent.
M-11.3 Bicycle Facilities on Roads Designated in the Mobility Element. Maximize the provision of bicycle facilities on County Mobility Element roads in Semi-Rural and Rural Lands to provide a safe and continuous bicycle network in rural areas that can be used for recreation or transportation purposes, while retaining rural character.	Please see the response to Goal/Policy/Objective M-11.2.	Consistent.

The proposed project provides comprehensive internal pedestrian and bicycle networks that connect to	
existing or planned adjacent community and countywide networks. To that end, the project would incorporate a network of bicycle lanes, trails and pedestrian pathways connecting the project's various neighborhoods together and with linkages to open space trails for hiking and equestrian users. The project would include bike lanes; multi-use pedestrian pathways along the project's loop road; primary and secondary trails within neighborhoods; and multi-purpose and secondary trails through the open space preserve areas, forming a network of approximately 16 linear miles of trails and pedestrian pathways that would extend throughout the project's individual neighborhoods and the open space preserve. Off-Site, the project would incorporate a multi-purpose trail along Deer Springs Road and Twin Oaks Valley Road that connects all the way into the City of San Marcos and the existing multipurpose trail along Twin Oaks Valley Road.	Consistent.
As a result of the project's traffic impacts to the existing I-15/Deer Springs Road interchange, the project applicant has initiated a three-phase process with Caltrans to plan and design a new interchange. The project applicant is currently in the first phase of that process, the Project Initiation Document (PID) process which requires the preparation of a Project Study Report/Project Development Support (PSR/PDS) document for the new interchange. In addition to identifying design alternatives for the new interchange, the PSR/PDS document will address the need to maintain pedestrian and bicyclist access through the interchange, to the project Site, and to any potential future expanded park-and-ride facilities. In addition to coordinating with Caltrans, the project applicant has coordinated with SANDAG and NCTD on these potential improvements at the I-15/Deer Springs Road Interchange.	Consistent.
Presently, there are two park-and-ride lots at the Interchange, one on the west side and one on the east side of the freeway. The project applicant has met with Caltrans, SANDAG, and NCTD about whether Caltrans plans to improve or expand the park-and-ride lots, either as stand-alone projects or as part of the process of improving the interchange. The project applicant supports and will advocate for the incorporation of alternative transportation modes such as electric vehicle charging stations, bicycle facilities, storage lockers for travelers, accommodations for ride-share and car-share services, and a possible future transit stop as part of any project to expand or improve the park-and-ride facilities at the interchange.	
	neighborhoods together and with linkages to open space trails for hiking and equestrian users. The project would include bike lanes; multi-use pedestrian pathways along the project's loop road; primary and secondary trails within neighborhoods; and multi-purpose and secondary trails through the open space preserve areas, forming a network of approximately 16 linear miles of trails and pedestrian pathways that would extend throughout the project's individual neighborhoods and the open space preserve. Off-Site, the project would incorporate a multi-purpose trail along Deer Springs Road and Twin Oaks Valley Road that connects all the way into the City of San Marcos and the existing multipurpose trail along Twin Oaks Valley Road.

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	pathway connecting through Twin Oaks Valley Road and into the City of San Marcos to the southwest and to the existing park-and-ride facility and Town Center neighborhood.	
M-11.7 Bicycle and Pedestrian Facility Design. Promote pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village.	Please see response to Goal/Policy/Objective M-11.4. The project's design of proposed bicycle and pedestrian facilities was tailored to the project's Semi-Rural and Village land uses.	Consistent.
M-11.8 Coordination with the County Trails Program. Coordinate the proposed bicycle and pedestrian network and facilities with the Community Trails Master Plan's proposed trails and pathways.	Proposed pathway and trail locations were coordinated with the County's Community Trails Master Plan. The project proposes a multi-use pathway connection along Deer Spring Road and Twin Oaks Valley Road with connections to the project's network of pedestrian pathways and trails, including to multi-use trails and open space trails in the project. The project would help implement the County's Community Trails Master Plan for the area as well as include additional trails within the project Site.	Consistent.
M-12 County Trails Program. A safe, scenic, interconnected, and enjoyable non-motorized multi-use trail system developed, managed, and maintained according to the County Trails Program, Regional Trails Plan, and the Community Trails Master Plan.	The project would include a trail network through open space areas that has been planned in coordination with the County Trails Program and Community Trails Master Plan. The project would include a range of trail types and pedestrian pathways, including multi-use trails, secondary trails, and single-track trails, however no motorized vehicles would be permitted on the project's trails or pedestrian pathways.	Consistent.
M-12.1 County Trails System. Implement a County Trails Program by developing the designated trail and pathway alignments and implementing goals and policies identified in the Community Trails Master Plan.	This Goal/Policy/Objective serves as direction to the County to develop a County Trails Program and, therefore, is not directly applicable to the project. Nevertheless, the proposed project implements trail and pathway alignments consistent with the County's Trails Program, and the goals and policies identified in the Community Trails Master Plan. To that end, Chapter 3 of the Specific Plan, Community Wide Trail Network provides sections of each trail type with illustrations – all of which are consistent with the County Trails Program.	Not Applicable.
M-12.2 Trail Variety. Provide and expand the variety of trail experiences that provide recreational opportunities to all residents of the unincorporated County, including urban/suburban, rural, wilderness, multi-use, staging areas, and support facilities.	Please see response to Goal/Policy/Objective M-11.4. The proposed project would provide and expand the variety of trail experiences that would provide recreational opportunities to all residents of the project and the County, including urban/suburban, rural, wilderness, multi-use staging areas, and support facilities. For example, the project would include a comprehensive pedestrian and bicycle network with pedestrian pathways and bicycle lanes connecting the project's various neighborhoods and multi-purpose trails into open space preserve areas. Further, an equestrian staging area is proposed on Camino Mayor at the project's Saddleback Park.	Consistent.

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M-12.3 Trail Planning. Encourage trail planning, acquisition, development, and management with other public agencies that have ownership or jurisdiction within or adjacent to the County.	As shown in the Parks Master Plan and Trails Master Plan, an extensive network of interconnected parks, open space, and trails is proposed throughout the project. This includes approximately 16 miles of pedestrian pathways and multipurpose trails.	Consistent.
M-12.4 Land Dedication for Trails. Require development projects to dedicate and improve trails or pathways where the development will occur on land planned for trail or pathway segments shown on the Regional Trails Plan or Community Trails Master Plan.	The project would improve and dedicate its proposed trails and pedestrian pathways, in certain cases through dedication of right-of-way where they are adjacent to the project's proposed road improvements, to ensure public access to these facilities. In addition, a substantial portion of the project would be preserved in perpetuity and managed through a Resource Management Plan (RMP). Trails through this open space would establish connections to a greater regional trail network.	Consistent.
M-12.5 Future Trails. Explore opportunities to designate or construct future trails on County- owned lands, lands within the Multiple Species Conservation Program (MSCP), or other lands already under public ownership or proposed for public acquisition.	The project would construct trails through the proposed on-Site open space preserve areas which may eventually become part of the North County MSCP preserve system.	Consistent.
M-12.6 Trail Easements, Dedications, and Joint-Use Agreements. Promote trail opportunities by obtaining easements, dedications, license agreements, or joint-use agreements from other government agencies and public and semi-public agencies.	The project's proposed public trails would be dedicated to the County by establishing an easement over them. Trails within the neighborhoods would include public use easements where those trails are not within the right of way for public roads.	Consistent.
M-12.8 Trails on Private Lands. Maximize opportunities that are fair and reasonable to secure trail routes across private property, agricultural and grazing lands, from willing property owners.	The project's proposed trail network would not require trail connections across any adjacent private property. The project would accommodate future pedestrian pathways associated with off-site improvements to Deer Springs Road and Twin Oaks Valley Road within the right-of-way, in certain instances acquired from private property owners, for those road improvements.	Not Applicable.

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M-12.9 Environmental and Agricultural Resources. Site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors, and agricultural lands. Within the MSCP preserves, conform siting and use of trails to County MSCP Plans and MSCP resource management plans.	The project would site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors, and agricultural lands. The project also would conform siting and use of trails to County plan requirements. For instance, to protect the project's proposed open space preserve areas and minimize human encroachment, signage and designated routes would establish public access trails, and protect large patches of habitat that do not currently contain trails. Additionally, the project's proposed trails into open space preserve areas would be predominantly located along existing dirt roads and existing trails. In accordance with the project's Resource Management Plan, a preserve manager would monitor the use of these trails and address any encroachment or other impacts associated with the trails in the project's open space preserve areas. The proposed project's trail system has also been designed to be consistent with the overarching goals of the draft North County MSCP.	Consistent.
M-12.10 Recreational and Educational Resources. Design trail routes that meet a public need and highlight the County's biological, recreational and educational resources, including natural, scenic, cultural, and historic resources.	The project's proposed trails would meet a public need and highlight the County's biological, recreational and educational resources, including natural, scenic, cultural, and historic resources. For example, the project's unique cultural resources informed proposed project design. Several permanent displays would be erected to provide information on the area's cultural and historic resources, including descriptions of Native American and historic occupants. These displays would include imagery and text to facilitate public outreach and enhance appreciation of regional diversity. The project's pedestrian pathways take advantage of the Site's prominent landform, featuring vista points along various segments of the surrounding landscape.	Consistent.
N 1 Land Llas Commethility Angles		Consistent
N-1 Land Use Compatibility. A noise environment throughout the unincorporated County that is compatible with the land uses.	The proposed project provides a noise environment that is generally compatible with both on Site and off Site land uses. The majority of potential noise effects are either less than significant or would be mitigated to less than significant through the mitigation measures identified in the EIR.	Consistent.
N-1.1 Noise Compatibility Guidelines. Use the Noise Compatibility Guidelines (Table N-1) and the Noise Standards (Table N-2) as a guide in determining the acceptability of exterior and interior noise for proposed land uses.	Using the Noise Compatibility Guidelines and the Noise Standards, the project would maintain acceptable exterior and interior noise levels for proposed land uses.	Consistent.

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 N-1.2 Noise Management Strategies. Require the following strategies as higher priorities than construction of conventional noise barriers where noise abatement is necessary: Avoid placement of noise sensitive uses within noisy areas Increase setbacks between noise generators and noise sensitive uses Orient buildings such that the noise sensitive portions of a project are shielded from noise sources Use sound-attenuating architectural design and building features Employ technologies when appropriate that reduce noise generation (i.e. alternative pavement materials on roadways) 	The proposed project discourages using noise walls; however, when necessary, the project would evaluate and require, where feasible, a combination of walls and earthen berms and the use of vegetation or other visual screening methods to soften the visual perspective. Additionally, mitigation measure M-N-1 requires a detailed acoustical study demonstrating that barriers and/or setbacks incorporated into the project design reduce noise exposure to residential receivers placed in all useable outdoor areas, including multi-family residential patios and balconies, to below the County's noise compatibility guideline of 65 A-weighted decibels (dBA) community noise equivalent level (CNEL).	Consistent.
N-1.3 Sound Walls. Discourage the use of noise walls. In areas where the use of noise walls cannot be avoided, evaluate and require where feasible, a combination of walls and earthen berms and require the use of vegetation or other visual screening methods to soften the visual appearance of the wall.	The proposed project discourages using noise walls; however, when necessary, the project would evaluate and require, where feasible, a combination of walls and earthen berms and the use of vegetation or other visual screening methods to soften the visual perspective. Additionally, mitigation measure M-N-1 requires a detailed acoustical study demonstrating that barriers and/or setbacks incorporated into the project design reduce noise exposure to residential receivers placed in all useable outdoor areas, including multi-family residential patios and balconies, to below the County's noise compatibility guideline of 65 A-weighted decibels (dBA) community noise equivalent level (CNEL).	Consistent.
N-1.4 Adjacent Jurisdiction Noise Standards. Incorporate the noise standards of an adjacent jurisdiction into the evaluation of a proposed project when it has the potential to impact the noise environment of that jurisdiction.	The noise analysis incorporates the noise standards of the City of San Marcos for traffic-related noise impacts within that jurisdiction. Please see EIR Section 2.10, Noise, and Appendix Q, Noise Technical Report.	Consistent.

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N-1.5 Regional Noise Impacts. Work with local and regional transit agencies and/or other jurisdictions, as appropriate, to provide services or facilities to minimize regional traffic noise and other sources of noise in the County.	Please see response to Goal/Policy/Objective N-1.4. Further, the project's Acoustical Analysis Report incorporated the traffic analysis and assessed potential noise impacts from project development. The project would coordinate with the County to ensure that traffic noise is minimized to the extent feasible.	Consistent.
N-2 Protection of Noise Sensitive Uses. A noise environment that minimizes exposure of noise sensitive land uses to excessive, unsafe, or otherwise disruptive noise levels.	The project would provide a noise environment that minimizes exposure of noise sensitive land uses to excessive, unsafe, or otherwise disruptive noise levels. For example, the project includes project design features (PDF-33 through PDF-38) that would reduce potential construction noise through the use of exhaust mufflers, use of electrical equipment when feasible, locating staging areas away from noise-sensitive land uses, and other noise attenuation techniques. Blasting involves drilling a series of bore holes and placing explosives in each hole. By limiting the amount of explosives in each hole, the blasting contractor can limit the fraction of the total energy released at any single time, which in turn can reduce noise and vibration levels. Rock drilling generates impulsive noise from the striking of the hammer with the anvil within the drill body, which drives the drill bit into the rock. Blasting (and the associated drilling that precedes blasting) would only occur between 7 a.m. and 7 p.m. Construction blasting generates a maximum noise level of approximately 94 dBA at a distance of 50 feet (FHWA 2006). To conduct blasting, a blasting permit must be obtained from the County Sheriff's Department prior to any blasting activities. The permit is issued in accordance with California Health and Safety Code requirements. The permit ensures that blasting is conducted in a safe manner. As part of the permit conditions, pre-blast notifications, pre-blast structure survey inspections for structures within 300 feet of the blast site, monitoring, and post-blast inspections are necessary. Mitigation measure M-N-5 requires the preparation of a blast drilling and monitoring plan which would reduce potentially significant impacts to below a level of significance.	Consistent.
N-2.1 Development Impacts to Noise Sensitive Land Uses. Require an acoustical study to identify inappropriate noise level where development may directly result in any existing or future noise sensitive land uses being subject to noise levels equal to or greater than 60 CNEL and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2.	The proposed project completed a Noise Technical Report to identify inappropriate noise level where development may directly result in any existing or future noise sensitive land uses being subject to noise levels equal to or greater than 60 CNEL and require feasible mitigation for sensitive uses in compliance with the noise standards within the General Plan's Noise Element, Table N-2. For instance, homes and other land uses are estimated to have rear yard noise exposures ranging from 61 to 69 dBA CNEL in the future with project implementation. Therefore, there would be potentially significant impacts from noise on ground floor receivers before incorporation of mitigation. Mitigation measures M-N-1 and M-N-2 require additional acoustical studies based on the final map and architectural plans, prior to the issuance of grading permits, to ensure noise compliance. The remaining on-Site receivers were determined to have future-with-project	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	noise levels that would comply with the County noise standards without mitigation. The TNM noise model was used to determine the barrier heights needed to reduce traffic noise impacts to less than significant at the ground-floor receiver locations identified above as significantly impacted (i.e., to reduce noise levels to or below the County noise compatibility guideline).	
N-2.2 Balconies and Patios. Assure that in developments where the exterior noise level on patios or balconies for multi-family residences or mixed-use developments exceed 65 CNEL, a solid noise barrier is incorporated into the building design of the balconies and patios while still maintaining the openness of the patio or balcony.	 The proposed project assures that where exterior noise level on patios or balconies for multi-family residences or mixed-use developments exceed 65 CNEL, a noise barrier is incorporated into the building design of the balconies and patios while still maintaining the openness of the patio or balcony. For instance, M-N-1 states that prior to grading permit issuance, for construction at the modeled receiver locations listed in Tables 9 and 10 of the Noise Technical Report (Appendix Q of this EIR), the project applicant or its designee would prepare an acoustical study based on the final map design and would implement recommended study measures, which the County's Planning & Development Services department (or its designee) would approve. The acoustical study would include: 1. The location, height, and building material of any constructed noise barriers. The noise barriers shall be a minimum height of 6 feet, have a surface density of at least 4 pounds per square foot, and be free of openings and cracks. The barriers may be constructed of acrylic glass, masonry material, earthen berm, or a combination of these materials. Noise barrier heights shall be relative to final pad elevation. 2. A detailed analysis that demonstrates noise barriers and/or setbacks were incorporated into the project design, such that exposure to residential receivers in all useable outdoor areas, including multi-family residences and 65 dBA CNEL at multi-family residences). 3. In the event pad grade elevations, lot configuration/Site design, and/or traffic assumptions change during the processing of any final maps, the noise barriers shall be revised to reflect those modifications. 	Consistent.
N-3 Groundborne Vibration. An environment that minimizes exposure of sensitive land uses to the harmful effects of excessive groundborne vibration.	The proposed project provides an environment that minimizes exposure of sensitive land uses to the harmful effects of excessive groundborne vibration. Project operational components would not include significant groundborne noise or vibration sources; and no significant vibrations sources presently exist, or are planned, in the project Site.	Consistent.
	As it relates to construction activities, M-N-6 requires that a vibration monitoring plan be prepared and sent to the County Noise Control Officer prior to initiating of construction activities having the potential to create groundborne vibration. The Noise Control Officer would have the authority to take the steps necessary to	

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	ensure future vibration levels do not exceed applicable limits, including suspending further construction activities that would result in excessive vibration levels until either alternative equipment or alternative construction procedures are identified that would reduce vibration levels in compliance with County standards.	
N-3.1 Groundborne Vibration. Use the Federal Transit Administration and Federal Railroad Administration guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains, construction equipment, and other sources.	According to the Federal Transit Administration's methodology for determining vibration propagation, vibration levels would exceed County-recommended Caltrans thresholds of 0.004 peak particle velocity (PPV) inch per second root mean square within 190 feet of large bulldozers and 170 feet of loaded trucks for residences. For pile driving, vibration levels would exceed County-recommended Caltrans thresholds of 0.1 PPV within 90 feet of the nearest sensitive receptor. M-N-6 would require that a vibration monitoring plan be prepared and sent to the County Noise Control Officer. The plan shall require monitoring of data on a weekly basis to ensure that vibration does not exceed established limits; methods include placement of vibration monitors, data acquisition and reporting, and exceedance notification. The Federal Railroad Administration guidelines are not applicable.	Consistent.
N-4 Transportation-Related Noise Generators. A noise environment that reduces noise generated from traffic, railroads, and airports to the extent feasible.	The proposed project provides a noise environment that reduces noise generated from traffic to the extent feasible. There are no airports or railroad lines proximate to the project Site. Reduction in traffic noise levels to less than significant at noise-sensitive land uses within the project would be accomplished through implementation of M-N-1 at completion of project build-out. M-N-1 requires a detailed acoustical study demonstrating that barriers and/or setbacks incorporated into the project design reduce noise exposure to residential receivers placed in all useable outdoor areas, including multi-family residential patios and balconies, to below the County's noise compatibility guideline of 65 A-weighted decibels (dBA) community noise equivalent level (CNEL).	Consistent.
N-4.1 Traffic Noise. Require that projects proposing General Plan amendments that increase the average daily traffic beyond what is anticipated in this General Plan do not increase cumulative traffic noise to off-site noise sensitive land uses beyond acceptable levels.	The project, when combined with other cumulative development, would have the potential to result in a 3 dBA increase in noise levels (under Option B) along Deer Springs Road. This increase is considered a minimal increase as it relates to the General Plan Mobility Element volumes and to the perception of noise. Sound studies and multiple validated sources state that a 1 dBA increase in noise is not noticeable to the human ear. A 3 dBA increase in sound level is barely noticeable. An increase of sound level by 5 dBA is considered noticeable. It is important to clarify that, per the Sierra Traffic Impact Analysis (Appendix R), the project would result in fewer peak hour vehicle trips when compared to the existing General Plan land use designations for the project Site, and, as a result, the project would result in a decrease in the noise levels along Deer Springs Road when compared to the noise levels that were analyzed from buildout of the existing General Plan with Deer Springs Road improved to its ultimate six-lane classification.	Consistent.

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N-4.2 Traffic Calming. Include traffic calming design, traffic control measures, and low- noise pavement surfaces that minimize motor vehicle traffic noise in development that may impact noise sensitive land uses.	The proposed project has incorporated traffic calming measures into its overall design. For example, the project includes speed feedback signs, narrowing of lanes to 10.5 feet on a portion of the loop road, landscaped medians, and enhanced parkways to minimize motor vehicle traffic noise that may impact noise sensitive land uses.	Consistent.
N-4.3 Jurisdictional Coordination. Coordinate with California Department of Transportation (Caltrans), the City of San Diego, and other adjacent jurisdictions, as appropriate, for early review of proposed new and expanded State freeways, highways, and road improvement projects within or affecting the unincorporated County to (1) locate facilities where the impacts to noise sensitive land uses would be minimized and to (2) develop and include noise abatement measures in the projects to minimize and/or avoid the impacts to noise sensitive land uses.	An Acoustical Analysis Report, prepared in accordance with the County's Guidelines for Determining Significance and Report Format and Content Requirements for Noise, assesses the proposed project's potential noise impacts to on-and off-Site uses, including transportation-related noise. Additionally, the project applicant has met on several occasions with Caltrans and the City of San Marcos to discuss roadway design, and will continue to coordinate with these agencies to minimize impacts on noise-sensitive land uses.	Consistent.
N-4.5 Roadway Location. Locate new or expanded roads designated in the Mobility Element in areas where the impact to noise sensitive land uses would be minimized.	The project does not propose any new or expanded roads that are not already included in the County's Mobility Element. The project proposes to expand Deer Springs Road, a Mobility Element road, from its current configuration to become a four-lane road with a center median. The alignment of this roadway was set in 1946, and, since that time, growth has occurred in neighboring communities and to the north in Riverside County, creating high existing demand along this road.	Not applicable.
N-4.6 Road Improvement Projects. For County road improvement projects, evaluate the proposed project against ambient noise levels to determine whether the project would increase ambient noise levels by more than three decibels. If so, apply the limits in the noise standards listed in Table N-2 for noise sensitive land uses that may be affected by the increased noise levels. For federally-	Construction-related traffic would not result in a perceptible (3 dBA) increase in the daily or peak-hour traffic noise levels. The project's operational noise was evaluated against ambient noise levels to determine if a 3 dBA increase would occur. Locations would experience an increase in ambient noise levels by 3 dBA, and mitigation measures would be implemented to reduce potentially significant noise level impacts.	Consistent.

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funded roadway construction projects, use the limits in the applicable Federal Highway Administration Standards.		
N-5 Non-transportation-Related Noise Sources. A noise environment that provides minimal noise spillovers from industrial, commercial, agricultural, extractive, and similar facilities to adjacent residential neighborhoods.	The project's noise environment does not include industrial, extractive, and similar facilities to adjacent residential neighborhoods. Nonetheless, project-associated stationary noise sources would include mechanical equipment associated with the residential and commercial developments, emergency generators, delivery activities associated with the commercial land uses, and recreational and educational activities. M-N-3 requires preparation of an acoustical study to identify effective noise-reducing mitigation measures (e.g., enclosures, barriers, Site orientation). The proposed project would implement the measures identified in the acoustical study to comply with the County's Noise Ordinance, Section 36.404.	Consistent.
N-5.1 Truck Access. Design development so that automobile and truck access to industrial and commercial properties abutting residential properties is located at the maximum practical distance from residential zones.	The proposed project would design its development areas so that automobile and truck access to commercial properties in the vicinity of residential uses are located at the maximum practical distance from residential zones. The project does not include industrial land uses. Automobiles and trucks accessing commercial properties would only occur within the Town Center planning area. The Town Center planning area would be located off of Deer Springs Road, east of the primary access road in the southernmost portion of the project. The 81,000 square feet of commercial land uses in the Town Center near residential properties would be located at the maximum practical distance to reduce truck delivery noise and reduce other noises associated with commercial activity.	Consistent.
N-6 Temporary and/or Nuisance Noise. Minimal effects of intermittent, short-term, or other nuisance noise sources to noise sensitive land uses.	Project-related construction noise would be temporary. Construction noise typically occurs intermittently and varies depending on the phase of construction (e.g., demolition, Site preparation, grading and excavation, building construction) and the types of construction activities, such as hauling material via trucks, pouring concrete, and using power tools. Additionally, noise generated by particular pieces of construction equipment, including earthmovers, material handlers, and portable generators, could reach high levels for brief periods of time. The proposed project would implement project design features (PDF-33 through PDF-38), which would require properly maintained construction equipment with noise-reduction features (e.g., intake, exhaust mufflers, engine shrouds), using electrical power tools, locating construction equipment staging areas away from residences and schools, and using noise attenuation techniques (e.g., noise blankets and temporary barriers) to reduce noise levels below 75 dBA Leq at existing noise-sensitive land uses. With implementation of these mitigation measures, the project's construction noise impacts would be less than significant.	Consistent.

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N-6.2 Recurring Intermittent Noise. Minimize impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in Table N-2, but can have other adverse effects.	The proposed project minimizes impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in General Plan, Noise Element, Table N-2. Please also see the response to Goal/Policy/Objective N-6.	Consistent.
N-6.3 High-Noise Equipment. Require development to limit the frequency of use of motorized landscaping equipment, parking lot sweepers, and other high-noise equipment if their activity will result in noise that affects residential zones.	Hours of construction would comply with the County of San Diego Code of Regulatory Ordinances, as well as the County's Noise Ordinance.	Consistent.
N-6.4 Hours of Construction. Require development to limit the hours of operation as appropriate for non-emergency construction and maintenance, trash collection, and parking lot sweeper activity near noise sensitive land uses.	Hours of construction would comply with the County of San Diego Code of Regulatory Ordinances, as well as the County's Noise Ordinance.	Consistent.
N-6.5 Special Events. Schedule special events sponsored by the County that may generate excessive noise levels to daytime hours when feasible.	The proposed project does not reasonably foresee County-sponsored special events; and, therefore, the policy is not applicable.	Not applicable.
	Safety Element	
S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.	Please see the response to <i>Guiding Principle 5</i> . Various sections of the EIR evaluate potential health and safety issues related to people and property within the project. The EIR either identifies no impacts associated with potential hazards or requires mitigation to ensure that all potentially significant hazards are reduced to less than significant. Most of the project's potential hazards are mitigated through compliance with the state's building and fire codes and the County's regulations for development. The hazards that are addressed in this manner include geologic (e.g., earthquakes, rock-fall hazards, subsidence), flooding, and wildfires. Geologic hazards are mitigated through a combination of best practices during grading, compliance with the County's Grading Ordinance, and construction and compliance with the California Building Standards Code. Flooding hazards are eliminated by avoiding the placement of structures within a flood zone and ensuring that new facilities such as roads are constructed to eliminate or avoid a flooding	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	condition along the road or downstream as a result of the road improvements. Compliance with the County's Hydrology Design Manual and Hydraulic Design Manual ensure that flooding issues are addressed in this manner. Fire hazards, including wildlife hazards, are addressed through compliance with the California Building Standards Code, which includes Chapter 7A of the CBC and the California Fire Code, applicable local codes and ordinances, and through evaluation of Site-specific conditions and constraints and the preparation of a Fire Protection Plan in accordance with those conditions and constraints. Accordingly, a Fire Protection Plan (FPP) has been prepared and approved for the project in accordance with the DSFPD standards, the California Fire Code, and the County Consolidated Fire Code. The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard. The wildfire threat will be mitigated to less than significant with the incorporation of the design features described in the FPP. Implementation of the FPP will ensure that exposure of the project's future residents, including the buildings they would inhabit, to wildfire risk would he mitigated	
S-2 Emergency Response. Effective emergency response to natural or human- induced disasters that minimizes the loss of life and damage to property, while also reducing disruptions in the delivery of vital public and private services during and following a disaster.	 would be minimized. The proposed project provides three access points for emergency response to reduce disruptions in the delivery of services during and following a disaster. Specifically, the project would have two primary access roads along Deer Springs Road at Mesa Rock Road and Sarver Lane, with an additional access point at Camino Mayor off of Twin Oaks Valley Road to the north. The primary access road at Mesa Rock Road would be a four-lane entry road with median that transitions into a four-lane divided road farther into the project. An additional access road (Camino Mayor) would provide residents and emergency access vehicles with sufficient Site access. All project access points and internal roadways would conform to County requirements to ensure adequate emergency access and response times. Further, the project's FPP provides information on wildland fire emergency response. Specifically, the FPP evaluates and identifies the potential fire risk associated with the proposed project's land uses, and identifies requirements for water supply, fuel modification and defensible space, emergency access, building ignition and fire resistance, fire protection systems, and wildfire emergency pre-planning, among other pertinent fire protection criteria. Additionally, in accordance with the FPP, an Evacuation Plan has been prepared and approved for the project. The Evacuation Plan describes how the project would evacuate 	Consistent.
	identifies requirements for water supply, fuel modification and defensible space, emergency access, building ignition and fire resistance, fire protection systems, and wildfire emergency pre-planning, among other pertinent fire protection criteria. Additionally, in accordance with the FPP, an Evacuation Plan has been	

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	resident education outreach regarding wildfire safety, the "Ready, Set, Go!" pre-planning model, and the project FPP requirements. Informational handouts, facility website page, mailers, fire safe council participation, inspections, and seasonal reminders are some methods that would also be used to disseminate wildfire and relocation awareness information. The Sierra HOA would coordinate with DSFPD regarding wildfire educational material/programs before printing and distribution.	
S-2.6 Effective Emergency Evacuation Programs. Develop, implement, and maintain an effective evacuation program for areas of risk in the event of a natural disaster.	The project has prepared an Evacuation Plan that guides evacuation procedures and routes for the project's neighborhoods during a wildfire emergency. The evacuation plan would be implemented in coordination with DSFPD and the County to avoid conflict with existing evacuation and pre-plans. The evacuation plan does not interfere with the countywide Operational Area Emergency Plan because County staff has ensured consistency with other applicable/overlapping emergency plans. In addition, the Newland Sierra HOA would provide ongoing resident education outreach regarding wildfire safety, the "Ready, Set, Go!" pre-planning model, and the project's FPP requirements. Wildlife and relocation awareness information would be disseminated using informational handouts, facility website page, mailers, fire safe council participation, inspections, and seasonal reminders The HOA would coordinate with DSFPD regarding wildfire educational material/programs before printing and distributing. The evacuation plan recommends the implementation of procedures for efficiently evacuating people from the project Site according to a pre-defined, practiced evacuation protocol. The evacuation plan provides a contingency option of temporarily refuging, if evacuation is considered less safe. The estimated minimum time needed to evacuate project residents to designated areas may be up to 4 hours after receiving notice to evacuate. The available project evacuation routes are egress to the south via Mesa Rock Road, egress to the south on Sarver Lane, and egress to the west via Camino Mayor. The evacuation plan requires adjustment and continued coordination with the Newland Sierra HOA and/or developer and DSFPD/law enforcement agencies during each of the construction phases. Interim evacuation routes. Please see Appendix N.	Consistent.
S-3 Minimized Fire Hazards. Minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards.	The proposed project has been designed to minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards. Specifically, the project would comply with state and County fire and building codes and ordinances to minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards. The project's FPP (Appendix N) demonstrates that the proposed project would comply with applicable portions of the County of San Diego 2014 Consolidated Fire Code and the Deer Springs Fire Protection District's Ordinance Number 2013-01. The County and DSFPD have both	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	approved the project's FPP. In addition to the project's overall FPP, an additional FPP was prepared for the Sierra Farms park site due to its location within the service area of the San Marcos Fire Department, which was approved on June 7, 2016. The proposed project would be required to comply with the most recent edition of the California Building Code, Chapter 7A, and California Fire Code, Chapter 49, as adopted by the County applicable at building permit issuance. Chapter 7A of the California Building Code focuses primarily on preventing ember penetration into homes, a leading cause of structure loss from wildfires. Building and fire code compliance is an important required component of the project's FPP.	
S-3.1 Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.	Please see responses to Goal/Policy/Objective S-1.1 through S-3, above. In addition, the proposed project would be located, designed and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires. The project's FPP demonstrates adequate defensible space, project siting, access, construction materials, fuel management, water supply, emergency response times and staffing, and overall coordination with DSFPD and the San Marcos Fire Department.	Consistent.
S-3.2 Development in Hillsides and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.	Due to the project Site's terrain and topography, neighborhoods and structures are located to minimize the likelihood of wildfire spread and encroachment. A proposed additional fully improved access road (Camino Mayor) would provide residents and emergency vehicles with sufficient ingress and egress to and from the project Site. Fire travel times on the proposed project would meet the County General Plan standard of 5 minutes or less for all structures. Fuel modification zones are conservatively sized (250 feet on either side of development, almost 4 times the modeled flame length). Please see Policy S-3, S-3.1, and S-3.3.	Consistent.
S-3.3 Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.	The project has been designed to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation. Specifically, the project would provide extended fuel modification zones that gradually reduce fire intensity and flame lengths from advancing fire by placing adjacent thinning zones, restricted vegetation zones, and irrigated zones between the project's open space preserve areas and individual neighborhoods and roads.	Consistent.
S-3.4 Service Availability. Plan for development where fire and emergency services are available or planned.	The project Site falls within the service territory for the Deer Springs Fire Protection District (DSFPD). Accordingly, the project has prepared a Fire Protection Plan demonstrating the availability of services to the project Site, which has been reviewed and approved by DSFPD and the San Diego County Fire Authority. The project has also received a Will Serve Letter from DSFPD.	Consistent.

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S-3.5 Access Roads. Require development to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently.	The project would provide access roads which provide for safe access of emergency equipment and civilian evacuation concurrently. The project would have two primary access roads that connect to Deer Springs Road, one at Mesa Rock Road and a second at Sarver Lane, with an additional third access point at Camino Mayor that would connect to Twin Oaks Valley Road to the north. Modeling performed in connection with the EIR demonstrated that an additional access road (Camino Mayor) would provide residents and emergency vehicles with sufficient Site access.	Consistent.
S-3.6 Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire. Mitigation measures include, but are not limited to, the use of ignition resistant materials, multiple ingress and egress routes, and fire protection systems.	Implementation of the project's Fire Protection Plan (FPP) would reduce on-site wildfire risk, minimize risks associated with typical uses, and aid responding firefighters during an emergency. The project's fire protection would not rely on one method, but, a system of fire protection measures, methods, and project design features that, in combination, would result in enhanced fire safety, reduced fire potential, and a Community prepared for a wildfire event. The project would implement the latest fire protection measures and exceed standard requirements for fuel modification. All new construction within the project would be required to comply with the latest editions of state and County building and fire code requirements applicable at the time of building permit application.	Consistent.
S-3.7 Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire hazards areas.	The project would be required to comply with the latest adopted ignition resistant building standards as contained in the California Building Standards Code. For example, on-site fire safety measures that are integrated into the project design include compliance with the ignition-resistant construction standards as contained in Chapter 7A of the CBC, requirements for water supply, fire apparatus access, fuel modification and defensible space, interior fire sprinklers in all new construction, and 5-minute or less fire response travel times.	Consistent.
S-4 Managed Fuel Loads. Managed fuel loads, including ornamental and combustible vegetation.	The project provides a thinning zone to reduce the fuel load of a wildland area adjacent to Zone 1, thereby reducing heat and ember production from wildland fires, slow fire spread, and reduce fire intensity. Zone 2 would adjoin Zone 1 and measure 150 feet in depth.	Consistent.
	Zone 2 would include the following components:	
	 A minimum of 50% thinning or removal of plants (50% no fuel). Grasses shall be cut to 4 inches in height. Native grasses can be cut after going to seed. 	
	 Grasses shall be cut to 4 inches in height. Native grasses can be cut after going to seed. Ground cover less than 6 inches high. 	
	• No trees except sycamore (<i>Platanus racemosa</i>), coast live oak (<i>Quercus agrifolia</i>), or Engelmann oak (<i>Quercus engelmannii</i>).	
	• Trees and tree-form shrub species that naturally grow to heights exceeding 4 feet shall be vertically	

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	 pruned to prevent ladder fuels. No shrubs, except single-specimen native shrubs, exclusive of chamise and sage, 20 feet on center. Maintenance, including ongoing removal and thinning of dead/dying planting, and regular trimming to prevent ladder fuels. Plant species introduced into Zone 2 shall not include prohibited or highly flammable species. No permanent or portable wood-burning fire pits, fireplaces, or other flame-generating devices allowed. No vegetation found on the Prohibited Plant List shall be planted or remain in any Fuel Modification Zone. 	
S-4.2 Coordination to Minimize Fuel Management Impacts. Consider comments from CAL FIRE, U.S. Forest Service, local fire districts, and wildlife agencies for recommendations regarding mitigation for impacts to habitat and species into fuel management projects.	Wildland areas adjacent to the project are Calfire's responsibility under the State Responsibility Area designation. The DSFPD, along with other local fire districts, would provide a coordinated response with CALFIRE in the event of a wildland fire. The project has undergone extensive coordination with CALFIRE, DSFPD, and the County to protect the project from potential wildfire hazards which resulted in an approved Fire Protection Plan (FPP).	Consistent.
S-6 Adequate Fire and Medical Services. Adequate levels of fire and emergency medical services (EMS) in the unincorporated County.	Adequate levels of fire and emergency medical services would be available to the project Site. The project has prepared and received approval of a Fire Protection Plan and has also received a Will Serve Letter from DSFPD demonstrating that adequate levels of service are available.	Consistent.
S-6.1 Water Supply. Ensure that water supply systems for development are adequate to combat structural and wildland fires.	The project would ensure fire prevention, protection, and suppression. Specifically, water availability and flow including fire flow and hydrant distribution, would be consistent with DSFPD requirements. These features, along with the ignition resistance of all buildings, interior sprinklers, pre-planning, and training and awareness, would assist responding firefighters.	Consistent.
S-6.2 Fire Protection for Multi-Story Development. Coordinate with fire services providers to improve fire protection services for multi-story construction. Multi-story structures are associated with densities of 15 to 30 dwelling units per acre- particularly in areas within the County Water Authority (CWA) boundary. Design features	All habitable structures in the project, whether single story or multi-story and including single-family homes, multi-family homes, and commercial spaces, would be equipped with automatic fire sprinkler systems as is required by the California Building Standards Code. All multi-family and commercial structures would be equipped with an electronically supervised fire alarm and detection system. These requirements are detailed in the project's Fire Protection Plan (FPP), the preparation of which has been coordinated with the fire service provider for the project Site, Deer Springs Fire Protection District (DSFPD). DSFPD and the San Diego County Fire Authority have both approved the project's FPP.	Consistent.

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may include safe zones and increased building design features.		
S-6.3 Funding Fire Protection Services. Require development to contribute its fair share toward funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.	The proposed project would be required to pay all County – and DSFPD – required public facilities impact fees to ensure available adequate fire and emergency medical services for future residents.	Consistent.
S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).	DSFPD Station 12 would provide initial fire response to the project Site. A GIS-based travel time coverage modeling effort was conducted to determine if the project meets the General Plan's 5-minute travel time response standard. A route analysis was also performed to determine the best route between a minimum of two points based on the parameters chosen. The analysis includes only response from Station 12 throughout the proposed project and surrounding areas where roads provide access. Modeling results indicate that Station 12 can reach all of the project's neighborhoods within 5 minutes of travel. The available firefighting and emergency medical resources within the project's vicinity include an assortment of fire apparatus and equipment capable of responding to typical potential fires that would occur within and adjacent to the project Site. DSFPD has issued a Will Serve Letter demonstrating that the district has sufficient capacity to serve the project Site.	Consistent.
S-6.5 Concurrency of Fire Protection Services. Ensure that fire protection staffing, facilities and equipment required to serve development are operating prior to, or in conjunction with, the development. Allow incremental growth to occur until a new facility can be supported by development.	The proposed project will pre-pay the County Fire Mitigation Fee pursuant to a Fire Fee Payment Agreement with the DSFPD which would also provide funding beyond the required County Fire Mitigation Fee to augment the DSFPD's capabilities for continued provision of timely service to its primary jurisdictional area, including the project Site. By pre-paying the County Fire Mitigation Fee, the proposed project ensures Fire Station 12 would continue to have the capacity and facilities to serve the project Site and satisfy the General Plan's 5-minute threshold (Appendix N). The final funding amount will be determined in the Fire Fee Payment Agreement, to be completed prior to map recordation per County conditions of approval. The proposed project would be in compliance with applicable portions of the San Diego County Consolidated Fire Code and the Deer Springs Fire Protection District's Ordinance No. 2013-01. The proposed project also would be consistent with the 2013 California Building Code, Chapter 7A, 2013 California Fire Code, Chapter 49, as adopted by San Diego County.	Consistent.
S-7 Reduced Seismic Hazards. Minimized personal injury and property damage resulting from seismic hazards.	To ensure structural integrity, the proposed project would conform to the seismic design requirements outlined within the California Building Code (CBC), which contains universal standards for proper Site preparation and grading practices, adequate design foundation, and guidelines for the appropriate selection	Consistent.

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	and use of construction materials. The County Department of Planning & Development Services enforces the CBC and reviews applications for building permits for compliance with the CBC, local amendments to the CBC, and County Zoning Ordinance Section 87.209. Grading plans would also be reviewed for compliance with state and local standards. Please also see the project's conformance with <i>Guiding Principle 5</i> .	
S-7.1 Development Location. Locate development in areas where the risk to people or resources is minimized. In accordance with the California Department of Conservation Special Publication 42, require development be located a minimum of 50 feet from active or potentially active faults, unless an alternative setback distance is approved based on geologic analysis and feasible engineering design measures adequate to demonstrate that the fault rupture hazard would be avoided.	The project would locate development in areas where the risk to people or resources is minimized. Review of available geologic literature indicates that no known active, potentially active, or inactive faults transect the project. In addition, the project has been designed to avoid development below steeply sloping areas with granitic boulder outcrops where there is a potential for isolated rockfalls to occur. Please also see the project's response to Goal/Policy/Objective S-7 and the project's conformance with <i>Guiding Principle 5</i> .	Consistent.
S-7.2 Engineering Measures to Reduce Risk. Require all development to include engineering measures to reduce risk in accordance with the California Building Code, Uniform Building Code, and other seismic and geologic hazard safety standards, including design and construction standards that regulate land use in areas known to have or potentially have significant seismic and/or other geologic hazards.	Project development would be required to include engineering measures to reduce risk in accordance with applicable California Building Code, Uniform Building Code, the County's Grading Design Manual, and other seismic and geologic hazard safety standards as outlined in the project's final geotechnical report(s) prepared in association with the project's grading and improvement plans. The process of preparing project's grading and improvement plans, and performing project-related grading work and building improvements, including utilities, streets, retaining walls, and the like, are subject to the County's plan check and inspection processes as well as the applicable recommendations contained in the project's final geotechnical report(s). All aspects of grading and horizontal construction are overseen by County as well as geotechnical inspectors to ensure full compliance with state and County requirements and those contained in the final geotechnical report(s).	Consistent.
S-8 Reduced Landslide, Mudslide, and Rock Fall Hazards. Minimized personal injury and	The project would minimize personal injury and property damage caused by mudslides, landslides, or rock falls. Specifically, the project and off-site improvement areas are not within or adjacent to a designated	Consistent.

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property damage caused by mudslides, landslides, or rock falls.	"Landslide Susceptibility Area" (County's Multi-Jurisdictional Hazard Mitigation Plan (2010)). Further, the high-density characteristics of the on-site bedrock materials and lack of a groundwater table result in a low potential for liquefaction in bedrock areas.	
	Notwithstanding these Site geologic characteristics, review of available geologic literature indicates the presence of possible ancient landslide debris on the eastern edge of the Site. This potential landslide area was mapped previously based on its surficial expression along the eastern portion of the Site and extending beneath I-15. The mapped landslide is not in the vicinity of any of the areas proposed for development by the project.	
	Areas that were observed to have potential rockfall hazards that are located within the project's proposed development areas would be subject to requirements to remove boulders and any loose material in conjunction with grading for the pad sites, roadways, and other infrastructure or improvements supporting the project. In situations where removal is not feasible, the hazard may be mitigated by breaking up the rock in place to reduce the potential for dislodgment. This remediation work would be done prior to construction of any structures in downslope areas (see mitigation measure M-GE-4).	
S-8.1 Landslide Risks. Direct development away from areas with high landslide, mudslide, or rock fall potential when engineering solutions have been determined by the County to be infeasible.	Please see response to Goal/Policy/Objective S-8, above.	Consistent.
S-8.2 Risk of Slope Instability. Prohibit development from causing or contributing to slope instability.	The project is designed to prohibit causing or contributing to slope instability. For example, slope excavation of cut slopes over 10 feet may require blasting. If rock debris remains on the 1:1 (horizontal to vertical) cut slopes, the cut rock slopes may need to be raked/scaled with proper runoff control measures in-place. Cut slopes located within dense rock areas and free of adverse geologic conditions (jointing, fracturing, and weathering) will have an adequate safety factor for both deep-seated and surficial stability. The project's final geotechnical report(s) and Grading Plans will contain detailed requirements for all cut and fill areas within the project based on the specific geotechnical conditions present in each area.	Consistent.
S-9 Protection of Life and Property. Minimized personal injury and property damage losses resulting from flood events.	The project Site is not located within a mapped or designated floodplain and the project has been designed in compliance with the County of San Diego Hydrology Manual and Drainage Design Manual. Post- development runoff flow rates match pre-development flow rates. Thus, the Project development would not result in the placement of any residential uses within a floodplain area. Off-Site improvements to Sarver	Consistent.

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	Lane and Deer Springs Road would eliminate the existing flooding condition that occurs along certain portions of these roads during major rainfall events. Accordingly, the project has prepared a drainage study in compliance with the County Hydrology Manual and a "Preliminary No Rise" analysis in compliance with the County Flood Damage Prevention Ordinance that demonstrates how the project would address this existing substandard condition that results in flooding. Thus, the proposed project's design minimizes personal injury and property damage losses resulting from flood events.	
S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.	Please see response to Goal/Policy/Objective S-9, above. The project Site is not located within a mapped or designated floodplain and the project has been designed in compliance with the County of San Diego Hydrology Manual and Drainage Design Manual. Post-development runoff flow rates match pre- development flow rates. Off-Site improvements to Sarver Lane (a public road) and Deer Springs Road (a Mobility Element Road and essential public facility) have been designed to conform to federal flood proofing standards and siting criteria to prevent flow obstruction and to ensure that the project would not contribute to or worsen a downstream flooding condition. While the project would require certain channel improvements for the project's off-Site road improvements, these channel improvements enhance and increase the capacity of existing road side channelize flow areas to safely convey the design flood and conform to federal flood proofing standards. These off-site facilities will be required to comply with the San Diego County Drainage Design Manual, Public Road Standards, and Flood Damage Prevention Ordinance. Prior to issuance of a permit for construction in the floodplain, the project will be required to obtain formal approval from FEMA of the proposed channel improvements and the resultant reduction in the area mapped as floodplain.	Consistent.
S-9.3 Development in Flood Hazard Areas. Require development within mapped flood hazard areas be sited and designed to minimize on and off-site hazards to health, safety, and property due to flooding.	Please see the responses to Goal/Policy/Objective S-9 and S-9.2 above.	Consistent.
S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the	The project Site is not located within any mapped or designated floodway, floodplain, or floodplain fringe; and, thus, no residential uses are placed in any such areas. Certain portions of off-site improvements proposed by the project, including improvements to Sarver Lane and Deer Springs Road, presently reside within the mapped 100-year floodplain and are subject to flooding during major rainfall events. In such cases, the floodwaters can overtop portions of these roads. The project would construct the improvements to these existing facilities to realign and lift these roads out of the floodplain and to eliminate the existing flooding condition (i.e., the overtopping of floodwaters across the road) that occurs. Please see the	Consistent.

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

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floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans. A higher level of flexibility for floodplain encroachment within Villages is provided where future growth is planned and where fewer options are available for locating development outside the floodplain.	responses to Goal/Policy/Objective S-9, S-9.2, and S-9.3 above.	
S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.	Please see response to Goal/Policy/Objective S-9.4, above.	Consistent.
S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.	The proposed project is not located in a dam inundation area.	Not applicable.
S-10 Floodway and Floodplain Capacity. Floodways and floodplains that have	The project Site is not located within a mapped or designated floodplain or floodway. Off-Site improvements to Deer Springs Road and Twin Oaks Valley Road have been designed to conform to federal flood proofing	Consistent.

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acceptable capacity to accommodate flood events.	standards and siting criteria in compliance with the County Flood Damage Prevention Ordinance and Federal Emergency Management Agency (FEMA) Guidelines and Standards to ensure that the project would not contribute to or worsen a downstream flooding condition. Please see response to Goal/Policy/Objective S-9.2, above.	
S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low- intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.	Please see response to Goal/Policy/Objective S-10, above. The project Site is not located within a mapped or designated floodplain or floodway. The project's off-Site improvements to Deer Springs Road and Twin Oaks Valley Road would be considered public infrastructure. Nevertheless, these off-Site improvements would be designed consistent with the intent of this policy as is required by the County's Drainage Design Manual and FEMA regulations.	Not applicable.
S-10.2 Use of Natural Channels. Require the use of natural channels for County flood control facilities except where necessary to protect existing structures from a current flooding problem and where natural channel use is deemed infeasible. The alternative must achieve the same level of biological and other environmental protection, such as water quality, hydrology, and public safety.	The project would use natural channels and drainages for County flood control facilities wherever feasible to convey storm water runoff from developed areas, including both on- and off-Site areas. Within project development areas, runoff along and from manufactured slopes would be accommodated with concrete brow ditches in accordance with the County's grading ordinance, however the project would incorporate natural drainage swales and bioretention areas to capture, treat, and detain stormwater runoff prior to this runoff being released into the Site's system of natural drainages. The project's improvements to Deer Springs Road between Sarver Lane and Sycamore Drive would include the creation of a new widened drainage channel along the east side of Deer Springs Road.	Consistent.
S-10.3 Flood Control Facilities. Require flood control facilities to be adequately sized, constructed, and maintained to operate effectively.	The project would ensure that flood control facilities built as part of the project would be adequately sized, constructed, and maintained to operate effectively. Storm water runoff from the project's developed areas and roads, including off-Site improvements to Deer Springs Road and Twin Oaks Valley Road, would be detained in the project's system of stormwater BMPs to remove criteria pollutants and attenuate runoff flowrates for both hydromodification minimization and flood control purposes. As is required by the MS4	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
	Permit, the project would comply with hydromodification requirements to ensure that its hydromodification BMPs would detain post-development flowrates to match those from pre-development conditions. As is required by the County's Drainage Design Manual, the project's stormwater BMPs would be sized and designed to control post-development flowrates to match those from pre-development conditions.	
S-10.4 Stormwater Management. Require development to incorporate low impact design, hydromodification management, and other measures to minimize stormwater impacts on drainage and flood control facilities.	The project would incorporate LID features, including preservation of nearly three quarters of the Site's existing natural drainages and terrain, bioswales along roads and within the project's development areas, and disconnecting impervious surfaces. The project would also include stormwater BMPs to minimize hydromodification of downstream receiving channels and other stormwater BMPs to review criteria pollutants, infiltrate stormwater runoff, and attenuate runoff flowrates prior to runoff being discharges to natural drainages.	Consistent.
	A Drainage Study, Hydromodification Study, Critical Coarse Sediment Analysis, and a Storm Water Quality Management Plan were prepared to analyze impacts related to water quality, flooding, hydromodification, and sediment supply from stormwater runoff. To that end, the project has been designed to comply with the San Diego Regional Water Quality Control Board requirements for stormwater runoff, discharges, and pollutants as contained in the National Pollution Discharge Elimination System (NPDES) Permit for Municipal Separate Storm Sewer Systems (MS4s), Order Numbers R9-2015-0001 and R9-2015-0100 as well as in compliance with the County of San Diego Hydrology Manual. The project has also completed a "No Rise" flood control analysis related to off-site improvements to Sarver Lane and Deer Springs Road. See also the responses above to COS-4.3 and COS 5 and EIR Section 3.2, Hydrology and Water Quality.	
S-10.5 Development Site Improvements. Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.	The proposed project proposes drainage facilities that would provide adequate capacity to safely convey stormwater runoff. Please see the responses to Goal/Policy/Objective S-10.2, S-10.3, and S-10.4.	Consistent.
S-10.6 Stormwater Hydrology. Ensure development avoids diverting drainages, increasing velocities, and altering flow rates to off-site areas to minimize adverse impacts to the area's existing hydrology. Increases in velocities and peak flow rates can result in flooding, erosion, and other problems downstream. Decreases can deprive	The project would incorporate hydromodification mitigation and peak-flow detention facilities to eliminate adverse impacts to the area's hydrology. Runoff diversion was avoided by balancing the proposed drainage basins with existing drainage basins. Where proposed storm drain systems would discharge to a natural drainage, adequate energy dissipation would be provided (energy dissipation to be sized during final engineering). As is required by the MS4 Permit, the project would comply with hydromodification requirements to ensure that its hydromodification BMPs would detain post-development flowrates to match those from pre-development conditions. As is required by the County's Drainage Design Manual, the project's stormwater BMPs would be sized and designed to control post-development flowrates to match	Consistent.

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Guiding Principle	Project Conformance	Conformance Conclusion
biological resources of a needed water source.	those from pre-development conditions. Please see the responses to Goal/Policy/Objective S-10.2-10.5 above.	
S-11.4 Contaminated Lands. Require areas of known or suspected contamination to be assessed prior to reuse. The reuse shall be in a manner that is compatible with the nature of the contamination and subsequent remediation efforts.	To comply with this policy, Phase I and II Environmental Site Assessments prepared for the project informed the analysis of potential environmental impacts. Any areas of suspected contamination would be evaluated and, if necessary, remediated according to all applicable federal, state, and local regulations, including County of San Diego Department of Environmental Health and U.S. Environmental Protection Agency Region 9 standards. Both Phase I ESAs (included as Appendix L to this EIR), concluded that hazardous materials may exist on Site. Depending upon final grading and construction plans, the extent of the lead contamination from the illegal use of the project Site for weapons firing may result in adverse effects. Therefore, impacts would be potentially significant and would be mitigated by soil evaluation (M-HZ-4). Due to the age of the on-site structures at 2733 Sarver Lane, asbestos and lead-based paint are likely to exist within the buildings. Therefore, impacts would be potentially significant. Performing a hazardous materials building survey and, pending results of the survey, implementing an abatement work plan (M-HZ-5), would reduce impacts to less than significant.	Consistent.
S-11.5 Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.	Please see the response to Goal/Policy/Objective COS-6.2. The project would provide adequate buffers between its development areas and existing off-Site agricultural uses. Furthermore, the existing off-site agricultural operations consistent of small, family-run avocado and citrus crops which are generally considered compatible with residential land uses. The project's Agricultural Resources Technical Report was completed in accordance with the County's Guidelines for Determining Significance and Report Format and Content Reports for Agricultural Resources (2007) which state that, "[t]he type of agricultural uses surrounding the project Site will affect the degree of agriculture interface conflicts that would be expected to occur. For example, orchard crops such as avocadoes and citrus are often compatible with residential uses."	Consistent.
S-12 Adequate Law Enforcement Facilities. Timely development of law enforcement facilities in locations that serve the unincorporated areas of the County.	The proposed project's population growth would increase demands for services necessitating an increase in law enforcement. The project would result in the need for five additional sworn personnel. The project does not propose construction of new law enforcement facilities, nor are new facilities required to serve the project.	Consistent.

Guiding Principle	Project Conformance	Conformance Conclusion
S-12.1 New Law Enforcement Facilities. Coordinate new law enforcement facilities and services with new development in ways that sustain the provision of comprehensive services at levels consistent with substantially similar areas of the County.	The project does not propose construction of new law enforcement facilities, nor are new facilities required to serve the project. However, the project would pay a fair share contribution, and combined with fees collected from surrounding developments, would ensure adequate facilities and equipment are provided for local law enforcement.	Consistent.
S-13 Safe Communities. Law enforcement facilities and services that help maintain safe communities.	Please see the response to Goal/Policy/Objective S-12, above.	Consistent.
S-13.1 Sheriff Facility Locations. Locate Sheriff facilities to best serve existing and planned development and the corresponding demand for services.	Please see the response to Goal/Policy/Objective S-12.1 above.	Consistent.
S-13.2 Sheriff Facilities in Non-Residential Areas. Locate future Sheriff facilities in commercial, industrial, or mixed-use areas; they may also be located within residential areas when other sites are unavailable or unsuitable based on circulation, geography, proximity to demand, and other factors that impact the practical provision of services.	The Town Center planning area would include 81,000 square feet of General Commercial use. The proposed project does not specify future uses within the proposed commercial space, and it does not prohibit future Sheriff facilities – see also response to Goal/Policy/Objective S-12.1, above.	Consistent.
S-14 Crime Prevention. Crime prevention through building and site design.	The proposed project provides crime prevention through building and Site design. Specifically, project design encourages clustered buildings to create high-traffic areas and incorporate 360-degree architecture for visibility. The Specific Plan promotes the visibility and safety principles of Crime Prevention Through Environmental Design, which reduces crime and improves resident quality of life through building and public space design.	Consistent.
S-14.1 Vehicular Access to Development. Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.	The proposed project provides vehicular connections that reduce response times and facilitate access for law enforcement personnel. Specifically, the project would have two primary access roads along Deer Springs Road at Mesa Rock Road and Sarver Lane, with an additional access point at Camino Mayor off of Twin Oaks Valley Road to the north. The primary access road at Mesa Rock Road would be a four-lane entry road with a median that transitions into a four-lane undivided road farther into the project Site. An additional access road (Camino Mayor) would provide residents and emergency vehicles with sufficient access to and from the project. All project	Consistent.

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Guiding Principle	Project Conformance	Conformance Conclusion
	access points and internal roadways would conform to County Public Road Standards to facilitate access for law enforcement and emergency responders. All neighborhoods within the project would meet the County's travel time of 5 minutes for fire and emergency response. Please also refer to the project's Fire Protection Plan and the response to Goal/Policy/Objective S-2.	
 S-14.2 Development Safety Techniques. Require development within Village areas to utilize planning and design techniques, as appropriate, that deter crime. Examples of design features include the following: Avoiding landscaping that might create blind spots or hiding places Centrally locating open green spaces and recreational uses so that they are visible from nearby homes and streets Designing streets to discourage cut- through or high-speed traffic Installing paving treatments, plantings, and architectural design features, such as columned gateways, to guide visitors to desired entrances and away from private areas Installing walkways in locations safe for pedestrians Designing lots, streets, and homes to encourage interaction between neighbors Including mixed land uses that increase activities on the street Siting and designing buildings oriented for 	The proposed project requires development within Village areas to utilize planning and design techniques that deter crime. As stated in the Specific Plan, visibility and safety would be promoted using the principles of Crime Prevention Through Environmental Design, which is based on design and use of buildings and public spaces to reduce the incidence of crime and improve the quality of life for residents.	Consistent.
occupants to view streets and public spaces		

Guiding Principle	Project Conformance	Conformance Conclusion
	North County Metropolitan Subregional Plan	
Goal 1. ACCOMMODATE URBAN DEVELOPMENT IN APPROPRIATE AREAS Because the North County Metropolitan Subregion A. is developing rapidly; and B. contains large areas of developable land with many basic urban services available or located nearby.	The proposed project accommodates development in appropriate areas, with basic urban services available or located nearby. For example, the project Site is located within the CWA boundary, directly west of I-15 and north of Deer Springs Road. The Site is within the service boundary of Vallecitos Water District for water and sewer service, and is within a 5 minutes travel time of Deer Springs Fire Protection District Station 12.	Consistent
 Goal 2. ENCOURAGE LOGICAL CITY ANNEXATIONS Because A. "spheres of influence" boundaries for all five cities have been adopted to facilitate rational city annexations in the future. ENCOURAGE THE ANNEXATION OF UNINCORPORATED LAND WITHIN EACH CITY'S ADOPTED SPHERE OF INFLUENCE. 	The proposed project's development would encourage logical City annexations. The southeastern portion of the project Site is located in the Sphere of Influence of the City of Escondido, and the southern portion of the Site is within the Sphere of Influence of the City of San Marcos. The Site does not physically touch either City's existing municipal boundary. There are properties in between the project Site and the Cities' boundaries that would need to be annexed before annexation was an option for the project Site. Even if the project Site was physically touching the boundary of San Marcos, any benefit to taxpayers/ratepayers that could result from annexation would be speculative because the existing facilities would remain unchanged. Vallecitos Water District would continue to be the provider of sewer and water services; police services would continue to be provided by the County's Sheriff's Department as San Marcos does not have a police department; and fire services would likely continue to be provided by the Deer Springs Fire Protection District (DSFPD)/Cal Fire (e.g., through an out-of-area service agreement or contract with San Marcos) due to the location of the Site and its proximity to existing DSFPD facilities. These same service provider conditions would likely apply in the case of a proposed annexation to Escondido.	Consistent
Goal 3. PROMOTE AGRICULTURE IN NON- URBAN AREAS Because A. a large portion of the unincorporated territory of the Subregion is in some form of valuable agricultural production;	The project would promote agriculture in non-urban areas. For example, the project proposes to include two types of neighborhood/Community-scale agriculture uses: over 20 acres of Community gardens and grape vineyards. As such, the project would create agriculture uses on a Site that does not presently support them, thereby contributing to the preservation of agriculture as an integral component of the region's economy, character, and open space network.	Consistent

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Guiding Principle	Project Conformance	Conformance Conclusion
and B. agriculture provides economic benefits to County residents. PROMOTE AGRICULTURE BY PROTECTING SEMI-RURALAND RURAL AREAS FROM URBANIZATION AND INCOMPATIBLE DEVELOPMENT.	The project's proposed Community gardens would be integrated into individual neighborhoods to promote sustainable Community-based agriculture. Both the project's residents and the general public could rent or reserve garden plots within these Community gardens, with first priority given to the project's residents. Additionally, on some of the project's more visible slopes within Fuel Modification Zone 1 areas along the edge of certain neighborhoods, productive grape vineyards would be planted and maintained. These productive landscapes would be maintained by the Homeowners' Association and add to the aesthetic appeal of the project's individual neighborhoods. These vineyards would include a variety of species of grapes that are drought tolerant, resistant to wildfire, and thrive in the local microclimate. The vineyards would be expected to produce 3 to 4 tons of grapes per acre. By including the Community gardens and vineyards in the project, the project would increase the amount of agriculture in the region and enhance the availability of locally grown organic food sources, thereby contributing to the preservation of agriculture as an integral component of the region's economy, character, and open space network.	
 Goal 4. PROTECT ENVIRONMENTAL RESOURCES Because A. the Subregion includes scenic rugged terrain, which is not suitable for urbanization; and B. Resource Conservation Areas have been identified to help protect valuable resources throughout the Subregion. PROTECT NATURAL AND ECONOMIC RESOURCES BY DESIGNATING APPROPRIATE LANDS AS RURAL, SEMI- RURAL, AND ENVIRONMENTALLY CONSTRAINED AREAS. 	The project would protect natural and economic resources within the North County Subregion. The project includes a proposed General Plan Amendment that would add the Semi-Rural Regional Category Designation to the project's proposed development areas and would replace the Rural Lands Land Use Designation with the more restrictive Open Space-Conservation Land Use Designation for the lands proposed to be preserved and managed in perpetuity as habitat preserve. The project would create a 1,209-acre habitat preserve (61% of the Site) and avoid grading impacts to nearly three quarters of the Site, thereby protecting and preserving a substantial portion of the Site's natural terrain and features, including its prominent geology and rock outcroppings and native habitat. It should also be noted that an additional 212 acres of off-site open space would be preserved, for a total preserve acreage of 1,421 acres (72 percent of the project Site acreage). For more information on how the project would protect the natural and economic resources of the Site and surrounding area, please see the response to <i>Guiding Principle 3</i> .	Consistent

Guiding Principle	Project Conformance	Conformance Conclusion
LAND USE Policy 1. INCREASE CITY-COUNTY PLANNING COOPERATION Because A. cities of the Subregion are closely related to the surrounding area in terms of public services, travel patterns, and community identity; and B. the cities and County are generally agreed on the spheres of influence boundaries, which were adopted by the Local Agency Formation Commission (LAFCO). THE COUNTY WILL COOPERATE IN THE PLANNING AND REGULATING OF GROWTH IN THE UNINCORPORATED TERRITORY WITHIN EACH CITY'S SPHERE OF INFLUENCE. FUTURE COUNTY DECISIONS ON PROPOSED PROJECTS IN THE SPHERE AREAS WILL TAKE EACH CITY'S PLANNING OBJECTIVES INTO CONSIDERATION.	The southeastern portion of the project Site is located in the sphere of influence of the City of Escondido, and the southern portion of the Site is within the sphere of influence of the City of San Marcos. The County has discussed this project with both jurisdictions, and has considered the planning objectives of those cities while reviewing the proposed project. The project applicant has coordinated directly with the City of San Marcos on the planning and design of improvements to Deer Springs Road and Twin Oaks Valley Road as those roads travel to and into the City's jurisdiction.	Consistent
GOVERNMENT STRUCTURE Policy 2. SUPPORT CITY ANNEXATION INCENTIVE PROGRAMS Because A. the cities and County are generally agreed that territory within the city spheres of influence should eventually be annexed; and	This policy is not relevant to the proposed project. It provides direction for City/County cooperation regarding annexation incentive programs. Please also see the response to <i>North County Subregional Plan Goal 2</i> .	Not Applicable.

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

Guiding Principle	Project Conformance	Conformance Conclusion
 B. pre-annexation improvement plans, which identify city services available to neighborhoods upon annexation, will encourage public support for annexation. SUPPORT CITY ANNEXATION INCENTIVE PROGRAMS FOR EACH CITY WITHIN THE SUBREGION. ASSIST THE CITIES IN PREPARING PRE-ANNEXATION IMPROVEMENT PLANS TO IDENTIFY CITY SERVICES AND FACILITIES THAT WOULD BE INCENTIVES TO PUBLIC SUPPORT FOR ANNEXATION. Policy 3. IDENTIFY POTENTIAL COMMERCIAL LOCATIONS 	The project is proposing commercial uses in its Town Center neighborhood. The project proposes a General Plan Amendment to redesignate an area as Village Core Mixed Use that also would allow commercial use.	Not applicable.
 CONMERCIAL LOCATIONS Because A. identification of the potential commercial use of these sites, if annexed to a city, will serve as an incentive for the property owner to seek annexation in order to realize a more intense use of the property B. these sites should only be developed when sewer service is made available; and C. the relevant city generally concurs that these locations are potentially as described below. THE FOLLOWING ARE IDENTIFIED AS POTENTIAL LOCATIONS FOR COMMERCIAL USES IF ANNEXED TO THE CITY: 	The Town Center is currently within the VWD sewer service area, and sewer service is available. The locations identified in this policy as potential locations for commercial uses if annexed are not applicable to the proposed project.	

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

Guiding Principle	Project Conformance	Conformance Conclusion
SAN PASQUAL VALLEY ROAD AT BEAR VALLEY PARKWAY - NEIGHBORHOOD SERVING COMMERCIAL USES. GAMBLE LAND (CITRICADO PARKWAY) AT FELICITA ROAD - NEIGHBORHOOD SERVING COMMERCIAL USES. PENDING ANNEXATION, THE COUNTY WILL PERMIT REASONABLE RESIDENTIAL USE OF THESE POTENTIAL COMMERCIAL SITES.		
Policy 4. STUDY AMENDMENT OF COUNTY ROAD AND SIGN STANDARDS Because each city is more likely to annex territory within its sphere if roads and signage are developed consistent with the city's own standards.	This policy does not apply to private development, however the project applicant has coordinated with the City of San Marcos on the planning and design@ of improvements to Deer Springs Road and Twin Oaks Valley Road to ensure that improvements to Deer Springs Road outside the City's boundary will be consistent with the improvements to Deer Springs Road and Twin Oaks Valley Road inside the City's boundary. For example, the proposed travel lane and shoulder widths for Deer Springs Road inside the City of San Marcos.	Not applicable,.
 Policy 7. LIMIT NEW SUBDIVISIONS EXCEEDING ONE DU/ACRE, OTHER THAN WHERE THE LAND USE MAP SHOWS A HIGHER DENSITY – ESCONDIDO Because A. there is a great amount of unincorporated land within the adopted city sphere of influence that is appropriate for urbanization if annexed to the city; B. a one acre minimum lot size requirement would create an incentive for landowners to annex to the city in order to realize higher densities; 	The proposed project includes a General Plan Amendment that would amend the General Plan Land Use Map such that the project would be consistent with the General Plan and thus is consistent with item (1). In addition, the proposed project has sewers available and can obtain sewer lateral connections to an existing sewer main and thus complies with item (2). The project's Town Center is located within the City of Escondido's sphere of influence and located within the boundaries of VWD's sewer service area. The majority of the Site will require annexation into a sewer improvement district prior to sewer service being available. This is an internal process for VWD and does not require Local Agency Formation Commission (LAFCO) approval.	Consistent

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

Guiding Principle	Project Conformance	Conformance Conclusion
C. a one acre minimum policy will minimize the creation of new public service demands; and D. exceptions to a one acre requirement can be considered on a case-by-case basis, if sewer service is available or if the vicinity of a proposed project is already fully subdivided or developed. PROHIBIT NEW MAJOR AND MINOR SUBDIVISIONS WITHIN THE ADOPTED ESCONDIDO CITY SPHERES OF INFLUENCE IF THE DENSITY SHOWN ON THE FINAL SUBDIVISION OR PARCEL MAP IS GREATER THAN ONE DWELLING UNIT PER GROSS ACRE, UNLESS: (1) CONSISTENT WITH THE GENERAL PLAN LAND USE MAP; OR (2) THE PROPOSED PROJECT HAS SEWERS AVAILABLE AND CAN OBTAIN SEWER LATERAL CONNECTIONS TO AN EXISTING SEWER MAIN, IN WHICH CASE THIS POLICY SHALL NOT APPLY TO THE PROPERTY.		
AGRICULTURE Policy 8. PROMOTE AGRICULTURE - OUTSIDE CITY SPHERES Because A. agriculture is an important commercial activity in the North County Metropolitan Subregion and valuable commercial crops are being raised; B. row crops and nursery production are common to the maritime area climate,	This policy applies to the County and not private development. However, the project is consistent with the policy's intent because the project: (1) proposes Semi-Rural and Rural Regional Categories for all development areas outside the Village designation, including those areas of the project Site outside the Sphere of Influence of the City of San Marcos; (2) incorporates Community-scale agricultural uses, including Community gardens and vineyards within project neighborhoods, thereby increasing the amount of agriculture in the North County Metropolitan Subregion, enhancing the availability of locally grown organic food sources, and contributing to the agricultural preservation as an integral component of the region's economy, character, and open space network (please see the response to the <i>North County Metropolitan Subregional Plan Goal 3</i> above); and, (3) provides appropriate buffers between the project's development areas and off-Site existing agricultural uses.	Consistent

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Guiding Principle	Project Conformance	Conformance Conclusion
 while orchards are scattered throughout the eastern portion of the Subregion. C. certain areas have viable commercial agriculture and soil; climate and other conditions are favorable for continuing success; and low density Land Use General Plan Designations can be applied to protect agriculture in these outlying and undeveloped locations. DESIGNATE THE TWIN OAKS VALLEY (PORTION OUTSIDE SAN MARCOS SPHERE) AS SEMI-RURAL AND RURAL LANDS REGIONAL CATEGORIES. THESE DESIGNATIONS WILL LIMIT THE INTRUSION OF INCOMPATIBLE LAND USES FROM EXISTING AGRICULTURAL LANDS. 	Finally, due to the surrounding terrain the off-site agricultural uses are limited to citrus and avocado groves. The County's Guidelines for Determining Significance and Report Format and Content Reports for Agricultural Resources (2007) states that, "[1]he type of agricultural uses surrounding the project Site will affect the degree of agriculture interface conflicts that would be expected to occur. For example, orchard crops such as avocadoes and citrus are often compatible with residential uses." Therefore, in light of these considerations, the project would be consistent with the intent of this policy to limit the intrusion of incompatible land uses from existing agricultural lands.	
 Policy 13. SEWER SERVICE 13. IMPROVE SEWER SERVICE WITHIN THE URBAN AREA Because A. many areas throughout the Subregion have experienced septic tank failures and the problem is especially critical in the fringe areas around Escondido and Vista, where the cumulative impact of residential development is causing this problem to worsen over time; and B. need for sewer service will expand greatly as growth continues, particularly within the County Water Authority (CWA) boundary. 	The project would improve sewer service. The project is located inside the CWA boundary and sewer service will be provided by the Vallecitos Water District to the project Site. Existing land uses (such as the gas station) within the vicinity of the project and adjacent to the sewer system to be built with the project will have the ability to connect to the expanded sewer system.	Consistent

 Table DD-1

 County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

Guiding Principle	Project Conformance	Conformance Conclusion
WHEREVER FEASIBLE, PROVIDE SEWER SERVICE INSIDE THE CWA		
BOUNDARYAND TO EXISTING		
DEVELOPED AREAS OUTSIDE THE CWA		
BOUNDARY, WHERE HIGH RATES OF		
SEPTIC TANK FAILURES HAVE BEEN		
EXPERIENCED. Policy 14. DESIGNATE RESOURCE	The County previously designated a significant portion of the project Site as a Resource Conservation Area.	Consistent
CONSERVATION AREAS	Much of the RCA will be folded into the proposed North County Multiple Species Program in the process of	Consistent
Because	that plan moving forward.	
A. it is County policy to protect and		
manage environmental resources in		
order to maintain them for future		
needs; and B. an initial inventory of valuable		
resources has been completed (refer		
to Appendix).		
THE RESOURCE CONSERVATION AREA		
(RCA) DESIGNATION IS APPLIED TO		
PROTECT SENSITIVE BIOLOGICAL,		
ARCHAEOLOGICAL, AESTHETIC, MINERAL, AND WATER RESOURCES.		
PROJECTS REQUIRING ENVIRONMENTAL		
ANALYSIS UNDER THE CALIFORNIA		
ENVIRONMENTAL QUALITY ACT (CEQA)		
THAT OCCUR WITHIN RESOURCE CONSERVATION AREAS SHOULD BE		
CONSERVATION AREAS SHOULD BE CAREFULLY ANALYZED TO ASSESS		
THEIR IMPACT ON THE RESOURCE		
CONSERVATION AREA.		

Guiding Principle	Project Conformance	Conformance Conclusion
 Policy 15. DIRECT COUNTY RESOURCES TOWARD PARKLAND ACQUISITION AND DEVELOPMENT Because A. priority to acquisition and development protects good park locations from alternative development; and B. acquisition and development by the County facilitates annexation of the park by the city, which is the appropriate entity to manage a recreation program for that locality. DIRECT COUNTY RESOURCES TOWARD PARK LAND ACQUISITION AND DEVELOPMENT; PARK SITES WITHIN AN ADOPTED CITY SPHERE OF INFLUENCE SHOULD BE ANNEXED AND SUBSEQUENTLY OPERATED AND MAINTAINED BY THE CITY. WHEN FEASIBLE, CITY ANNEXATION, OPERATION, AND MAINTENANCE SHOULD BE A REQUIREMENT OF CITY- COUNTY JOINT POWERS PARK AGREEMENTS. 	This policy is not directed to private development; however, the applicant has worked with the Parks Department to provide parkland in compliance with the Park Land Dedication Ordinance (PLDO). Please see the responses to Goal/Policy/Objective COS-21, COS-21.1, COS-21.2, COS-21.3, COS-21.5, COS-22, COS-24.	Not Applicable.
Policy 18. IMPLEMENTATION ADOPT GENERAL PLAN CATEGORIES Because A. the North County Metropolitan Subregional Plan, as part of the County General Plan, must conform to the County General Plan; and B. the Land Use Element contains a full	The policy is directed at the County's adoption of General Plan land use designations.	Not Applicable.

Table DD-1
County of San Diego General Plan (2011) and Subregional Plan Consistency Analysis

Guiding Principle	Project Conformance	Conformance Conclusion
description of the Land Use Designations that will be used to implement each of the County's Community and Subregional plans. THE LAND USE DESIGNATIONS CONTAINED IN THE LAND USE ELEMENT ARE HEREBY ADOPTED BY REFERENCE AND WILL BE USED TO IMPLEMENT THIS SUBREGIONAL PLAN.		
The North County Metropolitan Subregional Plan also has a description of the existing Specific Plans within the boundaries of the subregion. The project should also include an amendment to the subregional plan to include a brief description of the proposed project after Chapter 6.	Upon approval of a General Plan Amendment, a brief description of the proposed project will be included in the North County Metropolitan Subregional Plan.	
The North County Metropolitan Subregional Plan has two figures provided in Appendix A. These figures may need to be amended to account for the proposed project.	Figure 1 of the North County Metropolitan Subregional Plan will not need to be revised because the project would not amend the boundaries of the North County Metropolitan Subregional Plan area. Figure 3, North County Metropolitan Subregional Plan Village Boundaries, will remain the same; therefore, Figure 3 will not be amended.	

Table DD-2
Consistency with SANDAG 2050 RTP/SCS Policy Objectives

Category	Policy Objective or Strategy	Consistency Analysis
The Regional Plan – Policy Objectives		
Mobility Choices	Provide safe, secure, healthy, affordable, and convenient travel choices between the places where people live, work, and play.	Consistent . The project would provide safe, secure, healthy, affordable, and convenient travel choices between the places where people live, work, and play. For example, the project would foster a safe, secure, and healthy Community through a project design and project amenities that including walking, hiking, and bicycle routes, an electric bike-share program, and shuttle, ride-share, and carshare services throughout its various neighborhoods with access to parks, open space areas, the school site, the Village commercial area, and transit. In many areas, enhancements such as landscaped parkways and fencing would provide a safe pedestrian environment separating pedestrian pathways from roadways. In addition, Site lighting would provide illumination for safety. The project's internal circulation features provide residents the opportunity to access employment, education, recreational, and commercial uses via multiple modes of transportation.
Mobility Choices	Take advantage of new technologies to make the transportation system more efficient and environmentally friendly.	 Consistent. The project would include lane and intersection design configuration modifications where necessary, as well as installation of signalization where required per the Traffic Impact Analysis (LLG (2017)). The project would also a Transportation Demand Management Program (TDM Program) with mobility alternatives that reduce GHG emissions and VMTs such as an electric bike-share program and shuttle services. Additionally, the project does not impair SANDAG's ability to employ new technologies to make travel more reliable and convenient.
Habitat and Open Space Preservation	Focus growth in areas that are already urbanized, allowing the region to set aside and restore more open space in our less developed areas.	Consistent . The project is located close to major urban and employment centers, including the cities of San Marcos, Vista, and Escondido. The southwestern portion of the project Site is located within the sphere of influence of the City of San Marcos whereas the southeastern portion of the project Site is located within the sphere of influence of the City of Escondido. The project's open space design would consist of two large, continuous blocks of key biological resources situated within the northern half and along the eastern boundary of the project Site, as well as a large third block of open space in the center of the proposed Site that connects the abovementioned blocks of open space to open space located east and south of the project Site, as shown on Figure 1-18 of Chapter 1 of this EIR. In total, the project would permanently preserve and manage approximately 1,209 acres of preserve.

Table DD-2 Consistency with SANDAG 2050 RTP/SCS Policy Objectives

Category	Policy Objective or Strategy	Consistency Analysis
Habitat and Open Space Preservation	Protect and restore our region's urban canyons, coastlines, beaches, and water resources.	Consistent. The project would avoid impacts to the majority of the Site's natural topography, avoiding impacts to the Site's more prominent topographic features, including major ridgelines, peaks, prominent rock outcroppings, and drainages. Nearly three quarters of the Site would remain in its natural topographic condition. Proposed project Site planning accounts for existing landforms and topography by concentrating development between and away from ridge lines. Prominent ridges and landforms were mapped, and each neighborhood would minimize disturbance to prominent peaks and landforms. Each neighborhood would be developed to minimize impacts to the surrounding natural terrain, reducing the project's overall development footprint. Where possible, streets were designed to parallel topography and were guided by the watershed patterns on the Site.
Regional Economic Prosperity	Invest in transportation projects that provide access for all communities to a variety of jobs with competitive wages.	Not Applicable. The project would not impair SANDAG's ability to invest in transportation projects available to all communities.
Regional Economic Prosperity	Build infrastructure that makes the movement of freight in our community more efficient and environmentally friendly.	Not Applicable . The project does not propose freight movement, nor would it impair SANDAG's ability to preserve and expand options for freight movement.
Partnerships/Collaboration	Collaborate with Native American tribes, Mexico, military bases, neighboring counties, infrastructure providers, the private sector, and local communities to design a transportation system that connects to the mega-region and national network, and works for everyone and fosters a high quality of life for all.	Not Applicable. The project would not impair SANDAG's ability to provide transportation choices to better connect the San Diego region with Mexico, neighboring counties, and tribal nations.
Partnerships/Collaboration	As we plan for our region, recognize the vital economic, environmental, cultural, and community linkages between the San Diego region and Baja California.	Not Applicable . The project would not impair SANDAG's ability to provide transportation choices to better connect the San Diego region with Mexico.
Healthy and Complete Communities	Create great places for everyone to live, work, and play.	Consistent. The project would create great places for its residents and guests to live, work, and play. The project includes a variety of housing types, a school site, 35.9 acres of parks, 1,209 acres of habitat preserve open space, approximately 16 miles of pedestrian pathways and trails, protection of nearly three quarters of the Site's natural topography, and 80,000 square feet of neighborhood serving retail uses in its Town Center. The project's internal circulation features would provide residents the opportunity to access employment, education, recreational, and commercial uses via multiple modes of transportation. The project encourages

Table DD-2Consistency with SANDAG 2050 RTP/SCS Policy Objectives

Category	Policy Objective or Strategy	Consistency Analysis
		non-vehicular modes of transportation through the inclusion of bike lanes, an extensive system of multi-use trails and pedestrian pathways, and a variety of mobility alternatives, including an electric bike-share program, a car-share program, a ride-share program, shuttle services within the project and to major North County transit centers, and a transit stop in the Village. Finally, the project would include Community gardens and grape vineyards as a sustainable local agricultural component. Collectively, the project's variety of housing types, parks, school site, commercial uses, and agricultural component combined with its non- vehicular mobility alternatives and high conservation of the Site's natural terrain and habitat would create a great place to live, work, and play.
Healthy and Complete Communities	Connect communities through a variety of transportation choices that promote healthy lifestyles, including walking and biking.	Consistent . The proposed project connects communities through a variety of transportation choices that promote healthy lifestyles, including walking and biking. For example, the project would encourage non-vehicular mobility alternatives through the inclusion of bike lanes, an extensive trail system consisting of pedestrian pathways, multi-use trails, and an electric bike-share program.
Environmental Stewardship	Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.	Consistent. The project would make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living. The project would promote non-vehicular mobility alternatives through the inclusion of bike lanes, an extensive system of pedestrian pathways and multi-use trails with connections to the project's parks, open space preserve areas, and to and through its various neighborhoods. The project would include a TDM Program with shuttle services within and around the project and to Escondido Transit Center, support for ride-share and car-share programs, a Community-sponsored electric bike-share program, and system of pedestrian pathways, dedicated bike lanes, and multi-use trails. Collectively, these project design features would help reduce greenhouse gas emissions from vehicles while continuing to improve air quality in the region. PDF-1 through PDF-20 would reduce vehicle miles travelled associated with the project.
Environmental Stewardship	Support energy programs that promote Sustainability.	Consistent. See above response.

Table DD-2 Consistency with SANDAG 2050 RTP/SCS Policy Objectives

Category	Policy Objective or Strategy	Consistency Analysis	
	Sustainable Communities Strategy (SCS) – Strategies		
Strategy #1	Focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit.	Consistent. The project would focus housing and job growth near urbanized areas and where there is existing and planned transportation infrastructure. The project would be located close to major urban and employment centers, including the Cities of San Marcos, Escondido, Vista, Carlsbad, and Oceanside. The project Site is located directly west of and along the I-15 corridor, immediately adjacent to a park-and-ride facility at the I-15/Deer Springs Road Interchange, north of State Route 78 and south of State Route 76, and directly north of and along Deer Springs Road which serves as State Route 12 and is a planned six-lane Prime Arterial in the County's Mobility Element. In support of transit and mobility alternatives, the project proposes a Transportation Demand Management (TDM) Program that includes shuttle services within the project and to the Escondido Transit Center, subsidized transit passes for its residents, mobility hubs as a means of resident outreach and education, and support for ride-share and carshare services in the project's Town Center neighborhood.	
Strategy #2	Protect the environment and help ensure the success of smart growth land use policies by preserving sensitive habitat, open space, cultural resources, and farmland.	Consistent . The project's open space design would consist of two large continuous blocks of key biological resources situated within the northern half and along the eastern boundary of the project Site, as well as a large third block of open space in the center of the proposed Site that would connect the abovementioned blocks of open space to open space located east and south of the project Site, as shown in Figure 1-18 of Chapter 1 of this EIR. In total, the project would create a 1,209-acre open space preserve and preserve nearly three quarters of the Site's natural topography. While the project Site does not currently support agricultural uses, the project would include Community gardens and grape vineyards, thereby contributing to the preservation of agriculture in the North County subregion and promoting local sustainable agricultural uses.	
Strategy #3	Invest in a transportation network that gives people transportation choices and reduces greenhouse gas emissions.	Consistent. The project would make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living. The project would promote non-vehicular mobility alternatives through the inclusion of bike lanes, an extensive system of pedestrian pathways and multi-use trails with connections to the project's parks, open space preserve areas, and to and through its various neighborhoods. The project would include a TDM Program with shuttle services within and around the project and to the Escondido Transit	

Table DD-2 Consistency with SANDAG 2050 RTP/SCS Policy Objectives

Category	Policy Objective or Strategy	Consistency Analysis
		Center, support for ride-share and car-share programs, a Community-sponsored electric bike-share program, and system of pedestrian pathways, dedicated bike lanes, and multi-use trails. Collectively, these project design features would help reduce greenhouse gas emissions from vehicles while continuing to improve air quality in the region. PDF-1 through PDF-20 would reduce vehicle miles travelled associated with the project.
Strategy #4	Address the housing needs of all economic segments of the population.	The proposed project would include a variety of housing types leading to a range of housing opportunities, including a range of single-family, multi-family, and age- qualified housing options, located within a mixed-used Community.
Strategy #5	Implement the Regional Plan through incentives and collaboration.	Not Applicable. The project would not impair SANDAG's ability to implement the Regional Plan through incentives and collaborations.

Policy	Consistency Analysis
Site Design, Site Planning Standards, Policy 1: Individual projects shall reinforce the character of the sites, the attributes of adjacent properties and preserve the viewsheds, natural topographic features and natural watercourses.	Consistent. The project would reinforce the character of the Site, the attributes of adjacent properties and preserve the viewsheds, natural topographic features and natural watercourses found on-Site. The project would preserve nearly three quarters of the Site's existing natural topography, including natural watercourses, rock outcroppings, ridgelines, and peaks, and create a 1,209-acre habitat preserve. An additional 250 acres of the Site's native habitat would remain but be subject to thinning and weed abatement to protect against wildland fires. The project would focus development between and away from ridgelines and the Site's more prominent topographic features. The project's network of streets was designed to largely parallel topography and was guided by the project's system of drainages.
	Existing landforms and ridges north of Deer Springs Road would provide a buffer to minimize the proposed project's visibility from Deer Springs Road and from properties immediately adjacent. Additionally, existing landforms and ridges along the east side of the project Site would provide a buffer to minimize the project's visibility from I-15 and residential properties to the east. The project's neighborhoods were designed such that the homes would sit below ridgelines to avoid the "silhouette" of homes against the ridgeline. The project would include many single story homes and would draw from the more rustic and equestrian elements of the surrounding communities to guide its architectural styles.
	In summary, the combination of the project's proposed conservation of nearly three quarters of the natural topography, a development approach that focuses homes and streets between and away from ridgelines and peaks, and a project that avoids the silhouetting of homes against ridgelines along with architectural styles that pull from the surrounding communities would reinforce the character of the Site, the attributes of adjacent properties and preserve the viewsheds, natural topographic features and natural watercourses found on Site.
Site Design, Site Planning Standards, Policy 4: Building orientation shall take maximum advantage of existing views and create view corridors.	Consistent. The project's proposed neighborhoods have been planned in such a way that building orientation on individual home sites and building pads for multi-family buildings would take advantage of the predominant views to the north and east of the Site. The Knolls and Valley neighborhoods sit in the southeastern portions of the project Site and views from these two neighborhoods would of the Site's ridgelines and hillsides surrounding the Valley planning area and to the south of the project Site looking toward Twin Oaks and San Marcos. In this way, the project's various building sites would create new view corridors. Finally, the project includes a network of pedestrian pathways and trails with 35.9 acres of parks dispersed

 Table DD-3

 Consistency with Applicable I-15 Corridor Scenic Preservation Guidelines

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Policy	Consistency Analysis
	across the project Site and multiple locations where pedestrians, hikers, horseback riders, residents, and guests can enjoy scenic vistas of the surrounding area's dramatic landscape. Certain portions of the Town Center and Terraces neighborhoods would be subject to the I-15 Scenic Corridor design review process.
Site Design, Site Planning Standards, Policy 5: Ridgeline projects can be highly sensitive and are generally discouraged; (a) Ridgeline projects shall maintain a low profile appearance and the natural physical character of the ridgeline shall be substantially maintained; (b) Ridgeline projects shall be limited to one story; (c) Ridgelines that have been graded or disturbed shall be supplemented with a sufficient amount of trees, shrubs, and ground cover to minimize visual impacts resulting from such disturbances.	Not Applicable . While the project Site contains several prominent ridgelines, the project itself does not propose development on top of its ridgelines and is, therefore, not a ridgeline project. Instead, the project would preserve the Site's primary and secondary ridgelines and set its home sites and building pads below ridgelines. The project would also avoid grading impacts to nearly three quarters of the Site's natural topography. Finally, the project includes a landscape concept plan that includes tree-lined streets and 35.96 acres of Community and neighborhood parks helping to further minimize visual impacts.
Parking and Circulation Design Standards, Policy 2: Project entries shall provide for safe and efficient circulation; (a) Project entries and the transition from major circulation routes into the project interior shall be accomplished through the use of landforms, open space, landscape plantings, and architectural elements (i.e., wall, signs); (b) The number of driveway entrances into parking areas from public streets shall be minimized. Use of common easements for parking and circulation systems integrated between properties shall be encouraged; (c) Safety lighting shall be provided at all street intersections and on project drives,	 Consistent. Project entries would provide for safe and efficient circulation. Project entries and the transition from major circulation routes into the project interior would be accomplished through the use of landforms, open space, landscaped medians and parkways, and architectural elements. The number of driveway entrances into parking areas from public streets would be minimized. The project would include safety lighting at all street intersections and on project drives, entries, pathways, and parking areas. For example, the project Site would have two primary access roads along Deer Springs Road
entries, walkways and parking areas.	at Mesa Rock Road and Sarver Lane, with an additional access roads along beer springs road at Mesa Rock Road and Sarver Lane, with an additional access point at Camino Mayor off of Twin Oaks Valley Road to the north. The primary access road at Mesa Rock Road would be a four-lane entry road with a median that transitions into a four-lane undivided road farther into the project Site. On-site roadways would be constructed within and between the different planning areas where development would occur. These roadways would primarily consist of main roads with a pavement width of 34 feet that mostly run between the developed planning areas, and residential streets approximately 32 to 40 feet wide that generally traverse within a planning area.
	Further, Site lighting would provide a critical safety function. Lighting would provide minimum illumination for safety while minimizing ambient light spill. Pedestrian lighting would be provided for entry areas, courtyards, and other public gathering spaces. Parks shall have minimum security lighting. Low-level lighting would be provided along trails, roads, and throughout each neighborhood.

Table DD-3
Consistency with Applicable I-15 Corridor Scenic Preservation Guidelines

Policy	Consistency Analysis
Site Lighting Standards, Policy 1: Site lighting shall minimize emission of light rays into both the night sky and neighboring properties, especially as it pertains to Mt. Palomar Observatory; (a) Site lighting shall be limited to that necessary for security, safety and identification and shall be integrated with project landscape design.	 Consistent. The project's lighting would minimize emission of light rays into both the night sky and neighboring properties and be limited to that necessary for security, safety and identification, and would be integrated with project landscape design. For example, all Class I, II, and III lighting installed throughout the project as well as street lighting along off-site road improvements would comply with the applicable requirements of the County of San Diego Light Pollution Code Section 59.101 et seq. Further, Site lighting would provide security, safety, and identification. Lighting would provide minimum illumination for safety while minimizing ambient light spill. Pedestrian lighting would be provided for entry areas, courtyards, and other public gathering spaces. Parks would have minimum security lighting.
Site Lighting Standards, Policy 2: Site lighting plans that conflict with the character of the community shall be discouraged.	Consistent. Refer to the above consistency analysis for Site Lighting Standards, Policy 1.
Landscape Design Standards, Policy 2: Project boundary landscaping shall compliment adjacent landforms and plant materials.	Consistent. Project boundary landscaping shall compliment adjacent landforms and plant materials. For instance, the proposed project's landscape character would be informed by the natural terrain. The overall landscape theme would embody a native low-water use/drought-tolerant landscape character and include preservation and re-use of natural Site boulders paired with oak trees and other native plants, allowing for a visual blend between the Site's developed areas and the surrounding native habitat. The project's perimeter would be protected with a Fuel Modification Zone 2 area, a 150-foot-wide area of native vegetation thinned and kept free of weeds but retaining its native plant species.
Landscape Design Standards, Policy 3: Landscape plans shall utilize native and drought tolerant plants, where possible, per the plant list provided by County staff.	Consistent . In accordance with the County's native plant list, the project's landscape plan would utilize native and drought tolerant plants, where possible and where not in conflict with fuel modification and wildland/urban interface requirements applicable to the project. Please see the response to <i>Site Lighting Standards, Policy 2</i> above.
Landscape Design Standards, Policy 4: Trees and plantings adjacent to pedestrian paths and within parking areas shall be selected to enhance the human scale; (a) Tree canopies shall be encouraged to soften the visual impact of vehicular circulation and parking areas, and relieve them from heat build-up. Trees shall be placed away from entrances to buildings, parking lots, and street intersections for visibility and safety, where possible; (b) Low-scale plantings shall be located adjacent to driveway entrances and street corners, where	Consistent . The project's trees and plantings adjacent to pedestrian paths and within parking areas would be selected to enhance the human scale. Tree canopies would be installed to soften the visual impact or vehicular circulation and parking areas, and would relieve heat build-up. Trees would be placed away from entrances to buildings, parking lots, and street intersections for visibility and safety, where possible. Low-scale plantings would be located adjacent to driveway entrances and street corners, where possible, and would not obscure drive visibility. Parking areas would be visually screen with peripheral landscaping, where

Policy	Consistency Analysis
possible, and shall not obscure drive visibility; (c) Parking areas shall be visually screened with peripheral landscaping, wherever feasible. Exposed vehicular use areas shall include a minimum of 10% of the paved areas in landscaping dispersed throughout the parking area.	feasible. Exposed vehicular use would include a minimum of 10% of the paved areas in landscaping dispersed throughout the parking area.
Development Standards for Steep Topography and Natural Features, Policy 1: Extensive grading of slope areas within viewsheds will be minimized; (a) Revegetation and erosion control shall be provided in all newly graded areas.	Consistent . The proposed project would minimize extensive grading of slope areas within viewsheds, and would provide revegetation and erosion control in newly graded areas. For example, the project would preserve nearly three quarters of the Site's natural topography and drainages, particularly those areas of the Site visible from the I-15 corridor. In addition, where possible the project would use grade changes within individual neighborhoods as opposed to more conventional mass grading techniques to create separation between different land uses and to step up and down the Site. Consistent with the County's grading ordinance, the project would incorporate both internal and perimeter erosion control BMPs throughout the grading operation and would revegetated disturbed areas and all manufactured slopes consistent with the County's erosion control requirements and the project's landscape plans.
Development Standards for Steep Topography and Natural Features, Policy 2: Hillside development shall be integrated with existing topography and landforms. Areas of steep topography, tree stands, hillside agricultural activity, and rock outcroppings shall be respected and preserved.	Consistent . The proposed project integrates hillside development with existing topography and landforms. No agricultural activities exist within the project Site boundaries, however much of the Site's steep topography, tree stands, and rock outcroppings would be respected and preserved. Please see the response to <i>Site Design, Site Planning Standards, Policy 1</i> and <i>Development Standards for Steep Topography and Natural Features, Policy 1</i> above.
Development Standards for Steep Topography and Natural Features, Policy 3 : Variety in the development of hillsides shall be encouraged through the use of appropriate site preparation techniques, grading techniques, and in the configuration, size, and placement of lots.	Consistent. The project would include a variety of housing types on a range of lot sizes, including multi-family building sites and grade adaptive home sites, and implement a Site design approach that maximizes conformance to and integration of the Site's existing natural topography to locate and grade the project's seven distinct neighborhoods. Please see the response to <i>Site Design, Site Planning Standards, Policy 1</i> and <i>Development Standards for Steep Topography and Natural Features, Policy 1</i> and Policy 2 above.
Development Standards for Steep Topography and Natural Features, Policy 6: The visual quality shall be maximized and the erosion potential shall be minimized by planting native and naturalized plants, especially in disturbed areas adjacent to upgraded hillsides and watercourses.	Consistent . The project Site's visual quality would be maximized and the erosion potential minimized by planting native and naturalized plants. Please see the response to <i>Landscape Design Standards, Policy 2 and Policy 3</i> , and <i>Development Standards for Steep Topography and Natural Features, Policy 1</i> above.
Development Standards for Steep Topography and Natural Features, Policy 8: Any grading above 25% slope will blend with the surrounding area, and be landscaped appropriately to look natural.	Consistent . All of the project's manufactured slopes would be landscaped with a plant palette that includes a variety of Southern California native and California-friendly low-water use plants and trees to blend with the surrounding area.

Table DD-3 Consistency with Applicable I-15 Corridor Scenic Preservation Guidelines

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Policy	Consistency Analysis
Architectural Design, Policy 1: Building forms, materials, and colors shall complement adjacent topography, landscape, and buildings in the area; (1) Architectural harmony with the surrounding community shall be achieved through the use of natural appearing materials and complementary styles; (2) Colors for primary building forms shall be coordinated with landscaping materials. Earthtones and muted pastels are preferred for large areas, with primary colors limited to accent points and trim; (4) Where a site is visible from higher elevations, roof forms shall be considered integral design elements with consideration given to colors and pattern of roofing materials and (5) The use of mirrored glass, which can cause the sun to glare into drivers' eyes and, is therefore, a potential safety hazard, shall be prohibited on buildings visible from I- 15.	Consistent . The specific materials and styles of proposed commercial and residential uses have yet to be designed, but the project would ensure consistency with adjacent topography and landscape. Site planning for the proposed project took into account existing landforms and topography by concentrating development between and away from ridgelines. Earthtones and muted pastels would be preferred during the selection of project building colors, accents, and trims. Due to the Site's proximity to I-15, the use of mirrored glass is prohibited.
Architectural Design, Policy B: Building forms shall be of appropriate scale, provide visual interest, avoid block-like configurations, and, where feasible, be integrated into the existing topography; (3) Building forms shall be scaled to step up and away from primary circulation routes and from each other; parallel and continuous building facades and paved surfaces shall be avoided, where possible.	Consistent. Please refer to the response to <i>Architectural Design, Policy</i> 1 above.
Architectural Design, Policy C: Signage shall not adversely impact the environmental and visual quality of the area; (1) All signs shall be limited to the minimum size and height necessary to adequately identify a business location; (2) All signs shall be kept as low to the ground as possible; (3) Signs shall be used for identification, not advertisement; (4) Signage design shall be carefully integrated with the site and building design concepts to create a unified appearance for the total development; (5) Signs shall be predominately constructed of natural materials, non-moving, and externally illuminated; and (6) Off-premise signs shall be prohibited, except for temporary real estate directional, community identification, and directional signs, as specified in Section 6207 of the County Zoning Ordinance.	Consistent . All signage installed on the project Site would be limited to the minimum size and height necessary to adequately identify neighborhoods and business locations. Signs would be installed and kept as low to the ground as possible. A detailed signage program has not yet been developed, but signs would incorporate natural materials and would not feature moving components or externally illuminated lighting. The use of off-premise signs would be consistent with Section 6207 of the County Zoning Ordinance.