

2.9 Land Use

This section presents the existing conditions for land use regarding established communities, land use plans, policies, and regulations, and HCP or NCCP within the PSR Analysis Areas and the former CGSP Area. This section also examines the potential effects that implementation of the Proposed Project may have on these conditions. Information contained in this section has been incorporated from Section 2.9 of the 2011 PEIR. The analysis is based on guidelines and policies included in the County of San Diego General Plan Land Use Element (County 2011a), applicable HCP and NCCP, and Community Plans and Subregional Plans associated with PSR Analysis Areas.

A summary of the land use impacts identified in Section 2.9.3 is provided below.

Land Use Summary of Impacts

Issue Topic	Project Direct Impact	Cumulative Impact	Impact After Mitigation
Physical Division of an Established Community	Less than significant	Less than significant	Less than significant
Conflicts with Land Use Plans, Policies, and Regulations	Potentially significant	Potentially Significant	Significant and Unavoidable
Conflicts with HCP or NCCP	Less than significant	Less than significant	Less than significant

2.9.1 Existing Conditions

Section 2.9.1 of the 2011 PEIR included a discussion of existing conditions related to land use in the unincorporated County. The existing conditions described in the 2011 PEIR are the same as the existing conditions evaluated in this SEIR. While the Campo/Lake Morena Community Plan and the Mountain Empire Subregional Plan Amendment were adopted in December 2016, these updated community plans do not alter the land use designations or policies that were applicable to the General Plan. Figure 2.9-1 shows the existing land use designations per the General Plan. Table 1-1 of this SEIR shows land use designations included under the 2011 PEIR. All references used from the 2011 PEIR were reviewed to ensure they are still valid today, and are hereby incorporated by reference.

2.9.2 Regulatory Framework

Section 2.9.2 of the 2011 PEIR included a discussion of regulatory framework related to land use in the unincorporated County, including the PSR Analysis Areas. The regulations described in the 2011 PEIR are the same as the regulations evaluated in this SEIR. No changes to those regulations have been identified that would alter the conclusions from the 2011 PEIR. All references used from the 2011 PEIR were reviewed to ensure they are still valid today, and are hereby incorporated by reference. The following regulations have been modified or added since the 2011 PEIR.

California Office of Planning and Research General Plan Guidelines

The 2011 PEIR states that the most recent version of the California Office of Planning and Research General Plan Guidelines was prepared in 2003. This remains a valid statement; however, it should be noted that the Office of Planning and Research is currently in the process of preparing its 2017 update of the General Plan Guidelines.

Multiple Species Conservation Program

As described in Section 2.4.2 of this SEIR, the County is currently developing additional MSCP Plans for the North County and East County areas. The North County Plan is in draft form and was circulated for public review in 2009, however; it is not yet finalized. It will include the unincorporated lands under the County's jurisdiction in the northwestern and central parts of the County, including Fallbrook, Rainbow, Bonsall, Pala-Pauma, Valley Center, and San Dieguito which include PSR Analysis Areas. The draft North County Plan will not be adopted prior to the public review of this SEIR. In the interim, the County, USFWS, and CDFW have entered into a Planning Agreement for the draft North County Plan (County 2014). This Agreement defines the geographic scope of the Planning Area, identifies preliminary conservation objectives, ensures coordination between the wildlife agencies, and establishes a process to review interim development within the Planning Area to help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures.

The system of corridors and linkages that comprise the adopted MSCP South County Subarea Plan runs through the southwest portion of unincorporated County. This Plan identifies core habitat areas and linkages between them. Corridors and linkages are also identified in the draft North County Plan; however, the North County Plan has not yet been adopted.

The County released a preliminary draft map for the East County Plan in 2008. In 2009, budgetary issues put a stop to work on the plan until such issues could be resolved. Figure 2.4-1 of this SEIR identifies the adopted South County Subarea Plan corridors and linkages and those proposed in the North County and East County Plans.

San Diego County Regional Air Quality Strategy

As described in Section 2.3.2 of this SEIR, the RAQS was initially adopted in 1991, and is updated on a triennial basis. The RAQS was updated in 1995, 1998, 2001, 2004, 2007, 2009, and most recently in 2016 (APCD 2016b). The RAQS outlines APCD's plans and control measures designed to attain the State air quality standards for ozone. Six control measures have been adopted since 2009, resulting in VOC emission reductions averaging 3.45 tons per day. Additionally, two nitrogen oxides (NO_x) control measures were adopted and implemented during the same timeframe, resulting in an emissions reduction of up to 1.65 tons per day.

San Diego Basin Plan Update

As described in Section 2.8.2 of this SEIR, the San Diego Regional Board Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, in 2016 the Basin Plan was updated, and amendments included incorporating the California Water Regional Control Board On-site Wastewater Treatment Systems Policy; changing the nitrate water quality objective for groundwater, with exception of the Warner Valley Hydrologic Areas, to 45 mg/L nitrate; adding implementation provisions for the nitrate groundwater objective to protect surface water quality where groundwater and surface water are interconnected; and repealing Appendix D Conditions for Conditional Waivers of Waste Discharge Requirements and the corresponding concise summary of these Conditions for Conditional Waivers provided in Title 23 CCR Section 3989.

San Diego Forward: The Regional Plan

SANDAG adopted San Diego Forward: The Regional Plan on October 9, 2015. The Regional Plan is an update and combination of the Regional Comprehensive Plan for the San Diego Region and the 2050 Regional Transportation Plan and Sustainable Communities Strategy,

which were previously adopted on October 28, 2011. The Regional Plan provides a vision for the region's transportation system over the next 35 years, accommodating more than 925,000 new residents, nearly half a million new jobs, and over 300,000 new homes. The foundation of the Regional Plan is the Series 13 Regional Growth Forecast, which identifies future growth in population, housing units, and jobs for the San Diego region from 2012 to 2050. The forecast is based on the most recent planning assumptions, considering local general plans and other factors, as required by SB 375 (CGC Section 65080(b)(2)(B)). For the development of the Series 13 subregional forecast, SANDAG staff worked with each jurisdiction to collect and verify detailed land use inputs down to the parcel level. The final forecast was accepted for planning in October 2013.

2.9.3 Analysis of Project Impacts and Determination of Significance

2.9.3.1 Issue 1: Physical Division of an Established Community

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines, the Proposed Project would have a potentially significant impact if it would physically divide an established community. For the purposes of this SEIR, established communities are defined as established town centers and communities in the CPA/Subregions that contain PSR Analysis Areas and the former CGSP Area. These areas include the Bonsall CPA, Crest-Dehesa CPA, Desert Subregion, Fallbrook CPA, Mountain Empire Subregion, North County Metro Subregion, Pala-Pauma CPA, San Dieguito CPA, Valley Center CPA, and former CGSP Area.

Impact Analysis

The Proposed Project would increase land use intensity in the PSR Analysis Areas by allowing for higher land use densities or commercial or industrial uses, and would allow for an increase of 1,826 potential dwelling units above the current General Plan designations.

Bonsall CPA. The community center of Bonsall is referred to as a Village and is near Mission Road, Olive Hill Road and SR-76, respectively. PSR Analysis Area BO18+ is in the eastern portion of the Bonsall CPA, approximately 2 miles east of the Village. Old Highway 395 and the I-15 corridor are adjacent to the northeastern portion of this PSR Analysis Area, just south of West Lilac Road and just north of Camino Del Rey. The rest of the roads within or adjacent to the analysis area are private roads. Increased residential development density with this PSR Analysis Area would not divide the Bonsall community, as it is outside of the Village and located in a more semi-rural setting. The current designation for BO18+ is SR-10. PSR Analysis Area BO18+ proposes to change the land use designation from SR-10 to SR-4 (Figure 2.9-2), allowing an additional 67 potential dwelling units. In addition, the Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, the changes associated with PSR Analysis Area BO18+ would not divide an established community. Refer to Table 1-4 of this SEIR for land use designation data.

Crest-Dehesa CPA. The Crest-Dehesa CPA is divided into four separate communities: Crest, Dehesa, Harbison Canyon, and Granite Hills. PSR Analysis Area CD14 is located on the western portion of this CPA, near the eastern boundary of the city of El Cajon. Most of PSR Analysis Area CD14 is in undisturbed native habitat, except for a couple of dirt access roads and one single family residence near the southern boundary. The PSR Analysis Area CD14 is

surrounded by land designated as RL-20 to the north, east and south, and SR-1 to the south and west. The PSR Analysis Area CD14 proposes to change the land use designations from RL-20 and SR-1 to RL-20 and SR-2 (Figure 2.9-2), which would allow for an increase of seven potential dwelling units due to the proposed SR-2 area being much larger than the current SR-1 area. Much of the area of RL-20 to the east of CD14 is in open space preserves and/or undeveloped, providing a transition buffer between this area of Granite Hills and the communities of Crest and Dehesa, farther east. The area proposed for SR-2 would serve as a lower-density edge of the existing neighborhood of SR-1 properties to the west, on either side of Euclid Avenue. In addition, the Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, the changes associated with PSR Analysis Area CD14 would not divide an established community.

Desert Subregion. The Desert Subregion occupies approximately 43 square miles and is surrounded by the Anza-Borrego Desert State Park. This subregion includes the PSR Analysis Areas DS8 and DS24 within the community of Borrego Springs. The community center is located along Palm Canyon Drive and Borrego Springs Road, which is located approximately one-quarter mile southwest of PSR Analysis Area DS8, and 2 miles north of PSR Analysis Area DS24.

The current designation for PSR Analysis Area DS8 is VR-2, with SR-2 to the west; SR-4 to the north; VR-4.3 to the east; and RC, P/SP, and GC to the south. PSR Analysis Area DS8 proposes to change its land use designation from VR-2 to VR-4.3 (Figure 2.9-3), allowing an additional 389 potential dwelling units. This PSR Analysis Area is already within the Village boundary for Borrego Springs and would implement the same land use designation as the property to the east of this PSR Analysis Area. In addition, the Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, the changes associated with PSR Analysis Area DS8 would not divide an established community.

PSR Analysis Area DS24 is located near the southwestern edge of Borrego Springs. The current designation for PSR Analysis Area DS24 is SR-10, with SR-1 to the north and west, VR-2 to the east, and RL-40 to the south. PSR Analysis Area DS24 proposes to change the land use designation from SR-10 to SR-1 (Figure 2.9-3), allowing an additional 153 potential dwelling units. Though this would result in a substantial increase in density, the area would maintain a semi-rural density and limited to single family residential like the area to the north. In addition, the Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, the changes associated with PSR Analysis Area DS24 would not divide an established community.

Fallbrook CPA. The Fallbrook CPA is located east of the DeLuz community, north of Bonsall CPA, northwest of Valley Center CPA, west of Pala-Pauma CPA, and southwest of the community of Rainbow. Additionally, the Fallbrook CPA abuts Riverside County to the north, and is located east of Marine Corps Base Camp Pendleton.

PSR Analysis Area FB2+ is located on the eastern edge of this CPA, approximately 6 miles from the Village boundary. The surrounding land uses are mainly rural with extensive agriculture. Land use designations surrounding this PSR Analysis Area consist of RL-20 and public/semi-public lands (solid waste facility) to the north, public/semi-public lands to the east,

RL-40 to the south, and RL-40 and SPA to the west. The current land use designations for FB2+ are RL-20 and RL-40. The Proposed Project would change the land use designation to SR-4 and RL-20 (Figure 2.9-4), which would allow for an increase of 16 potential dwelling units in this PSR Analysis Area, limited to single family residential. In addition, the Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, the changes associated with PSR Analysis Area FB2+ would not divide an established community.

PSR Analysis Area FB17 is located in the eastern end of the Fallbrook CPA. This area is semi-rural and agricultural with an existing land use designation of SR-2. The Proposed Project would change the land use designation to SR-1 in the eastern portion of this PSR Analysis Area (Figure 2.9-4), which would increase the potential residential buildout from 49 dwelling units under the General Plan to 82 dwelling units under the Proposed Project. Buildout of SR-1 land uses currently occur along the south side of Reche Road, adjacent to the PSR Analysis Area FB17, with FB17 remaining semi-rural with new units limited to single-family residential. In addition, the Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, the proposed changes associated with PSR Analysis Area FB17 would not divide an established community.

PSR Analysis Area FB19+ is in a rural setting with minimal existing residential development, and approximately 4 miles east of the Village boundary. The area surrounding this PSR Analysis Area has land use designations of RL-20 to the north, east and southeast, SR-4 to the northwest and south, and SR-10 to the west. The Proposed Project would change the land use designation of the PSR Analysis Area from RL-20 to SR-10 (Figure 2.9-5), which would allow for an increase of only one potential dwelling unit. In addition, the Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, the proposed changes associated with PSR Analysis Area FB19+ would not divide an established community.

PSR Analysis Area FB21+ is in a rural setting with little existing residential development, and approximately 4 miles north of the Village boundary. The proposed land use designation of SR-10 would allow for an increase of seven potential dwelling units (Figure 2.9-5), which would be limited to single family residential. In addition, the Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, implementation of the proposed changes associated with PSR Analysis Area FB21+ would not divide an established community.

Mountain Empire Subregion. Situated in eastern San Diego County, south of I-8 and north of the U.S./Mexico border, this subregion contains five areas with their own unique identities, including Campo/Lake Morena, Tecate, Potrero, Boulevard, and Jacumba.

PSR Analysis Area ME26 is located east of Morena Village. The Proposed Project would change the land use designation from RL-20 to SR-10 (Figure 2.9-6). The surrounding area is rural with very few homes. The SR-10 designation would provide a transition from the more developed Morena Village area to a more rural development setting, and new units would be single family residential. In addition, the Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established

community. Therefore, implementation of the proposed changes associated with PSR Analysis Area ME26 would not divide an established community.

PSR Analysis Area ME30A is located in between Campo and Cameron Corners on the east side of the railway. The Proposed Project would change this PSR Analysis Area from RL-40 to a combination of RL-40 and SR-4 (Figure 2.9-6), with new units limited to single family residential. The PSR Analysis Area ME30A is adjacent to an area designated SR-1 and has a higher density of existing land uses than would be allowed under the proposed SR-4 designation. In addition, the Proposed Project does not include the construction/ placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, implementation of the proposed changes associated with PSR Analysis Area ME30A would not divide an established community.

North County Metro Subregion. The North County Metro Subregion is comprised of numerous non-contiguous areas located between the cities of Escondido, San Diego, San Marcos, Vista and Oceanside. The NC3A PSR Analysis Area is currently designated as RL-20 and is proposed for an SR-10 designation (Figure 2.9-7), allowing an increase of 11 potential dwelling units. This PSR Analysis Area is located at the edge of Escondido, with parcels immediately to the west designated SR-1. The Proposed Project would provide a transition from the higher density land uses on the city periphery to the open space preserve of Daley Ranch the east. In addition, the Proposed Project does not include the construction/ placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, implementation of the proposed changes associated with PSR Analysis Area NC3A would not divide an established community.

PSR Analysis Area NC18A is currently designated SR-2 and is proposed for a mix of SR-2 and SR-1, allowing an additional 34 potential dwelling units, which would be limited to single family residential. This PSR Analysis Area is located adjacent to the eastern edge of Escondido, with parcels immediately to the north, south and west designated for SR-1 or higher densities, and the area to the north and east designated for SR-2 (Figure 2.9-7). In addition, the Proposed Project does not include the construction/ placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, implementation of the proposed changes associated with PSR Analysis Area NC18A would not divide an established community.

PSR Analysis Area NC22 is currently designated as SR-10 and is proposed for a mix of SR-1 and SR-10 (Figure 2.9-8), allowing an additional 52 potential dwelling units, which would be limited to single family residential. Current surrounding designations are SR-10 and SR-2 to the north, SR-2 to the east, and SR-10 to the west, and the City of San Marcos to the south and southeast. There is a small buffer of open space between the south edge of PSR Analysis Area NC22 and the closest subdivision of San Marcos. The Proposed Project does not include the construction/ placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, Implementation of the proposed changes associated with PSR Analysis Area NC22 would not divide an established community.

PSR Analysis Area NC37 is currently designated as SR-10 and is proposed for SR-4 (Figure 2.9-8). The current surrounding designations are SR-10 to the north and east, RL-20 to the west, and SR-4 to the south. This PSR Analysis Area is currently characterized as semi-rural land with agricultural operations including covered greenhouses. The Proposed Project does not

include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, implementation of the proposed changes associated with PSR Analysis Area NC37 would not divide an established community.

PSR Analysis Area NC38+ is currently designated as SR-2 and is proposed to be designated as SR-1 (Figure 2.9-8), with new units limited to single family residential. The current surrounding designations are SR-2 to the north and east, and higher density residential development in the City of San Marcos to the south and west. This PSR Analysis Area is currently characterized by agricultural operations and a few residences. The Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, implementation of the proposed changes associated with PSR Analysis Area NC38+ would not divide an established community.

Pala-Pauma CPA. The Pala-Pauma CPA is located on the northern portion of San Diego County, consisting primarily of low density residential development, agriculture, and open space.

PSR Analysis Area PP30 is currently designated RL-40 and is proposed to change to SR-2 for the area east of the San Luis Rey River floodplain, while the rest of the area would remain RL-40 (Figure 2.9-9). The proposed designations would allow for an additional 122 potential dwelling units, which would be limited to single family residential. The current surrounding designations consist of a mix of P/SP, RL-40, VR-4.3, RC, RL-20, and SR-10 to the north, with Tribal lands to the east and south. The Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, implementation of the proposed changes associated with PSR Analysis Area PP30 would not divide an established community.

San Dieguito CPA. The San Dieguito CPA is located in northern San Diego County, surrounded mostly by incorporated cities, including Encinitas, Carlsbad, San Marcos, and San Diego.

PSR Analysis Area SD15 is currently designated SR-1 and is proposed for a mix of GC, VR-10.9, and SR-0.5 (Figure 2.9-9). Commercial, medium density residential (15 to 20 dwelling units per acre), medium-high density residential (20 to 30 dwelling units per acre), and open space land uses in the City of San Marcos are adjacent to PSR Analysis Area SD15 to the north and east, OS-C land use designations are located to the south and west, and SR-10 is located to the west. The Proposed Project does not include the construction/ placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, implementation of the proposed changes associated with PSR Analysis Area SD15 would not divide an established community.

Valley Center CPA. The Valley Center CPA is located in northern San Diego County east of I-15 and south of SR-76, northeast of the City of Escondido.

PSR Analysis Area VC7+ is currently designated SR-4 and is proposed for SR-2, allowing an additional 253 potential dwelling units (Figure 2.9-10), which would be limited to single family residential. The current surrounding designations are SR-10 to the west, RL-40 to the north, a combination of RL-20 and SR-2 to the east, SR-4 to the south, and RL-20 to the southwest. This PSR Analysis Area is in the northwest corner of the Valley Center community, in an area with

many agricultural operations. The Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, Implementation of the proposed changes associated with PSR Analysis Area VC7+ would not divide an established community.

PSR Analysis Area VC51 is currently designated RL-20 and is proposed for SR-4 (Figure 2.9-10), allowing for an additional 13 potential dwelling units. The current surrounding designations are RL-20 to the west, south and east, and SR-4 to the north. The PSR Analysis Area is in the northern portion of the Valley Center community and is characterized by steep slopes, agricultural operations, and scattered dwelling units. The Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, implementation of the proposed changes associated with PSR Analysis Area VC51 would not divide an established community.

PSR Analysis Area VC57+ is currently designated SR-4 and is proposed for SR-2 (Figure 2.9-11), allowing an additional 231 potential dwelling units. The current surrounding designations are SR-2 to the north; SR-4 and RL-20 to the east; SR-4, P/SP (Valley Center Middle School), and SPA to the south; and a combination of I-2, SR-2, and SR-4 to the west. The proposed designation of SR-2 would extend existing areas designated as SR-2 to the north into areas that currently have little development. This PSR Analysis Area is in the central-western portion of the Valley Center community and contains agricultural operations and semi-rural residential uses. The Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, the proposed changes associated with PSR Analysis Area VC57+ would not divide an established community.

PSR Analysis Area VC67 is currently designated as SR-2 and is proposed for I-2 Medium Impact Industrial (Figure 2.9-11). The current surrounding designations are I-1 and I-2 to the north, I-2 and SR-2 to the east, and SR-2 to the south and west. The PSR Analysis Area is located directly west of VC57+, and is characterized by industrial operations to the north and a few dwelling units to the south. The Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major roads, which could divide an established community. Therefore, the proposed changes associated with PSR Analysis Area VC67 would not divide an established community.

Former CGSP Area. Under the Proposed Project, the former CGSP Subareas CG1 and CG7 would be designated as SR-10; CG2 would be designated as SR-4; CG3, CG4, and CG5 would be designated SR-2; and CG6 and CG8 would be designated SR-10 and RC (Figure 2.9-12 and Table 1-2). The proposed zone change would apply for the following designations: CG1 and CG7 would be designated RR; CG2, CG3, and CG4 would be designated A70; CG5 would be designated RC; and CG6 and CG8 would be designated RR and C42 (Figure 2.9-12 and Table 1-7). These changes would result in an increase of 31 potential dwelling units; all of the Subareas, except CG7, have a current designation of Specific Plan Area with no residential density. The former CGSP Area is in a semi-rural portion of the County, within the Bonsall CPA, Valley Center CPA, and Hidden Meadows (part of North County Metro) CPA, with areas of Village densities in the Welk Resort to the south and more semi-rural estate lots to the north. The Proposed Project does not include the construction/placement of new airports, freeways, or large open space preserves; nor changes to Mobility Element classifications to widen major

roads, which could divide an established community. Therefore, the proposed changes associated with the area of the former CGSP Area would not divide an established community.

Roadway Improvements. As noted above, there are no changes to Mobility Element roadway classifications associated with the Proposed Project. Section 2.15 (Transportation and Traffic) and the Traffic Impact Assessment (included in Appendix E) of this SEIR discuss roadway impacts, including review of increases in ADT associated with the Proposed Project and impacts related to failing LOS. Three County road segments and one State highway segment have moved into failing LOS E or LOS F since the General Plan was adopted. The Proposed Project would add ADT to these segments; however, they have not been accepted at failing LOS. In addition, the Proposed Project adds additional ADT to another County road segment that was accepted at failing LOS with the adopted General Plan. As part of the Proposed Project, these road segments would be accepted at failing LOS, per the criteria for accepting failing roads in the General Plan Mobility Element.

Valley Center Community Plan Residential Policy 8 Revision. Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. The clustering would allow for development of land uses closer to existing roads and other infrastructure, preserving sensitive habitat areas, and would not have the effect of dividing an established community. Therefore, implementation of the Proposed Project would result in a less than significant impact related to the physical division of an established community.

2.9.3.2 Issue 2: Conflicts with Land Use Plans, Policies, and Regulations

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact if it would conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental impact.

Impact Analysis

The General Plan is the comprehensive land use plan for the unincorporated areas of the County, including the PSR Analysis Areas and the former CGSP Area. However, the unincorporated County is also addressed in regional planning documents, including the Regional Plan and the San Diego Local Agency Formation Commission Sphere of Influence Plan. In addition, the Proposed Project would need to demonstrate consistency with several adopted land use plans for the region, including the Basin Plan, Airport Land Use Compatibility Plans, RAQS, the County Trails Program, specific plans, and community plans. The Proposed Project's consistency with these plans is discussed below. The Proposed Project's compliance with MSCP and other related biological resource plans are discussed below in Section 2.9.3.3 for Issue 3.

San Diego County 2011 General Plan Update

The 2011 County General Plan Update was prepared with the objective of focusing population growth in the western areas of the County, where infrastructure and services are available, and reducing the potential for growth in the eastern areas. This was done in part to facilitate efficient,

orderly growth, to protect natural resources, and to reduce overall vehicle miles traveled. Overall, the General Plan was designed to support a reasonable share of the projected regional population growth, while focusing new development near existing infrastructure, services, and jobs, support a multi-modal transportation network, maintain the rural character of existing communities, protect natural resources and habitats, maintain environmentally sustainable communities and reduce greenhouse gas emissions, preserve agriculture, and minimize the costs of infrastructure and services. Mitigation measures in the 2011 PEIR are incorporated both as policies in the General Plan and as implementation measures in the Implementation Plan and, consequently, the General Plan is generally considered to be “self-mitigating.”

The project objectives are the Guiding Principles of the General Plan, which are listed in Chapter 1, Section 1.4. These Guiding Principles are implemented through the goals and policies of the General Plan. The goals describe future conditions being strived for (through the General Plan) and tend to be general and broad statements. Policies provide guidance to assist in making decisions that will aid in reaching the goals. As such, the level of consistency with the policies of the General Plan is a threshold that can be used to determine fulfillment of these project objectives for this programmatic approach. With the wide range of proposals associated with the PSR Analysis Areas and former CGSP area, there would be varying levels of consistency with the General Plan, including the Guiding Principles.

The County’s General Plan includes several policies that could be applicable to a GPA and/or Rezone only if the project includes an associated development proposal to review, as these policies relate to the proposed design of a development. The policies discussed below are those that have been determined to apply to a ‘stand-alone’ GPA/Rezone, like the Proposed Project, as they relate directly to proposed changes in land use designations and/or zoning, whether the project includes an associated development proposal or not. Additional General Plan policies would be applicable during review of future discretionary projects, like subdivisions or use permits, where there is a development proposal to evaluate.

The applicable policies are grouped by the General Plan goal they fall under. **The goals not listed do not contain underlying policies determined to be applicable to stand-alone GPAs/Rezones and relied upon in the 2011 PEIR to reduce environmental impacts.** Each policy reference is followed by a list of the environmental issues/topics (if any) from the 2011 PEIR that partially relied on implementation of the policy in order to reduce environmental impacts. As discussed above, the Proposed Project would have a significant impact if it would conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental impact. To meet this requirement, a discussion is provided for each component of the Proposed Project (PSR Analysis Areas, former CGSP Area, and Valley Center Community Plan Policy 8 Revision) in relation to the policies that served the purpose of reducing potential impacts in certain environmental categories, as discussed in the 2011 PEIR. **Those policies that are not applicable to a stand-alone GPA/Rezone, or were not relied upon in the 2011 PEIR to reduce environmental impacts are not discussed below.** A summary list of the policies that reduced impacts in various environmental categories for the 2011 PEIR can be found in Table S-1, within the Summary section of the 2011 PEIR.

Some of the applicable policies include clear, mandatory requirements. Other applicable policies are more general (particularly when applied at a programmatic level to large Analysis Areas) and require review and consideration of various factors in a holistic approach, by decision makers (the BOS for this project). For this second type of policy, a significant impact, as a result of policy inconsistency, is documented in this section only when substantial evidence in the record would lead a person to reasonably conclude inconsistency with the policy. In these

cases, as a result of the substantial evidence in the record and the fact that the policy was relied upon in the General Plan Update PEIR to reduce environmental impacts, a finding of a significant impact results.

This discussion is based upon an analysis provided by County staff and takes the conservative position that there are inconsistencies requiring analysis and disclosure. Such analysis does not limit the ultimate discretion of the County Board of Supervisors to determine whether the Proposed Project Map for any particular Analysis Area (or other project component) is in fact consistent with the General Plan when it considers whether to approve proposed changes. Where staff has found an inconsistency with a General Plan policy as it relates to a particular Analysis Area or other component of the project; that finding is followed by findings of any significant impacts associated with the policy inconsistency. In these cases of inconsistency findings, if the Board of Supervisors instead finds consistency with the noted policy as it relates to the particular Analysis Area (or other project component); there will be no need to supplement the SEIR because the decision would not result in any additional impacts that were not already disclosed.

Land Use Element

Goal 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 the Regional Categories.

The associated General Plan Policies that are applicable to a 'stand-alone' GPA/Rezone, like the Proposed Project are:

LU-1.1: Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model (CDM) and boundaries established by the Regional Categories Map.

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.

The 2011 PEIR analysis determined that Policy LU-1.2 would reduce impacts to Population and Housing - Population Growth; and Utilities and Service Systems - New Water or Wastewater Treatment Facilities.

LU-1.3: Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

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

- 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

The 2011 PEIR analysis determined that Policy LU-1.4 would reduce impacts to Aesthetics - Visual Character or Quality; Land Use - Physical Division of an Established Community; Public Services - Fire Protection Services; Public Services - Police Protection Services; Public Services - School Services; and Public Services - Other Public Services.

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.

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.

Analysis Area Discussion – Applicable Policies under Goal LU-1

These policies serve to implement the County's Community Development Model (CDM). In addition to providing a broad land use framework of Village, Semi-Rural, and Rural Lands Regional Categories, the CDM is directly connected to Guiding Principle 2 of the General Plan, which states, "Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development." In the County's unincorporated communities, the Village areas include the highest levels of residential density, transportation networks, other infrastructure, services, and access to jobs. The Semi-Rural areas surrounding the Village include lower density residential, agricultural operations, and sometimes rural commercial uses. The outlying Rural Lands are typically characterized by very low density residential, agriculture, and open space preserves. The Semi-Rural and Rural Lands categories tend to include higher levels of habitat and topography constraints, in addition to a corresponding higher fire hazard.

Policies LU-1.2 and LU-1.4 listed above include mandatory requirements to be met in relation to new Village densities and Village Regional Categories. *Policies LU-1.2 and LU-1.4 are the only policies listed under this goal that were relied upon in the 2011 PEIR to reduce environmental impacts.* The SD15 Analysis Area is the only component of the Proposed Project where these two policies could be applicable, as the Proposed Project Map includes a proposed change to VR-10.9 (Village density and requires a Village Regional Category) for a portion of SD15. The DS8 Analysis Area includes a proposal for VR-4.3, but it is currently designated VR-2, which is a Village density within a Village Regional Category, so it's not proposing a new Village area and these two policies would not be applicable. The remainder of the PSR Analysis Areas and other components do not include proposals for Village densities or Regional Categories. Included below is policy review related to LU-1.2 and LU-1.4 for Analysis Area SD15.

SD15

The SD15 Analysis Area is comprised of a 69-acre parcel in the northwestern portion of the San Dieguito CPA, adjacent to portions of the city of San Marcos. The proposed change from SR-1 to a combination of General Commercial (with mixed use zoning at 2 dwelling units per acre),

VR-10.9, and SR-0.5 is estimated to result in an increase in the potential dwelling units of 301 (estimated 61 potential units under the current designation and 362 under the Proposed Project Map).

The VR-10.9 aspect of the Proposed Project map would constitute Village densities and would require a change in the Regional Category from Semi-Rural to Village. The SD15 site lies within a 550-acre County "island" of the San Dieguito community, with open space preserves and low density residential outside the site in the unincorporated areas. Village densities are found in the City of San Marcos jurisdiction within ¼ mile of the north side of the site, and within ¼ mile of the west side of the site. The closest village within the unincorporated County jurisdiction is approximately 2 miles north via roads and 1.5 miles via a straight-line distance. Policy LU-1.4 has been interpreted as applying only to Village expansions, per the title of the policy. Policy LU-1.2 would apply. The VR-10.9 component would meet the Policy LU-1.2 definition of leapfrog development as it would constitute a new village density located away from established villages. Under LU-1.2, the leapfrog development prohibition does not apply to new villages that are 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.

The Community Development Model is outlined within the discussion of Guiding Principle 2 of the General Plan. Guiding Principle 2 states, "Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development." The discussion of this Guiding Principle further elaborates on the advantages of this type of development pattern in reducing the number and length of automobile trips, increasing the efficiency of providing public services, and reducing the costs of infrastructure expansion. These concepts form the basis of the General Plan's Community Development Model and the ideas on location of villages, with surrounding layers of Semi-Rural and Rural Lands designations. The limited area of unincorporated County jurisdiction in this County "island" of San Dieguito, in addition to the existing development pattern with large open space preserves, makes the realization of a typical concentric Community Development Model unrealistic (particularly if only the unincorporated area is considered). Guiding Principle 2 fully acknowledges the limitations of providing an ideal Community Development Model in the unincorporated County, with consideration of pre-existing development patterns and the limited transit network available.

Evaluation of the SD15 Proposed Project map in the context of Guiding Principle 2 and the Community Development should take into account the location and the proximity to infrastructure, services, and jobs. This consideration also addresses the feasibility of future development (under the proposed land use designations) to provide necessary services and facilities, as discussed in the Policy LU-1.2 requirements. The site is within the Olivenhain water service area and within the Vallecitos sewer service area, with existing water and sewer lines running adjacent to the property. Though internal access improvements would be required concurrent with development, SD15 fronts on San Elijo Road, which is a 4-lane road Major Road with bike lanes and sidewalks. It is within the Sphere of Influence for the City of San Marcos and adjacent to the City jurisdiction on the north and east. San Marcos is a major job center in North County, with an estimated jobs total of over 34,000, including the La Costa Meadows commercial/industrial complex less than one mile away. SD15 is also only a half mile from the City of Carlsbad jurisdiction, which is the largest job center of North County cities, with an estimated jobs total of over 67,000. Public elementary and middle schools are found a half mile away within the San Elijo Hills development of San Marcos. The site is within the Rancho Santa Fe Fire Protection District, with the closest station approximately 2.5 miles away. Though part of the portion proposed for VR-10.9 is currently estimated to be just outside the 5-minute

emergency response travel time standard for the designation, confirmation of that travel time is required at the development review stage, and access improvements to meet that standard have not been determined to be infeasible at this stage. The site is adjacent to open space preserves to the southeast, south and west, and development could be designed to cluster in the north, in order to preserve a viable wildlife corridor in the more constrained land on the south end of the site, and establish a level of compatibility with these adjacent preserves. In consideration of these factors, including the Sphere of Influence location, the proposal has been determined to be compatible with the Community Development Model, as discussed in Guiding Principle 2 of the General Plan.

As a “stand-alone” GPA/Rezone, with no development proposals, this project does not offer an opportunity for evaluation of a development design in meeting the LEED-Neighborhood Development Certification or an equivalent, as discussed in Policy LU-1.2. A “D” Special Area Zoning Designator (D Designator) is proposed to be applied to the property if the Proposed Project map for SD15 is approved by the Board of Supervisors (as part of the Form of Ordinance associated with such an approval). The text of this proposed D Designator is provided in Appendix I of this SEIR, and it would require that future development within the area of a Village Regional Category (including the VR-10.9 density area) be designed to meet the LEED-Neighborhood Development Certification or an equivalent, as discussed in Policy LU-1.2. With the application of this D Designator associated with potential approval of the Proposed Project map, and in consideration of the other factors discussed above, the Proposed Project map for SD15 has been determined to be consistent with Policy LU-1.2.

Goal LU-2: Maintenance of the County’s Rural Character. Conservation and enhancement of the unincorporated County’s varied communities, rural setting, and character.

The associated General Plan Policies that are applicable to a ‘stand-alone’ GPA/Rezone, like the Proposed Project are:

LU-2.3: Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The 2011 PEIR analysis determined that Policy LU-2.3 would reduce impacts to Aesthetics - Visual Character or Quality; and Land Use - Physical Division of an Established Community.

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.

LU-2.5: Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The 2011 PEIR analysis determined that Policy LU-2.5 would reduce impacts to Aesthetics - Visual Character or Quality; and Land Use - Physical Division of an Established Community.

Analysis Area Discussion – Applicable Policies under Goal LU-2

These policies are in place to preserve community character and the unique identities of individual communities.

Policy LU-2.5 listed above discusses identifying and maintaining ‘greenbelts,’ which are defined in the General Plan as, “A largely undeveloped area surrounding more urbanized areas, consisting of either agricultural lands, open space, conservation areas, passive parks, or very

low density rural residential lands.” Though there is some judgement required in determining whether a greenbelt is maintained (particularly with a ‘stand-alone’ GPA/Rezone proposal), one can determine whether a greenbelt exists, based on the General Plan definition. The other listed policies under this goal require a greater level of judgement and consideration of various factors to determine policy consistency, particularly for the larger PSR Analysis Areas. *Only policies LU-2.3 and LU-2.5 under this goal are applicable to a stand-alone GPA/Rezone and were relied upon in the 2011 PEIR to reduce environmental impacts.* Included below is policy review in relation to LU-2.3 and LU-2.5.

BO18+

The BO18+ Analysis Area is comprised of 120 parcels totaling approximately 921 acres in the northeastern portion of Bonsall. With consideration of existing parcelization, the proposed change from SR-10 to SR-4 is anticipated to increase the total potential dwelling units by 67 (estimated 129 potential units under the current designations and 196 under the Proposed Project Map).

Information related to LU-2.3 – The BO18+ Analysis Area contains extensive agricultural operations, which is also the case for a 1,000-acre area of SR-4 adjacent to the north; however, the adjacent SR-4 area includes more access options currently built to fire protection standards. Parcel sizes range from less than 0.5 acre to 480 acres within a one mile radius, with a wide range of parcel sizes, including several of less than five acres and several of more than ten acres. The proposed change would not require changing the Semi-Rural Regional Category, which is appropriate in this area, given the level of agricultural resources, environmental constraints, and existing infrastructure. Much of the southern and western portions contain extensive steep slope, habitat constraints, and limited road infrastructure built to the 24’ paved width fire protection standard. The northeastern portion contains a better existing access network (including the only area of public road access) and less slope and habitat constraints, thus reducing potential community character issues with an SR-4 proposal in that area. An alternative map has been developed and analyzed (see Chapter 4), which would only change the northeastern portion to SR-4, while leaving the rest at SR-10. While this alternative would demonstrate a higher level of consistency with LU-2.3, the Proposed Project Map would be consistent due to the nearby areas of SR-4 with similar constraints.

Information related to LU-2.5 – The Analysis Area is not within a ‘greenbelt’ per the General Plan definition, because it is not located within a very low-density area (Rural Lands). In addition, no change in the Regional Category is required for the proposal. Therefore, the Proposed Project Map for BO18+ is consistent with Policy LU-2.5.

CD14

The CD14 Analysis Area is comprised of 10 parcels covering approximately 101 acres of rolling topography in the western portion of the planning area, just outside the City of El Cajon. The proposed change from a combination of SR-1 and RL-20 to SR-2 (substantially more acreage of SR-2 than the current SR-1 area) and RL-20 is estimated to result in an increase in the potential dwelling units of seven (estimated 10 potential units under the current designations and 17 under the Proposed Project Map).

Information related to LU-2.3 – The Analysis Area is in a transition area of Crest-Dehesa, as it is adjacent to an SR-1 neighborhood to the west, but portions of the Analysis Area are on a hillside transition area with Rural Lands and open space to the east beyond the established neighborhood. Parcel sizes range from 0.5 acre to 280 acres within a one mile radius with larger parcels to the west and smaller parcels to the east in this area. The northern portion of the area

proposed for SR-2 in the Proposed Project Map contains extensive steep slopes, habitat constraints, and ridgeline viewpoints from the neighborhood to the west. An alternative map has been developed and analyzed (see Chapter 4), which would reduce the area proposed for SR-2 in the northern portion, leaving that area as RL-20, thus reducing potential community character issues. Due to the limited additional density potential associated with the proposal and location of the portion proposed for change (adjacent to a built-out neighborhood of slightly higher density) a consistency finding can be made. Therefore, the Proposed Project Map for CD14 is consistent with Policy LU-2.3.

Information related to LU-2.5 - The RL-20 designated northern portion of the PSR area is less than one mile from a border with the City of El Cajon; however, there is an area of SR-1 and SR-4 separating CD14 from this border. As such, there is not a greenbelt (of very low density, agricultural lands, and open space) separating this area of Crest-Dehesa from El Cajon. Therefore, the Proposed Project Map for CD14 is consistent with Policy LU-2.5.

DS8

The DS8 Analysis Area is comprised of three parcels totaling approximately 169 acres within the Village area of Borrego Springs. The proposed change from VR-2 to VR-4.3 is estimated to result in an increase in the potential dwelling units of 389 (estimated 337 potential units under the current designations and 726 under the Proposed Project Map).

Information related to LU-2.3 – The Borrego Springs CPA has some unique characteristics, in terms of application of Village designations and high densities. Considering groundwater limitations and the location of the CPA, far from job centers, the Land Use Map developed during the General Plan Update reflected pre-existing development patterns for the most part. The application of Village densities in areas without pre-existing density or parcelization was limited to a few areas around the Village Core, including the DS8 area. The VR-4.3 designation is applied to the Roadrunner Club property, which is adjacent to the DS8 Analysis Area, on the east. This designation generally reflects the existing residential density of condos and timeshares on that site. Adjacent to the DS8 area on the west is an area of SR-2 properties, including a group of roughly 1-acre lots near Palm Canyon Drive and an undeveloped area around the high school and Boys and Girls Club sites. Farther west is an area of SR-4 that is parcelized with roughly 2-4 acre lots. To the north of the DS8 site is a large area of SR-4 properties, which include current and former agricultural lands. Estimates from the Groundwater Study of the General Plan Update showed over 10,000 additional dwelling units would be possible when adding legally buildable vacant lots to the additional subdivision and multi-family development potential in the current Land Use Map for the CPA. As such, the currently available density in the community is well beyond the current demand. Issue LU-2.2 of the Community Plan calls for GPAs to consider the extent of existing vacant lots in evaluating density increases. Considering the over-abundance of existing vacant lots and existing density on the Land Use Map, along with the current groundwater overdraft situation, the proposed substantial increase in density associated with the DS8 Proposed Map (389-unit increase in potential dwelling units) would not be consistent with community character. Therefore, Proposed Project Map for DS8 has been found to be inconsistent with Policy LU-2.3. However, this noted inconsistency has not been determined to constitute a significant impact, because there is room for discretion by decision makers to weigh other factors more heavily than the high level of unbuilt planned density and groundwater critical overdraft situation. Mitigation measures for potential environmental impacts would apply to future development, particularly those outlined in Section 2.1 (Aesthetics) and in this section.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed VR-4.3 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Information related to LU-2.5 – The Analysis Area is not within a ‘greenbelt’ as it currently has a Village land use designation and Regional Category, and it is also not on the edge of the community. Therefore, the Proposed Project Map for DS8 is consistent with Policy LU-2.5.

DS24

The DS24 Analysis Area is comprised of 2 parcels covering approximately 169 acres south of the Village and in close proximity to state park lands. The proposed change from SR-10 to SR-1 is estimated to result in an increase in the potential dwelling units of 153 (estimated 16 potential units under the current designations and 169 under the Proposed Project Map).

Information related to LU-2.3 – The densities surrounding the DS24 site were developed with consideration of existing parcelization. There are only a few parcels in the VR-2, SR-1, and SR-2 areas near the DS24 site that have any additional subdivision potential. Issue LU-2.2 of the Community Plan calls for GPAs to consider the number of existing vacant lots in the community. The areas of SR-2, SR-1, and VR-2 that are near the DS24 site (between the site and the Village core) include a large number of vacant lots. Estimates from the Groundwater Study of the General Plan Update indicate there are over 3,000 vacant undeveloped lots in the CPA.

The Borrego Springs Community Plan also includes issue and policy references to the community character impacts of increased development on undisturbed desert vegetation (like the DS24 site), as opposed to fallowed agricultural lands and other previously cleared parcels. Page 8 of the Community Plan under d. Existing Land Uses and Community Character notes, “There is significant development pressure for housing and commercial development projects that are not consistent with our community character. Of special concern are those proposed plans that do not take the fragile ecosystem into account, or are sited on botanically-rich, native desert vegetation and which would significantly impact dark skies, scenic and vegetative elements of the community character.” In addition to the biological and erosion control values of the dense ocotillo forest in this Analysis Area, it is directly visible from County Scenic Highway Montezuma Valley Road, which is the main community entry road from the west, and from Borrego Springs Road, which is the main community entry road from the south. The aesthetic values of the native vegetation in the Analysis Area make it a draw for tourists, in addition to providing substantial aesthetic value to residents. This is a particularly significant issue because policy LU-2.3 was relied upon in the 2011 PEIR to reduce aesthetic impacts. All of these factors were considered in applying the current SR-10 designation on the property, which requires a Conservation Subdivision approach to facilitate clustering and maximize preservation.

Though the LU-2.3 language requires some judgement by decision makers, there is overwhelming evidence in the record to indicate inconsistency with this policy. Therefore, the DS24 proposal in the Proposed Project is inconsistent with Policy LU-2.3, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-2.3-DS24]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with

this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Information related to LU-2.5 – The Analysis Area is currently undeveloped and designated SR-10 so it is not in ‘very low density rural residential lands’ as discussed in the greenbelts definition. There is an area of Rural Lands separating the Analysis Area from the state parks lands to the south and west. This Rural Lands area makes up the greenbelt (as discussed in the General Plan definition) for this area of Borrego Springs. Therefore, the Proposed Project Map for DS24 is consistent with Policy LU-2.5.

FB2+

The FB2+ Analysis Area is comprised of 23 parcels over 491 acres in the southeastern portion of the Fallbrook CPA. The proposed change from a combination of RL-20 and RL-40 to a combination of SR-4 and RL-20 is estimated to result in an increase in the potential dwelling units of 16 (estimated 26 potential units under the current designations and 42 under the Proposed Project Map).

Information related to LU-2.3 – The Analysis Area is in an area of many large agricultural operations, including extensive Williamson Act contract lands; however, to the west is an area of higher planned densities within the Campus Park and Meadowood Specific Plan Areas. The Analysis Area is separated from these Specific Plan areas by a mountainous area of biological preserves and agricultural preserves. As there are already extensive Rural Lands designations in this area, potential community character concerns would be limited to the area proposed for SR-4, which is on a hillside mostly surrounded by open space preserves and undeveloped areas. Though the LU-2.3 language is somewhat open for interpretation, requiring the judgement of decision-makers in policy consistency, these issues will be taken into consideration. With consideration of the nearby Specific Plans of higher densities, there is not a clear inconsistency with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area currently has Rural Lands designations (RL-20 and RL-40) and is partially at an edge of the Fallbrook CPA. The northern end of the area proposed for SR-4 is at the edge of the community with ideal wildlife corridor potential as it is adjacent to over 1,000 acres of undeveloped similar native habitat to the north and northwest (with the majority in open space preserves). This area proposed for SR-4 is also within a Pre-Approved Mitigation Area (PAMA) of the draft North County MSCP. An alternative map has been developed and analyzed which would maintain the current RL-20 designation in the area proposed for SR-4, while including the change from RL-40 to RL-20 in the other portion. As the Proposed Project Map would change an area of sensitive undeveloped habitat at the edge of the Fallbrook community from Rural Lands to Semi-Rural (with additional density potential under the proposal), the Proposed Project Map for FB2+ has been determined to be inconsistent with Policy LU-2.5. However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh various factors in determining whether a greenbelt would be sufficiently maintained. Mitigation measures for potential environmental impacts would apply to future development, particularly those outlined in Section 2.1 (Aesthetics) and in this section.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation densities in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations

could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designations.

FB17

The FB17 Analysis Area is comprised of six parcels totaling approximately 107 acres along Reche Road near I-15. The proposed change from SR-2 to a combination of SR-1 and SR-2 is estimated to result in an increase in the potential dwelling units of 33 (estimated 49 potential units under the current designations and 82 under the Proposed Project Map).

Information related to LU-2.3 – Most of the Fallbrook CPA in this area between the Village and I-15 is designated SR-2, including the Analysis Area. The Analysis Area is adjacent to an area of SR-1; however, most of that SR-1 area is within a sewer service area, while the Analysis Area is not. The Fallbrook Community Plan encourages ‘country estates’ which combine residential and agricultural uses and are prevalent in this portion of the CPA. Some judgement is required in determining whether this pattern of development would be maintained in SR-1 areas, as some research points to SR-1 and higher densities having compatibility issues with agriculture. Based on comparisons with the nearby and adjacent areas of SR-1, the FB17 Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density. It is also not at the edge of the community. Therefore, the Proposed Project Map for FB17 is consistent with Policy LU-2.5.

FB19+

The FB19+ Analysis Area is comprised of 61 parcels totaling approximately 579 acres in the northeastern portion of the CPA, east of I-15. The proposed change from RL-20 to SR-10 is estimated to result in an increase in the potential dwelling units of one (estimated 61 potential units under the current designations and 62 under the Proposed Project Map).

Information related to LU-2.3 – The proposed change would not be anticipated to impact community character or consistency in land use mapping, as it is estimated that only one additional unit is possible over the 579 acres. This is due to the proposed density for SR-10 being the same as the existing RL-20 density in areas of steep slope, which are extensive here. Therefore, the Proposed Project Map for FB19+ is consistent with Policy LU-2.3.

Information related to LU-2.5 – A small portion of the northwestern edge of the Analysis Area is at the edge of the CPA, but this area would not have additional density potential associated with the proposal. The one parcel with additional density potential is not in northern portion near the community edge, but in the southernmost portion, so the proposed changes would not affect an existing greenbelt per the General Plan definition. Therefore, the Proposed Project Map for FB19+ has been determined to be consistent with Policy LU-2.5.

FB21+

The FB21+ Analysis Area is comprised of 52 parcels totaling approximately 679 acres on the northern edge of the CPA, adjacent to Riverside County. The proposed change from RL-20 to SR-10 is estimated to result in an increase in the potential dwelling units of seven (estimated 61 potential units under the current designations and 68 under the Proposed Project Map).

Information related to LU-2.3 – All of the private lands in Fallbrook that are north of the Santa Margarita River (and west of it, where it curves north) have Rural Lands designations. The

closest Semi-Rural area within the CPA is approximately 2 miles away. The Analysis Area contains extensive habitat, slope, and access constraints, and this portion of Fallbrook also contains large areas of open space preserves, including Bureau of Land Management (BLM) lands adjacent to the west. These characteristics tend to fit with the Rural Lands description. As discussed above, this policy inherently entails some judgement by decision-makers, but consideration of these issues results in a conclusion that the Proposed Project Map for FB21+ is not consistent with Policy LU-2.3. However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency. Mitigation measures for potential environmental impacts would apply to future development, particularly those outlined in Section 2.1 (Aesthetics) and in this section.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-10 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Information related to LU-2.5 – The Analysis Area currently has a Rural Lands designation and is within the northern edge of the Fallbrook CPA. Surrounding uses include very low density residential, open space, and agriculture. There are no Semi-Rural designations in this area of the CPA, north of the Santa Margarita River, which includes high quality riparian habitats and critical habitat areas for several sensitive species. In addition to locally important wildlife corridors in this area, it is part of the Santa Ana to Palomar regional wildlife corridor. These factors lead to a reasonable conclusion that the Analysis Area is part of an existing greenbelt (at the edge of the community, and at the edge of the County) per the General Plan definition, and the proposal would move the area from Rural Lands (‘very low density rural residential’ as discussed in the General Plan greenbelt definition) to Semi-Rural. Therefore, the FB21+ proposal in the Proposed Project is inconsistent with Policy LU-2.5, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-2.5-FB21+]**).

ME26

The ME26 Analysis Area is comprised of 15 parcels totaling approximately 678 acres just east of the Lake Morena Village. The proposed change from RL-20 to SR-10 is estimated to result in an increase in the potential dwelling units of 26 (estimated 33 potential units under the current designations and 59 under the Proposed Project Map).

Information related to LU-2.3 – The Analysis Area is adjacent to an area of SR-10 and is less than a mile from the Village. The proposed SR-10 designation would still require a Conservation Subdivision design, which would ensure a design that preserves the most sensitive habitat areas and important agricultural resources. No change in the zoning minimum lot size is necessary or proposed and the Groundwater Ordinance would limit parcel sizes to a minimum of 5 acres, with possibly larger parcels required, depending on analysis from a groundwater investigation. Therefore, the Proposed Project Map for ME26 is consistent with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area currently has a Rural Lands designation and is mostly surrounded by very low density residential, agriculture, and open space, so it would be considered a greenbelt per the General Plan definition; however, it is not on the edge of the

community, where this policy seeks to maintain greenbelts. Therefore, the Proposed Project Map for ME26 is consistent with Policy LU-2.5.

ME30A

The ME30A Analysis Area is comprised of one parcel totaling approximately 262 acres in the southern portion of CPA, bisected by SR-94. The proposed change from RL-40 to a combination of SR-4 and RL-40 is estimated to result in an increase in the potential dwelling units of 29.

Information related to LU-2.3 – The Analysis Area is adjacent to an area of SR-1 to the west and adjacent to the Cameron Corners Village on the northwest, but RL-40 to the east and southeast, so it's in a transition area on the Land Use Map. The site is groundwater dependent, with a Groundwater Ordinance minimum lot size of 8 acres, so the SR-4 density proposed for the southern portion is not feasible under these limitations. This lot size limitation would limit community character conflicts and lot size consistency issues. Based on the nearby areas of higher densities and higher intensity uses, the ME30A Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area currently has a Rural Lands designation, but it is not on the edge of the community, where this policy seeks to maintain greenbelts. Therefore, the Proposed Project Map for ME30A is consistent with Policy LU-2.5.

NC3A

The NC3A Analysis Area is comprised of 48 parcels totaling approximately 1,015 acres in the southern portion of Hidden Meadows. The proposed change from RL-20 to SR-10 is estimated to result in an increase in the potential dwelling units of 11 (estimated 66 potential units under the current designations and 77 under the Proposed Project Map).

Information related to LU-2.3 – The Analysis Area is adjacent to the Daley Ranch Preserve in the City of Escondido. With the unincorporated lands surrounding the northern and western sides of the Analysis Area, there are higher densities of SR-1 and SR-4, so the proposed SR-10 is not a stretch in terms of community character. There are extensive steep slopes in the Analysis Area, which limit the additional density potential, as the allowed SR-10 density is the same as the RL-20 density in areas of steep slopes. Therefore, the Proposed Project Map for NC3A is consistent with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area currently has a Rural Lands designation at the edge of the community. Greenbelts of Rural Lands and open space are very limited in the North County Metro Subregion (includes Hidden Meadows) due to many of the edges of the Subregion being located within a Sphere of Influence (SOI) of adjacent cities. Most of the edges of the Subregion received Semi-Rural designations during the 2011 General Plan Update, in consideration of the SOIs and planning documents of the adjacent cities. Considering this unique situation of the Subregion, the Proposed Project Map for NC3A has been found to be consistent with Policy LU-2.5.

NC18A

The NC18A Analysis Area is comprised of five parcels totaling approximately 93 acres located within an unincorporated "island" surrounded by the City of Escondido on the north and the City of San Diego on the south. The proposed change from SR-2 to a combination of SR-1 and SR-2 is estimated to result in an increase in the potential dwelling units of 34 (estimated 43 potential units under the current designations and 77 under the Proposed Project Map).

Information related to LU-2.3 – NC18A is in an area where SR-1 densities closer to central Escondido transition to more agricultural lands of SR-2 densities. Parcels of 1-2 acres are more common to the west while 5-20 acre parcels are more common to the east. Some objective judgement is required in determining whether a change to SR-1 would result in the loss of agricultural uses and community character impacts, as some research points to SR-1 and higher densities having compatibility issues with agriculture. An alternative map has been developed and analyzed (see Chapter 4), which would only change the farthest western parcel to SR-1 and maintain SR-2 in the most productive agricultural areas. Based on the nearby areas of SR-1, the NC18A Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). It is also not at the edge of the community. Therefore, the Proposed Project Map for NC18A is consistent with Policy LU-2.5.

NC22

The NC22 Analysis Area is comprised of 17 parcels totaling approximately 154 acres located in the southern end of Twin Oaks (within the North County Metro Subregion). The proposed change from SR-10 to a combination of SR-1 and SR-10 is estimated to result in an increase in the potential dwelling units of 52 (estimated 21 potential units under the current designations and 73 under the Proposed Project Map).

Information related to LU-2.3 – Parcel sizes range from ¼ acre to 40 acres within a one mile radius. Smaller parcels are found to the west in the transition to the Village and larger parcels are found in the SR-10 area to the north and SR-2 area to the east. General Plan designations vary widely in this portion of Twin Oaks and this area of SR-10 is reflective of a prime wildlife corridor that forms the headwaters of Agua Hedionda Creek. As stated previously, this policy requires some judgement by decision-makers, but the wildlife corridor issues will be considered in the context of community character and mapping consistency, in addition to other issues. Considering the higher densities to the west and the variations in land use designations in this area of Twin Oaks, the NC22 Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). Therefore, the Proposed Project Map for NC22 is consistent with Policy LU-2.5.

NC37

The NC37 Analysis Area is comprised of 15 parcels totaling approximately 158 acres located in the northern portion of Twin Oaks (within the North County Metro Subregion), adjacent to the City of San Marcos. The proposed change from SR-10 to SR-4 is estimated to result in an increase in the potential dwelling units of 12 (estimated 19 potential units under the current designations and 31 under the Proposed Project Map).

Information related to LU-2.3 – Parcel sizes range from ½ acre to 175 acres within a one mile radius. SR-10 designated properties are found to the north and east, while SR-4 designated properties are found to the south. The Analysis Area includes extensive agricultural operations, and it is anticipated that an SR-4 designation would not inherently lead to a substantial loss of agriculture in the area and corresponding community character impacts. Therefore, the Proposed Project Map for NC37 is consistent with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). Therefore, the Proposed Project Map for NC37 is consistent with Policy LU-2.5.

NC38+

The NC38+ Analysis Area is comprised of eight parcels totaling approximately 77 acres located in the southeastern portion of Twin Oaks, adjacent to the City of San Marcos. The proposed change from SR-2 to SR-1 is estimated to result in an increase in the potential dwelling units of 38 (estimated 37 potential units under the current designations and 75 under the Proposed Project Map).

Information related to LU-2.3 – There is a wide range of parcel sizes within a one mile radius, from ¼ acre to 115 acres. Smaller minimum lot sizes (half-acre within sewer service portion; one acre outside sewer service area) would be necessary in order to meet the density potential. SR-10 and SR-2 designated properties are prevalent to the north and west, while adjacent lands within the City of San Marcos are higher density. As with Analysis Areas FB17 and NC18A, community character and land use consistency determinations require consideration of various factors. Research on agriculture compatibility with SR-1 areas will be taken into account. An alternative map has been developed and analyzed that would only incorporate the SR-1 change in the areas outside the FEMA floodplain, so that less clustering and potential agricultural conflicts would be required in order to reach the overall planned density potential. Considering the location within a Sphere of Influence for the City of San Marcos, higher densities adjacent to the south, and the sewer availability in part of the area, the NC38+ Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). Therefore, the Proposed Project Map for NC38+ is consistent with Policy LU-2.5.

PP30

The PP30 Analysis Area is comprised of eleven parcels totaling approximately 518 acres located in the southern portion of Pala-Pauma, adjacent to SR-76. The proposed change from RL-40 to a combination of SR-2 and RL-40 is estimated to result in an increase in the potential dwelling units of 122 (estimated 12 potential units under the current designations and 134 under the Proposed Project Map).

Information related to LU-2.3 – This portion of the planning area includes a small area of higher densities in the nearby Village, and Rural Lands and SR-10 designations are prevalent in the sensitive habitat areas, steep slope areas, and agricultural areas. With the exception of approximately 110 acres of VR-4.3 and SR-1 just outside the Village, the entire Subregional Planning Area outside the Village boundary is SR-10 or lower density. There is a high prevalence of sensitive habitats within the Analysis Area, as the San Luis Rey River passes through the Analysis Area. An alternative map has been prepared and analyzed, which would include an SR-10 designation in the area proposed for SR-2 in the Proposed Project Map. The SR-10 designation would require a Conservation Subdivision design, while the SR-2 does not. Decision-makers will consider these issues and the nearby Village and Rincon reservation uses. Considering the proximity to the Village, the PP30 Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

Information related to LU-2.5 – The Analysis Area is currently designated RL-40, so it could be considered a greenbelt of very low density. The portion of the Analysis Area that is on the edge

of the community would remain RL-40 in the Proposed Project Map. Therefore, the Proposed Project Map for PP30 is consistent with Policy LU-2.5.

SD15

The SD15 Analysis Area is comprised of one 69-acre parcel in the northwestern portion of the San Dieguito CPA, adjacent to portions of the City of San Marcos. The proposed change from SR-1 to a combination of General Commercial (with mixed use zoning at 2 dwelling units per acre), VR-10.9, and SR-0.5 is estimated to result in an increase in the potential dwelling units of 301 (estimated 61 potential units under the current designations and 362 under the Proposed Project Map).

Information related to LU-2.3 – SD15 is located in a 550-acre County “island” which is surrounded by the cities of San Marcos, Carlsbad, and Encinitas. There is a wide range of parcel sizes in this area, due to the adjacent open space preserves and nearby higher density developments in San Marcos and Carlsbad. Unincorporated County parcel sizes range from ¼ acre to 150 acres within a one mile radius. This County island contains a majority of open space lands and other undisturbed habitat. The closest unincorporated area to this County island is the western portion of Elfin Forest (part of the San Dieguito CPA), which contains mostly SR-4, RL-20, and open space preserves. Outside of some adjacent undeveloped areas within the jurisdiction of adjacent cities, there are some existing higher density developments nearby in Carlsbad and San Marcos (La Costa Oaks, University Commons, and San Elijo Hills, among others). Considering the fact that this County “island” has as much or more of a connection to the adjacent areas of San Marcos as it does to the Elfin Forest portion of the San Dieguito community, it can be considered a transition area. Higher densities are found nearby (within ½ mile) in San Marcos than proposed with the SD15 Proposed Project map. Nearby incorporated areas also contain several commercial uses. Considering these factors, the Proposed Project map has been found to be consistent with LU-2.3

Information related to LU-2.5 – The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). Therefore, the Proposed Project Map for SD15 is consistent with Policy LU-2.5.

VC7+

The VC7+ Analysis Area is comprised of 233 parcels totaling approximately 1,465 acres located in the western portion of Valley Center, just east of I-15. The proposed change from SR-4 to SR-2 is estimated to result in an increase in the potential dwelling units of 253 (estimated 366 potential units under the current designations and 619 under the Proposed Project Map).

Information related to LU-2.3 – Designations adjacent to the Analysis Area include SR-10 to the west, RL-40 and RL-20 to the north, SR-2 and RL-20 to the east and SR-4 and RL-20 to the south. There is a wide range of parcel sizes in this area of mainly residential and agricultural uses.

In looking at compatibility of the proposed SR-2 designation, a comparison can be made to a large area of existing SR-2 to the east (approximately 3,500 acres that is north of Old Castle Road, south of the 900-acre open space preserve to the east, and west of the ‘leg’ of RL-20 in this area). The Analysis Area is part of the ‘outer ring’ of Semi-Rural as it is located further away from the Villages than the adjacent area of SR-2; however, it is closer to the I-15. The adjacent area of SR-2 has a higher prevalence of 2-acre and smaller parcels. The adjacent area of SR-2 is served by four public roads (Old Castle Road, Circle R Drive, Lilac Road, and West Lilac Road), while the Analysis Area is only served by one (West Lilac Road). Both areas are within water service areas, but not within a sewer service area. The Analysis Area has a higher

prevalence of large agricultural operations, but remaining native vegetation is not as prevalent as it is in the adjacent SR-2 area. Both areas include portions with extensive steep slope constraints. In consideration of these factors and the high prevalence of SR-2 designated lands in Valley Center, a Policy LU-2.3 consistency finding can be made.

Information related to LU-2.5 – The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). Therefore, the Proposed Project Map for VC7+ is consistent with Policy LU-2.5.

VC51

The VC51 Analysis Area is comprised of 14 parcels totaling approximately 166 acres located in the northwestern portion of Valley Center. The proposed change from RL-20 to SR-4 is estimated to result in an increase in the potential dwelling units of 13 (estimated 14 potential units under the current designations and 27 under the Proposed Project Map).

Information related to LU-2.3 – The Analysis Area is adjacent to RL-20 properties on the west, south, and east, and SR-4 properties to the north. The adjacent SR-4 to the north is approximately 820 acres and would be considered the one exception to the ‘greenbelt’ of very low density (Rural Lands) in this northwestern portion of the CPA. The mapped SR-4 in this area is generally reflective of existing parcelization, with most of the parcels having no additional density potential under SR-4. The Analysis Area contains larger parcels, with five of the 13 parcels under Williamson Act contracts for preservation of agricultural uses. These properties would not have subdivision potential under the change until/if Williamson Act contracts are removed (typically a 10-year non-renewal process), thus limiting potential community character impacts. Therefore, a finding of consistency with Policy LU-2.3 can be made.

Information related to LU-2.5 – The Analysis Area currently has a Rural Lands designation, but it is not on the edge of the community, where this policy seeks to maintain greenbelts. Therefore, the Proposed Project Map for VC51 is consistent with Policy LU-2.5.

VC57+

The VC57+ Analysis Area is comprised of 217 parcels totaling approximately 1,337 acres located in the eastern portion of Valley Center, just east of the northern Village. The proposed change from SR-4 to SR-2 is estimated to result in an increase in the potential dwelling units of 231 (estimated 374 potential units under the current designations and 605 under the Proposed Project Map).

Information related to LU-2.3 – Designations adjacent to the Analysis Area include SR-2 and Medium Impact Industrial to the west, SR-2 to the north, RL-20 to the east and SR-4 and Specific Plan Area (SPA) to the south. There is a wide range of parcel sizes in this area of mainly residential and agricultural uses.

In looking at compatibility of the proposed SR-2 designation, a comparison can be made to a large area of existing SR-2 to the north (existing SR-2 acreage to the north is similar to the Analysis Area acreage). The proximity to the North Village would be similar, with the western ends of both areas being adjacent to the Village boundary. Available services would also be similar with water service available to both areas, but not sewer service. The VC57+ area has a more extensive public road network than this adjacent SR-2 area, but also has a higher level of floodplain constraints (western portion). The extents of native vegetation and existing agricultural operations are similar for both areas. In consideration of these factors and the high prevalence of SR-2 designated lands in Valley Center, a Policy LU-2.3 consistency finding can be made.

Information related to LU-2.5 – The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). Therefore, the Proposed Project Map for VC57+ is consistent with Policy LU-2.5.

VC67

The VC67 Analysis Area is comprised of 6 parcels totaling approximately 13 acres located just south of the northern Village of Valley Center. The proposed change is from SR-2 to Medium Impact Industrial.

Information related to LU-2.3 – The Analysis Area has a history of industrial uses, particularly outdoor storage of vehicles and equipment. There are properties with existing industrial designations and zoning adjacent to the north, and the Analysis Area was designated and zoned for industrial prior to the 2011 General Plan Update. Therefore, a finding of consistency with Policy LU-2.3 can be made.

Information related to LU-2.5 – The Analysis Area is not within a greenbelt per the General Plan definition because it is not within a Rural Lands area. Therefore, the Proposed Project Map for VC57+ is consistent with Policy LU-2.5.

Former Champagne Gardens Specific Plan Area

The former CGSP Area is comprised of 14 parcels totaling approximately 115 acres located at the intersection of three planning areas (Bonsall, Valley Center and Hidden Meadows) along Champagne Boulevard just east of I-15. The proposed change from Specific Plan Area (with no residential density) and RL-20 to a combination of SR-2, SR-4, SR-10, and Rural Commercial in the Referral Map (analyzed as part of the Proposed Project) is estimated to result in an increase in the potential dwelling units of 31 (estimated 1 potential unit under the current designations and 32 under the Proposed Project Map).

Information related to LU-2.3 – The former CGSP area is surrounded by SR-4 and Specific Plan Area to the east, Specific Plan Area and RL-20 to the south, I-15 to the west (with RL-20 west beyond that), and SR-4 to the north. This area near the freeway has a varied mix of land uses, with the Welk Specific Plan nearby, which includes timeshares and some limited commercial uses surrounded by open space; however, other land uses nearby are more semi-rural in nature. This area of the I-15 includes extensive mapping of SR-10 and RL-20 in close proximity to the freeway, reflecting steep slopes and agricultural uses. The western portion of the former CGSP area includes some flat areas where limited commercial would not be anticipated to impact community character, considering the mini-storage and winery already located in two of the Subareas. Therefore, a finding of consistency with Policy LU-2.3 can be made.

Information related to LU-2.5 – The former CGSP area is not within a greenbelt per the General Plan definition because only the Subarea 7 (just over 1 acre) currently has a Rural Lands designation.

Valley Center Community Plan Policy 8 Proposed Revision

Information related to LU-2.3 – This proposed policy revision would be very limited in scope as it would only apply to SR-2 or SR-4 properties that are within the sewer service area (see Figure 1-2). Outside of the former CGSP Area, which includes SR-2 and SR-4 designations proposed in two of the map alternatives on the east side, only one other applicable parcel has subdivision potential under its current SR-4 designation. This policy revision would help in maintaining community character within the subject CGSP parcels by clustering away from valued areas of

riparian, oak, and coastal sage scrub habitats. Therefore, a finding of consistency with Policy LU-2.3 can be made.

Information related to LU-2.5 – This policy revision would not affect allowed density, so it would not impact greenbelts.

Goal 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 associated General Plan Policies that are applicable to a ‘stand-alone’ GPA/Rezone, like the Proposed Project are:

LU-6.2: Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

The 2011 PEIR analysis determined that Policy LU-6.2 would reduce impacts to Aesthetics - Scenic Vistas; Aesthetics - Scenic Resources; and Biological Resources - Species Status Plant and Wildlife Species.

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 2011 PEIR analysis determined that Policy LU-6.11 would reduce impacts to Hazards and Hazardous Materials - Wildland Fires; and Public Services - Fire Protection Services.

Analysis Area Discussion – Applicable Policies under Goal LU-6

These policies require consideration of sensitive habitats, wildlife corridors, other natural resources, and hazards in reviewing development projects, and as applicable to this project, in land use mapping decisions.

Both policies require some level of interpretation and judgement. Large portions of the unincorporated County contain Very High FHSZs, sensitive habitats, and wildlife corridors, particularly outside the Village boundaries, where most of the PSR Analysis Areas are located. Policy consistency can be considered in the context of extent of sensitive habitats, wildlife corridors, critical habitat areas, density feasibility with avoidance of sensitive habitats; and access limitations, fire clearing limitations and other fire protection considerations for wildfire hazards. *Both of these policies were relied upon in the 2011 PEIR to reduce environmental impacts.* Included below is information related to LU-6.2 and LU-6.11.

BO18+

Information related to LU-6.2 – Of the total 921 acres in the Analysis Area, GIS estimates show approximately 73 acres of sensitive habitats. Much of the coastal sage scrub and southern mixed chaparral are found on the hillsides of the southern and western portions. There is a narrow riparian corridor that runs northwest to southeast. 110 acres in the southern portion is in a Pre-Approved Mitigation Area (PAMA) in the draft North County MSCP (see the Biology sections 2.4.2 and 2.4.3.4), signifying an area of high biological value and typically serving as a wildlife corridor, where preservation will be encouraged. It is anticipated that the potential density of the Proposed Project could be achieved in most or all portions of the Analysis Area, while avoiding sensitive habitats. The northeastern portion of the Analysis Area contains a higher level of existing development footprint and lower extent of sensitive habitats than found in

the southern and western portions. An alternative map has been developed and analyzed (see Chapter 4), which would only change the northeastern portion to SR-4, while leaving the rest at SR-10. The Proposed Project Map for BO18+ is consistent with LU-6.2 as the proposed SR-4 density is low enough in consideration of the extent of native vegetation and other resources, to conclude that the most environmentally sensitive areas could be avoided in future development.

Information related to LU-6.11 – There are no floodplains, dam inundation zones, or fault hazard zones in the Analysis Area. Approximately 100 acres in the southern hillsides of the Analysis Area is within a Very High Fire Hazard Severity Zone (FHSZ). The rest of the area is within a Moderate FHSZ, due to the extensive areas of irrigated agriculture. Access improvements would be required throughout the Analysis Area in order to accommodate further subdivisions, but it is estimated that most of the area could meet the General Plan travel time standard of 10 minutes upon provision of access roads to fire protection standards. Existing access (and feasibility of improvements) is most sufficient in the northeastern portion, which is the only portion that would be changed in the alternative map mentioned above. Improving access in the southern and western portions of the Analysis Area (near Rancho Amigos Road in the south and the western portion of Calle de Tallar in the west) will be challenging given the extent of steep slopes, some very steep roadside drop-offs, and coastal sage scrub in these areas. Areas adjacent to the southern end of the Analysis Area have limited fire clearing due to the steep slopes and sensitive vegetation on hillsides above the Moosa Creek corridor. Most of the parcels with additional density potential (associated with the proposal) in the western portion of the Analysis Area are currently accessed via dead end roads or have no access at all. As a result of these issues, the proposed density increase to SR-4 within the southern and western portions of the Analysis Area results in a conclusion of inconsistency with LU-6.11 for the Proposed Project Map. However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of the proposed SR-4 density as it relates to the parameters of the policy, and the mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-4 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

CD14

Information related to LU-6.2 – Most of the 101-acre Analysis Area contains coastal sage scrub and chaparral vegetation communities, and almost the entire area is within a Pre-Approved Mitigation Area (PAMA) in the adopted South County MSCP (see Biology sections 2.4.2 and 2.4.3.4), signifying an area of high biological value and typically serving as a wildlife corridor, where preservation will be encouraged. The Analysis Area connects to extensive areas of open space preserves to the east. The area proposed for SR-2 would be limited to the western portion, adjacent to an existing built out single family residential neighborhood. The estimated increase in potential dwelling units of seven would require clustering to the maximum extent allowed in order to preserve a functional wildlife corridor. An alternative map has been developed and analyzed (see Chapter 4) which would reduce the area proposed for SR-2, consolidating it closer to existing development and keeping the steepest hillsides at RL-20. As

the area proposed for SR-2 would be consolidated in the western portion, adjacent to the existing built out neighborhood, a consistency finding can be made.

Information related to LU-6.11 – The entire area is within the Very High FHSZ. Access improvements would be required, but current GIS estimates show the 10-minute response time could likely be met for the SR-2 proposed area, upon implementation of access improvements to fire protection standards. Depending on the proposed location of homes, subdivisions within the Analysis Area could have difficulty meeting the maximum dead-end road length requirements and may require secondary access which would be challenging to implement in this location. An alternative map has been prepared and analyzed that would reduce the area of SR-2 in the northwestern portion, which is more problematic for access and fire protection than the southwestern portion with less steep slope and closer to public roads. While this alternative would demonstrate a greater level of consistency with Policy LU-6.11, a consistency finding can be made for the CD14 Proposed Project Map due to the fact that the most hazardous areas in the eastern portion would remain unchanged and additional density would be focused in the area closest to existing access and development.

DS8

Information related to LU-6.2 – While the PSR parcel contains very little vegetative cover, much of the Study Area contains native vegetation, consisting of desert saltbush scrub, particularly in the southern portion. Wildlife corridor opportunities would be limited due to the adjacent roads and Village uses, and the Analysis Area is already within the Village.

In terms of natural resources, the greatest obstacle for increased development in this CPA is the reliance on groundwater. Per the requirements of the Sustainable Groundwater Management Act (SGMA), a Groundwater Sustainability Plan (GSP) will soon be prepared for the Borrego Valley, in order to ensure long term groundwater sustainability. Preliminary estimates indicate that the CPA may have to reduce groundwater use by 70% or more as part of implementing a GSP. Estimates from the Groundwater Study of the General Plan Update showed over 10,000 additional dwelling units would be possible when adding legally buildable vacant lots to the additional subdivision and multi-family development potential in the current Land Use Map for the CPA. As such, even though the Analysis Area is currently within a Village, with a Village density on the Land Use Map, increasing allowed density within the CPA would further exacerbate an already critical overdraft situation. Though some level of interpretation and judgement is required of decision-makers for this type of policy, the critical nature of the groundwater situation in the valley, combined with the substantial decrease in groundwater use that will be necessary to meet SGMA requirements entails a breadth of evidence in the record to reasonably come to a conclusion that the DS8 proposal is inconsistent with Policy LU-6.2. Therefore, the DS8 proposal in the Proposed Project is inconsistent with Policy LU-6.2, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-6.2-DS8]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed VR-4.3 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Information related to LU-6.11 – The Analysis Area is in a Moderate FHSZ. The southern portion is only approximately 200 feet from the Borrego Springs FPD fire station on Stirrup Road. With the public roads surrounding the Analysis Area, it is anticipated that the 5-minute General Plan travel time standard could be met. Therefore, a consistency finding can be made for Policy LU-6.11.

DS24

Information related to LU-6.2 – The vegetation of the site is categorized as Sonoran creosote bush scrub. This classification includes ocotillos (*Fouquieria splendens*) and the site contains one of the densest concentrations of ocotillos in the Borrego Valley. In addition to the limited recovery capabilities of this type of vegetation community, the removal of native vegetation in this area can have substantial impacts to air quality, as high winds are common. The site provides potential habitat for some sensitive species, including flat-tailed horned lizard and burrowing owl. The site is also near Recovery Region 7 (South San Ysidro Mountains) for the peninsular bighorn sheep which has the potential to visit the site from the nearby east-facing slopes, for foraging and for a seasonal water source. A drainage corridor (USGS blue line stream) is found on the western end of the Analysis Area.

In terms of natural resources, the greatest obstacle for increased development in this CPA is the reliance on groundwater. Per the requirements of SGMA, a GSP will soon be prepared for the Borrego Valley, in order to ensure long term groundwater sustainability. Preliminary estimates indicate that the CPA may have to reduce groundwater use by 70% or more as part of implementing a GSP. Estimates from the Groundwater Study of the General Plan Update showed over 10,000 additional dwelling units would be possible when adding legally buildable vacant lots to the additional subdivision and multi-family development potential in the current Land Use Map for the CPA. As such, increasing allowed density within the CPA would further exacerbate an already critical overdraft situation.

Though some level of interpretation and judgement is required of decision-makers for this type of policy, the groundwater situation in the valley, combined with the sensitive nature of the habitat on the site entails a breadth of evidence in the record to reasonably come to a conclusion that the DS24 proposal is inconsistent with Policy LU-6.2. Therefore, the DS24 proposal in the Proposed Project is inconsistent with Policy LU-6.2, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-6.2-DS24]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Information related to LU-6.11 – The Analysis Area is within a Moderate FHSZ. The estimated fire response travel time is currently estimated to be beyond the 5-minute General Plan standard. This will require confirmation during the subdivision application process, based on existing and proposed access roads at that time. The proposed designation is not inconsistent with the level of fire hazard in this area, though extensive access improvements would be required for a subdivision. The site is mostly within the 100-year floodplain and the potential for particularly hazardous flooding is apparent, due to the proximity to the confluence of west to east drainage flows associated with the alluvial fans of Dry Canyon, Tubb Canyon, Culp

Canyon, and Loki Canyon. The flood hazards and fire response times could prove challenging to mitigate during the development review process, and could render the proposed densities infeasible. However, a consistency finding can be made at this programmatic level, based on nearby designations of the same or slightly higher densities, with similar hazard constraints.

FB2+

Information related to LU-6.2 – The central portion of this Analysis Area (much of the FB18 portion) has been previously cleared and graded for agricultural uses. The hillsides on the eastern and western edges of the Analysis Area contain coastal sage scrub and chaparral vegetation communities with minimal existing development. The western hillside portion that includes the FB2 PSR and associated Study Area parcels is proposed for SR-4. With most of the Analysis Area in the PAMA of the draft North County MSCP (see Biology sections 2.4.2 and 2.4.3.4), this portion would have the best wildlife corridor potential as it is adjacent to over 1,000 acres of undeveloped similar native habitat to the north and northwest (with the majority in open space preserves). An alternative map has been developed analyzed that would keep the RL-20 in the area proposed for SR-4, while changing the remainder with a high level of existing graded footprint, from RL-40 to RL-20. As the Proposed Project Map would place the highest density (SR-4) in the area that would serve as the most critical wildlife corridor of the Analysis Area, the Proposed Project Map has been found to be inconsistent with Policy LU-6.2. However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency. Mitigation measures for potential environmental impacts would apply to future development, particularly those outlined in Section 2.1 (Aesthetics), Section 2.4 (Biological Resources), and in this section.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation densities in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designations.

Information related to LU-6.11 – Most of the extent of the previously graded central portion of the Analysis Area that is used for agriculture is in the Moderate FHSZ. The hillsides on the western and eastern portions along with ungraded portions on the northern end are in the Very High and High FHSZs. For fire protection, the Analysis Area is under the County Fire Authority with the closest station located approximately 15 miles east on SR-76 with an estimated 20-minute travel time, which would be sufficient for the RL-20 proposed portion, but would not meet the 10-minute standard for the SR-4 proposed portion. As discussed previously, this would be reviewed at the subdivision application stage, based existing and proposed roads and fire protection infrastructure available at that time. In considering fire protection infrastructure, the Analysis Area has a good public road network for this area of Fallbrook, with SR-76 traversing through the southern portion of the Analysis Area and Rice Canyon Road traversing through the western portion (separating the area proposed for SR-4 from the area proposed for RL-20). In addition to fire hazards, the floodplain and dam inundation zones along the San Luis Rey River encroach into the southern portion of the Analysis Area; however, the allowed density associated with the Proposed Project could likely be achieved with complete avoidance of these areas. Considering the high fire hazards in the area proposed for SR-4, the limited fire clearing in that area, and the emergency response travel time being well beyond the SR-4 standard, the Proposed Project Map has been found to be inconsistent with Policy LU-6.11. However, this

noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency. Mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation densities in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designations.

FB17

Information related to LU-6.2 – FB17 contains a corridor of riparian wetlands running from northwest to southeast through the central portion and along the southern perimeter, adjacent to Reche Road. Some small areas of oaks are found in the eastern portion. Outside of these areas, there are agricultural uses with some coastal sage scrub growing back in areas mapped as agriculture. The wetland areas are fairly extensive in the western part of the area proposed for SR-1 and could pose feasibility issues for access options. There are developable areas, but it may be difficult to reach the development potential after appropriate wetland buffers are factored in. In addition, the Analysis Area is not in a sewer service area and septic systems/leach fields cannot encroach into wetland buffers. Consideration of the density allowed under SR-1 and the spread-out nature of the wetlands entails a breadth of evidence in the record to reasonably come to a conclusion of the FB17 proposal posing an inconsistency with Policy LU-6.2. Therefore, the FB17 proposal in the Proposed Project is inconsistent with Policy LU-6.2, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-6.2-FB17]**). An alternative map has been developed and analyzed (see Chapter 4) that would change only the eastern leg of the Analysis Area to SR-1, where wetland constraints are reduced.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Information related to LU-6.11 – Most of the Analysis Area is within the Moderate FHSZ, due to the presence of agricultural operations. Current estimates show the site would not meet the 5-minute fire protection service travel time standard for the proposed SR-1. Access will be a critical issue for fire protection in subdivision review. An alternative map has been prepared and analyzed that would only change the eastern leg of the Analysis Area to SR-1. That portion would not have the access issues of the central portion as it's adjacent to the public Ranger Road, without a wetland area along the road. Though the alternative map would provide a greater level of policy consistency, a consistency finding can be made for the FB17 Proposed Project Map, given the mapped FHSZs here in relation to nearby areas of SR-1.

FB19+

Information related to LU-6.2 – Outside of areas previously graded for agricultural and recreational uses, the Analysis Area contains riparian habitats along Stewart Canyon Creek, with areas of coastal sage scrub and southern mixed chaparral on hillsides. As discussed previously, the proposal is only anticipated to result in one additional potential dwelling unit over the 579-acre Analysis Area, as the proposed SR-10 has the same allowed density as the existing RL-20, within areas of steep slopes (which are extensive here). In addition, the Conservation Subdivision requirement would remain under the proposed SR-10, ensuring the preservation of critical habitats under the minimal additional development that would be allowed. Therefore, a consistency finding can be made.

Information related to LU-6.11 – The majority of the Analysis Area is within the Very High FHSZ, while almost 200 acres (mostly in the eastern portion) is within the Moderate FHSZ due to the presence of agricultural operations. Current GIS and fire district estimates anticipate that the Analysis Area would be able to meet the 20-minute General Plan standard for fire response travel time. The estimated one additional potential dwelling unit would be in the southern property, closest to the fire station. Therefore, a consistency finding can be made.

FB21+

Information related to LU-6.2 – The Analysis Area is within the Santa Margarita River Resource Conservation Area of the Fallbrook Community Plan, is mostly within a PAMA of the draft North County MSCP (see Biology sections 2.4.2 and 2.4.3.4), and is part of the Santa Ana to Palomar regional wildlife corridor. Most of the additional density potential is within the western portion of the Analysis Area, which includes large areas of wetlands surrounding the Sandia Creek corridor (connects to the Santa Margarita River to the south), and is also adjacent to a 1,600-acre BLM preserve to the west. Portions of the Santa Margarita River corridor, less than one mile away, are within a Critical Habitat Area for federally endangered arroyo toad, least Bell's vireo, and southwestern willow flycatcher. These Critical Habitat Areas are connected to the additional density potential portion of the Analysis Area via Sandia Creek, which provides ideal habitat for these species, both in the connection area and in the Analysis Area. These substantial habitat constraints will require consideration in the context of the proposed SR-10 designation, which requires a Conservation Subdivision design and is estimated to result in seven additional potential dwelling units. The western portion of the Analysis Area presents some feasibility issues for reaching the density potential, as there is limited acreage available, outside wetlands, typical wetland buffer widths, and steep slopes. Therefore, the Proposed Project Map for FB21+ has been found to be inconsistent with Policy LU-6.2. However, this noted inconsistency has not been determined to constitute a significant impact because there is some room for judgement of decision makers to weigh other factors more heavily in evaluating policy consistency, including the Conservation Subdivision requirement, which would remain under the proposed SR-10 designation. Mitigation measures for potential environmental impacts would apply to future development, particularly those outlined in Section 2.1 (Aesthetics), Section 2.4 (Biological Resources), and in this section.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-10 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Information related to LU-6.11 – The Analysis Area is approximately half within the Very High FHSZ and half within the Moderate FHSZ, due to the presence of agricultural operations. Travel time estimates show some of the northern portions would be outside of the 20-minute travel time standard of the General Plan for the proposed SR-10 and the existing RL-20. This is a particularly hazardous area for wildfire evacuations, as there are no public roads in the Analysis Area and the main road for ingress and egress to the area (Sandia Creek Drive) traverses over sharp curves and slopes with steep roadside drop-offs in some areas. The Analysis Area lacks a paved second option for evacuation. In addition, the Analysis Area is surrounded by extensive areas of open space preserves, so fire clearing in this area is limited. Most of the additional density potential associated with the SR-10 proposal would be in the western portion, which is adjacent to a BLM preserve of approximately 1,600 acres. Adjacent to the south are undeveloped properties of the Fallbrook Public Utilities District which contain riparian habitats connecting to preserves of the Santa Margarita River. Within the southeast portion of the Analysis Area is the 78-acre Rock Mountain Preserve of the Fallbrook Land Conservancy, and extensive undeveloped lands are also found adjacent to the east. Due to the particularly hazardous conditions associated with wildfire evacuation, and the large expanses of flammable vegetation with limited fire clearing in this area, a proposed increase in density would not be consistent with land use mapping to minimize populations exposed to hazards, particularly when there are no Semi-Rural designations within two miles. Therefore, the FB21+ proposal in the Proposed Project is inconsistent with Policy LU-6.11, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-6.11-FB21+]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-10 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

ME26

Information related to LU-6.2 – The vegetation communities found in the Analysis Area include granitic northern mixed chaparral, chamise chaparral, sagebrush scrub, and some smaller areas of oak woodlands. Though there is some sparse existing development, including residential and agricultural uses, wildlife corridor opportunities exist, with the adjacent Cleveland National Forest and BLM lands. The Conservation Subdivision requirement would remain, under the proposed SR-10 designation, which would serve to preserve the most critical habitats of the Analysis Area. In addition, the most sensitive habitats and important wildlife corridor areas could be preserved during the subdivision process, without impacting the feasibility of the proposed density. Therefore, a consistency finding can be made.

Information related to LU-6.11 – The Analysis Area includes portions within the Very High (approximately 410 acres) and High (approximately 268 acres) FHSZs. Current estimates show that the 20-minute fire response travel time standard for the proposed SR-10 could likely be met. Subdivision applicants would have to obtain permission to improve roads through adjacent federal lands to fire access standards. The portion of the Analysis Area with substantial steep slopes is closest to the public road (Buckman Springs Road) and the Village. A consistency finding can be made, given that access improvements through federal lands would be reviewed by the appropriate agencies at the subdivision application stage, and those improvements have not been determined to be infeasible at this programmatic review stage.

ME30A

Information related to LU-6.2 – The portion of the Analysis Area proposed to remain RL-40 includes the greatest habitat constraints, with wetlands and floodplain area. The southern portion proposed to change to SR-4 is limited to granitic northern mixed chaparral and sagebrush scrub. The 8-acre minimum lot size required under the Groundwater Ordinance would make the proposed SR-4 density infeasible, while the site continues to be reliant on on-site groundwater resources. This limitation would facilitate the maintenance of important wildlife corridors. Therefore, a consistency finding can be made.

Information related to LU-6.11 – The southern portion of the Analysis Area which is proposed to change designations is within the Very High FHSZ. The Analysis Area is just over one mile from the closest fire station, and it is anticipated the 10-minute travel time standard for SR-4 could be met, upon implementation of access improvements to fire protection standards. Floodplain, floodway, and dam inundation zone hazards are limited to the northern portion that is proposed to remain unchanged at RL-40. Therefore, a consistency finding can be made.

NC3A

Information related to LU-6.2 – The majority of the Analysis Area contains undeveloped areas of coastal sage scrub and chaparral, and there is also an area of oak woodlands covering just over 100 acres. Existing agricultural operations, residential development, and sufficient access options are more prevalent in the southern portion. With an estimate of only 11 additional potential dwelling units over a 1,015-acre area, and with the Conservation Subdivision requirement remaining with the proposed SR-10 designations, the most sensitive habitat areas could be preserved. Therefore, a consistency finding can be made.

Information related to LU-6.11 – Approximately 800 acres of the 1,015 total acres is within the Very High FHSZ, while the southern end is in the Moderate FHSZ. Current estimates show the 20-minute fire response travel time could be met for this area, upon implementation of internal access roads to fire protection standards. Therefore, a consistency finding can be made.

NC18A

Information related to LU-6.2 – While much of this Analysis Area has been previously cleared for residential and agricultural uses, a riparian corridor remains in the south-central portion and some small pockets of coastal sage scrub remain on hillsides. Additional consideration could be given to the location outside of PAMA for draft North County MSCP and outside of a Resource Conservation Area. An alternative map has been developed (see Chapter 4) which would limit the designation change to the westernmost parcel, which is mostly outside of sensitive habitat areas. While the alternative map would provide a greater level of policy consistency, the additional density feasibility associated with the Proposed Project Map could be achieved with avoidance of the most sensitive resources, and a consistency finding can be made.

Information related to LU-6.11 – Most of the Analysis Area is within the Very High FHSZ, like much of the adjacent and nearby areas of existing SR-1. Current estimates show most of the Analysis Area would be just beyond the 5-minute General Plan standard for fire response travel time. The alternative map mentioned above would only change the westernmost parcel to SR-1, as this portion would have the best estimated travel time of the Analysis Area parcels. Considering the level of fire hazards in relation to adjacent and nearby SR-1 areas, a consistency finding can be made.

NC22

Information related to LU-6.2 – The entire Analysis Area is within a PAMA area for the draft North County MSCP (see Biology sections 2.4.2 and 2.4.3.4), and it is within an important wildlife corridor for this area near the border between the City of San Marcos and the North County Metro Subregion, due to the size of the corridor and the development pressures in this area. The majority of the Analysis Area (126 acres of the 154 acres) is comprised of the NC22 PSR parcels, which are undeveloped, with the southwestern half of the area proposed for SR-1. This area contains a riparian corridor in the headwaters of Agua Hedionda Creek. Surrounding the riparian corridor are hillsides of high quality coastal sage scrub habitat. Several species covered in the draft North County MSCP have the potential to occur within the Analysis Area. The Conservation Subdivision design required in the current SR-10 would be removed with the proposed change to SR-1. Consideration of these issues together entails a breadth of evidence in the record to reasonably come to a conclusion of the NC22 proposal posing an inconsistency with Policy LU-6.2. Therefore, the NC22 proposal in the Proposed Project is inconsistent with Policy LU-6.2, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-6.2-NC22]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Information related to LU-6.11 – The Analysis Area is almost entirely within the Very High FHSZ. Current estimates show the area would not meet the 5-minute General Plan travel time standard for the proposed SR-1. Fire protection access improvement requirements along with the extent of sensitive habitats could affect the feasibility of the density allowed under the Proposed Project Map. An alternative map has been developed and analyzed (see Chapter 4) that would apply SR-4 in the area proposed for SR-1 in the Proposed Project Map. Considering the high level of fire clearing in surrounding properties, a consistency finding can be made, though extensive access improvements would be required for the potential density associated with the proposed SR-1.

NC37

Information related to LU-6.2 – This Analysis Area contains extensive existing grading footprint for agricultural and residential uses. Areas of remaining vegetation include coastal sage scrub, chaparral, and non-native grasslands mostly in the northern and western portions. The level of habitat constraints is similar to nearby SR-4 areas. Therefore, a consistency finding can be made.

Information related to LU-6.11 – Approximately half of the area is within the Moderate FHSZ, due to the agricultural operations. The other half is in the Very High FHSZ. Current estimates show that most of the Analysis Area would be within the 10-minute General Plan fire response travel time standard for SR-4. As with other issues, the western leg of the Analysis Area would be the most problematic from a fire protection standpoint, due to the native vegetation, slopes, and distance from the public road. An alternative map has been developed and analyzed (see Chapter 4) that would maintain the current SR-10 designation in this western leg of the Analysis

Area. As the parcels with additional density potential are located in the eastern and northern portions closer to the public road, a consistency finding can be made.

NC38+

Information related to LU-6.2 – Habitat constraints within NC38+ are limited to a small drainage area which includes some riparian vegetation and a small patch of oaks near a road, both in the eastern portion. These areas cover approximately 4 acres of the 77 total acres, so this is not an area substantially constrained by sensitive natural resources and a consistency finding can be made.

Information related to LU-6.11 – The entire Analysis Area is within the Moderate FHSZ, due to the agricultural uses. Wildfire risks are minimized here by the extent of surrounding development (including higher density residential adjacent to the south in San Marcos), the lack of large areas of native habitat in close proximity, and the large proportion of the Analysis Area planted with irrigated crops or developed with homes and/or greenhouses. Current estimates show only the westernmost portion of the Analysis Area would meet the 5-minute General Plan standard for fire response travel time. This would be evaluated at the subdivision application stage, with consideration of additional access proposed. Therefore, a consistency finding can be made.

PP30

Information related to LU-6.2 – With the exception of the northeastern parcel planted with citrus trees, the entire Analysis Area is within a PAMA area for the draft North County MSCP (see Biology sections 2.4.2 and 2.4.3.4). It is also within an important wildlife corridor with the San Luis Rey River running southeast to northwest through the Analysis Area, connecting with Yuima Creek and Potrero Creek near the center of the Analysis Area. PP30 is also adjacent to approximately 1,800 acres of undeveloped native habitat to the south and west. These riparian areas within PP30 are part of federal Critical Habitat Areas for the endangered arroyo toad and southwestern willow flycatcher, and the Critical Habitat Area for the endangered least Bell's vireo is approximately 10 miles downstream. Outside of the riparian areas, substantial acreages (estimated through GIS vegetation mapping) of other sensitive habitats are found in the Analysis Area, including coastal sage scrub, coastal sage-chaparral transition, montane buckwheat scrub and coast live oak woodland. With the range of connected riparian/wetland and upland habitats, several species covered in the draft North County MSCP have the potential to occur on the site. The Analysis Area is also within the San Luis Rey River Resource Conservation Area of the Pala-Pauma Subregional Plan. The Proposed Project Map would change approximately half of the Analysis Area (portion east of the floodplain) to SR-2, resulting in a substantial increase in potential density, from 12 to 134, and the removal of the Conservation Subdivision requirement in the area proposed for SR-2. Consideration of the extent of sensitive habitats throughout the Analysis Area entails a breadth of evidence in the record to reasonably come to a conclusion of the PP30 proposal posing an inconsistency with Policy LU-6.2. Therefore, the PP30 proposal in the Proposed Project is inconsistent with Policy LU-6.2, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-6.2-PP30]**). An alternative map has been developed and analyzed (see Chapter 4) that would place SR-10 in the area proposed for SR-2 in the Proposed Project Map. This alternative would maintain a Conservation Subdivision requirement throughout the Analysis Area.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation densities in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations

could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designations.

Information related to LU-6.11 – With the exception of the northeast portion (approximately 100 acres, including citrus groves, a house, and accessory structures), the entire Analysis Area is within the Very High FHSZ. Fire protection service is provided by CAL FIRE via a contract with the Pauma Municipal Water District, and the closest station is on SR-76 adjacent to the northeast portion of PP30. Meeting the General Plan standard for fire response travel time (10 minutes for the SR-2 portion in the Proposed Project Map) is anticipated to be feasible; however, developing internal access roads to fire standards could be difficult, depending on the location of homes, due to the riparian areas discussed above. Given the close proximity to the fire station and the presence of irrigated agriculture in some of the areas proposed for SR-2, a consistency finding can be made.

SD15

Information related to LU-6.2 – The entire Analysis Area is within a PAMA area for the draft North County MSCP (see Biology sections 2.4.2 and 2.4.3.4) and potential wildlife corridors are abundant within the currently vacant property. Adjacent to the west, south and southeast are open space preserves covering over 1,000 acres, in addition to areas of low density SR-10 nearby. Most of the site consists of coastal sage scrub and southern mixed chaparral, with a riparian area starting at a storm drain outfall near the southeast boundary. With the location of connected open space, steep slopes, and sensitive habitat in the southern end of the PSR, that area should, in accordance with this policy, have a designation/density that reflects the sensitive habitats in that area and the need for maintaining a wildlife corridor. As discussed previously, the Proposed Project map includes SR-0.5 for the southern end. An alternative map has been developed and analyzed (see Chapter 4) that would place SR-10 on the southern 30 acres of the Analysis Area, thus requiring a Conservation Subdivision design in that portion. In the review of this policy, consideration is given to the fact that the Analysis Area is just one parcel under one ownership. Under the General Plan (Policy LU-1.8, applicable to development projects), transfer of density within a parcel with multiple designations is allowed with a Major Use Permit or Specific Plan. Therefore, the area proposed for SR-0.5 in the Proposed Project map could be preserved, with the potential units transferred into the northern portion. If the PAMA designation is approved for this site, this preservation of a viable wildlife corridor in the south would likely be required, regardless of designation. While the alternative map would require a Conservation Subdivision process on the southern 30 acres and would demonstrate a greater level of consistency with LU-6.2, a clear inconsistency under the Proposed Project map has not been found, due to the likelihood of preservation in the southern portion, as discussed above.

Information related to LU-6.11 – The entire Analysis Area is within the Very High Fire Hazard Severity Zone. The site is currently vacant with adjacent open space preserves, so adjacent fire clearing is limited. Current estimates show the northern portion of the site is within the 5-minute fire response travel time, which is the General Plan standard for each of the designations in the Proposed Project Map. The majority of the site is within the 5-10 minute travel time range. Fire response time, internal access, and sufficient clearing will need to be addressed during the development review stage and could prove challenging to sufficiently mitigate. Considering the nearby high-density developments along San Elijo Road, a consistency finding can be made in reviewing at this programmatic level.

VC7+

Information related to LU-6.2 – Much of this 1,465-acre Analysis Area consists of agricultural uses and single family residential uses. Sensitive habitats cover just over 120 acres, including riparian scrub/forest, coastal sage scrub, southern mixed chaparral and a small area of oak woodlands. Considering the estimated acreage of sensitive habitats in relation to the overall Analysis Area acreage, it is anticipated that most of the sensitive habitats could be preserved. Approximately 90 acres on the northern end are within a PAMA area of the draft North County MSCP (see Biology sections 2.4.2 and 2.4.3.4). This PAMA area would serve to protect the wildlife corridor associated with Keys Creek, its tributaries, and adjacent undeveloped upland habitats. An alternative map has been developed and analyzed (see Chapter 4) that would keep the existing SR-4 designation in the northern and southern portions of riparian habitats surrounded by areas of steep slopes. While this alternative map would demonstrate a greater level of policy consistency, a consistency finding can be made for the Proposed Project Map, given the acreage of sensitive habitats in relation to the overall Analysis Area acreage.

Information related to LU-6.11 – The majority of the Analysis Area is within the Moderate FHSZ, due to the prevalence of agricultural operations, in addition to approximately 365 acres in the Very High FHSZ. Current estimates show most of the Analysis Area would be within the 10-minute General Plan fire response travel time standard for the proposed SR-2. The closest station of the Deer Springs FPD (applicable district) is approximately 2 miles from the southern end of the Analysis Area. Access improvements would be necessary throughout the Analysis Area, as the only public road is West Lilac Road, which is adjacent to the northern and eastern end; however, a policy consistency finding can be made.

VC51

Information related to LU-6.2 – While most of the Analysis Area is used for agriculture and single family residential, there are some areas of mostly undisturbed sensitive habitats, particularly in the eastern end. These include some remaining coastal sage scrub and southern mixed chaparral on hillsides and a corridor of oak woodlands (which includes areas that could qualify as wetlands) along Lilac Road. The Analysis Area is not within the PAMA area for the draft North County MSCP, as the sensitive habitat is dispersed and most areas have been graded for agricultural or residential uses, thus limiting wildlife corridor opportunities. An alternative map has been developed and analyzed (see Chapter 4) that would keep the existing RL-20 designation in all of the Analysis Area except the three northern parcels, leaving the most sensitive habitat areas at RL-20. While this alternative map would demonstrate a greater level of policy consistency, a consistency finding can be made for the Proposed Project Map, given the acreage of sensitive habitats in relation to the overall Analysis Area acreage.

Information related to LU-6.11 – The Analysis Area is completely within the Moderate Fire Hazard Severity Zone, due to the extensive agricultural operations. With the closest Valley Center FPD fire station being approximately 8 miles away, estimates show the Analysis Area is currently beyond the 10-minute fire response time General Plan standard for the proposed SR-4. Approximately half of the additional density potential associated with the proposed SR-4 is on properties under Williamson Act contracts for agricultural preservation, where owners would not be able to apply for subdivisions until/if a non-renewal process is completed, which typically takes 10 years. As such, even if the Proposed Project change is approved for VC51, it may be many years before subdivision applications come forward, when travel time will need to be evaluated, based on existing and proposed access at that time. Considering the proposed designation in relation to the mapped FHSZ, a consistency finding can be made at this programmatic stage.

VC57+

Information related to LU-6.2 – As with the VC7+ and VC51 Analysis Areas, most of VC57+ contains existing agricultural uses and single family residential uses and sensitive habitats are more dispersed. No portions are in the PAMA of the draft North County MSCP. The largest concentration of sensitive habitat areas is found in the areas in and around the floodplain in the southwestern portion, which contains wetlands and riparian habitats in the portions not previously developed. An alternative map has been developed and analyzed (see Chapter 4) which would exclude the floodplain area south of Valley Center Road from the proposed change to SR-2. While this alternative map would demonstrate a greater level of policy consistency, a consistency finding can be made for the Proposed Project Map, given the acreage of sensitive habitats in relation to the overall Analysis Area acreage.

Information related to LU-6.11 – The Analysis Area is mostly split between the High and Moderate FHSZs, with the eastern end being within the Very High FHSZ. With the closest Valley Center FPD station being adjacent to the southeastern portion of the Analysis Area, most of the area is estimated to be within the 5-minute fire response travel time, and some of the areas in the western portion that are furthest from Valley Center Road are within the 5-10 minute estimate, which is consistent with the General Plan standard of 10 minutes for the proposed SR-2. In addition, the Analysis Area has a good public road network for fire protection, with Valley Center Road and Vesper Road running east-west, and Mactan Road, Sunset Road, and Lake Wohlford Road running north-south. Therefore, a consistency finding can be made.

VC67

Information related to LU-6.2 – Most of the Analysis Area was previously cleared (in addition to grading and/or fill in some portions) for the existing storage uses. Outside of these development footprints, there are some small portions of the riparian habitats of Keys Creek that encroach into the southern edge of the properties. The Analysis Area is completely outside of the PAMA for the draft North County MSCP. Given the limits of the riparian habitats, these areas could be avoided during development and a consistency finding can be made.

Information related to LU-6.11 – With the exception of the easternmost parcel (in the Moderate FHSZ), the entire Analysis Area is within the Very High FHSZ. The closest Valley Center FPD station is approximately 1.5 miles away and the entire Analysis Area is currently estimated to be within the 5-minute fire response time. A 10-minute maximum travel time is the standard for the proposed Medium Impact Industrial (based on the Semi-Rural Regional Category, existing and proposed). Therefore, a consistency finding can be made.

Former Champagne Gardens Specific Plan Area

Information related to LU-6.2 – The majority of the western portion of the former CGSP area contains coastal sage scrub vegetation, and also includes smaller areas of non-native grasslands, southern mixed chaparral and some oaks. The areas proposed for Rural Commercial (total of 6 acres) are comprised of non-native grasslands and an area of transition between non-native grasslands and coastal sage scrub. Outside of the areas proposed for Rural Commercial, SR-10 is proposed throughout, which requires a Conservation Subdivision design. The eastern portion contains more varied habitats with a riparian corridor running through, and mostly coastal sage scrub and southern mixed chaparral outside the riparian corridor. Some mature oak woodlands are also found on Subarea 4, and there is some existing development footprint outside the riparian areas on Subareas 3 and 5. Considering the widespread extent of high quality habitats in the eastern portion of the former CGSP area, in comparison to slightly less constrained adjacent areas mapped SR-4, the proposed SR-2 designation in most of the

eastern portion per the Proposed Project Map (Referral Map) for the former CGSP area leads to a conclusion of Policy LU-6.2 inconsistency. However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency, including the proximity to the Welk Resort to the south. Mitigation measures for potential environmental impacts would apply to future development, particularly those outlined in Section 2.1 (Aesthetics), Section 2.4 (Biological Resources), and in this section. The Preliminary Staff Recommendation Map (analyzed with the other alternative maps in Chapter 4) would place SR-4 throughout the eastern portion, consistent with most of the properties east of Champagne Boulevard in this area.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation densities in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Information related to LU-6.11 – The entire former CGSP area is within the Very High FHSZ; however, the area is in an optimal location for fire protection services. The Deer Springs FPD station is less than a mile away, and all Subareas are adjacent to, or in close proximity to Champagne Boulevard, which is classified as a Major Road in the Mobility Element. The entire area would be estimated to be within the 0-5 minute fire response travel time. Therefore, a consistency finding can be made.

Valley Center Community Plan Policy 8 Proposed Revision

Information related to LU-6.2 and LU-6.11 – This proposed policy revision would be very limited in scope as it would only apply to SR-2 or SR-4 properties that are within the sewer service area (see Figure 1-2). Outside of the former CGSP area, which includes SR-2 and SR-4 proposals on the east side, only one other applicable parcel has subdivision potential under its current SR-4 designation. This policy revision would help in preserving sensitive habitats within the subject CGSP parcels by clustering away from valued areas of riparian, oak, and coastal sage scrub habitats. The additional clustering allowance would reduce the extent of new fire protection access roads required and facilitate placement of homes to avoid other hazards, like the floodplain within the former CGSP area. The proposed policy revision would not change the allowed density for any area. Therefore, a consistency finding can be made.

Goal 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.

The associated General Plan Policy that is applicable to a 'stand-alone' GPA/Rezone, like the Proposed Project is:

LU-7.1: Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

The 2011 PEIR analysis determined that Policy LU-7.1 would reduce impacts to Agricultural Resources – Conversion of Agricultural Resources, and Agricultural Resources – Land Use Conflicts.

Analysis Area Discussion – Applicable Policy under Goal LU-7

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define 'lower-density land use designations that support continued agricultural operations' or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County's CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County's unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include 'rural residential lands,' which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the *Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses* section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

BO18+

Information related to LU-7.1 – The Analysis Area contains several current agricultural operations, including citrus, avocados, and vineyards. Almost half of the Analysis Area contains soils which meet the criteria for Farmland of Statewide Importance. The proposed SR-4 designation would not be anticipated to conflict with continued agricultural operations, due to the reasons noted above for consideration of an SR-2 threshold used for this policy. Therefore, the Proposed Project Map for BO18+ has been found to be consistent with Policy LU-7.1.

CD14

Information related to LU-7.1 – The Analysis Area does not contain any agricultural operations.

DS8

Information related to LU-7.1 – Most of the Analysis Area contains prime agricultural soils and there are existing agricultural/nursery operations in the northern parcel (PSR parcel). The proposed change to VR-4.3 would not constitute a change that would be attributable to negatively impacting the protection of agricultural resources, as both the existing VR-2 and

proposed VR-4.3 would facilitate lot sizes and densities too high for continued agricultural operations upon buildout to density potential. Therefore, the Proposed Project Map for DS8 has been found to be consistent with Policy LU-7.1.

DS24

Information related to LU-7.1 – The Analysis Area does not contain any agricultural operations.

FB2+

Information related to LU-7.1 – The Analysis Area contains a large agricultural operation in the central portion proposed for RL-20, which is a density low enough to support continued agricultural operations. A couple smaller agricultural operations (combined with residential uses) are found in the Study Area portion proposed for SR-4, which would also not be anticipated to conflict with continued agricultural operations, due to the reasons noted above for consideration of an SR-2 threshold used for this policy. Therefore, the Proposed Project Map for FB2+ has been found to be consistent with Policy LU-7.1.

FB17

Information related to LU-7.1 – The Analysis Area contains agricultural operations, which is generally consistent with adjacent land uses combining agricultural and residential land uses. Prime soils are limited in the Analysis Area, with a few small, disconnected areas of prime soils. Based on the research noted above, a switch from the SR-2 to SR-1 designation for the 71 acres (portion proposed to change to SR-1) would not be in line with a 'lower density land use designation that supports continued agricultural operations' due to the increased edge effects associated with homes in such close proximity and the Proposed Project Map for FB17 has been found to be inconsistent with Policy LU-7.1. Therefore, the FB17 proposal in the Proposed Project is inconsistent with Policy LU-7.1, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-7.1-FB17]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

FB19+

Information related to LU-7.1 – The Analysis Area contains some agricultural operations, but not in the area that would be estimated to have additional density potential under the proposal. The proposed SR-10 designation is low enough to support continued agricultural operations. Therefore, the Proposed Project Map for FB19+ has been found to be consistent with Policy LU-7.1.

FB21+

Information related to LU-7.1 – The Analysis Area contains agricultural operations and the proposed SR-10 designation is low enough to support continued agricultural operations. Therefore, the Proposed Project Map for FB21+ has been found to be consistent with Policy LU-7.1.

ME26

Information related to LU-7.1 – The Analysis Area contains some small scale agricultural operations and the proposed SR-10 designation is low enough to support continued agricultural operations. Therefore, the Proposed Project Map for ME26 has been found to be consistent with Policy LU-7.1.

ME30A

Information related to LU-7.1 – The Analysis Area does not contain any agricultural operations.

NC3A

Information related to LU-7.1 – The Analysis Area contains some small scale agricultural operations and the proposed SR-10 designation is low enough to support continued agricultural operations. Therefore, the Proposed Project Map for NC3A has been found to be consistent with Policy LU-7.1.

NC18A

Information related to LU-7.1 – The Analysis Area contains agricultural operations and is in an area of transition from the mostly small lot, suburban-style residential to the south and west (just outside the City of Escondido) and larger lots of combined residential and agricultural uses in the area of NC18A and to the east. There are some areas of prime agricultural soils in the central portion of NC18A. Based on the research noted above, a switch from the SR-2 to SR-1 designation for the 93 acres would not be in line with a ‘lower density land use designation that supports continued agricultural operations’ due to the increased edge effects associated with homes in such close proximity and the Proposed Project Map for NC18A has been found to be inconsistent with Policy LU-7.1. Therefore, the NC18A proposal in the Proposed Project is inconsistent with Policy LU-7.1, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-7.1-NC18A]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

NC22

Information related to LU-7.1 – The PSR parcels that cover most of the Analysis Area do not contain agricultural operations. There are some small agricultural operations within the 28-acre Study Area; however, all of the parcels used partially for agriculture within the Study Area except one, are already less than two acres. There are no prime agricultural soils within the Analysis Area. The proposed change from SR-10 to SR-1 for part of the Analysis Area (all of the Study Area) should be considered for the potential loss of agriculture, based on the research noted above. Decision makers will consider this in combination with other policies in determining the likelihood of agricultural preservation under the proposed change. Considering the existing parcel sizes of the Study Area properties that contain agricultural operations, a consistency finding can be made.

NC37

Information related to LU-7.1 – The Analysis Area contains agricultural operations. Portions of the eastern end of the Analysis Area contain soils which meet the criteria for Farmland of Statewide Importance. The proposed SR-4 designation would not be anticipated to conflict with continued agricultural operations, so the proposal has been found to be consistent with Policy LU-7.1.

NC38+

Information related to LU-7.1 – Most of the Analysis Area is used for agricultural operations and contains prime agricultural soils and soils which meet the criteria for Farmland of Statewide Importance. The surrounding unincorporated areas also contain several agricultural operations. This pattern transitions into a more suburban residential character in adjacent properties within the City of San Marcos to the south. Based on the research noted above, a switch from the SR-2 to SR-1 designation for the 77 acres would not be in line with a ‘lower density land use designation that supports continued agricultural operations’ due to the increased edge effects associated with homes in such close proximity and the Proposed Project Map for NC38+ has been found to be inconsistent with Policy LU-7.1. Therefore, the NC18A proposal in the Proposed Project is inconsistent with Policy LU-7.1, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-7.1-NC38+]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

PP30

Information related to LU-7.1 – The Analysis Area contains agricultural operations in the area east of the San Luis Rey River that runs through the site. Approximately half of the areas used for agriculture also contain prime agricultural soils. Agriculture is widespread throughout the Pala-Pauma community. The proposed change from RL-40 to SR-2 will be considered in light of the potential loss of agriculture, based on the research noted above. The research tends to support SR-2 as a designation that facilitates agricultural preservation; however, smaller lot agricultural operations (consistent with SR-2 typical lot sizes) are more common in communities like Fallbrook and Valley Center. Decision makers will consider this in combination with other policies in determining the likelihood of agricultural preservation under the proposed change. A clear inconsistency has not been found.

SD15

Information related to LU-7.1 – The Analysis Area does not contain any agricultural operations.

VC7+

Information related to LU-7.1 – The Analysis Area is within a productive agricultural area in western Valley Center. There are several agricultural operations of varying types within the Analysis Area and in surrounding areas. Prime agricultural soils are not widespread throughout the Analysis Area, but many viable agricultural operations common in San Diego County do not require this. The proposed change from SR-4 to SR-2 will be considered in light of the potential

loss of agriculture, based on the research noted above. The research tends to support SR-2 as a designation that can facilitate agricultural preservation. Therefore, the Proposed Project Map for VC7+ has been found to be consistent with Policy LU-7.1.

VC51

Information related to LU-7.1 – The VC51 Analysis Area is also within the agriculturally productive western Valley Center and multiple agricultural operations are found within VC51, including orchards and vineyards. Statewide significance soils are found in the eastern end of the Analysis Area. The proposed SR-4 designation would not be anticipated to conflict with continued agricultural operations. Therefore, the Proposed Project Map for VC51 has been found to be consistent with Policy LU-7.1.

VC57+

Information related to LU-7.1 – The VC57+ Analysis Area has a variety of agricultural operations throughout, and ideal conditions for agriculture. Prime agricultural soils and statewide significance soils cover most of the Analysis Area and steep slopes are generally limited to the southernmost leg (approximately 70 acres) of the Analysis Area. The proposed change from SR-4 to SR-2 will be considered in light of the potential loss of agriculture, based on the research noted above. The research tends to support SR-2 as a designation that can be consistent with agricultural preservation. Therefore, the Proposed Project Map for VC57+ has been found to be consistent with Policy LU-7.1.

VC67

Information related to LU-7.1 – The Analysis Area does not contain any agricultural operations.

Former Champagne Gardens Specific Plan Area

Information related to LU-7.1 – There is an existing small vineyard associated with the Deer Park Winery within Subarea 5, and there is a history of agricultural operations within Subareas 2 and 3. Approximately 1/3 of the former CGSP area contains prime agricultural soils. Within eastern Champagne Gardens the highest density proposed is SR-2. The research tends to support SR-2 as a designation that can be consistent with agricultural preservation. Within the small areas proposed for Rural Commercial in western Champagne Gardens, there are no agricultural operations. Therefore, the Proposed Project Map (Referral Map) for the former CGSP area has been found to be consistent with Policy LU-7.1.

Valley Center Community Plan Policy 8 Proposed Revision

Information related to LU-7.1 – This proposed policy revision would be very limited in scope as it would only apply to SR-2 or SR-4 properties that are within the sewer service area (see Figure 1-2). Outside of the former CGSP area, which includes SR-2 and SR-4 proposals on the east side, only one other applicable parcel has subdivision potential under its current SR-4 designation. This policy revision would help in facilitating agricultural preservation by clustering residential only properties closest to existing infrastructure, leaving more possibilities for larger agricultural operations that would not face as many potential land use conflicts. The proposed policy revision would not change the allowed density for any area. Therefore, this proposed policy revision has been found to be consistent with Policy LU-7.1.

Goal LU-8: Aquifers and Groundwater Conservation. Sustainable aquifers and functional groundwater recharge areas.

The associated General Plan Policy that is applicable to a 'stand-alone' GPA/Rezone, like the Proposed Project is:

LU-8.1: Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

The 2011 PEIR analysis determined that Policy LU-8.1 would reduce impacts to Hydrology and Water Quality - Groundwater Supplies and Recharge, and Utilities and Service Systems - Adequate Water Supplies.

Analysis Area Discussion – Applicable Policy under Goal LU-8

This policy was developed to ensure that densities applied in groundwater dependent areas (outside Borrego Valley) would reflect sustainable groundwater use and aquifer recharge limitations.

For groundwater dependent areas, the County's Groundwater Ordinance establishes minimum lot sizes, based on average annual precipitation. In the absence of groundwater studies for each groundwater-dependent area (which may be required at the development review stage), the proposed densities can be considered in light of this requirement, in determining basic policy consistency.

Outside of Analysis Areas in Borrego Valley (which is the exception to the policy and so those Borrego Springs Analysis Areas are not listed here), only the following Analysis Areas are groundwater dependent: ME26, ME30A, PP30, and part of FB2+ (FB18 PSR portion of the FB2+ Analysis Area). These Analysis Areas are discussed below.

ME26

Information related to LU-8.1 – This Analysis Area is outside the County Water Authority boundary and is groundwater dependent. The average annual precipitation for this area is 18 to 21 inches. Per the County's Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 5 acres. The proposed SR-10 density would not be inconsistent with this minimum lot size requirement. Though additional groundwater analysis may be required at the development review stage, a finding of consistency with Policy LU-8.1 can be made at this programmatic level.

ME30A

Information related to LU-8.1 – This Analysis Area is outside the County Water Authority boundary and is groundwater dependent. The average annual precipitation for this area is 15 to 18 inches. Per the County's Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 8 acres. The SR-4 component (proposed for the southern portion) of the Proposed Project map for ME30A would not be consistent with this requirement and the SR-4 density would not be feasible. Therefore, the ME30A proposal in the Proposed Project is inconsistent with Policy LU-8.1, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-8.1-ME30A]**). An alternative map has been developed and analyzed (see Chapter 4) that would place SR-10 in the area proposed for SR-4 in the Proposed Project Map, which would not pose an inconsistency with the Groundwater Ordinance requirement.

PP30

Information related to LU-8.1 – This Analysis Area is outside the County Water Authority Boundary and is groundwater dependent. The average annual precipitation for this area is 18 to 21 inches. Per the County’s Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 5 acres. The SR-2 component (proposed for the eastern portion) of the Proposed Project Map for PP30 would not be consistent with this requirement and the SR-2 density would not be feasible. Therefore, the PP30 proposal in the Proposed Project is inconsistent with Policy LU-8.1, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy LU-8.1-PP30]**). An alternative map has been developed and analyzed (see Chapter 4) that would place SR-10 in the area proposed for SR-2 in the Proposed Project Map, which would not pose an inconsistency with the Groundwater Ordinance requirement.

FB2+ (FB18 PSR portion of the Analysis Area)

Information related to LU-8.1 – The FB18 portion of the FB2+ Analysis Area (portion currently designated RL-40 and proposed for RL-20) is outside the County Water Authority boundary and is groundwater dependent. The average annual precipitation for this area is 15 to 18 inches. Per the County’s Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 8 acres. The proposed RL-20 density would not be inconsistent with this minimum lot size requirement. Though additional groundwater analysis may be required at the development review stage, a finding of Policy LU-8.1 consistency can be made at this programmatic level.

Goal 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 associated General Plan Policies that are applicable to a ‘stand-alone’ GPA/Rezone, like the Proposed Project are:

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.

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.

The 2011 PEIR analysis determined that Policy LU-10.4 would reduce impacts to Transportation and Traffic - Unincorporated County Traffic, and Transportation and Traffic - Adjacent Cities Traffic and LOS Standards.

Analysis Area Discussion – Applicable Policy under Goal LU-10

The policies under this goal serve to outline the purpose of the Semi-Rural and Rural Lands Regional Categories, in addition to noting issues and considerations for review of projects. *LU-10.3 and LU-10.4 are the only policies under this goal that are applicable to stand-alone GPAs/Rezones and of those two policies, only LU-10.4 was relied upon in the 2011 PEIR to reduce environmental impacts.* Policy LU-10.4 will require judgement of decision makers in consideration of several factors, as it directs to ‘limit’ (as opposed to ‘prohibit’) commercial and industrial uses outside Villages. Included below is information related to LU-10.4, which is only

applicable to Analysis Areas with a commercial or industrial component in the proposal, including SD15, VC67, and the former CGSP area.

SD15

Information related to LU-10.4 – The SD15 property fronts on San Elijo Road, which is a 4-lane major road that connects areas in the cities of Carlsbad and San Marcos, and touches the unincorporated community of San Dieguito (in the area of SD15), along its 4-mile course. There are nearby commercial nodes along this corridor. One of them is about a half mile to the northeast, along San Elijo Road, within the San Elijo Hills development. The other is a larger and more varied commercial and industrial area of multiple developments around the intersection Rancho Santa Fe Road and San Elijo Road, about a mile to the northwest. In addition to these commercial nodes, the nearby areas of incorporated cities include areas of higher densities (Village densities by County General Plan standards) that could be served by commercial uses in the SD15 area, with bike lanes and sidewalks/pathways along San Elijo Road. Considering the language of the Policy, a consistency finding can be made.

VC67

Information related to LU-10.4 – The VC67 Analysis Area is adjacent to the Village boundary for the North Village in Valley Center. It is accessed via Cole Grade Road which is private for the portion adjacent to the Analysis Area, but the public portion starts at the intersection with Valley Center Road less than ¼ mile to the north. Industrial operations are not typically accessed via biking or walking, though car trips could be minimized by the close proximity to other commercial and industrial uses within the Village. Considering the language of the Policy, a consistency finding can be made.

Former Champagne Gardens Specific Plan Area

Information related to LU-10.4 – There are two small areas (2.5 acres and 3.5 acres) of Rural Commercial proposed within the western portion of the former CGSP area. These would not be out of character with the pattern of this area of Champagne Boulevard, which exhibits the characteristics of a Semi-Rural Mobility Element road corridor with small-scale commercial uses supporting the Village densities within the adjacent Welk Resort and further southeast in Hidden Meadows. The western portion of the former CGSP area is adjacent to the I-15 corridor and is only approximately 450 feet wide at its widest portion, which makes substantial residential development potentially problematic due to noise and air quality impacts. As such, the small areas of Rural Commercial surrounded by low density SR-10 for this area is ideal for the location and character of the western portion of the former CGSP area. In the eastern portion of the former CGSP area, Subarea 5 is proposed for Residential/Commercial (RC) zoning with the SR-2 land use designation in the Proposed Project Map (Referral Map). The RC zone best matches the existing uses on that site (Deer Park Winery and Auto Museum), without allowing extensive new commercial uses. Considering the language of the Policy, a consistency finding can be made.

Goal 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.

The associated General Plan Policies that are applicable to a ‘stand-alone’ GPA/Rezone, like the Proposed Project are:

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.

LU-11.10: Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The 2011 PEIR analysis determined that Policy LU-11.10 would reduce impacts to 2.7 Hazards and Hazardous Materials - Hazards to School.

Analysis Area Discussion – Applicable Policy under Goal LU-11

Goal LU-11 and the corresponding policies discuss location, design, and transportation network integration for commercial, office, and industrial uses. *LU-11.1 and LU-11.10 are the only policies under this goal that are applicable to stand-alone GPAs/Rezones and of those two policies, only LU-11.10 was relied upon in the 2011 PEIR to reduce environmental impacts.* Of all the Proposed Project components, only Analysis Areas VC57+ and VC67 include a proposed designation change within ¼ mile of a designated Medium or High Impact Industrial Area. VC67 proposes Medium Impact Industrial, so it would not be an incompatible land use with the adjacent industrial land use. VC57+ proposes a change from SR-4 to SR-2, and is discussed below.

VC57+

Information related to LU-11.10 – The proposed change to SR-2 for VC57+ would increase the potential dwelling units for the area. A small portion of the furthest western end of the Analysis Area is adjacent to an existing Medium Impact Industrial area. The proposed minimum lot size of one acre would allow clustering housing pads away from the industrial area, and provision of effective buffering. In addition, the portion adjacent to the Medium Impact Industrial is part of a 38-acre parcel which has the northern portion (adjacent to industrial) within the floodplain. As such, a subdivision of that property would cluster housing pads to the south, away from the floodplain and away from the adjacent industrial land use. Therefore, the Proposed Project Map for VC57+ has been found to be consistent with Policy LU-11.10.

Conservation and Open Space Element

Goal 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 standards such that adverse effects on surrounding land uses, public health, and the environment are minimized.*

The associated General Plan Policies that are applicable to a ‘stand-alone’ GPA/Rezone, like the Proposed Project are:

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.

The 2011 PEIR analysis determined that Policy COS-10.2 would reduce impacts to Mineral Resources – Mineral Resource Availability; and Mineral Resources – Mineral Resource Recovery Sites.

Analysis Area Discussion – Applicable Policy under Goal COS-10

Goal COS-10 and associated policies were developed to ensure that development projects and land use decisions take into consideration the preservation of mineral resource recovery options and adequate sites. See Section 2.10.1 (Minerals) for an explanation of mineral resource zones (MRZs). *COS-10.2 is the only policy under this goal that is applicable to stand-alone GPAs/Rezoned and this policy was relied upon in the 2011 PEIR to reduce environmental impacts.* As the policy is focused on MRZ-2 and MRZ-3 areas, only those Analysis Areas that include MRZ-2 and/or MRZ-3 areas are discussed below. For the Analysis Areas that do not contain MRZ-2 or MRZ-3 areas, the Proposed Project Map would not pose any inconsistencies with Policy COS-10.2. The proposed revision to Residential Policy 8 of the Valley Center Community Plan would not change any land use designations or zoning use regulations.

BO18+

Information related to COS-10.2 – The entire Analysis Area is located within MRZ-3 designated lands and the proposed SR-4 designation is not a density low enough to allow for potential future mining operations. However, the number of existing homes spread throughout the Analysis Area and adjacent areas would preclude mining operations, due to the lack of adequate area that is not in close proximity to homes. Therefore, the Proposed Project Map for BO18+ has been found to be consistent with Policy COS-10.2.

CD14

Information related to COS-10.2 – Approximately 2 acres of the Analysis Area are within a 1,300-foot buffer from MRZ-2 lands, which is identified for consideration of effects on the potential for future mineral resource extraction. This 2-acre area is proposed to remain unchanged at RL-20, which is a density low enough to not preclude future mining operations. The remaining area is classified as MRZ-3. The area proposed for SR-2 within the MRZ-3 area is adjacent to an existing neighborhood with typical lot sizes of one acre, which would preclude future mining operations due to the proximity to existing homes. Therefore, the Proposed Project Map for CD14 has been found to be consistent with Policy COS-10.2.

FB2+

Information related to COS-10.2 – The southern portion of the Analysis Area (approximately 200 acres) includes some MRZ-2 lands and the corresponding 1,300-foot buffer from MRZ-2. All of this area is proposed for an RL-20 designation, which is low enough so as not to preclude a future mining operation. Therefore, the Proposed Project Map for FB2+ has been found to be consistent with Policy COS-10.2.

FB17

Information related to COS-10.2 – The entire Analysis Area is within MRZ-3 designated lands. The existing density of SR-2 would already preclude future mining operations, due to the proximity of homes associated with that density. Therefore, the Proposed Project Map for FB17 has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

FB19+

Information related to COS-10.2 – Approximately 29 acres of MRZ-3 designated lands are found in the southwest corner of the Analysis Area. The proposed SR-10 designation is low enough so as not to preclude a future mining operation. Therefore, the Proposed Project Map for FB19+ has been found to be consistent with Policy COS-10.2.

NC3A

Information related to COS-10.2 – The entire Analysis Area is within MRZ-3 designated lands. The proposed SR-10 designation is low enough so as not to preclude a future mining operation. Therefore, the Proposed Project Map for NC3A has been found to be consistent with Policy COS-10.2.

NC18A

Information related to COS-10.2 – The entire Analysis Area is within MRZ-3 designated lands. The existing density of SR-2 would already preclude future mining operations, due to the proximity of homes associated with that density. Therefore, the Proposed Project Map for NC18A has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

NC22

Information related to COS-10.2 – The entire Analysis Area is within MRZ-3 designated lands. The change to the SR-1 designation for the southwestern portion of the PSR area and the entire Study Area would not constitute a density low enough to facilitate future mining operations; however, the proximity of existing homes would preclude future mining operations in this area. Therefore, the Proposed Project Map for NC22 has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

NC37

Information related to COS-10.2 – The Analysis Area includes approximately 131 acres within MRZ-3 designated lands. The change to the SR-4 designation would not constitute a density low enough to facilitate future mining operations; however, the proximity of existing homes would preclude future mining operations in this area. Therefore, the Proposed Project Map for NC37 has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

NC38+

Information related to COS-10.2 – Approximately 4 acres along the northern end of the Analysis Area is within MRZ-3 designated lands. The existing density of SR-2 would already preclude future mining operations, due to the proximity of homes associated with that density. Therefore, the Proposed Project Map for NC38+ has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

PP30

Information related to COS-10.2 – Most of the Analysis Area (approximately 418 acres of the 518 total acres) is within MRZ-2 designated lands, with the 1,300-foot buffer from MRZ-2 extending south from this area to cover another approximately 83 acres. The SR-2 designation proposed for the eastern portion of the Analysis Area would preclude future mining operations. In determining whether this would constitute an ‘incompatible land use’ or whether mining would already be precluded here (due to existing incompatible land uses), consideration is given to

adjacent uses on the Rincon Reservation, which is adjacent on the east. In this area, the Reservation contains a large hotel/casino (Harrah's Rincon) and associated facilities adjacent to the southeastern portion of the Analysis Area, with larger lot residential development and other uses adjacent to the northeast. The northern portion of the Analysis Area contains a residence and is adjacent to several residences. There is a relatively small area (approximately 20-30 acres) that would be within the area proposed for SR-2, is within MRZ-2, and is also at least 1,300 feet from these residences and other uses. This portion of the Analysis Area would be considered as having mining potential and therefore, the Proposed Project Map for PP30 has been found to be inconsistent with COS-10.2. However, this inconsistency has not been determined to constitute a significant impact, as the area for potential mining is fairly small, and there is room for discretion of decision makers in considering the other factors, such as the proximity of adjacent uses affecting mining feasibility.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-2 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

SD15

Information related to COS-10.2 – The entire Analysis Area is within MRZ-3 designated lands. The existing density of SR-1 would already preclude future mining operations, due to the proximity of homes associated with that density. Therefore, the Proposed Project Map for SD15 has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

Former Champagne Gardens Specific Plan Area

Information related to COS-10.2 – Almost the entire area of the former CGSP (approximately 108 acres) is within MRZ-3 designated lands. Of the proposed designations, only the proposed SR-10 designation would constitute a density low enough to be compatible with future mining operations. However, the former CGSP area is in close proximity to existing single family residences and existing higher Village densities within portions of the Welk Resort to the south, which would preclude future mining operations. Therefore, the Proposed Project Map for the former CGSP area has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

Goal COS-12: Preservation of Ridgelines. Ridgelines and steep hillsides that are preserved for their character and scenic value.

The associated General Plan Policy that is applicable to a 'stand-alone' GPA/Rezone, like the Proposed Project is:

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 2011 PEIR analysis determined that Policy COS-12.1 would reduce impacts to Aesthetics - Scenic Vistas; and Aesthetics - Scenic Resources.

Analysis Area Discussion – Applicable Policy under Goal COS-12

Goal COS-12 and associated policies serve to limit development in steep hillsides and preserve ridgelines. *COS-12.1 is the only policy under this goal that is applicable to stand-alone GPAs/Rezones and this policy was relied upon in the 2011 PEIR to reduce environmental impacts.* The only Analysis Areas that include proposals for designations outside the Semi-Rural or Rural Lands Regional Categories are DS8 and SD15, which are discussed below. The remainder of the Analysis Areas would not pose any inconsistencies with Policy COS-12.1 because they propose designations within the Semi-Rural or Rural Lands Regional Categories. As discussed previously, the proposed revision to Valley Center Community Plan Residential Policy 8 would not change any land use designations or zoning.

DS8

Information related to COS-12.1 – The DS8 Analysis Area is currently designated VR-2 and the proposed change is to VR-4.3. The Analysis Area does not contain any ridgelines or steep hillsides. As such, the Proposed Project Map for DS8 would not pose any inconsistencies with Policy COS-12.1.

SD15

Information related to COS-12.1 – The SD15 Analysis Area is currently designated SR-1 and the Proposed Project map includes General Commercial (under the Semi-Rural Regional Category) in the northern portion, VR-10.9 in the central portion, and SR-0.5 in the southern portion. There are steep hillsides and ridgelines in the southern portion, which is proposed for a Semi-Rural designation. As such, the Proposed Project Map for DS8 has been found to be consistent with Policy COS-12.1.

Goal COS-14: Sustainable Land Development. 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.

The associated General Plan Policy that is applicable to a ‘stand-alone’ GPA/Rezone, like the Proposed Project is:

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 2011 PEIR analysis determined that Policy COS-14.1 would reduce impacts to Air Quality - Air Quality Violations; and Air Quality - Non-Attainment Criteria Pollutants.

Analysis Area Discussion – Applicable Policy under Goal COS-14

Goal COS-14 and associated policies are developed to further emphasize Guiding Principles of the General Plan to promote more compact development patterns in the unincorporated area. *COS-14.1 is the only policy under this goal that is applicable to stand-alone GPAs/Rezones and this policy was relied upon in the 2011 PEIR to reduce environmental impacts.* Due to the language, review of this policy can be subjective, particularly when there is no development project and large Analysis Areas are analyzed. The direction of, “...utilizing compact regional and community-level development patterns while maintaining community character” can be interpreted various ways, particularly when considering the existing community character of unincorporated communities. See the review of Policy LU-2.3 above for some discussion of community character issues. Like other policies without clear mandatory language, decision

makers will consider various factors in a holistic approach. Provided below is some policy review for each component of the Proposed Project.

BO18+

Information related to COS-14.1 – The western portion of the Analysis Area is approximately 1.5 miles from the Bonsall-East Village and would remain within the Semi-Rural Regional Category under the proposed change. The Analysis Area is approximately 2.5 miles from the nearest transit stop and park-and-ride facility, both in the area of the SR-76/I-15 interchange. There is a Class II bike lane along Old Highway 395 on the eastern edge of the Analysis Area and a bike lane is planned (in the Mobility Element) along West Lilac Road, which would eventually provide bike lane access to the Bonsall Villages. In consideration of the SR-4 density in relation to the distance to the Village and the I-15 corridor located adjacent to the eastern portion of the Analysis Area, a consistency finding can be made for the BO18+ Proposed Project Map.

CD14

Information related to COS-14.1 – The Analysis Area is just over a mile from the Crest Village, which is rather limited in terms of commercial services and jobs. Due to this lack of extensive services in the Village and intervening steep slopes and conserved areas, residents in the CD14 area would be more likely to travel to commercial areas approximately 1 mile away within the City of El Cajon. The Analysis Area is approximately 1.5 miles from the nearest transit stop, approximately 3 miles from the nearest park-and-ride, and approximately 4 miles from the trolley park-and-ride. The majority of the Analysis Area would remain unchanged at RL-20 and the portion proposed for SR-2 (part of which is currently SR-1) is adjacent to an existing built out neighborhood of SR-1. As a result, a consistency finding can be made for the CD14 Proposed Project Map.

DS8

Information related to COS-14.1 – The Analysis Area is already within the Village of Borrego Springs and the Town Center at Christmas Circle is less than a half mile away, so it is in a central location with many services available in the community located within walking distance. In the context of this policy, decision-makers will consider the limited jobs in the community, the large number of vacant parcels and the limited demand for the additional density potential currently on the Land Use Map for this community. Though these factors will be considered in the context of Policy COS-14.1 and other policies, the central location within the Village allows a finding of consistency to be made.

DS24

Information related to COS-14.1 – The Analysis Area is approximately 1.5 miles from the Village of Borrego Springs. However, there are many vacant undeveloped lots between the Analysis Area and the Village. For the most part, the vacant parcels in this area already have the necessary road network and adjacent water lines to facilitate development (groundwater sustainability concerns notwithstanding), while the DS24 site lacks this existing infrastructure. In the context of this policy, decision-makers will consider the limited jobs in the community, the large number of vacant parcels and the limited demand for the additional density potential currently on the Land Use Map for this community. Estimates indicate there are over 3,000 vacant undeveloped lots in the community and over 10,000 additional dwelling units possible when adding the additional density potential currently on the Land Use Map to this estimate of vacant undeveloped lots. Considering these factors and the fact that the Analysis Area is outside the Village and close to State Park lands, the Proposed Project Map has been found to be inconsistent with Policy COS-14.1. However, this noted inconsistency has not been

determined to constitute a significant impact because the inconsistency is based on the weighing of several factors in the planning analysis. There is room for discretion by decision makers in weighing other factors as they relate to the parameters of the policy, and the mitigation measures outlined in Section 2.3 (Air Quality) and in this section would apply to future development.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

FB2+

Information related to COS-14.1 – The Analysis Area is approximately 1.5 miles from a planned Village in the area of the SR-76/I-15 interchange; however, this new Village will be more limited in terms of services and jobs than the main Village of Fallbrook, which is over six miles away. The closest current transit stop, park-and-ride facility, and commercial area (convenience-type commercial) are also in the area of the SR-76/I-15 interchange. As discussed previously, the portion of the Analysis Area proposed for SR-4 will be under the most scrutiny for a number of policies, as Rural Lands designations are most prevalent in this area of large lots and agricultural operations, which is separated from the higher densities planned in the SR-76/I-15 interchange by a mountainous area of open space preserves and agricultural preserves. Considering the language of the Policy, the Proposed Project Map for FB2+ has been found to be consistent with COS-14.1.

FB17

Information related to COS-14.1 – The Analysis Area is approximately 2 miles from the Fallbrook Village boundary and just over 4 miles from the Town Center area, via roads. The Fallbrook CPA has a large ring of Semi-Rural outside the Village, with SR-2 being the most prevalent designation, reflecting objectives of the Community Plan to foster combined residential and agricultural uses. The closest transit stop, park-and-ride facility and convenience commercial are just over three miles away at the SR-76/I-15 interchange. A Class II bike line is available on nearby Old Highway 395. Considering the language of the Policy, the Proposed Project Map for FB17 has been found to be consistent with COS-14.1.

FB19+

Information related to COS-14.1 – The proposal for the Analysis Area would result in a negligible change in vehicle trips, as the proposal is estimated to result in only one additional potential dwelling unit. The one property that could be subdivided based on these estimates is closest to the public road and to the I-15 interchange. Considering the language of the Policy, the Proposed Project Map for FB19+ has been found to be consistent with COS-14.1.

FB21+

Information related to COS-14.1 – The Analysis Area is approximately 3.5 miles from the Village boundary for Fallbrook and just over four miles from the nearest transit stop and commercial area. It is approximately nine miles via roads to the nearest I-15 on ramp. There are no public roads within the Analysis Area, which is in the most remote location of Fallbrook. Precedent setting issues associated with the proposal are also considered in this policy review (in relation

to the policy reference to community character), as all private lands in Fallbrook that are north of the Santa Margarita River (and east of the river, where it curves north) have Rural Lands designations. The closest Semi-Rural area is over two miles away. In consideration of these issues, the Proposed Project Map for FB21+ has been found to be inconsistent with Policy COS-14.1. Therefore, the FB21+ proposal in the Proposed Project is inconsistent with Policy COS-14.1, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy COS-14.1-FB21+]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-10 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

ME26

Information related to COS-14.1 – The Analysis Area is approximately 1.5 miles from the Lake Morena Rural Village, 0.5 miles from the nearest transit stop, and 17 miles from the nearest park-and-ride facility. Under the proposal, the Analysis Area would become part of the outer ring of low density Semi-Rural that is still in relatively close proximity to the Village. Considering the language of the Policy, the Proposed Project Map for ME26 has been found to be consistent with COS-14.1.

ME30A

Information related to COS-14.1 – ME30A is less than one mile from the Rural Village of Campo and Cameron Corners, 0.25 miles from the nearest transit stop and just over 20 miles from the nearest park-and-ride facility. Villages and higher density Semi-Rural areas are kept relatively small in area in Mountain Empire to reflect the rural character of the area. ME30A is adjacent to the Campo Hills subdivision of SR-1 densities on the west, but is currently RL-40 (southern portion proposed to change to SR-4) and adjacent to large areas of RL-40 to the east and preserved lands further east. Considering the language of the Policy, the Proposed Project Map for ME30A has been found to be consistent with COS-14.1.

NC3A

Information related to COS-14.1 – The Analysis Area is approximately 4 miles from the North County Metro-East Village, but due to its location, residents within NC3A would be more likely to utilize areas within the City of Escondido for services, uses, and amenities typically associated with villages. NC3A is within Escondido's Sphere of Influence. It is approximately 1.5 miles from the nearest transit stop and three miles from the nearest park-and-ride facility. The Analysis Area is within a transition area between the higher density SR-1 adjacent to the west and Escondido's Daley Ranch Preserve adjacent to the east. The steep slopes within the Analysis Area greatly limit the additional density potential associated with the proposed SR-10 (slope-dependent). Considering the language of the Policy, the Proposed Project Map for NC3A has been found to be consistent with COS-14.1.

NC18A

Information related to COS-14.1 – The Analysis Area is approximately one mile from the North County Metro-East Village, but would also maintain a closer connection to services within the

nearby City of Escondido and is within their Sphere of Influence. NC18A is approximately 0.75 miles from the nearest transit stop and 4.5 miles from the nearest park-and-ride facility. NC18A is in an area where SR-1 densities closer to central Escondido transition to more agricultural lands of SR-2 densities. Considering the language of the Policy, the Proposed Project Map for NC18A has been found to be consistent with COS-14.1.

NC22

Information related to COS-14.1 – The western portion of the Analysis Area is adjacent to the Village boundary for the North County Metro-North Village, but Village densities are approximately 0.25 miles away. Village densities of single family residential are also in close proximity within the City of San Marcos to the south, but commercial uses are approximately one mile away; to the west within the unincorporated County and to the south within the City of San Marcos. Approximately half of the Analysis Area is within the Sphere of Influence for San Marcos. The Analysis Area is approximately 1.5 miles from the nearest transit stop. Considering the language of the Policy, the Proposed Project Map for NC22 has been found to be consistent with COS-14.1.

NC38+

Information related to COS-14.1 – The Analysis Area is approximately four miles away via roads from the North County Metro-North Village. It is approximately three miles from the closest transit stop and just over three miles from the closest park-and-ride facility. The entire Analysis Area is within the SOI for San Marcos and it is adjacent to higher densities within the City of San Marcos. Considering the language of the Policy, the Proposed Project Map for NC38+ has been found to be consistent with COS-14.1.

PP30

Information related to COS-14.1 – The Analysis Area is adjacent to the Pauma Village, but this community lacks the range of commercial uses and jobs that other Villages have, and it lacks a substantial buffer of Semi-Rural between the Village and the Rural Lands of low density and agriculture. The Pala-Pauma Subregion is one of the more rural areas of the County, with a prevalence of large lot agriculture and open space. With the exception of approximately 110 acres of VR-4.3 and SR-1 just outside the Village, the entire Subregional Planning Area outside the Village boundary is SR-10 or lower density. Village densities and the higher densities of the Semi-Rural Regional Category are generally limited to areas with existing parcelization that is consistent with these densities, and/or water and sewer service availability (which is not available in the Analysis Area). The Analysis Area is approximately one mile from the nearest transit stop and 15 miles from the nearest park-and-ride facility. Considering the rural nature of the community and the limited availability of jobs and commercial services in the Subregion, the proposed jump from RL-40 to SR-2 for the eastern portion of large lots has been found to be inconsistent with COS-14.1. However, this noted inconsistency has not been determined to constitute a significant impact because the inconsistency is based on the weighing of several factors in the planning analysis. There is room for discretion by decision makers in weighing other factors as they relate to the parameters of the policy, and the mitigation measures outlined in Section 2.3 (Air Quality) and in this section would apply to future development.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-2 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a

stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

SD15

Information related to COS-14.1 – SD15 is in an area of stark differences between the unincorporated area and the incorporated city lands (San Marcos and Carlsbad). The unincorporated side has a large area of open space preserves, limited development and lower densities of the Semi-Rural Regional Category. On the north side of the adjacent San Elijo Road and also to the west, higher densities are found (Village densities by County standards), along with commercial nodes. It is approximately two miles via roads from the North County Metro-South Village, two miles from the nearest transit stop, and seven miles from the nearest park-and-ride facility. Considering the language of the Policy, the Proposed Project Map for SD15 has been found to be consistent with COS-14.1.

VC7+

Information related to COS-14.1 – The Analysis Area is approximately six miles from the Valley Center North Village, two miles from the nearest transit stop, and two miles from the nearest park-and-ride facility. It is in close proximity to interchanges for I-15, but public roads in the Analysis Area are limited to West Lilac Road, adjacent on the north and east. Considering the language of the Policy, the Proposed Project Map for VC7+ has been found to be consistent with COS-14.1.

VC51

Information related to COS-14.1 – The Analysis Area is approximately six miles from the Valley Center North Village, and five miles from the nearest transit stop and park-and-ride facility. An existing area of SR-4 is north of the Analysis Area and thus slightly farther away from the Village, but the SR-4 in that area generally reflects existing parcelization. Additional density potential in the VC51 Analysis Area would be limited due to the prevalence of steep slopes with the proposed SR-4 designation being slope-dependent. Additional density potential is further restricted by the Williamson Act contracts within some of the parcels, which would limit additional density potential to six dwelling units while the contracts are in place, prohibiting further subdivision on other parcels. Considering the language of the Policy, the Proposed Project Map for VC51 has been found to be consistent with COS-14.1.

VC57+

Information related to COS-14.1 – The western portion of the Analysis Area is adjacent to the Village boundary for the Valley Center North Village. There are a few transit stops along Valley Center Road within the Analysis Area, and this road also includes a Class II bike lane for connecting to the two Villages. The closest park-and-ride facility is over 10 miles away via roads. Considering the language of the Policy, the Proposed Project Map for VC57+ has been found to be consistent with COS-14.1.

VC67

Information related to COS-14.1 – Medium Impact Industrial is proposed for this Analysis Area, which would not allow residential. It is adjacent to the Village boundary for the Valley Center North Village, so it is in close proximity to transportation networks, other industrial uses, and commercial uses. Considering the language of the Policy, the Proposed Project Map for VC67 has been found to be consistent with COS-14.1.

Former Champagne Gardens Specific Plan Area

Information related to COS-14.1 – The former CGSP area is adjacent to the Village associated with the Welk Resort. It is less than a half mile from a park-and-ride facility at Gopher Canyon Road and Champagne Boulevard. The Subareas are located along Champagne Boulevard, which has a Class II bike lane. The closest transit stops are just over five miles away. Considering the language of the Policy, the Proposed Project Map for the former CGSP area has been found to be consistent with COS-14.1.

Valley Center Community Plan Residential Policy 8 Proposed Revision

Information related to COS-14.1 – This proposed revision would not change any land use designations, but it would allow slightly more clustering flexibility in SR-2 or SR-4 designations, for properties within the sewer service area. This change would facilitate more compact development within a subdivision site and could potentially reduce trip lengths but would not have an effect on number of vehicle trips. Therefore, the proposed policy revision is consistent with COS-14.1.

Housing Element

Goal H-1: Housing Development and Variety. A housing stock comprising a variety of housing and tenancy types at a range of prices, which meets the varied needs of existing and future unincorporated County residents, who represent a full spectrum of age, income, and other demographic characteristics.

The associated General Plan Policy that is applicable to a ‘stand-alone’ GPA/Rezone, like the Proposed Project is:

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 2011 PEIR analysis determined that Policy H-1.3 would reduce impacts to Utilities and Service Systems – New Water or Wastewater Treatment Facilities.

Analysis Area Discussion – Applicable Policy under Goal H-1

Goal H-1 and associated policies were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. *H-1.3 is the only policy under this goal that is applicable to stand-alone GPAs/Rezoning and this policy was relied upon in the 2011 PEIR to reduce environmental impacts.* The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages lack either sewer service or a range of transportation networks/options (or lack both). The only Analysis Area currently within a Village is DS8; however, that Analysis Area doesn’t meet the criteria of being within close proximity to a job center. The extent of jobs available in Borrego Springs is not in line with the population of the community, as the percentage of the population that is made up of retirees is higher than in other unincorporated communities.

Safety Element

Goal S-1: Public Safety. Enhanced public safety and the protection of public and private property.

The associated General Plan Policy that is applicable to a 'stand-alone' GPA/Rezone, like the Proposed Project is:

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.

The 2011 PEIR analysis determined that Policy S-1.1 would reduce impacts to Hazards and Hazardous Materials - Transport, Use, and Disposal of Hazardous Materials; Hazards and Hazardous Materials - Accidental Release of Hazardous Materials; and Hazards and Hazardous Materials - Existing Hazardous Materials Sites.

Analysis Area Discussion – Applicable Policy under Goal S-1

Goal S-1 and associated policies include measures to plan for disaster response and reduce risks to residents and property from hazards. *S-1.1 is the only policy under this goal that is applicable to stand-alone GPAs/Rezoning and this policy was relied upon in the 2011 PEIR to reduce environmental impacts.* Based on the language of the policy, there is room for discretion by decision makers in determining policy consistency. Hazardous materials and hazardous materials sites, including sufficient buffering are addressed during the development review stage. Restrictions on development are based on specific locations of uses and proximity to hazardous materials sites and/or facilities that currently use hazardous materials or propose to use hazardous materials. Additional hazards are discussed below, including some wildfire hazard information that is also discussed in the review of Policy LU-6.11.

BO18+

Information related to S-1.1 – There are no floodplains, dam inundation zones, or fault hazard zones in the Analysis Area. Approximately 100 acres in the southern hillsides of the Analysis Area is within a Very High Fire Hazard Severity Zone (FHSZ). The rest of the area is within a Moderate FHSZ, due to the extensive areas of irrigated agriculture. Access improvements would be required throughout the Analysis Area in order to accommodate further subdivisions, but it is estimated that most of the area could meet the General Plan travel time standard of 10 minutes upon provision of access roads to fire protection standards. Existing access (and feasibility of improvements) is most sufficient in the northeastern portion, which is the only portion that would be changed in the alternative map mentioned above. Improving access in the southern and western portions of the Analysis Area (near Rancho Amigos Road in the south and the western portion of Calle de Tallar in the west) will be challenging given the extent of steep slopes, some very steep roadside drop-offs, and coastal sage scrub in these areas. Areas adjacent to the southern end of the Analysis Area have limited fire clearing due to the steep slopes and sensitive vegetation on hillsides above the Moosa Creek corridor. Most of the parcels with additional density potential (associated with the proposal) in the western portion of the Analysis Area are accessed via dead end roads or have no access at all. As a result of these issues, the proposed density increase to SR-4 within the southern and western portions of the Analysis Area results in a conclusion of inconsistency with S-1.1 for the Proposed Project Map. However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of the proposed

SR-4 density as it relates to the parameters of the policy, and the mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-4 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

CD14

Information related to S-1.1 – There are no floodplains or dam inundation zones in the Analysis Area and the fault zone that runs through a small portion is a pre-Quaternary fault (inactive). The entire area is within the Very High FHSZ. Access improvements would be required, but current GIS estimates show the 10-minute response time could likely be met for the SR-2 proposed area, upon implementation of access improvements to fire protection standards. Depending on the proposed location of homes, subdivisions within the Analysis Area could have difficulty meeting the maximum dead-end road length requirements and may require secondary access which would be challenging to implement in this location. An alternative map has been prepared and analyzed that would reduce the area of SR-2 in the northwestern portion, which is more problematic for access and fire protection than the southwestern portion with less steep slope and closer to public roads. While this alternative would demonstrate a greater level of consistency with Policy S-1.1, a consistency finding can be made for the CD14 Proposed Project Map due to the fact that the most hazardous areas in the eastern portion would remain unchanged and additional density would be focused in the area closest to existing access and development.

DS8

Information related to S-1.1 - The Analysis Area is in a Moderate FHSZ. The southern portion is only approximately 200 feet from the Borrego Springs FPD fire station on Stirrup Road, and there is a good network of public roads surrounding the Analysis Area. The entire Analysis Area is within a FEMA-mapped alluvial floodplain, which is the case for much of the Village of Borrego Springs and other areas in the northern portion of the CPA. The Analysis Area is not within a dam inundation zone or fault zone. Given the ideal fire access roads and close proximity to the fire station, the floodplain hazard would be more of a concern in relation to this policy. A finding of consistency can be made under consideration of surrounding densities with similar floodplain constraints and the measures in place for discretionary reviews and building permit reviews to ensure reasonable assurance of minimizing flood hazards on development.

DS24

Information related to S-1.1 - The Analysis Area is within the Moderate FHSZ. The fire response travel time is currently estimated to be beyond the 5-minute General Plan standard. This will require confirmation during the subdivision application process, based on existing and proposed access roads at that time. The site is mostly within the 100-year floodplain and the potential for particularly hazardous flooding is apparent, due to the proximity to the confluence of west to east drainage flows associated with the alluvial fans of Dry Canyon, Tubb Canyon, Culp Canyon, and Loki Canyon. These factors will be considered by decision makers, in the context of existing designations in this area. There are no dam inundation zones in the Analysis Area. A pre-Quaternary (inactive) fault zone goes through a small portion of the site near the eastern

boundary. The flood hazards and fire response times could prove challenging to mitigate during the development review process, and could render the proposed densities infeasible. However, a consistency finding can be made at this programmatic level, based on nearby designations of the same or slightly higher densities, with similar hazard constraints.

FB2+

Information related to S-1.1 - Most of the extent of the previously graded central portion of the Analysis Area that is used for agriculture is in the Moderate FHSZ. The hillsides on the western and eastern portions along with ungraded portions on the northern end are in the Very High and High FHSZs. For fire protection, the Analysis Area is under the County Fire Authority with the closest station located approximately 20 miles east on SR-76 with an estimated 20-minute travel time, which would be sufficient for the RL-20 proposed portion, but would not meet the 10-minute standard for the SR-4 proposed portion. As discussed previously, this would be reviewed at the subdivision application stage. In considering fire protection infrastructure, the Analysis Area has a good public road network for this area of Fallbrook, with SR-76 traversing through the southern portion of the Analysis Area and Rice Canyon Road traversing through the western portion (separating the area proposed for SR-4 from the area proposed for RL-20). In addition to fire hazards, there is a pre-Quaternary (inactive) fault zone within the northwest corner of the Analysis Area; the floodplain and dam inundation zones along the San Luis Rey River encroach into the southern portion of the Analysis Area; however, the allowed density associated with the Proposed Project Map could be achieved with complete avoidance of these areas. Therefore, a consistency finding can be made.

FB17

Information related to S-1.1 - There are no floodplains, fault zones, or dam inundation zones within the Analysis Area. Most of the Analysis Area is within the Moderate FHSZ, due to the presence of agricultural operations. Current estimates show the site would not meet the 5-minute fire protection service travel time standard for the proposed SR-1. Access will be a critical issue for fire protection in subdivision review. An alternative map has been prepared and analyzed that would only change the eastern leg of the Analysis Area to SR-1. That portion would not have the access issues of the central portion as it's adjacent to the public Ranger Road, without a wetland along the road. There are no floodplains, dam inundation zones, or fault zones within the Analysis Area. Though the alternative map would provide a greater level of policy consistency, a consistency finding can be made for the FB17 Proposed Project Map, given the mapped FHSZs here in relation to nearby areas of SR-1.

FB19+

Information related to S-1.1 - The majority of the Analysis Area is within the Very High FHSZ, while almost 200 acres (mostly in the eastern portion) is within the Moderate FHSZ due to the presence of agricultural operations. Current GIS and fire district estimates anticipate that the Analysis Area would be able to meet the 20-minute General Plan standard for fire response travel time. The estimated one additional potential dwelling unit would be in the southern property, closest to the fire station. Therefore, a consistency finding can be made.

FB21+

Information related to S-1.1 - There are no floodplains, dam inundation zones, or fault zones within the Analysis Area. The Analysis Area is approximately half within the Very High FHSZ and half within the Moderate FHSZ, due to the presence of agricultural operations. Travel time estimates show some of the northern portions would be outside of the 20-minute travel time standard of the General Plan for the proposed SR-10 and the existing RL-20. This is a

particularly hazardous area for wildfire evacuations, as there are no public roads in the Analysis Area and the main road for ingress and egress to the area (Sandia Creek Drive) traverses over sharp curves and slopes with steep roadside drop-offs in some areas. The Analysis Area lacks a paved second option for evacuation. In addition, the Analysis Area is surrounded by extensive areas of open space preserves, so fire clearing in this area is limited. Most of the additional density potential associated with the SR-10 proposal would be in the western portion, which is adjacent to a BLM preserve of approximately 1,600 acres. Adjacent to the south are undeveloped properties of the Fallbrook Public Utilities District which contain riparian habitats connecting to preserves of the Santa Margarita River. Within the southeast portion of the Analysis Area is the 78-acre Rock Mountain Preserve of the Fallbrook Land Conservancy, and extensive undeveloped lands are also found adjacent to the east. Due to the particularly hazardous conditions associated with wildfire evacuation, the large expanses of flammable vegetation with limited fire clearing in this area, a proposed increase in density would not be consistent with land use mapping to minimize populations exposed to hazards, particularly when there are no Semi-Rural designations within two miles. Therefore, the FB21+ proposal in the Proposed Project is inconsistent with Policy S-1.1, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy S-1.1-FB21+]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-10 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

ME26

Information related to S-1.1 - There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The Analysis Area includes portions within the Very High (approximately 410 acres) and High (approximately 268 acres) FHSZs. Current estimates show that the 20-minute fire response travel time standard for the proposed SR-10 could likely be met. Subdivision applicants would have to obtain permission to improve roads through adjacent federal lands to fire access standards. The portion of the Analysis Area with substantial steep slopes is closest to the public road (Buckman Springs Road) and the Village. A consistency finding can be made, given that access improvements through federal lands would be reviewed by the appropriate agencies at the subdivision application stage, and that has not been determined to be infeasible at this programmatic review stage.

ME30A

Information related to S-1.1 - The southern portion of the Analysis Area which is proposed to change designations is within the Very High FHSZ. The Analysis Area is just over one mile from the closest fire station, and it is anticipated the 10-minute travel time standard for SR-4 could be met, upon implementation of access improvements to fire protection standards. Floodplain, floodway, and dam inundation zone hazards are limited to the northern portion that is proposed to remain unchanged at RL-40. Therefore, a consistency finding can be made.

NC3A

Information related to S-1.1 - There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. Approximately 800 acres of the 1,015 total acres is within the Very High

FHSZ, while the southern end is in the Moderate FHSZ. Current estimates show the 20-minute fire response travel time could be met for this area, upon implementation of internal access roads to fire protection standards. Therefore, a consistency finding can be made.

NC18A

Information related to S-1.1 - There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. Most of the Analysis Area is within the Very High FHSZ, like much of the adjacent and nearby areas of existing SR-1. Current estimates show most of the Analysis Area would be just beyond the 5-minute General Plan standard for fire response travel time. An alternative map has been developed and analyzed (see Chapter 4) that would only change the westernmost parcel to SR-1, as this portion would have the best estimated travel time of the Analysis Area parcels. Considering the level of fire hazards in relation to adjacent and nearby SR-1 areas, a consistency finding can be made.

NC22

Information related to S-1.1 - There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The Analysis Area is almost entirely within the Very High FHSZ. Current estimates show the area would not meet the 5-minute General Plan travel time standard for the proposed SR-1. Fire protection access improvement requirements along with the extent of sensitive habitats could affect the feasibility of the density allowed under the Proposed Project Map. An alternative map has been developed and analyzed (see Chapter 4) that would apply SR-4 in the area proposed for SR-1 in the Proposed Project map. Considering the high level of fire clearing in surrounding properties, a consistency finding can be made, though extensive access improvements would be required for the potential density associated with the proposed SR-1.

NC37

Information related to S-1.1 - There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. Approximately half of the area is within the Moderate FHSZ, due to the agricultural operations. The other half is in the Very High FHSZ. Current estimates show that most of the Analysis Area would be within the 10-minute General Plan fire response travel time standard for SR-4. As with other issues, the western leg of the Analysis Area would be the most problematic from a fire protection standpoint, due to the native vegetation, slopes, and distance from the public road. An alternative map has been developed and analyzed (see Chapter 4) that would maintain the current SR-10 designation in this western leg of the Analysis Area. As the parcels with additional density potential are located in the eastern and northern portions closer to the public road, a consistency finding can be made.

NC38+

Information related to S-1.1 - There are no dam inundation zones or fault zones within the Analysis Area. The entire Analysis Area is within the Moderate FHSZ, due to the agricultural uses. Wildfire risks are minimized here by the extent of surrounding development (including higher density residential adjacent to the south in San Marcos), the lack of large areas of native habitat in close proximity, and the large proportion of the Analysis Area planted with irrigated crops or developed with homes or greenhouses. Current estimates show only the westernmost portion of the Analysis Area would meet the 5-minute General Plan standard for fire response travel time. Approximately 20 acres of NC38+ is within a FEMA floodplain. Of that, approximately 7 acres is also in the FEMA floodway. An alternative map has been developed and analyzed (see Chapter 4), that would only change the land use designation in the portions outside the floodplain. Considering the extent of the floodplain and floodway within the Analysis

Area and the lack of SR-1 (Proposed Project Map designation for NC38+) areas nearby with a similar level of flood constraints, the NC38+ Proposed Project Map has been determined to be inconsistent with Policy S-1.1. However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of clustering possibilities and other factors. The mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

PP30

Information related to S-1.1 - Approximately 170 acres of the Analysis Area are within a floodplain and 235 acres are within a dam inundation zone; however, almost all of the area within these two hazard zones is in the portion proposed to remain RL-40 in the Proposed Project Map. There are no fault zones within the Analysis Area. With the exception of the northeast portion (approximately 100 acres, including citrus groves, a house, and accessory structures), the entire Analysis Area is within the Very High FHSZ. Fire protection service is provided by CAL FIRE via a contract with the Pauma Municipal Water District, and the closest station is on SR-76 adjacent to the northeast portion of PP30. Meeting the General Plan standard for fire response travel time (10 minutes for the SR-2 portion in the Proposed Project map) is anticipated to be feasible; however, developing internal access roads to fire standards could be difficult, depending on the location of homes, due to the riparian areas discussed above. Given the close proximity to the fire station, the presence of irrigated agriculture in some of the areas proposed for SR-2, and other (non-fire) hazard areas being almost completely consolidated in the area proposed to remain unchanged at RL-40, a consistency finding can be made.

SD15

Information related to S-1.1 - There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The entire Analysis Area is within the Very High Fire Hazard Severity Zone. The site is currently vacant with some adjacent open space preserves, so adjacent fire clearing is limited. Current estimates show the northern portion of the site is within the 5-minute fire response travel time, which is the General Plan standard for each of the designations in the Proposed Project Map. The majority of the site is within the 5-10 minute travel time range. Fire response time, internal access, and sufficient clearing will need to be addressed during the development review stage and could prove challenging to sufficiently mitigate. Considering the nearby high-density developments along San Elijo Road, the Proposed Project Map a consistency finding can be made with Policy S-1.1 in reviewing at this programmatic level.

VC7+

Information related to S-1.1 - There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The majority of the Analysis Area is within the Moderate FHSZ, due to prevalence of agricultural operations, in addition to approximately 365 acres in the Very High FHSZ. Current estimates show most of the Analysis Area would be within the 10-minute General Plan fire response travel time standard for the proposed SR-2. The closest station of

the Deer Springs FPD (applicable district) is approximately 2 miles from the southern end of the Analysis Area. Access improvements would be necessary throughout the Analysis Area, as the only public road is West Lilac Road, which is adjacent to the northern and eastern end; however, a policy consistency finding can be made at this programmatic level.

VC51

Information related to S-1.1 - There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The Analysis Area is completely within the Moderate Fire Hazard Severity Zone, due to the agricultural operations. With the closest Valley Center FPD fire station being approximately 8 miles away, estimates show the Analysis Area is currently beyond the 10-minute fire response time General Plan standard for the proposed SR-4. Approximately half of the additional density potential associated with the proposed SR-4 is on properties under Williamson Act contracts for agricultural preservation, where owners would not be able to apply for subdivisions until/if a non-renewal process is completed, which typically takes 10 years. As such, even if the Proposed Project change is approved for VC51, it may be many years before subdivision applications come forward, when travel time will need to be evaluated, based on existing and proposed access at that time. Considering the proposed designation in relation to the mapped FHSZ, and the lack of additional significant hazards, a consistency finding can be made.

VC57+

Information related to S-1.1 - The Analysis Area is mostly split between the High and Moderate FHSZs, with the eastern end being within the Very High FHSZ. With the closest Valley Center FPD station being adjacent to the southeastern portion of the Analysis Area, most of the area is estimated to be within the 5-minute fire response travel time, and some of the areas in the western portion that are furthest from Valley Center Road are within the 5-10 minute estimate, which is consistent with the General Plan standard of 10 minutes for the proposed SR-2. In addition, the Analysis Area has a good public road network for fire protection, with Valley Center Road and Vesper Road running east-west, and Mactan Road, Sunset Road, and Lake Wohlford Road running north-south. As mentioned above, the Analysis Area is within a County and FEMA floodplain covering approximately 170 acres, of which, approximately 100 acres is also in a County floodway. There are no dam inundation zones or fault zones within the Analysis Area. Considering the extent of hazards and the emergency infrastructure available, a consistency finding can be made.

VC67

Information related to S-1.1 - With the exception of the easternmost parcel (in the Moderate FHSZ), the entire Analysis Area is within the Very High FHSZ. The closest Valley Center FPD station is approximately 1.5 miles away and the entire Analysis Area is currently estimated to be within the 5-minute fire response time. A 10-minute maximum travel time is the standard for the proposed Medium Impact Industrial (based on the Semi-Rural Regional Category, existing and proposed). A FEMA and County-mapped floodplain covers the entire Analysis Area and a County-mapped floodway covers the entire PSR parcel and approximately 80% of the Study Area. Considering almost the entire Analysis Area is within a floodway, it has been determined that a change to Medium Impact Industrial would not be in line with assigning a land use designation that is reflective of site specific constraints and hazards. Therefore, the VC67 proposal in the Proposed Project is inconsistent with Policy S-1.1, which was adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact (**Impact LU-1 [GP Policy S-1.1-VC67]**).

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

Former Champagne Gardens Specific Plan Area

Information related to S-1.1 - The entire former CGSP area is within the Very High FHSZ; however, the area is in an optimal location for fire protection services. The Deer Springs FPD station is less than a mile away, and all Subareas are adjacent to, or in close proximity to Champagne Boulevard, which is classified as a Major Road in the Mobility Element. The entire area would be estimated to be within the five minute fire response travel time. A FEMA and County-designated floodplain covers approximately 23 acres of the former CGSP area, with almost all of that in the eastern portion. Of those 23 acres, a County floodway covers approximately 18 acres, while the FEMA floodway is approximately 8 acres. There are no dam inundation zones or fault zones within the Analysis Area. With adoption of the proposed Valley Center Community Plan Policy 8 revision (allowing additional clustering capability within SR-2 or SR-4 designations in the sewer service area), more lot size flexibility will be possible, which would make the proposed density more feasible with avoidance of the floodplains and most sensitive habitat areas. Policy review at this programmatic level can benefit from consideration of adjacent areas with similar constraints. This particular floodplain/floodway, associated with the Moosa Creek corridor continues to properties to the north, which are SR-4; and to the south, which is the Welk Specific Plan of higher overall density (though most of the habitable structures are away from the floodplain there). As such, the mapping of SR-2 in Subareas 3, 4, and 5 per the Proposed Project Map (Referral Map) would not be in line with the land use designations through most of this floodplain area. In addition, most of this floodplain area, through the Subareas mentioned, is constrained by highly sensitive riparian habitats. Therefore, the Proposed Project Map for Champagne Gardens has been determined to be inconsistent with Policy S-1.1. However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of clustering possibilities and other factors. The mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation densities in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designations.

Valley Center Community Plan Policy 8 Proposed Revision

Information related to S-1.1 - The proposed policy revision would not change the allowed density for any area. The additional clustering allowance would reduce the extent of new fire protection access roads required and facilitate placement of homes to avoid other hazards, like the floodplain within the former CGSP area. Therefore, a consistency finding can be made.

Goal S-9: Protection of Life and Property. Minimized personal injury and property damage losses resulting from flood events.

Goal S-10: Floodway and Floodplain Capacity. Floodways and floodplains that have acceptable capacity to accommodate flood events.

These two goals are discussed together, to cover flood hazards. The associated General Plan Policies that are applicable to a 'stand-alone' GPA/Rezone, like the Proposed Project are:

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.

The 2011 PEIR analysis determined that Policy S-9.2 would reduce impacts to Hydrology and Water Quality – Flooding; and Hydrology and Water Quality - Exceed Capacity of Stormwater Systems.

S-9.4: Development in Villages within the Floodplain Fringe. 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 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.

S-9.5: Development in Semi-Rural and Rural Lands within 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.

The 2011 PEIR analysis determined that Policy S-9.5 would reduce impacts to Hydrology and Water Quality - Housing within a 100-year Flood Hazard Area; and Hydrology and Water Quality - Impeding or Redirecting Flood Flows.

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 2011 PEIR analysis determined that Policy S-9.6 would reduce impacts to 2.8 Hydrology and Water Quality - Dam Inundation and Flood Hazards; and Hydrology and Water Quality - Seiche, Tsunami, and Mudflow Hazards.

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.

The 2011 PEIR analysis determined that Policy S-10.1 would reduce impacts to Hydrology and Water Quality - Housing within a 100-year Flood Hazard Area; Hydrology and Water Quality - Impeding or Redirecting Flood Flows; and Hydrology and Water Quality - Dam Inundation and Flood Hazards.

Analysis Area Discussion – Applicable Policies under Goals S-9 and S-10

These policies have been developed to detail limitations on development in floodplains, floodways, and dam inundation zones.

While the requirements in these policies will require careful consideration of the placement of structures during development review, a stand-alone GPA/Rezone proposal can be evaluated for increases in development potential within floodplains, floodways or dam inundation zones and for noted restrictions on uses. *Only policies S-9.2, S-9.5, S-9.6, and S-10.1 under this goal are applicable to a stand-alone GPA/Rezone and were relied upon in the 2011 PEIR to reduce environmental impacts.* Included below is policy review for Analysis Areas that have floodplains or dam inundation zones. Analysis Areas not listed below in this policy review do not contain floodplains or dam inundation zones.

DS8 and DS24

Information related to S-9.2, S-9.5, S-9.6, and S-10.1 - The entire DS8 Analysis Area and most of the DS24 Analysis Area are within a FEMA-mapped alluvial floodplain (with no mapped floodway), which is the case for a large portion of the community of Borrego Springs, including almost the entire Village area. These Analysis Areas are not within dam inundation zones or floodways. Building regulations address specific requirements for elevating structures above the base flood elevation, to allow residential development in the community without impeding flood flows. At this programmatic review level, the approach to evaluating policy consistency with these floodplain and floodway policies is similar to the approach of the General Plan Update. Considering the extent of the alluvial floodplain in the Community Planning Area, development review includes design considerations and mitigation to elevate structures above the base flood elevation, so that development of habitable structures is still possible. Considering the higher density designations applied during the General Plan Update in areas of the community with similar alluvial floodplain constraints, a finding of consistency with these policies can be made for both DS8 and DS24.

FB2+

Information related to S-9.2, S-9.5, S-9.6, and S-10.1 - Approximately 28 acres in the southern portion of the Analysis Area is within a FEMA and County-mapped floodplain. Approximately 6 acres of this area is also part of a County-mapped floodway, and approximately 26 acres of this area is also part of a dam inundation zone. The entire area covered by these constraints is proposed for RL-20 and the lot size flexibility would facilitate meeting the density potential for the RL-20 area while completely avoiding the floodplain (including floodway) and dam inundation zone. Therefore, a finding of consistency can be made for FB2+ in relation to these policies.

ME30A

Information related to S-9.2, S-9.5, S-9.6, and S-10.1 – The northern portion of the Analysis Area is within a County-designated floodplain, which includes a County-designated floodway.

This entire floodplain/floodway area is proposed to remain unchanged at RL-40. Therefore, a finding of consistency can be made for ME30A in relation to these policies.

NC38+

Information related to S-9.2, S-9.5, S-9.6, and S-10.1 – A FEMA-mapped floodplain covers approximately 20 acres in the western and central portions of the Analysis Area and approximately 8 acres of this floodplain is also a FEMA-mapped floodway. The size of this floodplain/floodway area in relation to the overall size of the area of the PSR NC38 ownership could pose feasibility issues for achieving the SR-1 (Proposed Project) density for that area. An alternative map has been developed and analyzed (see Chapter 4) that would leave this entire flood hazard area unchanged at SR-2, while changing the other areas to SR-1. Considering the extent of the floodplain and floodway within the Analysis Area and the lack of SR-1 (Proposed Project Map designation for NC38+) areas nearby with a similar level of flood constraints, the NC38+ Proposed Project Map has been determined to be inconsistent with Policies S-9.2 and S-9.5. However, these noted inconsistencies have not been determined to constitute significant impacts because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, and the mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed SR-1 designation density in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

PP30

Information related to S-9.2, S-9.5, S-9.6, and S-10.1 – The western portion of the Analysis Area is within a FEMA and County-mapped floodplain, with part of the floodplain also in a County-mapped floodway. This area is proposed to remain RL-40. The line between the area proposed to change to SR-2 and the area proposed to remain RL-40 was developed to follow the edge of the floodplain. A small portion of the dam inundation zone encroaches into the area proposed to change to SR-2 and that portion could be avoided during the development design and review process without substantially impacting density feasibility (though other constraints in the proposed SR-2 area could affect feasibility, as discussed above). Considering the locations of these constraints in relation to the area proposed to change designations, consistency findings can be made for each of these policies.

VC57+

Information related to S-9.2, S-9.5, S-9.6, and S-10.1 – Approximately 143 acres in the western portion of the Analysis Area is within a FEMA and County-mapped floodplain, with about half of that also in a County-mapped floodway. As the floodplain area is spread out among ownerships within this portion of the Analysis Area, it is anticipated that the placement of development pads could be planned outside floodplain/floodway areas in accordance with these policies during the development review process. Given the size of the Analysis Area (1,337 acres) in relation to the size of the floodplain area, policy review at this programmatic level can consider adjacent areas with similar constraints. This floodplain (including a floodway within) includes approximately 85 acres to the west of the Analysis Area and 35 acres to the north of the Analysis Area with SR-2

or higher densities in these adjacent areas. Considering each of these factors, a finding of consistency can be made for this review at a programmatic level with no development design.

VC67

Information related to S-9.2, S-9.5, S-9.6, and S-10.1 - The entire Analysis Area is within a FEMA and County-mapped floodplain, and the County-mapped floodway covers all of the Analysis Area with the exception of approximately one acre in the northern end of the Study Area. Both the noted applicable General Plan floodway policy (S-10.1) and the County's Resource Protection Ordinance require that uses in a floodway shall be limited to agricultural, recreational, and other such low intensity uses. Medium Impact Industrial uses would not be considered agricultural, recreational, or similarly low intensity. This designation and corresponding zoning allow some of the highest intensity uses of any zone, which can severely impair the environmental values of the floodway, even if flood hazards could be adequately mitigated or avoided. Changing from an SR-2 designation (appropriate for agriculture) to Medium Impact Industrial would not be in line with limiting development in floodplains as discussed in Policy S-9.2. Similarly, such a change would not be in line with the restrictions noted in Policy S-9.5, which prohibits floodplain development in the Semi-Rural Regional Category, with limited exceptions. Therefore, the VC67 proposal in the Proposed Project is inconsistent with Policies S-9.2, S-9.5, and S-10.1, which were adopted in part for the purpose of avoiding or mitigating environmental impacts as discussed in the 2011 PEIR, resulting in a potentially significant impact **(Impact LU-1 [GP Policy S-9.2-VC67]) - (Impact LU-1 [GP Policy S-9.5-VC67]) - (Impact LU-1 [GP Policy S-10.1-VC67])**.

Former Champagne Gardens Specific Plan Area

Information related to S-9.2, S-9.5, S-9.6, and S-10.1 – A FEMA and County-designated floodplain covers approximately 23 acres of the former CGSP area, with almost all of that in the eastern portion. Of those 23 acres, a County floodway covers approximately 18 acres, while the FEMA floodway is approximately 8 acres. There are no dam inundation zones or fault zones within the Analysis Area. With adoption of the proposed Valley Center Community Plan Policy 8 revision (allowing additional clustering capability within SR-2 or SR-4 designations in the sewer service area), more lot size flexibility will be possible, which would make the proposed density more feasible with avoidance of the floodplains and most sensitive habitat areas. Policy review at this programmatic level can benefit from consideration of adjacent areas with similar constraints. This particular floodplain/floodway, associated with the Moosa Creek corridor continues to properties to the north, which are SR-4; and to the south, which is the Welk Specific Plan of higher overall density (though most of the habitable structures are away from the floodplain there). As such, the mapping of SR-2 in Subareas 3, 4, and 5 per the Proposed Project Map (Referral Map) would not be in line with the land use designations through most of this floodplain area and has been determined to be inconsistent with Policies S-9.2 and S-9.5. However, these noted inconsistencies have not been determined to constitute significant impacts because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, and the mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation densities in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designations.

Valley Center Community Plan Residential Policy 8 Revision

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. The policy revision would make it easier to avoid potential impacts to sensitive resources. The proposed revision to the policy would involve changing the minimum lot size allowed in the SR-2 designation, from one acre to one-half acre, and change the minimum lot size in the SR-4 designation from two acres to one acre; however, the adoption would not result in an increase in number of dwelling units. Upon adoption of the Proposed Project, the revision to Residential Policy 8 would become part of the Valley Center Community Plan and would not result in a conflict. Therefore, implementation of Valley Center Community Plan Residential Policy 8 Revision would result in a less than significant impact related to the adopted General Plan.

San Diego County Regional Air Quality Strategy

Updated in December 2016, the County RAQS lays out a program for attaining State ozone standards within San Diego County. The Proposed Project would result in a potentially significant land use conflict if future development would be greater than that anticipated in regional planning documents, because this growth would result in additional emissions not accounted for during preparation of the RAQS. The Proposed Project's compliance with the RAQS is described in detail in Section 2.3.3.1 for Issue 1. The RAQS utilize SANDAG population forecasts in the development of measures for attaining air quality standards; and SANDAG growth forecasts are based on the adopted General Plan for the County (SDCAPCD 2016). The SANDAG model used for projecting growth in the region considers demographic, economic, and land use data. The growth associated with the Proposed Project (1,826 additional potential dwelling units) is more than half the increase forecast by SANDAG, and the project is not accounted for in that forecast or in the RAQS. Therefore, the Proposed Project would result in a potentially significant impact on the environment.

San Diego Basin Plan Update

The San Diego Regional Board Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. The plan designates the water quality objectives necessary to ensure the reasonable protection of the beneficial uses and describes the implementation plan for achieving and maintaining the beneficial uses and water quality objectives. The Basin Plan objectives are implemented through federal, State, and local regulations and programs, primarily NPDES permits. In 2016 the Basin Plan was updated, and amendments included incorporating the State Water Regional Control Board On-site Wastewater Treatments Systems Policy, modifying the nitrate water quality objective for groundwater and adding implementation provisions for the nitrate groundwater objective, and repealing the Conditions for Conditional Waivers of Waste Discharge Requirements. The Proposed Project does not propose any specific development or other projects that would have the potential to directly impact water quality. However, development of the PSR Analysis Areas and former CGSP Area would have the potential to impact water quality and would be subject to the programs and regulations of the Basin Plan to obtain necessary permits. Therefore, the Proposed Project would be consistent with the Basin Plan and no impact would occur.

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. The Valley Center Community Plan Residential Policy 8

Revision does not propose any specific development or other projects that would have the potential to directly impact water quality, nor does it change the number of lots permitted within the affected areas. Therefore, the Valley Center Community Plan Residential Policy 8 Revision is also consistent with the Basin Plan and there is no impact. Refer to Section 2.8.3.1, Issue 1: Water Quality Standards and Requirements, for additional discussion regarding water quality impacts.

San Diego Forward: The Regional Plan

Part of the Regional Plan focus is to support many active community centers throughout the County by connecting a variety of transportation choices such as transit, carpool lanes, toll roads and freeways, bikeways and walking paths, the Regional Plan assumes that population growth in the County will focus in the western areas with higher densities added to existing neighborhoods with 55 percent of the region being preserved as open space, parks, protected habitat and farmland.

The Regional Plan identifies existing and planned Smart Growth Opportunity Areas, which are compact, mixed use, pedestrian-oriented developments where a higher priority is placed on providing transportation facility improvements. A specific Smart Growth Opportunity Areas category (rural village) was developed by SANDAG to represent the unique community character and development patterns found in unincorporated communities. The strategy is closely related to the County's community development model for the village, semi-rural, and rural land use categories, and is reflected in the project objectives identified in Section 1.3 of the 2011 PEIR. Objective 2 is to promote sustainability by locating new development near existing infrastructure, services, and jobs; and Objective 6 is to provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.

The Regional Plan endorses a land use pattern that channels much of the region's future growth into existing urban communities, preserving and protecting the lifestyle and sensitive environment of the rural unincorporated areas. PSR Analysis Areas CD14, DS8, DS24, ME30A, NC3A, NC18A, NC22, NC38+, SD15, VC57+, and VC67, and former CGSP Subareas CG1-8 would be consistent with this land use pattern because they propose higher density development along the periphery of existing villages and towns. The Valley Center Community Plan Residential Policy 8 Revision is also consistent with the Regional Plan because it would allow for clustering dwelling units closer to existing infrastructure, including roads.

PSR Analysis Areas BO18+, FB2+, FB17, FB19+, FB21+, ME26, NC37, PP30, VC7+, and VC51 would increase dwelling units in more rural areas, farther from villages and/or higher densities of incorporated cities and thus would not be consistent with the Regional Plan, resulting in a potentially significant impact.

Airport Land Use Compatibility Plans

ALUCP are plans that guide property owners and local jurisdictions in determining what types of proposed new land uses are appropriate around airports. They are intended to protect the safety of people, property and aircraft on the ground and in the air near the airport. Three PSR Analysis Areas, DS8, FB21+, and NC22+ are located within the AIA of an airport located in the unincorporated County (Borrego Valley Airport, Fallbrook Community Airpark, and McClellan-Palomar Airport). The Proposed Project would result in a potentially significant impact if future development would conflict with the land use restrictions established by the ALUCP. Some public airports, such as Fallbrook Community Airport, would be surrounded by land uses that would maintain higher density populations, such as village residential. These land uses would

also have the potential to conflict with ALUCP land use restrictions. However, the adopted General Plan Safety Element includes Policy S-15.1 that would require land uses surrounding airports to be compatible with the operation of each airport. Future development of the Proposed Project areas would be required to be consistent with any applicable ALUCP. Therefore, development of the PSR Analysis Areas would be consistent with ALUCP and there would be no impact.

The former CGSP Area and the Valley Center Community Plan Policy 8 Revision pertain to lands that are not within any AIA and, therefore, implementation of these aspects of the Proposed Project would not conflict with an ALUCP. ALUCPs are discussed in greater detail in Section 2.7 (Hazards and Hazardous Materials).

County Trails Program

The County Trails Program develops a system of interconnected regional and community trails and pathways. The Program provides a plan for the development of the trail and pathway system, and includes community trails maps that depict the general location of future trails within a one-quarter mile wide corridor. The Community Trails Master Plan is the implementing document for this Program, and includes policies to mitigate environmental impacts. These policies are also included in the existing General Plan Public Facilities Element. The Proposed Project would result in a potentially significant land use conflict if it would conflict with the Community Trails Master Plan policies. Future development under the Proposed Project would be required to comply with Policy M-12.1, which requires developing proposed trail and pathway alignments and implementing goals and policies identified in the Community Trails Master Plan. Future development accommodated by the Proposed Project would undergo the County's regulatory and environmental review process for project approval, which includes review of project compliance with identified goals and policies. When an application for a specified discretionary development permit is submitted for land that includes a trail corridor, the specific location of a proposed trail within the trail corridor would be determined based on a route study. The environmental review process for the proposed discretionary project would include a site-specific analysis of the trail proposed in the route study. Therefore, the Proposed Project would be consistent with the County Trails Program.

Sphere of Influence

A Sphere of Influence is a planning tool adopted and used by Local Agency Formation Commission to designate the probable physical future boundaries and services areas for a city or special district. It is intended to ensure the provision of efficient services, while discouraging urban sprawl and the premature conversion of agricultural and open space lands by preventing overlapping jurisdictions and duplication of services. Furthermore, California Planning and Zoning Law Section 65067 mandates coordination of local efforts within a region to help prevent conflicts among land use plans, policies, and regulations. As discussed in the Section 2.9.2 of the 2011 PEIR, and incorporated here by reference, the Local Agency Formation Commission regulations and policies assist local agencies with jurisdictional boundary changes. The primary goals are to encourage orderly growth, promote logical and efficient public services for cities and special districts, streamline governmental structure, and discourage premature conversion of prime agricultural and open space lands to urban uses.

Current County processes require a comprehensive review of applicable plans, policies, and regulations for all discretionary projects. Processes for ministerial permits have focused reviews for those regulations that directly affect the decision. For discretionary reviews, CEQA compliance is the primary means for accomplishing these reviews. This includes a review of

relevant plans and regulations by staff, as well as notifying other agencies of projects so that they would also review the projects for compliance with their plans.

As shown in Figure 2.9-13, 18 communities within the unincorporated County are affected by the Sphere of Influence from 11 of the surrounding jurisdictions. In most cases, the adjacent city also plans land uses for these areas with the intent that the areas will eventually be annexed into the City's jurisdiction. The Commission regulates local agency boundary changes including annexation of unincorporated land into incorporated cities. Because these areas are not yet under the jurisdiction of an adjacent city, the land use designations within the Sphere of Influence do not have to match the city's plans for the area. However, the Sphere of Influence was reviewed for comparison with the adjacent city's proposed land use designations.

The Proposed Project would implement changes to land use designations proposed in the Sphere of Influence for San Marcos and Escondido. The San Marcos Sphere of Influence extends into the unincorporated County to the north (North County Metro CPA) and south (San Dieguito CPA) (Figure 2.9-14). The Escondido Sphere of Influence extends into the North County Metro CPA to the north and south of the City (Figure 2.9-15). Table 2.9-1 provides a comparison of the land use designations provided by the cities of San Marcos and Escondido with the proposed land use designations for each of the applicable PSR Analysis Areas.

As shown in Table 2.9-1, the Proposed Project designations are generally similar to the land uses proposed by the San Marcos and Escondido Sphere of Influences. PSR Analysis Area NC18A proposes the SR-1 (one dwelling unit per 1, 2, or 4 acres) and SR-2 (one dwelling unit per 2, 4, 8 acres) land use designations, whereas, the City of Escondido proposes the land use designation of Estate I which allows one dwelling unit per 1, 2, 4, or 20 acres. The proposed land use designations are comparable to those of the City of Escondido.

For Analysis Areas NC3A, the City of Escondido proposes Rural I (one dwelling unit per 4, 8, 20 acres) and Rural II (one dwelling unit per 2, 4, or 20 acres). These land uses designations are comparable to the proposed land use designation of SR-10 (one dwelling unit per 10 or 20 acres).

The San Marcos Sphere of Influence extends into the San Dieguito CPA to the southwest and the north of the City. San Marcos proposes a Specific Plan Area over the PSR Analysis Area SD15 that would allow for light industrial, commercial, and open space uses. The proposed land use designation for PSR Analysis Area SD15 would be C-1 (0.45 FAR) with mixed use zoning at two dwelling units per acre, SR-0.5 (one dwelling unit per 0.5, 1, or 2 acres), and VR-10.9 (10.9 dwelling units per one acre).

The City of San Marcos proposes the following land use designations for PSR Analysis Area NC22: Barham/Discovery Specific Plan which would allow for Mixed Use 4 (maximum 1.50 FAR), 'Low' Density Residential (4.1 to 8 dwelling unit per acre) and 'Low Medium' Density Residential (8.1 to 12 dwelling unit per acre), with residential not to exceed 346 dwelling units, and community park (a minimum of 75 acres and preserving open space). The proposed land use designation for PSR Analysis Area NC22 would be SR-1 (one dwelling unit per 1, 2, 4 acres) and SR-10 (one dwelling unit per 10 or 20 acres), which would result in up to 73 dwelling units. Therefore, the San Marcos land use designations would be more intensive than those proposed by the Proposed Project for PSR Analysis Area NC22, under the Proposed Project Map.

Additionally, the San Marcos Highlands Specific Plan proposes the annexation of a portion of PSR Analysis Area NC22. The project, if approved by the Local Agency Formation Commission, would result in the annexation of 125 acres of County land that would become part of the

Tentative Map for the San Marcos Highlands Specific Plan. The land would be zoned as SPA and would result in the construction of 189 dwelling units. This Specific Plan would result in increased density compared to the 73 total allowable dwelling units under the Proposed Project within PSR Analysis Area NC22, which includes a portion outside of the San Marcos Sphere of Influence.

For the NC37 Analysis Area, the City of San Marcos proposes Agriculture/Residential (0.125 dwelling units per acre), commercial (0.70 FAR), and Rural Residential (two dwelling units per acre). The proposed land use designation for this PSR Analysis Area would be SR-4 (one dwelling unit per 4, 8, or 16 acres), which is a higher density than is proposed by San Marcos.

The City of San Marcos has designated the NC38+ Analysis Area for Agriculture/Residential (0.125 to one dwelling unit per acre). The proposed PSR land use designation for NC38+ would be SR-1 (one dwelling unit per 1, 2, or 4 acre), which is a higher density than is proposed by San Marcos.

As stated above, these areas are not yet under the jurisdiction of the adjacent cities. As such, the proposed differences described above would not result in any conflicts with applicable land use plans, policies, or regulations with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental impact. However, it should also be noted that the General Plan Land Use Element contains Policies LU-4.1 and LU-4.2 that would require the County to participate in regional planning and review, comment, and coordinate when appropriate on plans, projects, and proposals of overlapping or neighboring agencies. This will serve to promote compatibility in land use planning and development while minimizing adverse environmental effects.

Community Plans

The various components of the Proposed Project fall within the Community and/or Subregional Planning Areas of 10 community and/or subregional plans. The 2011 PEIR did not discuss reliance on community plan policies to reduce potential impacts. Provided below is a discussion of each applicable community/subregional plan, and policies that apply to a stand-alone GPA/Rezone (with no associated development proposals/applications) in relation to the proposals for the Analysis Areas within the subject community.

Bonsall Community Plan

The BO18+ Analysis Area and the western portion of the former CGSP area are within the Bonsall Community Planning Area.

The BO18+ Analysis Area is comprised of 120 parcels totaling approximately 921 acres in the northeastern portion of Bonsall. With consideration of existing parcelization, the proposed change from SR-10 to SR-4 is anticipated to increase total potential dwelling units by 67 (estimated 129 potential units under the current designations and 196 under the Proposed Project Map).

The western portion of the former CGSP area is comprised of 8 parcels totaling approximately 44 acres in the easternmost end of Bonsall. The proposed changes from Specific Plan Area (Subareas 1, 6, and 8) and RL-20 (Subarea 7) to SR-2, SR-4, SR-10 and Rural Commercial are anticipated to increase total potential dwelling units by seven, in addition to six acres proposed as Rural Commercial (3.5 acres on Subarea 6 and 2.5 acres on Subarea 8).

While most of the policies of the Community Plan apply to projects with a development component (development design to review), there are a few that are applicable to the proposals. Policy LU-1.1.2 seeks to “Maintain the existing rural lifestyle by continuing the existing pattern of residential, equestrian, and agricultural uses within the CPA.” Similarly, Policy LU-4.1.7 notes, “Discourage incompatible land uses on areas of agricultural use and land suitable for agricultural usage.” No changes in the zoning use regulations are proposed for BO18+, so no changes in allowed land uses would occur as a result of the proposed changes there. Within the western portion of the former CGSP area, there are no agricultural uses. Policy LU-5.2.1 is most directly related to a stand-alone GPA/Rezone like the Proposed Project, as it states, “Require lot sizes, except through planned development, lot area averaging or specific plan projects, to be no smaller than 50 percent of the density indicated on the Land Use Map, without clustering or lot averaging, for Semi-Rural 4 and higher densities, or four acres for Semi-Rural 10 and lower densities.” The zoning minimum lot sizes associated with the Proposed Project would be consistent with this policy. Therefore, there are no policy inconsistency issues with the Bonsall Community Plan.

Borrego Springs Community Plan

The DS8 and DS24 Analysis Areas are within the Borrego Springs Community Planning Area, which is part of the Desert Subregion.

The DS8 Analysis Area is comprised of three parcels totaling approximately 169 acres within the Village area of Borrego Springs. The proposed change from VR-2 to VR-4.3 is estimated to result in an increase of 389 potential dwelling units (estimated 337 potential units under the current designations and 726 under the Proposed Project Map). The DS24 Analysis Area is comprised of two parcels covering approximately 169 acres south of the Village and in close proximity to state park lands. The proposed change from SR-10 to SR-1 is estimated to result in an increase of 153 potential dwelling units (estimated 16 potential units under the current designations and 169 under the Proposed Project Map).

A few policies of the Community Plan have been considered for the Proposed Project proposals because they are applicable to a stand-alone GPA/Rezone and have a purpose that is related to one of these Analysis Area proposals or both of them.

The DS24 proposal would constitute a substantial increase in density on a site of native desert habitat which includes a dense concentration of ocotillos and other plant species characteristic of Sonoran creosote bush scrub. Community Plan policy LU-2.1.1 discourages development on undisturbed and substantially undisturbed desert native habitat lands outside the Village Core. Policy LU-1.1.1 follows along these guidelines by ensuring these types of undisturbed desert native habitat lands are conserved to the greatest extent possible. In the proposed change from SR-10 to SR-1, the DS24 Analysis Area proposal would remove the Conservation Subdivision requirements from the site and allow a density ten times what is allowed now. **Therefore, the DS24 Proposed Project Map has been determined to be inconsistent with Borrego Springs Community Plan policies LU-1.1.1 and LU-2.1.1. The 2011 PEIR did not specifically call out community plan policies that were relied upon to partially reduce environmental impacts. As such, a potentially significant impact is not noted in consideration of CEQA Guidelines Appendix G. However, these two policies cover similar issues to those discussed in General Plan Policies LU-2.3 and LU-6.2, where significant impacts (from policy inconsistency) and corresponding mitigation measures are noted for DS24 in the impact analysis for County General Plan consistency in this Section.**

Crest-Dehesa Community Plan

The CD14 Analysis Area is within the Crest-Dehesa Community Planning Area. The Analysis Area is comprised of 10 parcels covering approximately 101 acres of rolling topography in the western portion of the planning area, just outside the City of El Cajon. The proposed change from a combination of SR-1 and RL-20 to SR-2 (substantially more acreage of SR-2 than the current SR-1 area) and RL-20 is estimated to result in an increase of seven potential dwelling units (estimated 10 potential units under the current designations and 17 under the Proposed Project Map).

The policies of the Community Plan are generally focused on considerations in review of development design, including location of uses and development pads. A couple policies could be considered in light of the CD14 stand-alone GPA proposal, even though they are more geared toward review of development. Policy LU-1.1.2 restricts development with residential clustering from using lots of less than one acre net, and CD14 does not include proposals for zoning minimum lot sizes of less than one acre. Policy COS-1.1.1 notes, "Preserve the integrity and continued function of natural habitat within the Subregion by maximizing the amount of areas left in natural coastal sage scrub cover to ensure its long-term value as a vegetation community and wildlife habitat." Much of the Analysis Area contains coastal sage scrub and the area proposed to change to SR-2 is consolidated in the western portion, which is closest to the existing neighborhood and already contains disturbed areas for roads and an existing single-family residence. An alternative map has been developed and analyzed (see Chapter 4) which would reduce the area proposed for SR-2. While the alternative map would demonstrate a greater level of consistency with Community Plan Policy COS-1.1.1, the Proposed Project Map for CD14 does not present a clear inconsistency with either of these two policies that could be applicable to a stand-alone GPA/Rezone, under this programmatic review approach. Therefore, there are no policy inconsistency issues with the Crest-Dehesa Community Plan.

Fallbrook Community Plan

The FB2+, FB17, FB19+, and FB21+ Analysis Areas are within the Fallbrook Community Planning Area. The FB2+ Analysis Area is comprised of 23 parcels over 491 acres in the southeastern portion of the Fallbrook CPA. The proposed change from a combination of RL-20 and RL-40 to a combination of SR-4 and RL-20 is estimated to result in an increase of 16 potential dwelling units (estimated 26 potential units under the current designations and 42 under the Proposed Project Map).

The FB17 Analysis Area is comprised of six parcels totaling approximately 107 acres along Reche Road near I-15. The proposed change from SR-2 to a combination of SR-1 and SR-2 is estimated to result in an increase of 33 potential dwelling units (estimated 49 potential units under the current designations and 82 under the Proposed Project Map).

The FB19+ Analysis Area is comprised of 61 parcels totaling approximately 579 acres in the northeastern portion of the CPA, east of I-15. The proposed change from RL-20 to SR-10 is estimated to result in an increase of one potential dwelling unit (estimated 61 potential units under the current designations and 62 under the Proposed Project Map).

The FB21+ Analysis Area is comprised of 52 parcels totaling approximately 679 acres on the northern edge of the CPA, adjacent to Riverside County. The proposed change from RL-20 to SR-10 is estimated to result in an increase of seven potential dwelling units (estimated 61 potential units under the current designations and 68 under the Proposed Project Map).

There are a few policies of the Community Plan that could be applied to a stand-alone GPA/Rezone. Policy LU 2.1.6 calls for minimum lot sizes to be no less than a half-acre in the Semi-Rural Regional Category and one acre in the Rural Lands Regional Category. None of the proposed minimum lot sizes would be in violation of this policy. Policy 2.1.4 encourages country estates which combine agricultural and residential uses. See the reviews of General Plan Policy LU-7.1 in this section for a discussion of the proposals in relation to preserving agriculture. Of the Fallbrook Analysis Areas, only FB17 includes a proposed designation with a density greater than SR-2, which research shows can support continued agricultural operations in the County, as discussed in the General Plan policy review. Within the FB17 Analysis Area, a subdivision could be designed under the proposed designation that would maintain agricultural operations in portions of the site. Policy LU 2.4.7 seeks to limit development of steep slopes to agriculture and very low density residential and allowing clustering in flatter areas only. Per the County's Resource Protection Ordinance (RPO) requirements and considering the percentage of steep slopes in the Fallbrook Analysis Areas, each property in these areas would be limited to 10% development footprint encroachment into steep slopes, so there are no policy inconsistency issues at this stage. Policy COS-1.2.1 encourages floodplains and natural stream courses to be preserved in permanent open space and uses limited to recreational or light agricultural uses. Though this policy is geared toward review of development projects, at this stand-alone GPA/Rezone level, a policy review can consider changes in zoning use regulations within these areas. None of the Fallbrook Analysis Areas include proposals for changes in zoning use regulations, so the allowed uses would not change. Therefore, there are no policy inconsistency issues with the Fallbrook Community Plan.

Mountain Empire Subregional Plan and Campo/Lake Morena Community Plan

The ME26 and ME30A Analysis Areas are within the Campo/Lake Morena Community Planning Area, within the Mountain Empire Subregion. These Analysis Areas are subject to the goals and policies of the Campo/Lake Morena Community Plan and the Mountain Empire Subregional Plan.

The ME26 Analysis Area is comprised of 15 parcels totaling approximately 678 acres just east of the Lake Morena Village. The proposed change from RL-20 to SR-10 is estimated to result in an increase of 26 potential dwelling units (estimated 33 potential units under the current designations and 59 under the Proposed Project Map).

The ME30A Analysis Area is comprised of one parcel totaling approximately 262 acres in the southern portion of CPA, bisected by SR-94. The proposed change from RL-40 to a combination of SR-4 and RL-40 is estimated to result in an increase of 29 potential dwelling units.

The Mountain Empire Subregional Plan and Campo/Lake Morena Community Plan include some policies that would be applicable to a stand-alone GPA/Rezone if Village densities or commercial uses were proposed, and/or if incompatible uses were planned adjacent to commercial areas. Neither of the Analysis Areas proposes Village densities, commercial uses, or changing densities in areas adjacent to commercial. Beyond requirements for Village densities and commercial uses/buffering, Policy LU 5.1.1 of the Campo/Lake Morena Community Plan discourages Rural Village lot sizes (for clustering) outside of Rural Villages. No changes in zoning minimum lot sizes are proposed for these Analysis Areas and further lot size limitations are imposed by the County's Groundwater Ordinance, limiting lot sizes within the ME26 Analysis Area to 8 acres and within the ME30A Analysis Area to 5 acres (based on groundwater dependency and average annual precipitation in the two areas). Therefore, there

are no policy inconsistency issues with the Mountain Empire Subregional Plan or the Campo/Lake Morena Community Plan.

North County Metro Subregional Plan

The NC3A, NC18A, NC22, NC37, and NC38+ Analysis Areas are within the North County Metro Subregional Planning Area. In addition, Subarea 5 and the southern portion of Subarea 4 of the former CGSP area are within North County Metro. North County Metro includes the Subregional Group Areas (also referred to as Community Planning Areas) of Twin Oaks and Hidden Meadows. Though these areas are represented by Community Sponsor Groups (CSGs), they do not currently have their own separate Community Plans, outside of the North County Metro Subregional Plan. NC3A and the noted portions of the former CGSP area are within Hidden Meadows; NC22, NC37, and NC38+ are within Twin Oaks; and NC18A is in an unrepresented portion of North County Metro.

The NC3A Analysis Area is comprised of 48 parcels totaling approximately 1,015 acres in the southern portion of Hidden Meadows. The proposed change from RL-20 to SR-10 is estimated to result in an increase of 11 potential dwelling units (estimated 66 potential units under the current designations and 77 under the Proposed Project Map).

The NC18A Analysis Area is comprised of five parcels totaling approximately 93 acres located within an unincorporated “island” surrounded by the City of Escondido on the north and the City of San Diego on the south. The proposed change from SR-2 to a combination of SR-1 and SR-2 is estimated to result in an increase of 34 potential dwelling units (estimated 43 potential units under the current designations and 77 under the Proposed Project Map).

The NC22 Analysis Area is comprised of 17 parcels totaling approximately 154 acres located in the southern end of Twin Oaks (within the North County Metro Subregion). The proposed change from SR-10 to a combination of SR-1 and SR-10 is estimated to result in an increase of 52 potential dwelling units (estimated 21 potential units under the current designations and 73 under the Proposed Project Map).

The NC37 Analysis Area is comprised of 15 parcels totaling approximately 158 acres located in the northern portion of Twin Oaks (within the North County Metro Subregion), adjacent to the City of San Marcos. The proposed change from SR-10 to SR-4 is estimated to result in an increase of 12 potential dwelling units (estimated 19 potential units under the current designations and 31 under the Proposed Project Map).

The NC38+ Analysis Area is comprised of eight parcels totaling approximately 77 acres located in the southeastern portion of Twin Oaks, adjacent to the City of San Marcos. The proposed change from SR-2 to SR-1 is estimated to result in an increase of 38 potential dwelling units (estimated 37 potential units under the current designations and 75 under the Proposed Project Map).

Subareas 4 and 5 of the former CGSP area are proposed to change from Specific Plan Area to SR-2. This is estimated to increase potential dwelling units in Subarea 5 by 5. The portion of Subarea 4 that is in North County Metro is being analyzed together with the remainder of Subarea 4 and Subarea 3, due to common ownership. The change to SR-2 for that common ownership area is estimated to increase potential dwelling units by 17.

There are two policies of the North County Metro Subregional Plan that are considered during the review of a stand-alone GPA/Rezone. Land Use Policy 7 prohibits new subdivisions exceeding the one dwelling unit per acre density within the City of Escondido Sphere of

Influence. Only the NC18A Analysis Area is within the Escondido Sphere of Influence and the proposal would not exceed the one dwelling unit per acre density. Land Use Policy 8 calls for designating the Twin Oaks Valley outside the City of San Marcos Sphere of Influence under the Semi-Rural and Rural Lands Regional Categories. NC22, NC37, and NC38+ are within the Twin Oaks Valley, but only part of NC22 and part of NC37 are outside of the San Marcos Sphere of Influence. Both of those areas are proposed for Semi-Rural designations. Therefore, there are no policy inconsistency issues with the North County Metro Subregional Plan.

Pala-Pauma Subregional Plan

The PP30 Analysis Area is within the Pala-Pauma Subregional Planning Area. The Analysis Area is comprised of eleven parcels totaling approximately 518 acres located in the southern portion of the Pala-Pauma CPA, adjacent to SR-76. The proposed change from RL-40 to a combination of SR-2 and RL-40 is estimated to result in an increase of 122 potential dwelling units (estimated 12 potential units under the current designations and 134 under the Proposed Project Map).

There are a few policies of the Subregional Plan to be considered for review of a stand-alone GPA/Rezone. Land Use Policy 4 and Conservation Policy 1 both call for applying low density plan designations and zoning to Resource Conservation Areas (RCAs). Conservation Policy 1 refers to applying 'very low density' plan designations and zoning to RCAs. The Analysis Area is within the San Luis Rey River RCA of the Subregional Plan, with the San Luis Rey River running through the area proposed to remain RL-40. Potrero Creek and Yuima Creek (tributaries to the San Luis Rey River) run through the area proposed to change to SR-2, with sensitive riparian habitats and upland habitats surrounding these areas. The SR-2 designation proposed in the eastern portion of the Analysis Area would not be considered a 'very low density' plan designation for this RCA. **Therefore, the PP30 Proposed Project Map has been determined to be inconsistent with Pala-Pauma Subregional Plan policies Land Use 4 and Conservation 1. The 2011 PEIR did not specifically call out community plan policies that were relied upon to partially reduce environmental impacts. As such, a potentially significant impact is not noted in consideration of CEQA Guidelines Appendix G. However, these two policies cover similar issues to those discussed in General Plan Policy LU-6.2, where significant impacts (from policy inconsistency) and corresponding mitigation measures are noted for PP30 in the impact analysis for County General Plan consistency in this Section.**

Land Use Policy 5 of the Subregional Plan states, "Designate existing agricultural areas under the Rural Lands Regional Category, when consistent with parcel sizes, to limit the intrusion of incompatible land uses into existing agricultural areas." As shown in the Proposed Project Map, the western portion within the San Luis Rey River floodplain (and portions south of the floodplain) would remain RL-40 under the proposal. The eastern portion proposed to change to SR-2 contains some agricultural uses and varying parcel sizes, with a few under 20 acres and a few over 20 acres. The Proposed Project Map for PP30 has been determined to be inconsistent with this policy; however, there is some room for discretion by decision-makers due to the varying parcel sizes and location of agricultural uses in the large Analysis Area. In addition, the 2011 PEIR did not specifically call out community plan policies that were relied upon to partially reduce environmental impacts.

San Dieguito Community Plan

The SD15 Analysis Area is within the San Dieguito Community Planning Area. The Analysis Area is comprised of one 69-acre parcel in the northwestern portion of the San Dieguito CPA,

adjacent to portions of the City of San Marcos. The proposed change from SR-1 to a combination of General Commercial (with mixed use zoning at 2 dwelling units per acre), VR-10.9, and SR-0.5 is estimated to result in an increase of 301 potential dwelling units (estimated 61 potential units under the current designations and 362 under the Proposed Project Map).

There are a few policies of the San Dieguito Community Plan that apply to stand-alone GPAs/Rezoned. Land Use Policy 1 calls for prohibiting 'leap frog' development, as it will unnecessarily increase the costs of providing public services and facilities. This Policy and the overall Community Plan do not provide a definition of 'leap frog' as it pertains to this policy. See the review of General Plan Policy LU-1.2 for SD15 in the County General Plan consistency review within this Section for a discussion of the 'leap frog' policy, which provides a definition of the term as it pertains to this Policy. Conservation Policy 2 looks to ensure that land adjacent to recreation areas, natural preserves, and agricultural areas have the appropriate, compatible land use designation. The entire Analysis Area is within a PAMA area for the draft North County MSCP (see Biology sections 2.4.2 and 2.4.3.4) and potential wildlife corridors are abundant within the currently vacant property. Adjacent to the west, south and southeast are open space preserves covering over 1,000 acres, in addition to areas of low density SR-10 nearby. Most of the site consists of coastal sage scrub and southern mixed chaparral, with a riparian area starting at a storm drain outfall near the southeast boundary. With the location of connected open space, steep slopes, and sensitive habitat in the southern end of the PSR, that area should, in accordance with this policy, have a designation/density that reflects the sensitive habitats in that area and the need for maintaining a wildlife corridor. As discussed previously, the Proposed Project map includes SR-0.5 for the southern end. An alternative map has been developed and analyzed (see Chapter 4) that would place SR-10 on the southern 30 acres of the Analysis Area, thus requiring a Conservation Subdivision design in that portion. In the review of this policy, consideration is given to the fact that the Analysis Area is just one parcel under one ownership. Under the General Plan (Policy LU-1.8, applicable to development projects), transfer of density within a parcel with multiple designations is allowed with a Major Use Permit or Specific Plan. Therefore, the area proposed for SR-0.5 in the Proposed Project map could be preserved, with the potential units transferred into the northern portion. If the PAMA designation is approved for this site, this preservation of a viable wildlife corridor in the south would likely be required, regardless of designation. While the alternative map would require a Conservation Subdivision process on the southern 30 acres and would demonstrate a greater level of consistency with Conservation Policy 2, a clear inconsistency under the Proposed Project map has not been found, due to the likelihood of preservation in the southern portion, as discussed above.

Commercial Policies 10 and 11 consider underutilized commercial areas in the CPA along with commercial uses in adjacent cities when determining the need for additional commercial uses in the community. Based on available information, there are only four properties in San Dieguito that are designated/zoned for commercial that are undeveloped, and three of those are currently going through the permit review process for commercial development. There are a couple nearby commercial nodes within the City of San Marcos, within the San Elijo Hills development to the east, and in the Melrose Drive/Rancho Santa Fe Road area to the northwest. Considering the growing population within San Marcos in this area and the four-lane road with sidewalks and bike lanes connecting these populations to the Analysis Area, adding commercial area to the property would not be inconsistent with this Policy.

Valley Center Community Plan

The VC7+, VC51, VC57+, and VC67 Analysis Areas are within the Valley Center Community Planning Area. In addition, within the former CGSP area, Subareas 2, 3 and the northern portion of Subarea 4 are within Valley Center.

The VC7+ Analysis Area is comprised of 233 parcels totaling approximately 1,465 acres located in the western portion of Valley Center, just east of I-15. The proposed change from SR-4 to SR-2 is estimated to result in an increase of 253 potential dwelling units (estimated 366 potential units under the current designations and 619 under the Proposed Project Map).

The VC51 Analysis Area is comprised of 14 parcels totaling approximately 166 acres located in the northwestern portion of Valley Center. The proposed change from RL-20 to SR-4 is estimated to result in an increase of 13 potential dwelling units (estimated 14 potential units under the current designations and 27 under the Proposed Project Map).

The VC57+ Analysis Area is comprised of 217 parcels totaling approximately 1,337 acres located in the eastern portion of Valley Center, just east of the northern Village. The proposed change from SR-4 to SR-2 is estimated to result in an increase of 231 potential dwelling units (estimated 374 potential units under the current designations and 605 under the Proposed Project Map).

The VC67 Analysis Area is comprised of 6 parcels totaling approximately 13 acres located just south of the northern Village of Valley Center. The proposed change is from SR-2 to Medium Impact Industrial.

Subareas 2, 3 and 4 of the former CGSP area are proposed to change from Specific Plan Area to SR-2 in Subareas 3 and 4, and to SR-4 in Subarea 2. This is estimated to increase potential dwelling units in Subarea 2 by 2. The portion of Subarea 4 that is in Valley Center is being analyzed together with the remainder of Subarea 4 and Subarea 3, due to common ownership. The change to SR-2 for that common ownership area is estimated to increase potential dwelling units by 17.

As discussed in Chapter 1 and throughout the SEIR, the Proposed Project includes a revision to Residential Policy 8 of the Valley Center Community Plan, to allow additional clustering capabilities within the SR-2 and SR-4 designations. The sewer service requirement of the policy would not change, which greatly limits the scope of the proposed revision, as discussed earlier in this Section. The proposed policy revision could apply to later development projects within the former CGSP Subareas of Valley Center if those areas are approved for SR-2 and/or SR-4 designations. The additional clustering capability would provide greater assurance of reaching density potential while avoiding the most sensitive habitat areas and floodplain in this area.

There are a few policies of the Community Plan that can be applied to stand-alone GPAs/Rezones. None of the Analysis Areas in Valley Center propose commercial designations and only VC67 proposes an industrial designation. VC67 is discussed separately below for consistency with the industrial policies of the Community. Residential Policy 2 requires, "...preservation of unique features such as oak woodlands, riparian habitats, steep slopes, archaeological sites, and ecologically sensitive areas." Though this policy is more geared toward development projects, it can be considered with regard to proposed density feasibility and avoidance of these resources. Analysis Areas VC7+, VC51, and VC57+ are large enough in comparison to additional potential units and acreage of these sensitive habitats, to be able make a finding of consistency, considering that it is anticipated that future projects could be designed to avoid these resources without rendering the proposed densities infeasible. While

the VC67 Analysis Area is only approximately 13 acres, the remaining riparian vegetation is limited to a narrow strip along the southern end of each of the properties. Agricultural Policy 1 states, "Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center." Most of the CPA contains designations and zones that would facilitate agricultural uses, along with combined residential and agricultural uses. As discussed in the review of General Plan Policy LU-7.1 in this Section, the SR-2 designation proposed in Analysis Areas VC7+ and VC57+, and the SR-4 designation proposed in Analysis Area VC51 would be anticipated to support continued agricultural uses, based on research of the County's Guidelines for Determining Significance, the 2011 PEIR, and other County documents. Given the small size of Analysis Area VC67, the proposed change for that Analysis Area would not be anticipated to substantially impact the availability of properties designated/zoned for agriculture. Thus, a consistency finding can be made.

The Community Plan includes a group of industrial policies, with a couple that apply to a stand-alone GPA/Rezone. The VC67 Proposed Project Map includes a proposed change from SR-2 to Medium Impact Industrial (I-2) for a group of properties almost completely within the floodway. Industrial Policy 3 requires that industrial development adhere to floodplain preservation criteria outlined in the Design Guidelines for Valley Center. The Design Guidelines require that the floodway be kept as close as possible to its natural condition and prohibits structures, parking areas, and other major improvements. These Guidelines also refer to the Resource Protection Ordinance, which limits uses in floodways to agricultural, recreational, or other such low intensity uses that don't harm the environmental values of the floodway area. This language is also consistent with General Plan Policy S-10.1 discussed in the County General Plan review in this Section. **Therefore, the proposed change from SR-2 to Medium Impact Industrial (I-2) in the Proposed Project Map has been determined to be inconsistent with Industrial Policy 3. The 2011 PEIR did not specifically call out community plan policies that were relied upon to partially reduce environmental impacts. As such, a potentially significant impact is not noted in consideration of CEQA Guidelines Appendix G. However, this policy covers similar issues to those discussed in the impact analysis for General Plan Policy S-10.1, where significant impacts (from policy inconsistency) and corresponding mitigation measures are noted for the VC67 Proposed Project Map in the impact analysis for County General Plan consistency in this Section.** Industrial Policy 5 of the Community Plan specifically references the area of the VC67 Analysis Area, following up on the Issue statement in this Section of the Community Plan, calling for this area to be re-designated to Industrial if new floodway mapping is completed and shows this area to be outside the floodway. New floodway mapping has not been undertaken since the adoption of this Industrial Policy 5 in 2011.

Zoning Ordinance

As mandated by the State, the County Zoning Ordinance must be consistent with the adopted General Plan. Property specific zoning changes are included in those cases where they are necessary for consistency with the Proposed Project General Plan land use designations.

Specific Plans

While there are existing Specific Plan Area General Plan designations and zoning (S88) in the area of the former Champagne Gardens Specific Plan, as discussed previously, that Specific Plan expired in 2007 and there is no adopted Specific Plan in this area. In addition, there are no adopted specific plans within the PSR Analysis Areas. Future specific plans would be required

to comply with the existing General Plan and other associated supplemental plans. Therefore, the Proposed Project is not inconsistent with any existing specific plans.

Summary

In summary, PSR Analysis Areas BO18+, FB2+, FB17, FB19+, FB21+, ME26, NC37, VC7+, VC51, and PP30 would conflict with the adopted San Diego Forward: The Regional Plan. The growth associated with the Proposed Project would not be consistent with the RAQS. In addition, PSR Analysis Areas DS8, DS24, FB17, FB21+, ME30A, NC18A, NC22, NC38+, and VC67 were found to be inconsistent with one or more General Plan policies that apply to stand-alone GPAs/Rezoned and were relied upon in the 2011 PEIR to reduce impacts; *and* it has been determined that these particular noted inconsistencies would result in potentially significant impacts. **Therefore, the Proposed Project would result in potentially significant impacts associated with land use plans, policies, and regulations (Impact LU-1).**

2.9.3.3 Issue 3: Conflicts with Habitat Conservation Plans and Natural Community Conservation Plans

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines, the Proposed Project would be considered to have a significant impact if it would conflict with any applicable HCP or NCCP. In San Diego County the appropriate plans would be the South County MSCP, and for all other areas of the county, the Southern California Coastal Sage Scrub NCCP.

Impact Analysis

A discussion of the Proposed Project's compliance with applicable regional HCPs and NCCPs is included in Section 2.4.3.6 of this SEIR and is hereby incorporated by reference. As discussed in that section, the Proposed Project would not conflict with applicable HCPs and NCCPs, as regulatory processes are in place to assure implementation of and conformance with these plans. Therefore, the Proposed Project would not conflict with applicable HCPs and NCCPs.

2.9.4 Cumulative Impacts

The geographic scope of the cumulative impact analysis for land use Issue 1 (Physical Division of an Established Community) are the CPAs and Subregions that contain the PSR Analysis Areas and the former CGSP Area. The geographic scope of the cumulative impact analysis for land use Issue 2 (Conflicts with Land Use Plans, Policies, and Regulations) and Issue 3 (Conflicts with HCP or NCCP) is the San Diego region, including jurisdictions and special districts within and adjacent to the unincorporated County.

2.9.4.1 Issue 1: Physical Division of an Established Community

The geographic scope for the cumulative analysis is limited to the CPAs and Subregions of Bonsall, Crest-Dehesa, Desert, Fallbrook, Mountain Empire, North County Metro, Pala-Pauma, San Dieguito, and Valley Center. Cumulative projects would have the potential to result in a cumulative impact if they include the construction of new or widened roadways, airports, railroad tracks, open space areas, large developments or other features that would have the potential to physically divide an established community. However, it is not anticipated that any of the cumulative projects propose major infrastructure features that would divide any established

community. Therefore, cumulative projects are not anticipated to result in a significant cumulative impact associated with the physical division of an established community.

As discussed above in Section 2.9.3.1 for Issue 1, the Proposed Project land uses would not result in the physical division of an established community, specifically the CPAs and Subregions where they are located. In addition, the Proposed Project does not include changing Mobility Element classifications to widen major public roads, the development of future railroads or airports, or the designation of large open space areas. Therefore, the Proposed Project would not contribute to a significant cumulative impact.

2.9.4.2 Issue 2: Conflicts with Land Use Plans, Policies, and Regulations

The cumulative projects in the San Diego region would have the potential to result in a cumulative impact if they would, in combination, conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Although upon initial analysis, some cumulative projects might not be consistent with some goals or policies of certain land use plans (e.g. consistency with the RAQS), many of these plans are regularly updated and account for projects that are approved. Therefore, cumulative projects shown in Tables 1-10 to 1-14 of this SEIR are anticipated to result in a significant cumulative impact by conflicting with land use plans, policies, and regulations, such as the RAQS, until those plans are updated post project approval.

As discussed above in Section 2.9.3.2 for Issue 2, the Proposed Project would conflict with the adopted San Diego Forward: The Regional Plan and the RAQS and result in a considerable contribution to cumulative impacts. In addition, PSR Analysis Areas DS8, DS24, FB17, FB21+, ME30A, NC18A, NC22, NC38+, SD15, and VC67 were found to be inconsistent with one or more of the General Plan policies that apply to stand-alone GPAs/Rezonses that were relied upon in the 2011 PEIR to reduce impacts; however, it has been determined that these particular noted inconsistencies would result in potentially significant impacts. These impacts would also be cumulatively considerable. **Therefore, the Proposed Project would contribute to a potentially significant cumulative impact from conflicting with land use plans, policies, or regulations (Impact LU-2).**

2.9.4.3 Issue 3: Conflicts with Habitat Conservation Plans and Natural Community Conservation Plans

As discussed in Sections 2.4.3.6 and 2.4.4.6 of this SEIR, the Proposed Project would result in less than significant impacts associated with conflicts with HCPs and NCCPs. Therefore, the Proposed Project would not contribute to a significant cumulative impact regarding potential conflicts with applicable HCPs and NCCPs.

2.9.5 Mitigation

2.9.5.1 Issue 1: Physical Division of an Established Community

The Proposed Project would not result in significant direct and cumulative impacts related to the physical division of an established community; therefore, mitigation is not necessary. However, the adopted General Plan policies H-2.1, LU-1.4, LU-2.1, LU-2.3, LU-2.5, LU-4.1, LU-4.2, LU-

4.3, LU-4.4, LU-11.2, LU-12.4, and M-10.6 listed in Section 2.1.5.3 for Issue 3 regarding Visual Character or Quality would apply to this issue and are incorporated here by reference.

2.9.5.2 Issue 2: Conflicts with Land Use Plans, Policies, and Regulations

Implementation of the following adopted General Plan policies and new mitigation measures M-Air-1.1 and M-Air-1.2 listed in Section 2.3.5.1 for Issue 1 would reduce **Impact LU-1** and **Impact LU-2** but **not to a level below significant; therefore, the impacts would remain significant and unavoidable**.

Adopted General Plan Policies

Policy 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.

Policy 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.

Policy LU-1.3: Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

Policy 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.

Policy LU-4.1: Regional Planning. Participate in regional planning to ensure that the unique communities, assets, and challenges of the unincorporated lands are appropriately addressed with the implementation of the planning principles and land use requirements, including the provisions of SB 375.

Policy LU-5.3: Rural Land Preservation. Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations.

Mitigation Measures

Implementation of mitigation measures M-Air-1.1 and M-Air-1.2 as listed in Section 2.3.5.1 for Issue 1 of this SEIR would reduce **Impact LU-1** and **Impact LU-2** and are incorporated here by reference.

Implementation of the following adopted 2011 PEIR mitigation measures related to General Plan policy inconsistency impacts would also reduce **Impact LU-1** and **Impact LU-2** and are incorporated here by reference.

To reduce impacts associated with DS24 being inconsistent with Policy LU-2.3 that resulted in a significant impact determination:

2011 PEIR mitigation measures Aes-1.1 through Aes-1.10, Aes-3.1, and Aes-3.2 incorporated in Section 2.1.4.3 (Aesthetics – Visual Character or Quality); would reduce **Impact LU-1 (GP Policy LU-2.3-DS24)**.

To reduce impacts associated with FB21+ being inconsistent with Policy LU-2.5 that resulted in a significant impact determination:

2011 PEIR mitigation measures Aes-1.1 through Aes-1.10, Aes-3.1, and Aes-3.2 incorporated in Section 2.1.4.3 (Aesthetics – Visual Character or Quality); would reduce **Impact LU-1 (GP Policy LU-2.5-FB21+)**.

To reduce impacts associated with DS8, DS24, FB17, NC22, and PP30 being inconsistent with Policy LU-6.2 that resulted in significant impact determinations:

2011 PEIR mitigation measures Aes-1.1 through Aes-1.11 incorporated in Section 2.1.4.1 (Aesthetics – Scenic Vistas); Aes-3.1 and Aes-3.2 incorporated in Section 2.1.4.2 (Aesthetics – Scenic Resources); and Bio-1.1 through Bio-1.7 incorporated in Section 2.4.5.1 (Biological Resources – Special Status Plant and Wildlife Species) would reduce **Impacts LU-1 (GP Policy LU-6.2-DS8), LU-1 (GP Policy LU-6.2-D24), LU-1 (GP Policy LU-6.2-FB17), LU-1 (GP Policy LU-6.2-NC22), and LU-1 (GP Policy LU-6.2-PP30)**.

To reduce impacts associated with FB21+ being inconsistent with Policy LU-6.11 that resulted in a significant impact determination:

2011 PEIR mitigation measures Haz-4.1 through Haz-4.4 incorporated in Section 2.7.5.8 (Hazards and Hazardous Materials – Wildland Fires); and Pub-1.1 through Pub-1.9 incorporated in Section 2.13.5.1 (Public Services – Fire Protection Services) would reduce **Impact LU-1 (GP Policy LU-6.11-FB21+)**.

To reduce impacts associated with FB17, NC18A, and NC38+ being inconsistent with Policy LU-7.1 that resulted in significant impact determinations:

2011 PEIR mitigation measures Agr-1.1 through Agr-1.5 incorporated in Sections 2.2.5.1 (Agricultural Resources – Direct Conversion of Agricultural Resources) and 2.2.5.3 (Agricultural Resources – Indirect Conversion of Agricultural Resources); and Agr-2.1 incorporated in Section 2.2.5.2 (Agricultural Resources – Land Use Conflicts) would reduce **Impacts LU-1 (GP Policy LU-7.1-FB17), LU-1 (GP Policy LU-7.1-NC18A), and LU-1 (GP Policy LU-7.1-NC38+)**.

To reduce impacts associated with ME30A and PP30 being inconsistent with Policy LU-8.1 that resulted in significant impact determinations:

2011 PEIR mitigation measures Hyd-2.1 through Hyd-2.5 incorporated in Section 2.8.5.2 (Hydrology and Water Quality – Groundwater Supplies and Recharge); and USS-4.1 through USS-4.7 incorporated in Section 2.16.5.4 (Utilities and Service Systems – Adequate Water Supplies) would reduce **Impacts LU-1 (GP Policy LU-8.1-ME30A) and LU-1 (GP Policy LU-8.1-PP30)**.

To reduce impacts associated with FB21+ being inconsistent with Policy COS-14.1 that resulted in a significant impact determination:

2011 PEIR mitigation measures M-Air-1.2 and Air-2.5 through Air-2.9 (Air Quality – Air Quality Violations; and Air Quality – Nonattainment Criteria Pollutants) incorporated in Sections 2.3.5.2 and 2.3.5.3 would reduce **Impact LU-1 (GP Policy COS-14.1-FB21+)**.

To reduce impacts associated with FB21+ and VC67 being inconsistent with Policy S-1.1 that resulted in significant impact determinations:

2011 PEIR mitigation measures Haz-4.1 through Haz-4.4 incorporated in Section 2.7.5.8 (Hazards and Hazardous Materials – Wildland Fires); and Pub-1.1 through Pub-1.9 incorporated in Section 2.13.5.1 (Public Services – Fire Protection Services) would reduce **Impact LU-1 (GP Policy S-1.1-FB21+)**.

To reduce impacts associated with VC67 being inconsistent with Policies S-9.2, S-9.5, and S-10.1 that resulted in a significant impact determination:

2011 PEIR mitigation measures Hyd-1.1 through Hyd-1.5, Hyd-2.5, Hyd-4.1 through Hyd-4.3, Hyd-6.1, Hyd-8.1, and Hyd-8.2 incorporated in Sections 2.8.5.4, 2.8.5.5, 2.8.5.7, and 2.8.5.8 (Hydrology and Water Quality – Flooding; Hydrology and Water Quality – Exceeding Capacity of Stormwater Systems; and Hydrology and Water Quality – Impeding or Redirecting Flood Flows) would reduce **Impact LU-1 (GP Policy S-9.2-VC67), Impact LU-1 (GP Policy S-9.5-VC67), and Impact LU-1 (GP Policy S-10.1-VC67)**.

2.9.5.3 Issue 3: Conflicts with HCP or NCCP

Implementation of the Proposed Project would have less than significant direct and cumulative impacts regarding potential conflicts with applicable HCPs and NCCPs; therefore, no mitigation measures are required.

2.9.6 Conclusion

The discussion below provides a synopsis of the conclusion reached in each of the impact analyses, and the level of impact that would occur after mitigation measures are implemented, if applicable.

2.9.6.1 Issue 1: Physical Division of an Established Community

Implementation of the Proposed Project would have a less than significant impact associated with the physical division of an established community; therefore, a significant direct impact would not occur. Additionally, the Proposed Project would not contribute to a significant cumulative impact associated with the physical division of an established community.

2.9.6.2 Issue 2: Conflicts with Land Use Plans, Policies, and Regulations

The Proposed Project would have the potential to conflict with land use plans, policies, and regulations; specifically, with the San Diego Forward: The Regional Plan, the RAQS, and adopted General Plan policies (**Impact LU-1**). Implementation of the adopted General Plan policies and mitigation measures identified above in Section 2.9.5.2 for Issue 2, would reduce

the impact but not to a level below significant. Additionally, the Proposed Project would contribute to a potentially significant cumulative impact (**Impact LU-2**) and the implementation of the mitigation measures would not reduce the cumulative impact to less than significant. **Therefore, direct and cumulative impacts LU-1 and LU-2 would remain significant and unavoidable.**

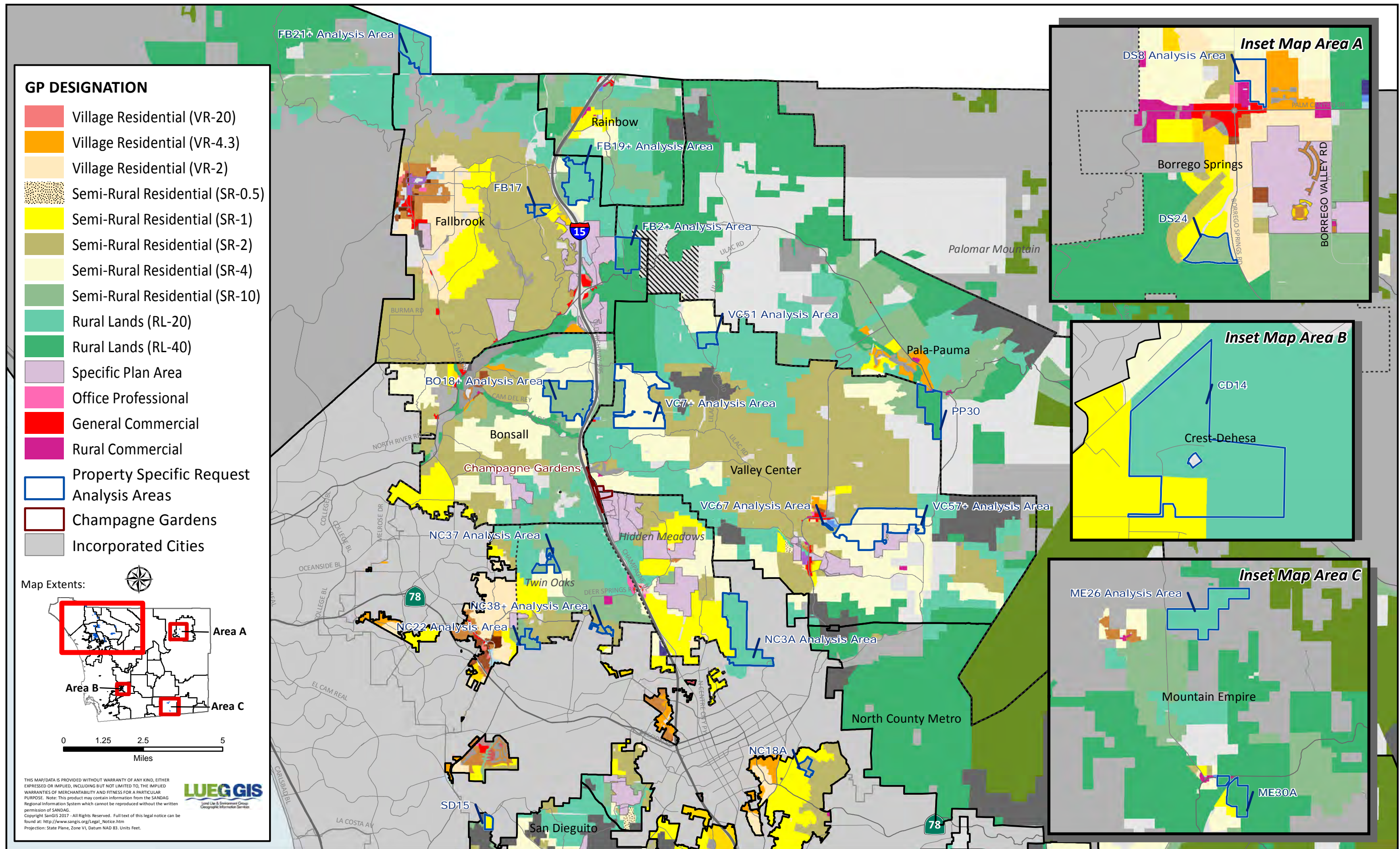
2.9.6.3 Issue 3: Conflicts with HCP or NCCP

Implementation of the Proposed Project would not conflict with applicable HCPs and NCCPs as regulatory processes are in place to assure implementation of and conformance with these plans. Additionally, the Proposed Project would not contribute to any potentially significant cumulative impact.

Table 2.9-1 Proposed Sphere of Influence Land Use Differences

City	CPA within SOI	PSR Analysis Area	City Designation	Proposed Project Designation
San Marcos	San Dieguito	SD15	SPA (LI/C/OS)	C-1 (0.45 FAR) with mixed use zoning at 2DU/AC), SR-0.5 (1DU/0.5,1,2AC), VR-10.9 (10.9DU/AC)
	North County	NC22	SPA (a total of 125 acres of County land to proposed be annexed into City of San Marcos; proposes 189 dwelling units)	SR1/SR10
			Barham/Discovery Community SP (Mixed Use 4, LDR & LMDR (residential not to exceed 346 DU, and community park at a minimum of 75 acres and preserving OS).	SR-1 (1 du/1, 2, 4 ac) & SR-10 (1du/10, 20 ac)
		NC37	Agriculture/Residential (0.125-1 du/ac), Commercial, and County Rural Residential	SR-4 (1du/4, 8, 16 ac)
		NC38+	Agriculture/Residential (0.125-1 du/ac)	SR-1 (1 du/1, 2, 4 ac)
Escondido	North County Metro	NC18A	Estate 1 (1 du/1, 2, 4, 20 acres)	SR-1 and SR-2 (1 du/2, 4, 8 ac)
		NC3A	Rural1 (1 du/4, 8, 20 acres) and Rural II (1 du/2, 4, 20 acres)	SR-10 (1du/10, 20 ac)
		NC37 (southern portion of NC42 along Deer Springs Road and I-15)	Rural1 (1 du/4, 8, 20 acres) and Estate 1 (1 du/1,2,4,20 acres)	SR-4 (1du/4, 8, 16 ac)

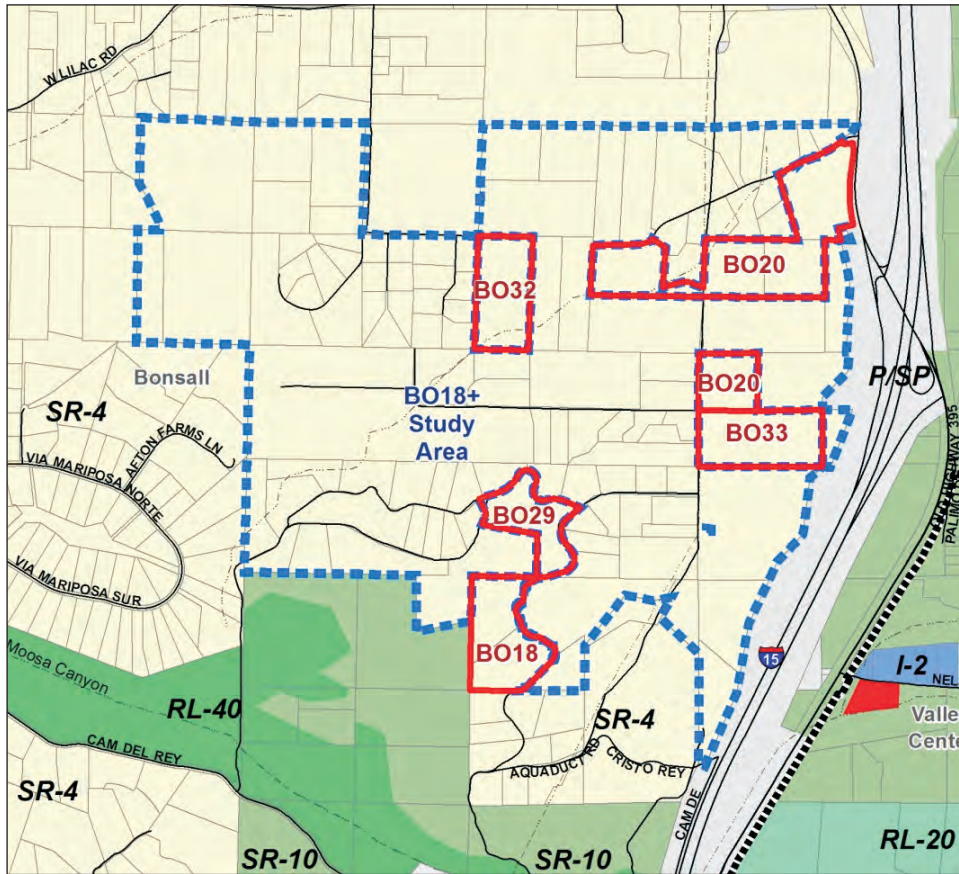
Sources: SANDAG 2011a and 2011b; San Marcos 2013; Escondido 2012



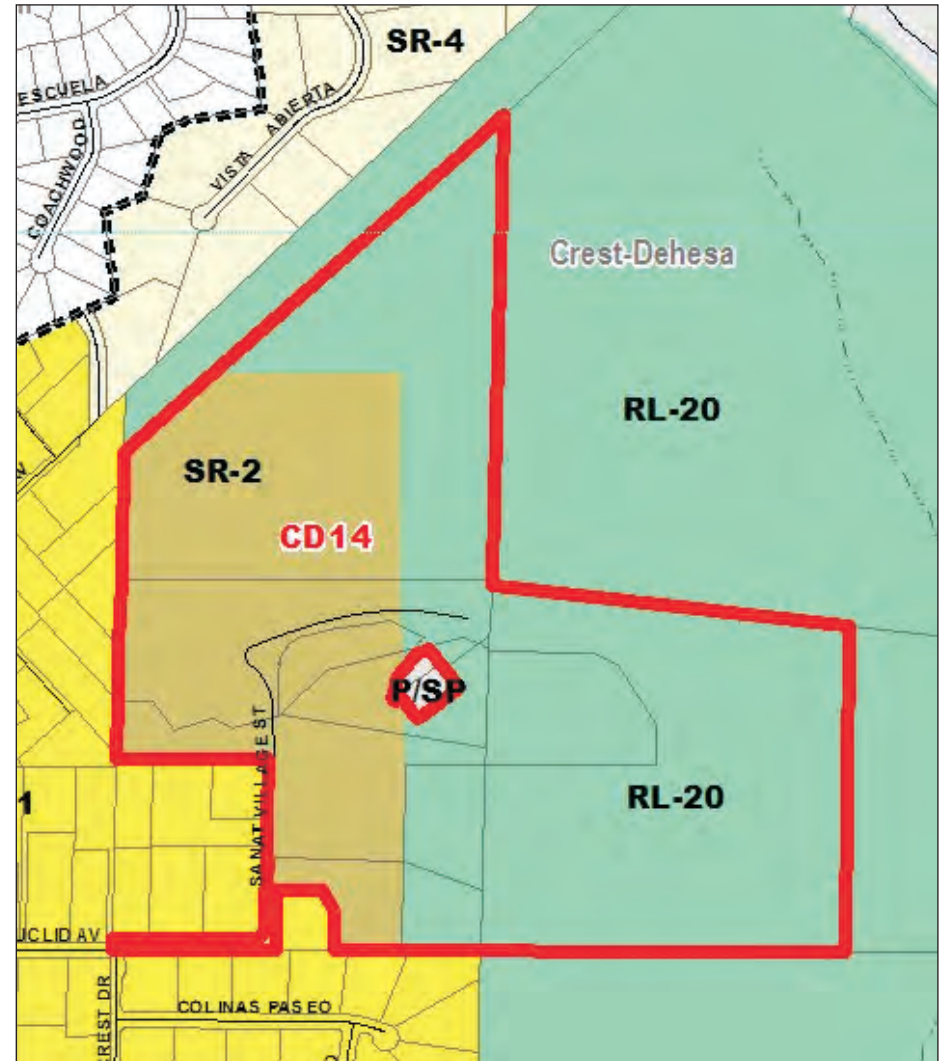
Source: SanGIS, County of San Diego, 2017

Existing General Plan Designation

Figure 2.9-1



BO18+ Proposed Land Use Designation (196 DU)



CD14 Proposed Land Use Designation (17 DU)

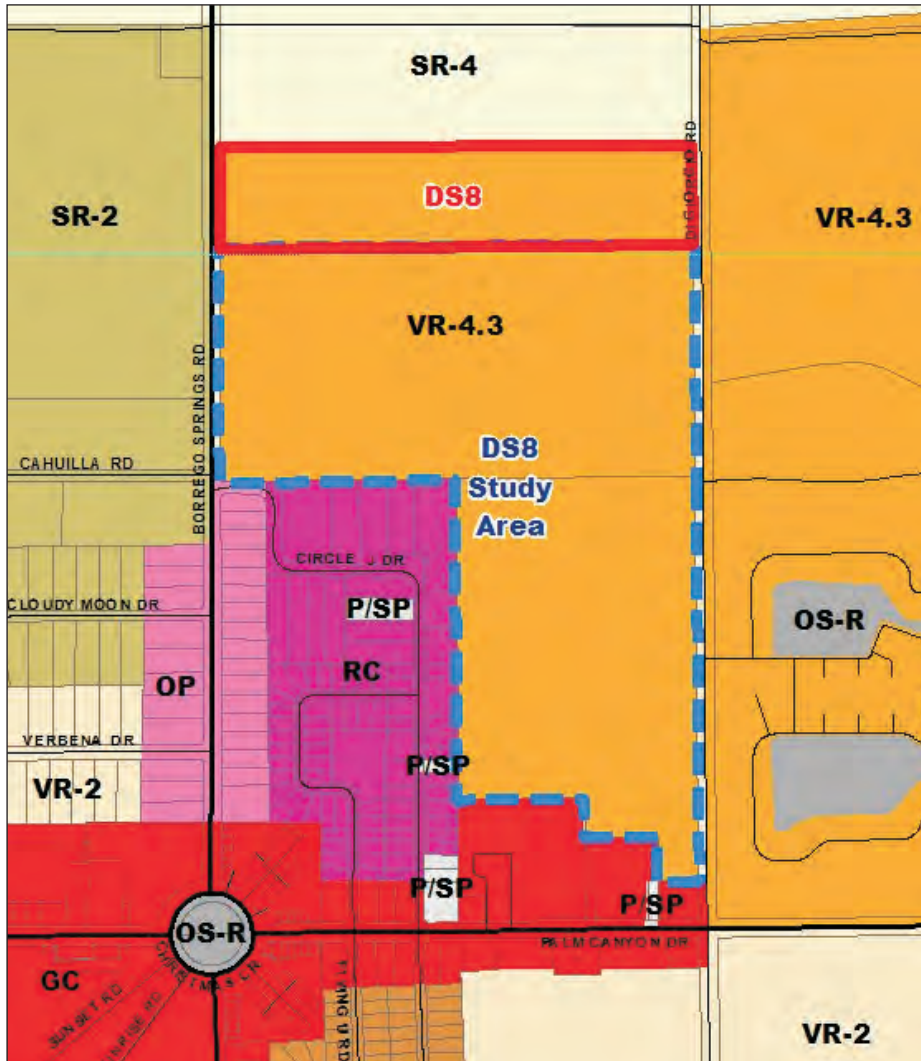


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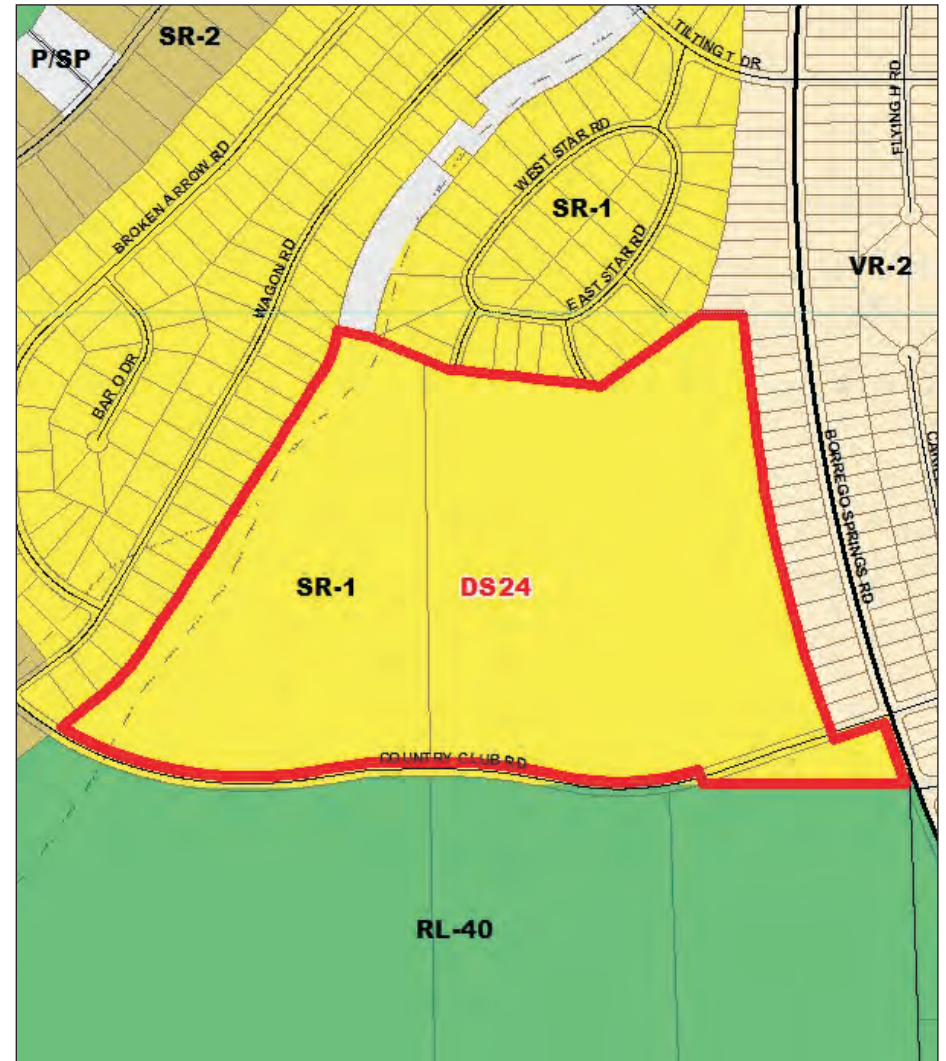
Source: County of San Diego 2017

Proposed General Plan Land Use Designations for
PSR Analysis Area BO18+ and CD14

Figure 2.9-2



DS8 Proposed Land Use Designation (726 DU)

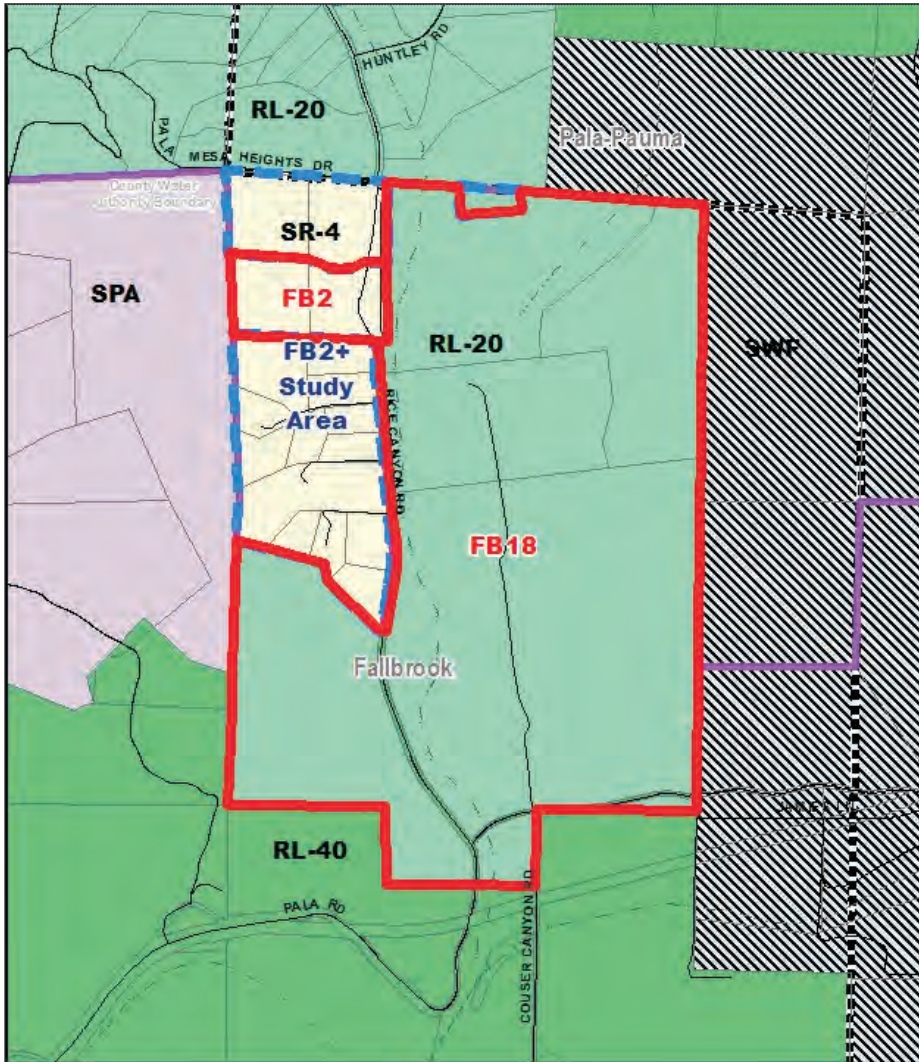


DS24 Proposed Land Use Designation (169 DU)

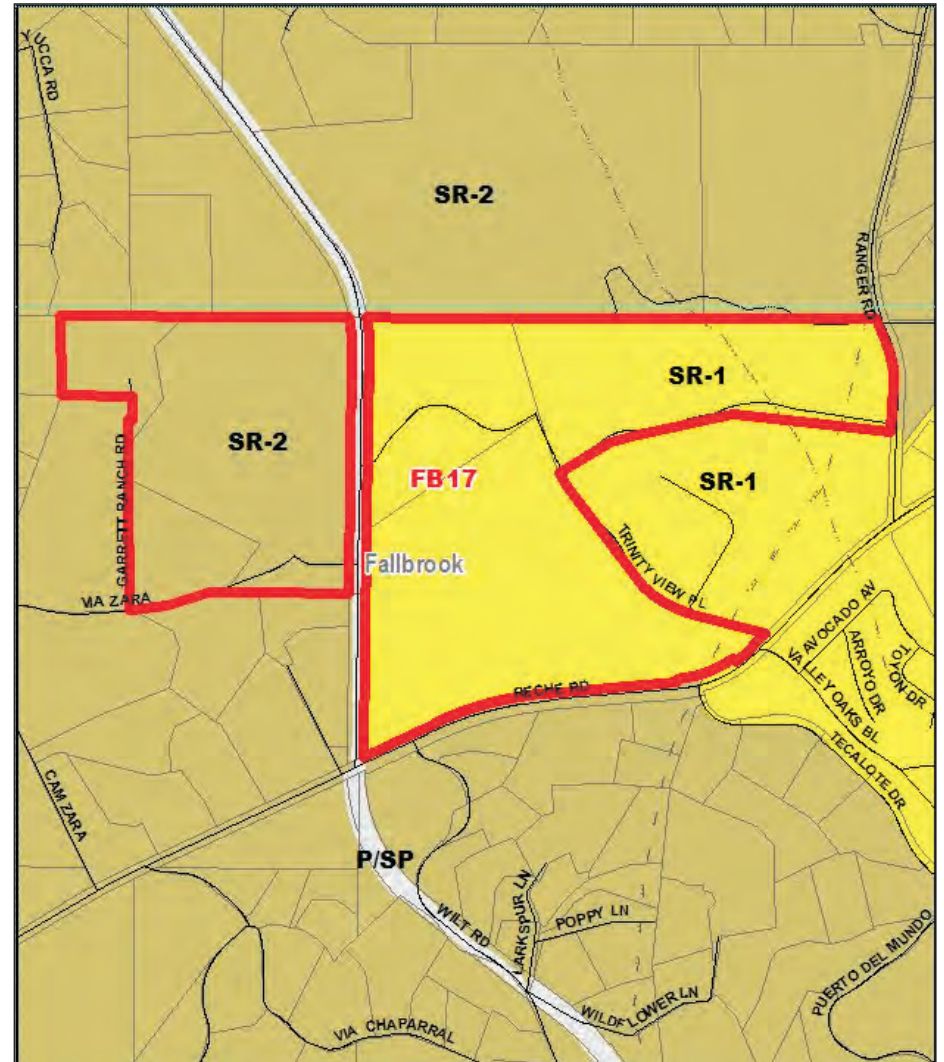


No Scale

Source: County of San Diego 2017



FB2+ Proposed Land Use Designation (42 DU)



FB17 Proposed Land Use Designation (82 DU)

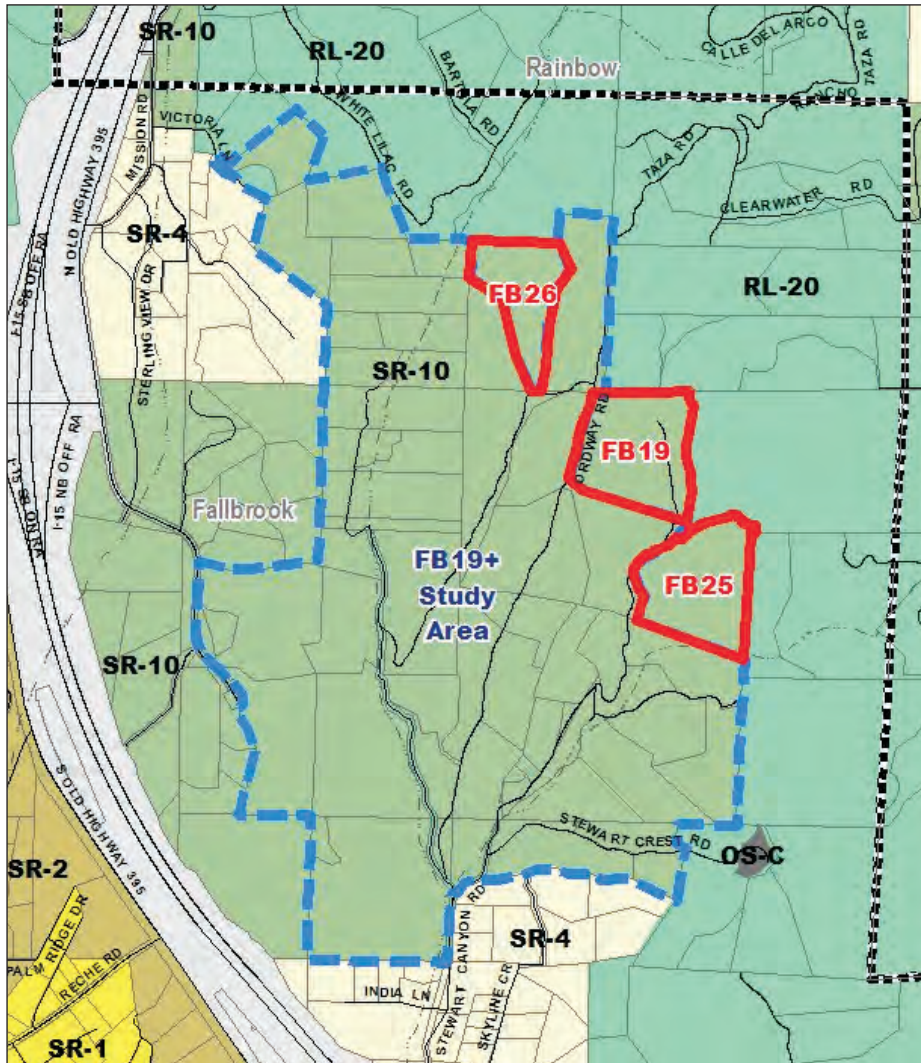


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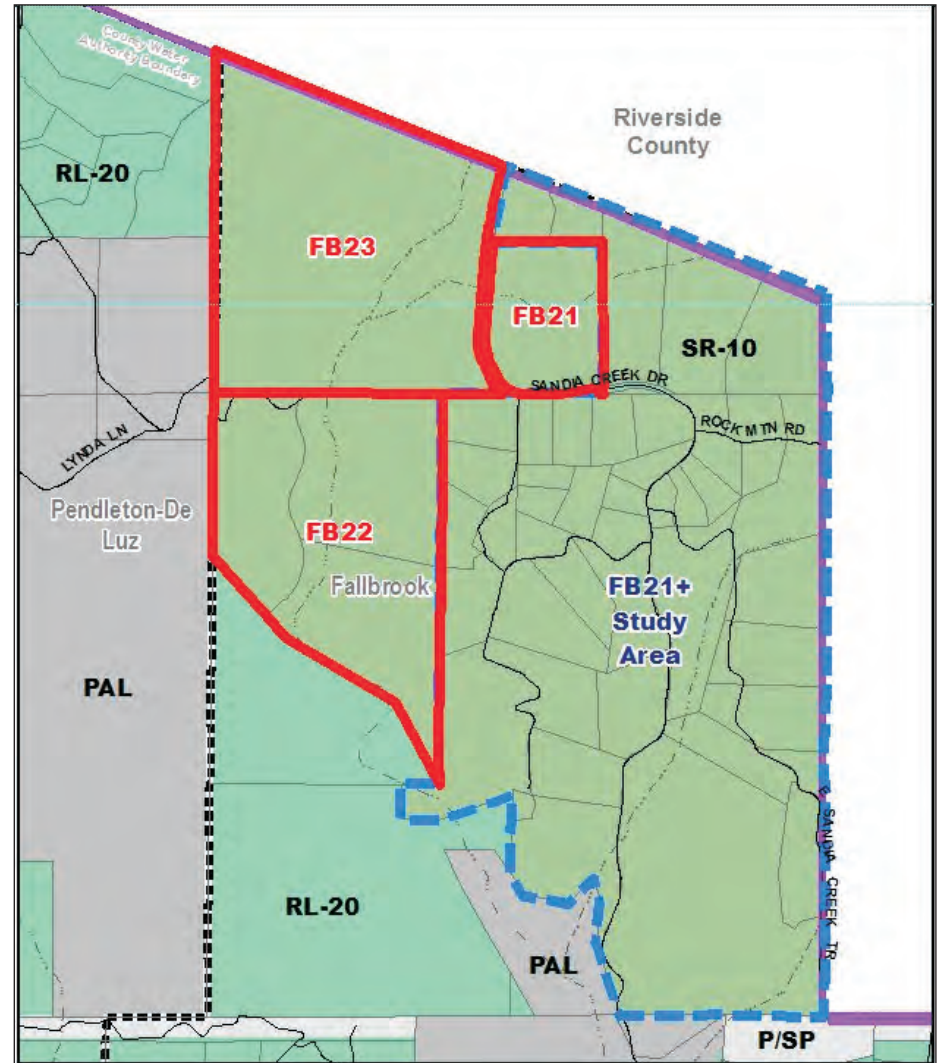
Source: County of San Diego 2017

Proposed General Plan Land Use Designations for
PSR Analysis Area FB2+ and FB17

Figure 2.9-4



FB19+ Proposed Land Use Designation (62 DU)



FB21 Proposed Land Use Designation (68 DU)

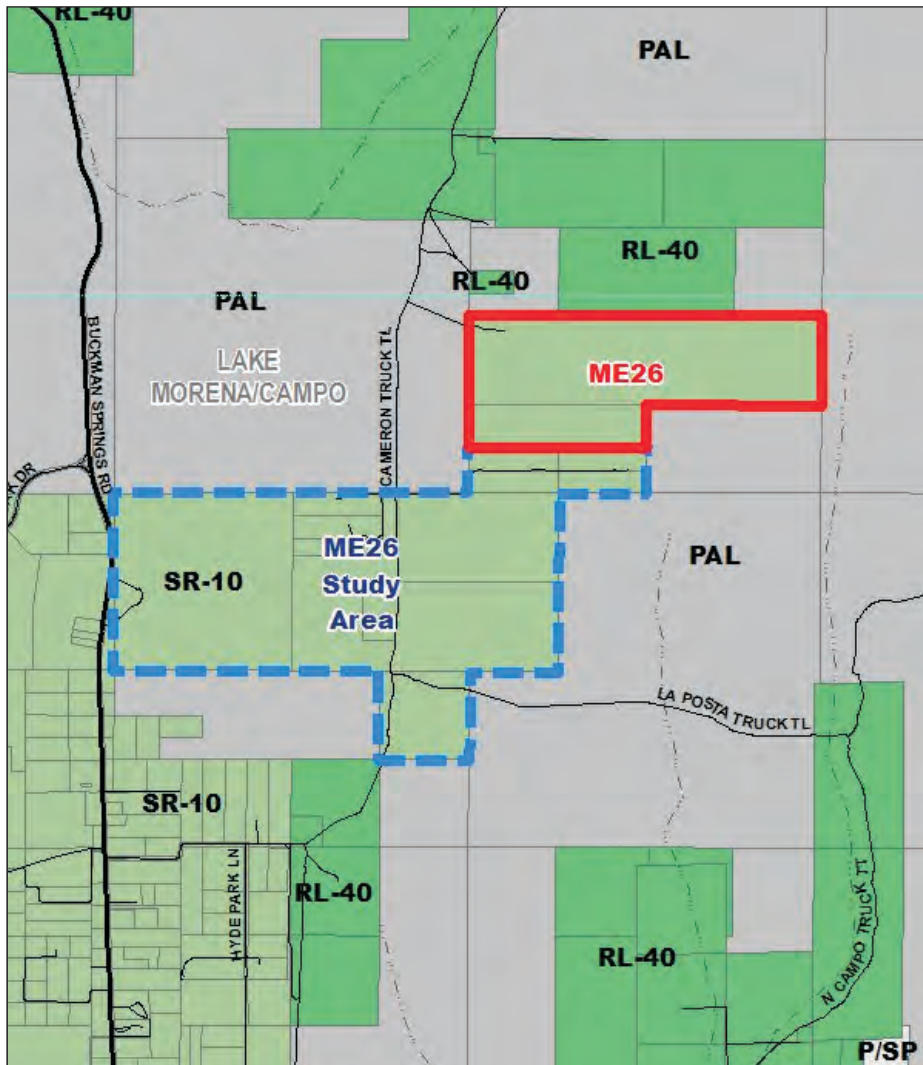
Proposed General Plan Land Use Designations for
PSR Analysis Area FB19+ and FB21+



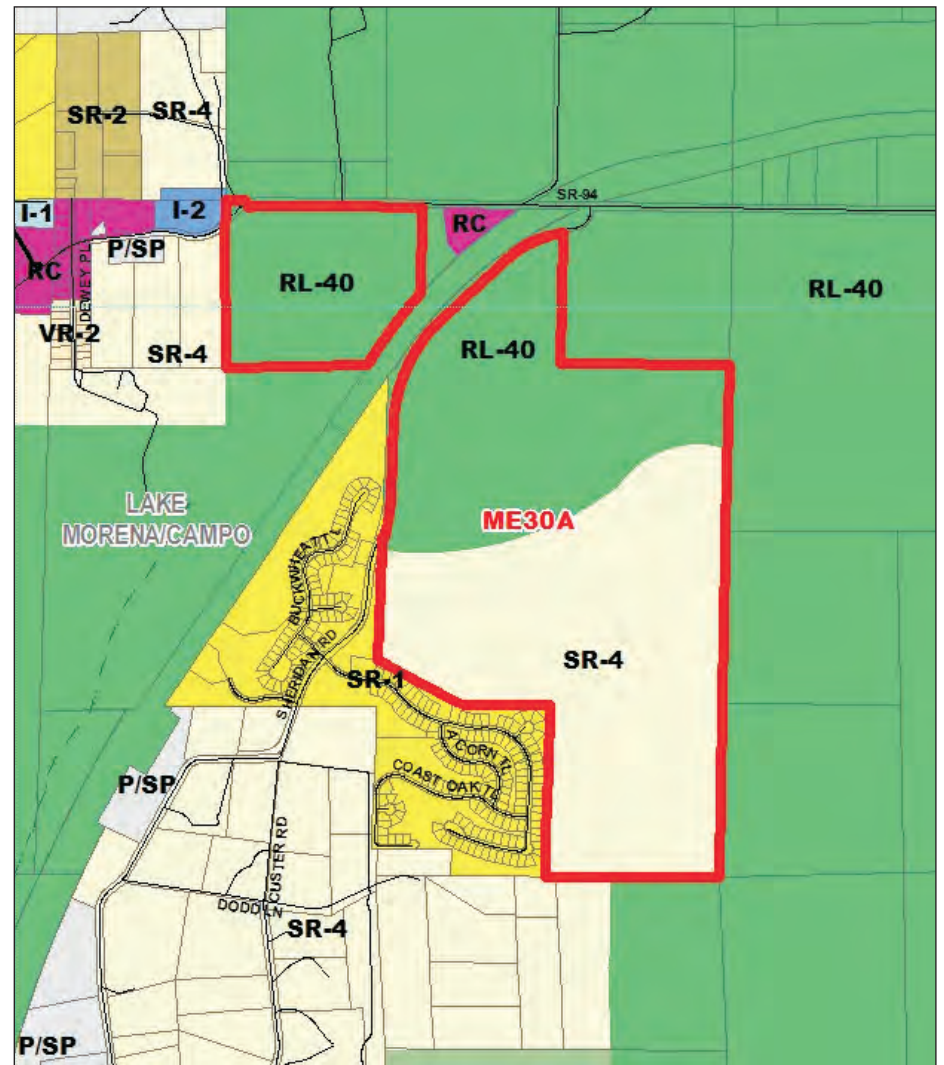
No Scale

Source: County of San Diego 2017

Figure 2.9-5



ME26 Proposed Land Use Designation (59 DU)



ME30A Proposed Land Use Designation (35 DU)

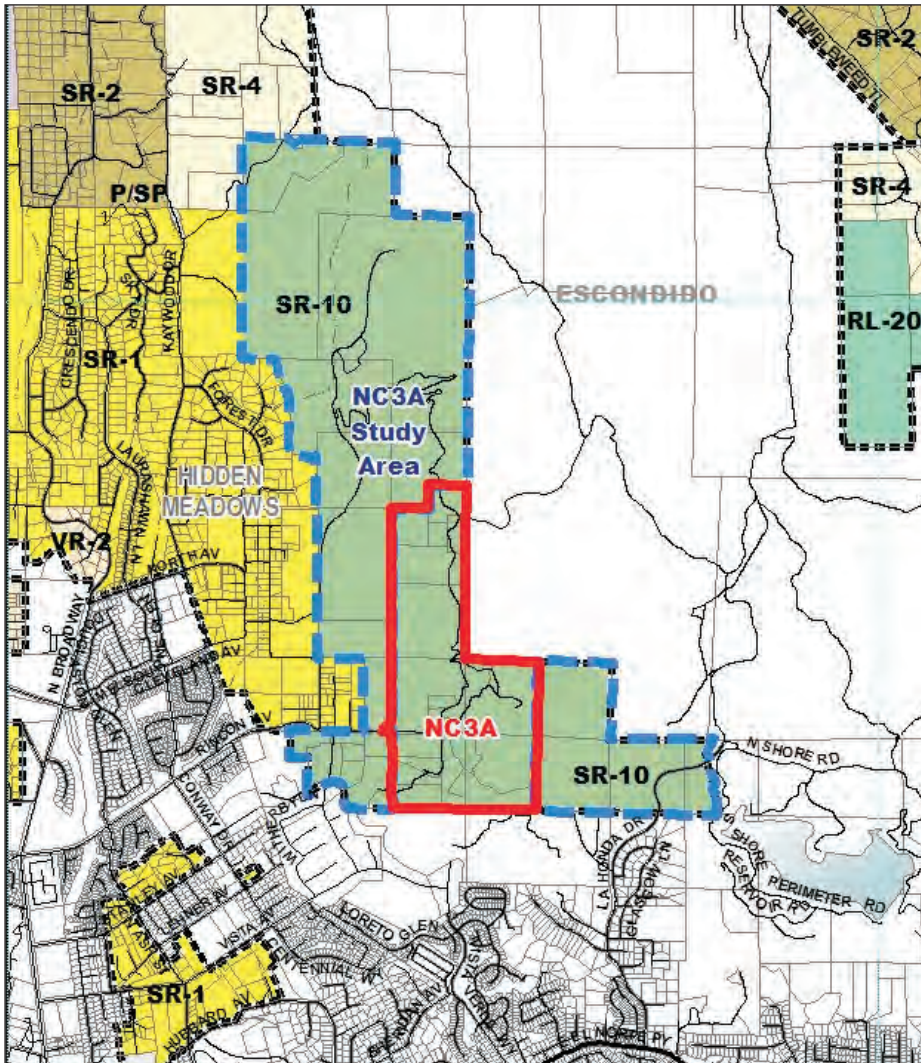


No Scale

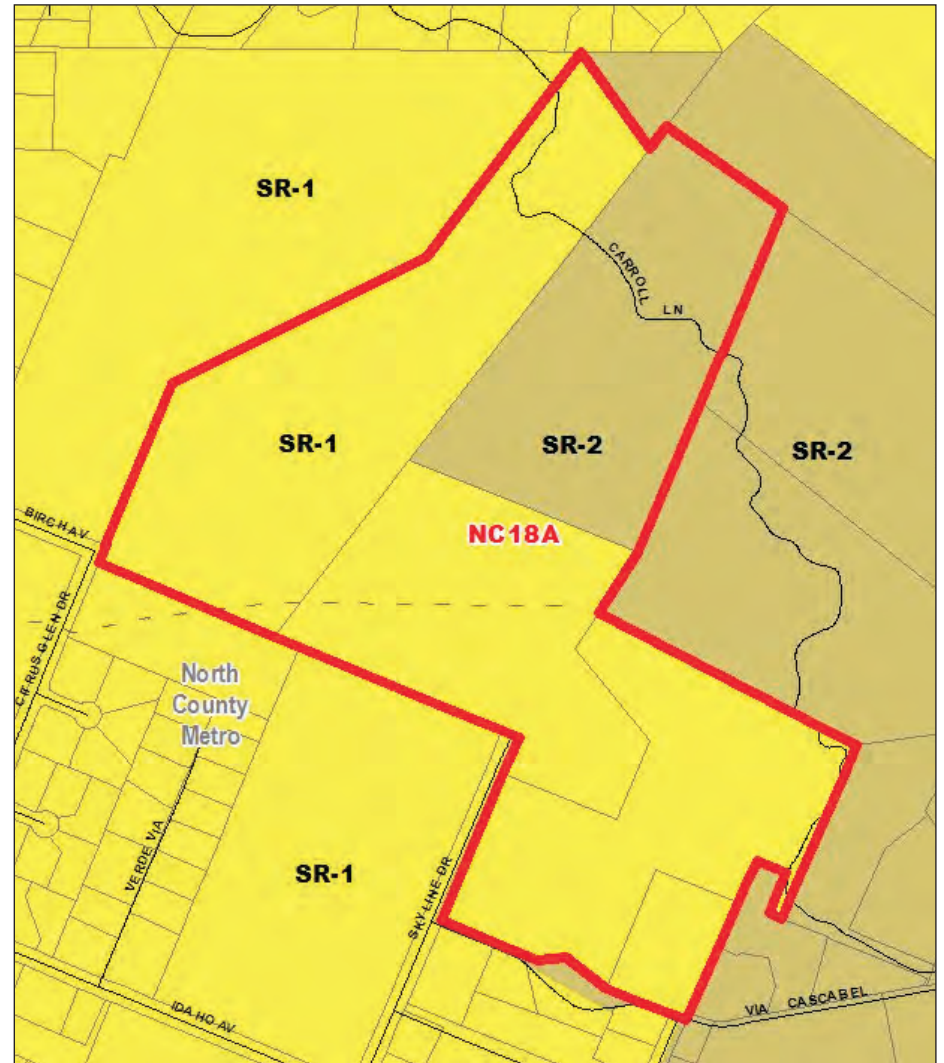
Source: County of San Diego 2017

Proposed General Plan Land Use Designations for
PSR Analysis Area ME26 and ME30A

Figure 2.9-6



NC3A Proposed Land Use Designation (77 DU)

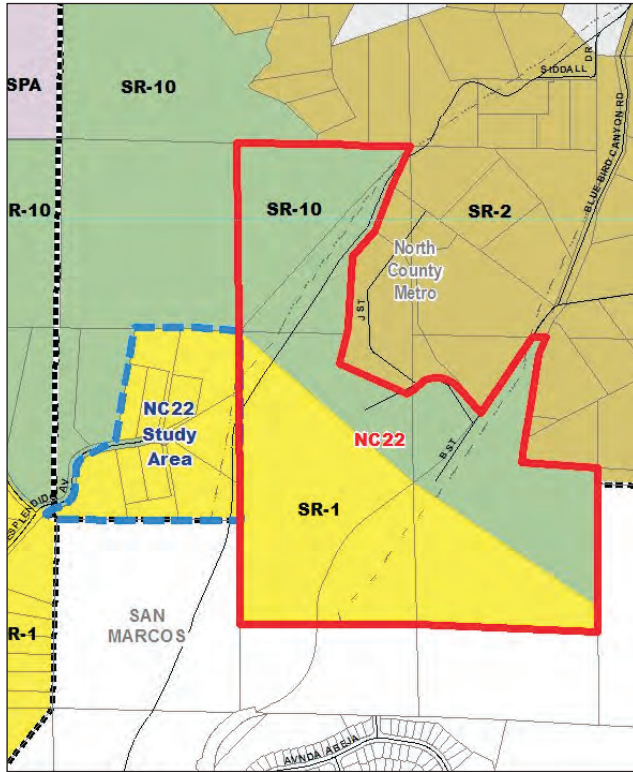


NC18A Proposed Land Use Designation (77 DU)

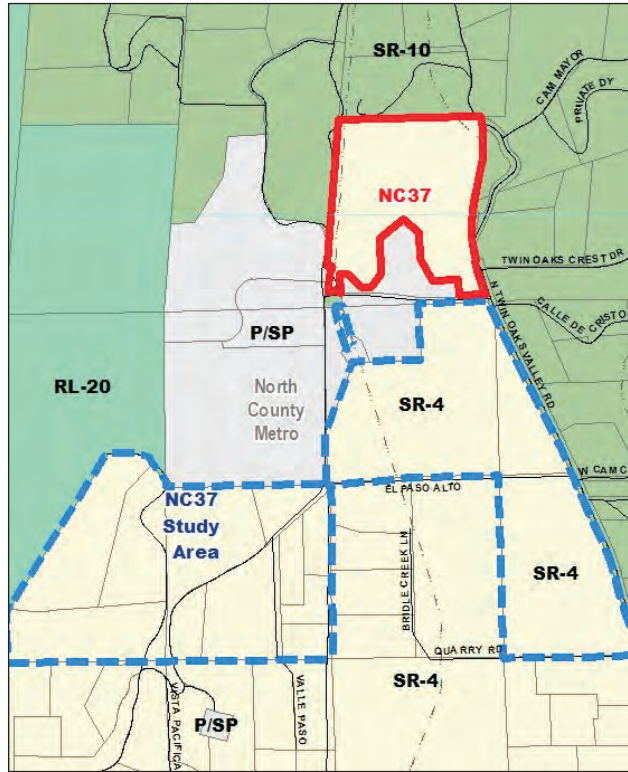


No Scale

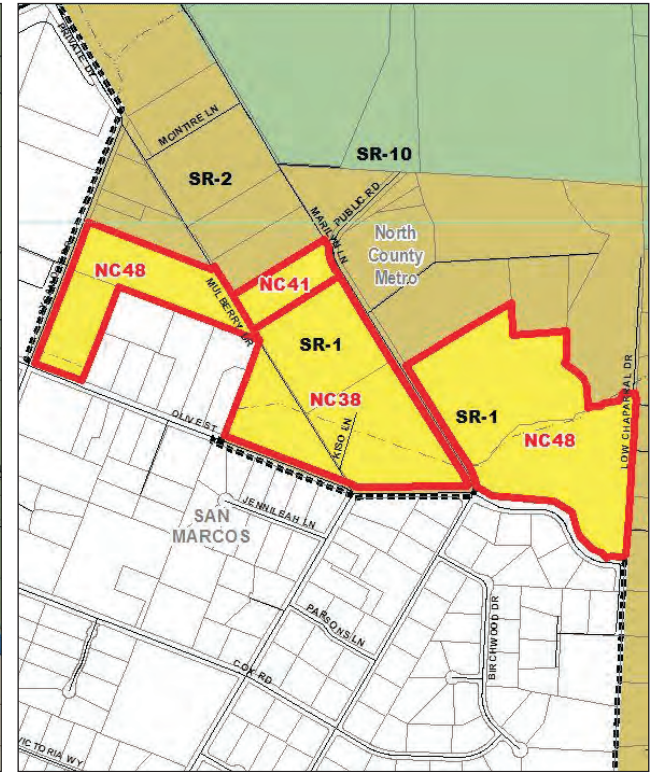
Source: County of San Diego 2017



NC22 Proposed Land Use Designation (73 DU)



NC37 Proposed Land Use Designation (31 DU)



NC38+ Proposed Land Use Designation (75 DU)

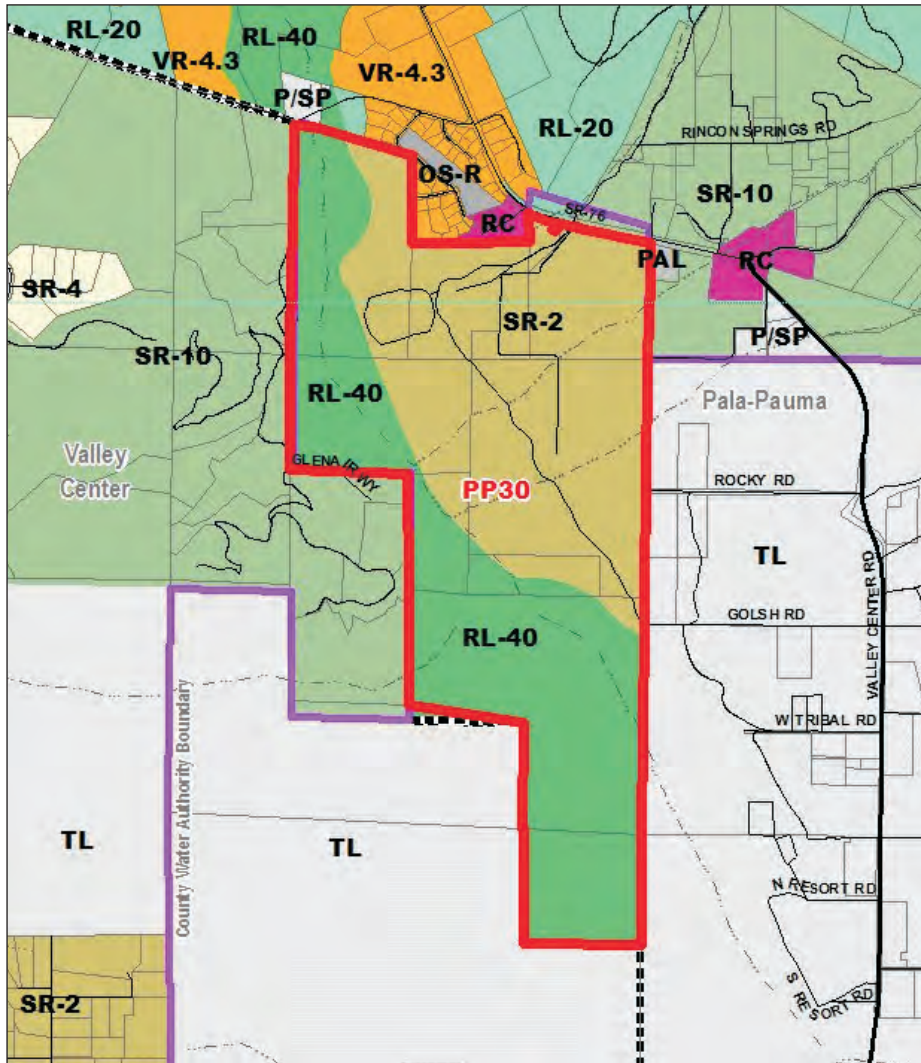


No Scale

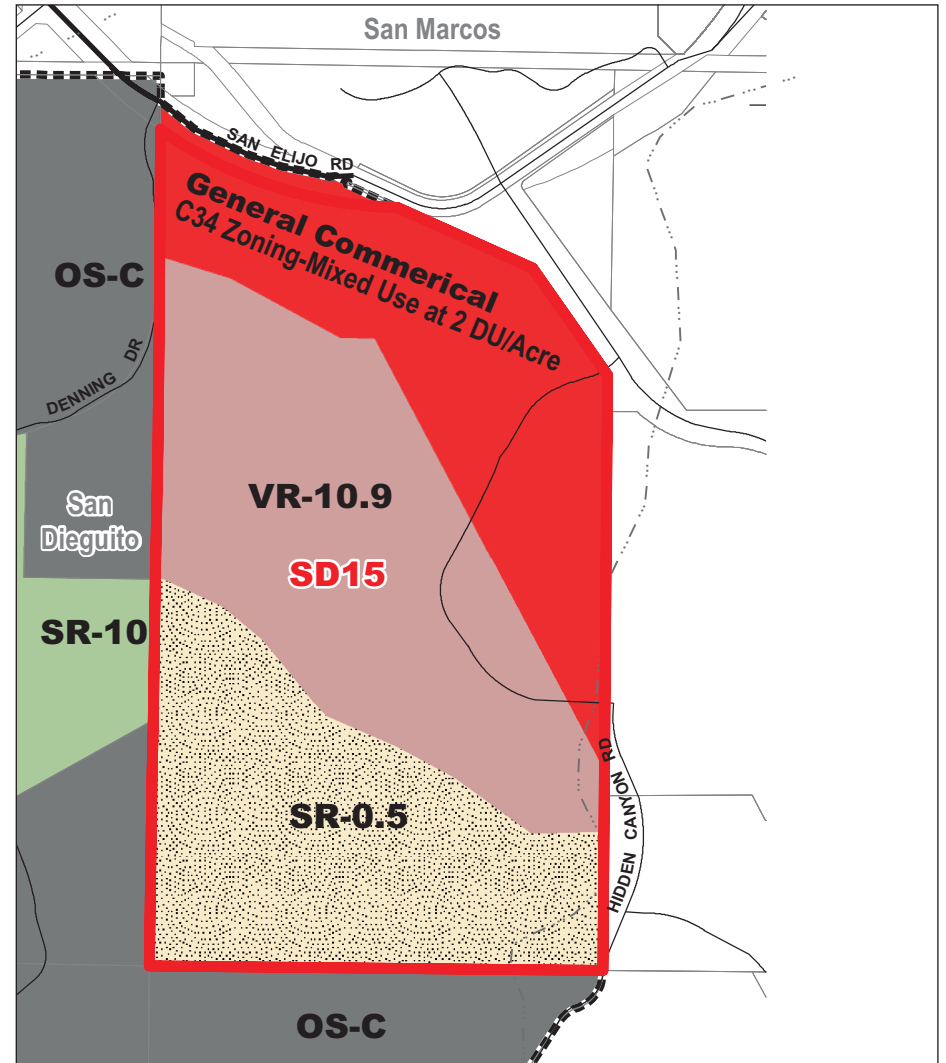
Source: County of San Diego 2017

Proposed General Plan Land Use Designations for
PSR Analysis Area NC22, NC37, and NC38+

Figure 2.9-8



PP30 Proposed Land Use Designation (134 DU)

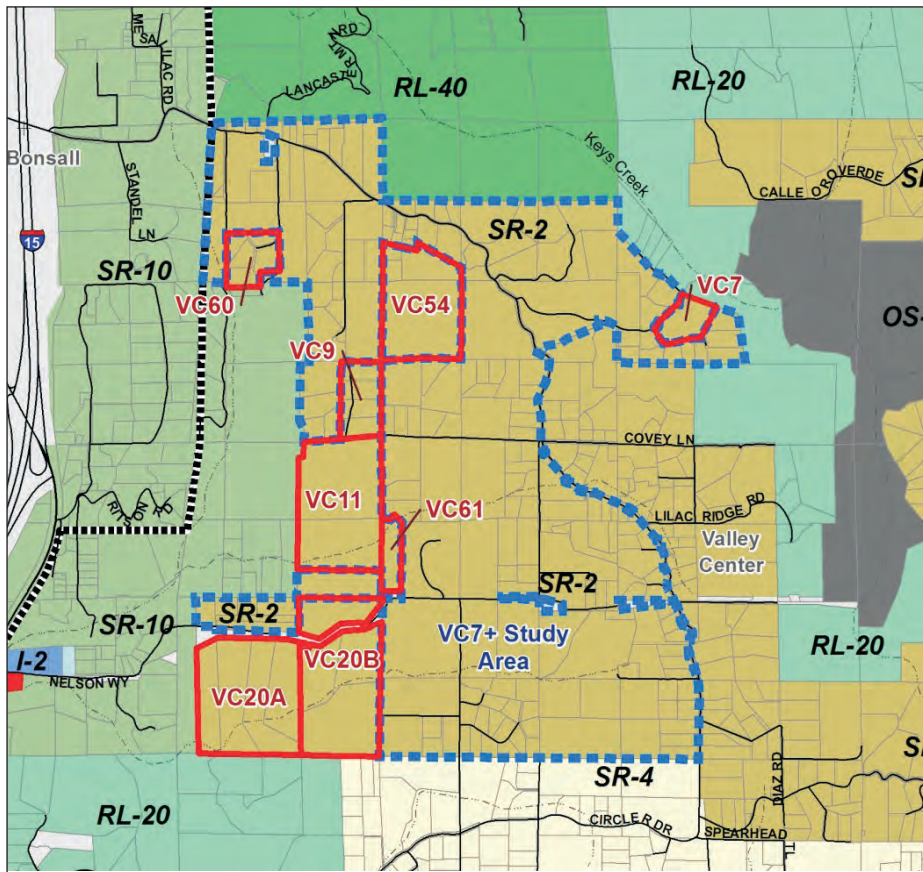


SD15 Proposed Land Use Designation (362 DU)

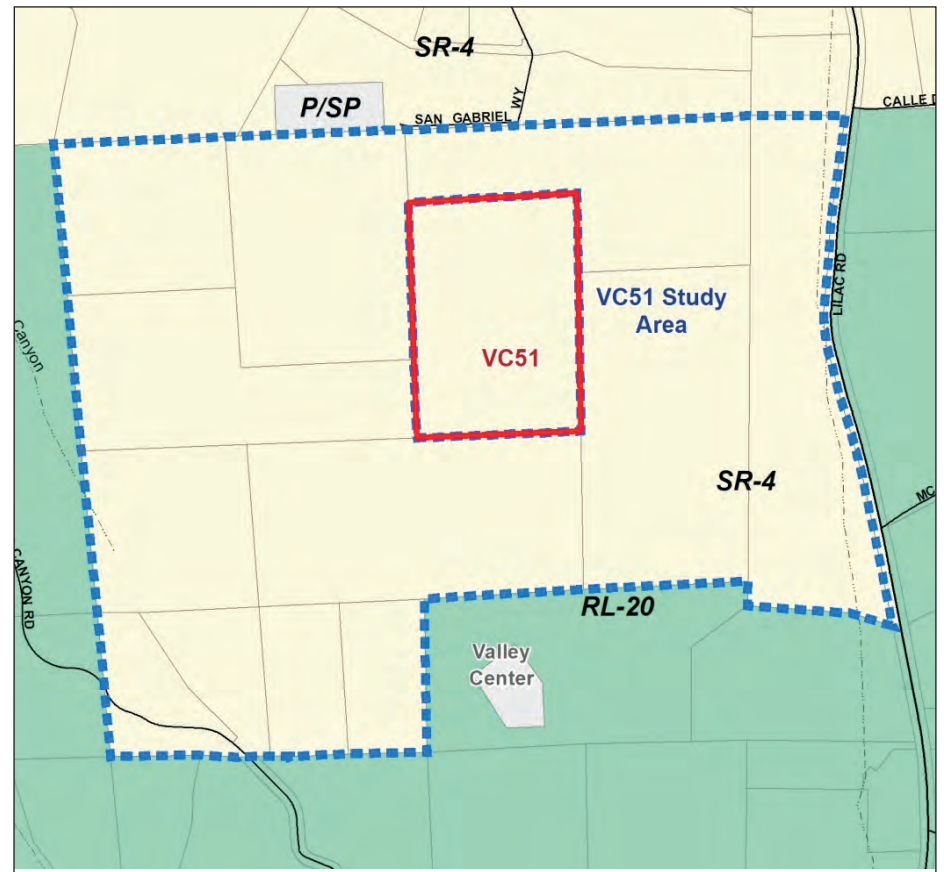


No Scale

Source: County of San Diego 2017



VC7+ Proposed Land Use Designation (619 DU)



VC51 Proposed Land Use Designation (27 DU)

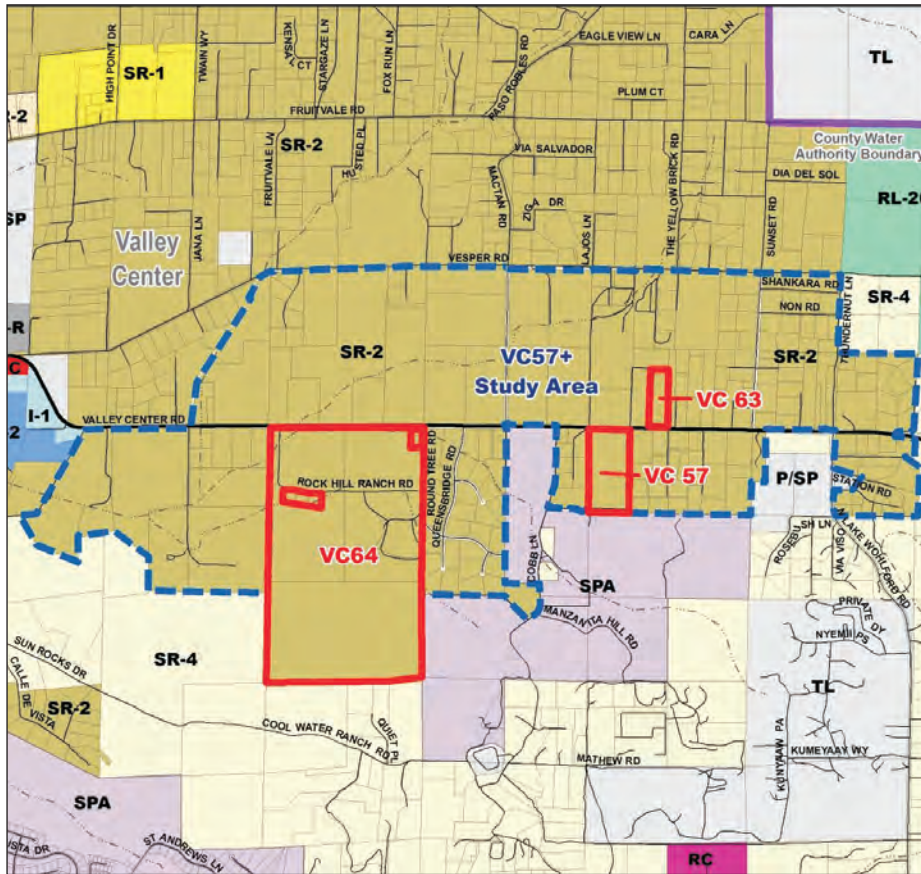


No Scale

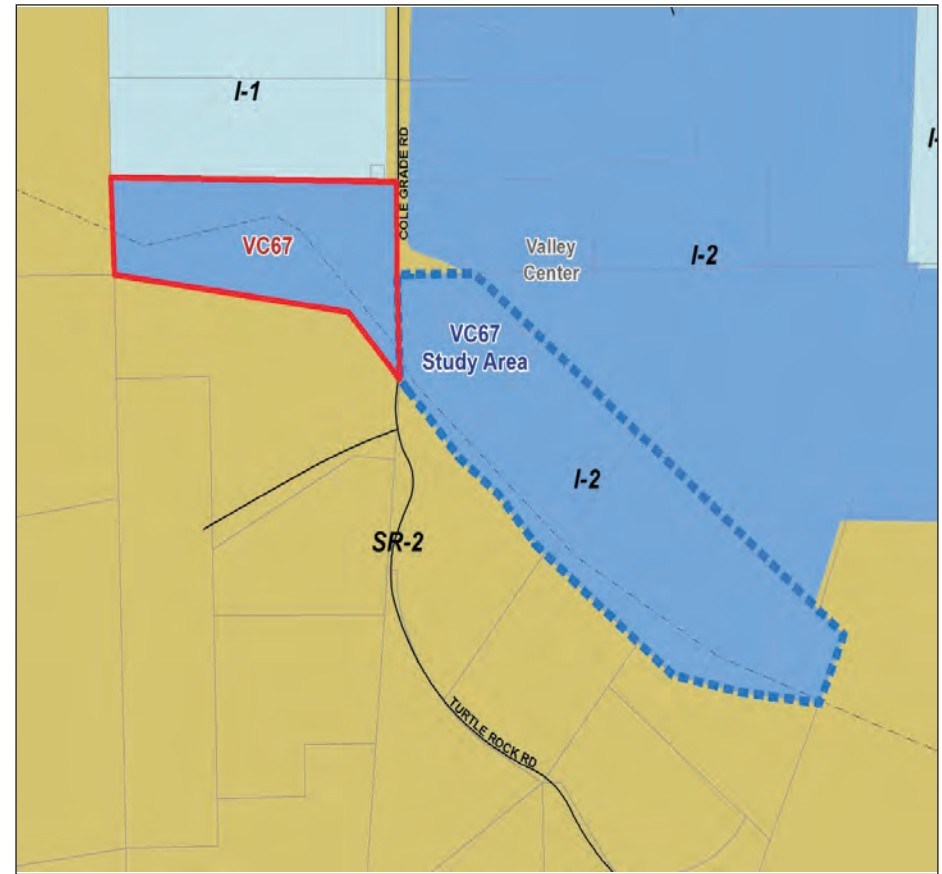
Source: County of San Diego 2017

Proposed General Plan Land Use Designations for
PSR Analysis Area VC7+ and VC51

Figure 2.9-10



VC57+ Proposed Land Use Designation (605 DU)



VC67 Proposed Land Use Designation

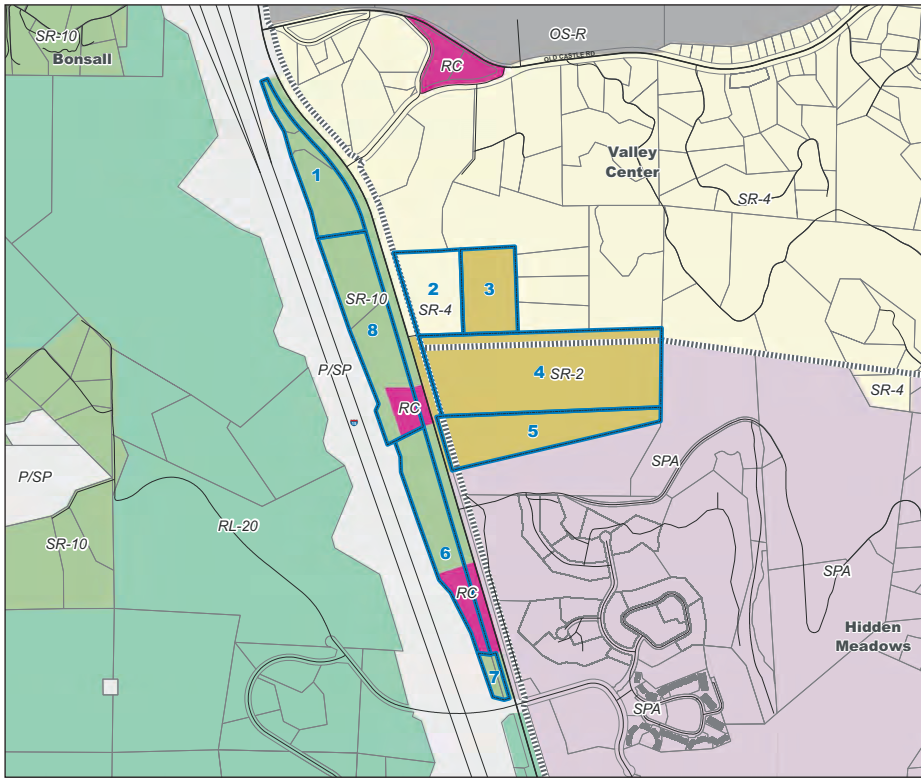


No Scale

Source: County of San Diego 2017

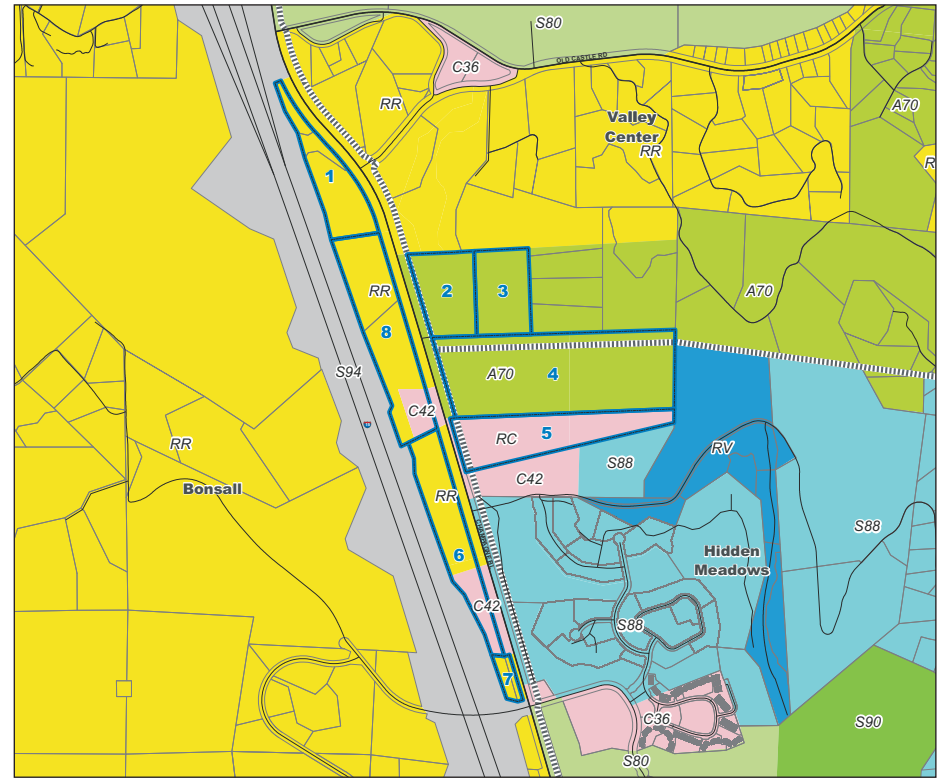
Proposed General Plan Land Use Designations for
PSR Analysis Area VC57+ and VC67

Figure 2.9-11



Former CGSP Area Proposed Land Use Designations

- Subarea
- Community Plan Area
- Semi-Rural Residential (SR-4), 1 du/4,8,16 ac
- Semi-Rural Residential (SR-10), 1 du, 10,20 ac
- Rural Lands (RL-20), 1 du/20 ac
- Specific Plan Area (residential densities in italics)
- Rural Commercial
- Public/Semi-Public Facilities
- Open Space (Recreation)



Former CGSP Area Proposed Zoning Designation

- Subarea
- Community Plan Area
- A70 - Agriculture
- C36, C42, RC - Commercial/Office
- RR - Rural Residential
- RV - Residential - Variable
- S80 - Open Space
- S88 - Specific Plan
- S90 - Holding Area
- S94 - Transportation and Utility

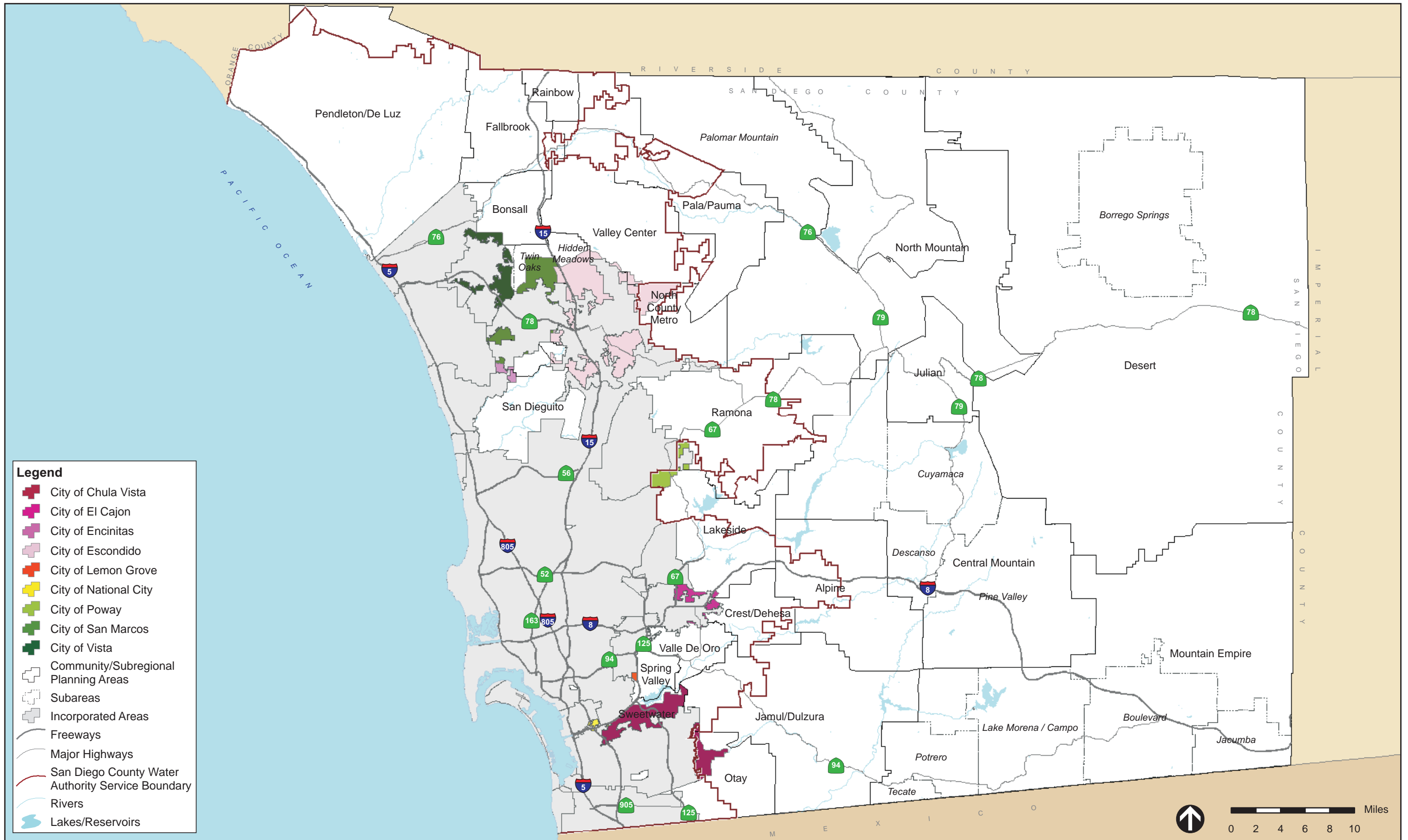


No Scale

Source: County of San Diego 2017

Proposed General Plan Land Use and Zoning Designations for the Former CGSP Area

Figure 2.9-12



Source: LAFCO, 2008; County of San Diego, 2008

Countywide Spheres of Influence

Figure 2.9-13