

3.1.4 Land Use and Planning

This land use analysis for the Proposed Project describes land use policies applicable to the Project, identifies guidelines for determination of significance, evaluates potential impacts related to Project implementation, evaluates cumulative impacts and discusses feasible mitigation measures.

3.1.4.1 Existing Conditions

For information regarding the existing setting, the reader is referred to the discussion of Subchapter 1.4, *Environmental Setting*, of this EIR, as well as Figure 3.1.4-1, *Existing Land Uses*.

Regulatory Setting

Land use plans, policies, and ordinances that apply to the Proposed Project are contained in the County General Plan, San Dieguito Community Plan, Elfin Forest and Harmony Grove portion of the San Dieguito Community Plan, County Zoning Ordinance, County RPO, County Park Land Dedication Ordinance (PLDO), Natural Community Conservation Planning (NCCP) Program, County Subdivision Ordinance, LPC, and a host of other implementing regulations discussed in the other sections of this EIR. These documents address a variety of issues, including development at appropriate densities, as well as conservation of sensitive habitats, provision of open space, protection of visual amenities, regulation of signage and lighting, and protection against incompatible land uses. Many of these issues are addressed in several elements of the General Plan, as well as in the Community Plan. The regulations discussed here are primarily related to land use and development.

County of San Diego General Plan

The General Plan was comprehensively updated and adopted on August 3, 2011.

The General Plan Land Use Element provides maps, goals, and policies and serves as the regulatory document guiding land use, conservation, and development in the unincorporated County. This element provides a framework to accommodate future development within the County in an efficient and sustainable manner that is compatible with the character of unincorporated communities and the protection of valuable and sensitive natural resources (County 2011a). The Land Use Element describes land use designations and use regulations shown on community and subregional area maps, in this case the San Dieguito Community Planning Area (CPA) Land Use Map, as contained in an appendix to the General Plan and referenced in the San Dieguito Community Plan. The existing regional land use categories for the Proposed Project site, as identified in the Land Use Element, are Semi-Rural Residential (SR-1 and SR-2; refer to EIR Figure 3.1.4-2, *Existing County General Plan Land Use Designations*). The Land Use Element also includes a Community Services and Infrastructure section addressing water supply, wastewater collection and treatment, solid waste management, schools, libraries and telecommunication services.

The Mobility Element of the General Plan describes the multi-modal transportation network within the unincorporated areas, including motor vehicle, public transportation, bicycle,

pedestrian, rail and air transportation facilities. The element states the goals and policies that address the safe and efficient operation, maintenance, and management of the transportation network, and identifies major existing and planned road network components in the County. These road network components are shown on maps and matrices in the Mobility Element Network Appendix. In the vicinity of the Proposed Project site, the following roads and their corresponding classifications are identified: Harmony Grove Road (Light Collector), Lariat Drive (Community Collector) and Citracado Parkway (Major Road).

The Conservation and Open Space (COS) Element combines what formerly were four separate elements (Open Space, Conservation, Scenic Highway and Energy) and describes the natural resources within the County and goals and policies to preserve them. This element provides direction for future growth and development in the County with respect to the conservation, management, and utilization of natural (biological, water, agricultural, paleontological, mineral and visual [including scenic highways and dark skies]) and cultural resources; protection and preservation of open space; and provision of park and recreation resources. The closest scenic highway to the Proposed Project site is the segment of Elfin Forest Road/Harmony Grove Road between the San Marcos city limits and the Escondido city limits, which is located, at its closest point, approximately 0.5 mile from the Project site. Other designated Scenic Highways in the general Project area include the segment of Via Rancho Parkway between Del Dios Highway and SR-78, which is located approximately 1.5 miles west of the Project site. The COS Element also addresses air quality, climate change and energy, and the associated generation of criteria pollutants and greenhouse gas emissions. Finally, the element contains goals and policies related to parks and recreation and uses residential densities to determine the spacing of parks based on population (i.e., 10 acres of local parks and 15 acres of regional parks for every 1,000 persons in the unincorporated County). Projects are required to provide in lieu fees and/or dedicate land to parks, passive recreation open space areas, and trails in accordance with the County PLDO.

The Safety Element brings safety considerations into the planning and decision-making process by establishing policies related to future development that will minimize the risk of injury, death, property and environmental damage associated with natural and human-made hazards (County 2011). The Safety Element ensures that development accounts for physical constraints and natural hazards of the land. The goals and policies of this element were developed to protect residents and areas from wildland and urban fire, crime, hazardous materials incidents, earthquakes, flooding and hazardous incidents associated with aircrafts and airports. Disaster preparedness and emergency response also are addressed in this element.

The Noise Element ensures that noise considerations are incorporated into the land use decision-making process and establishes Noise Compatibility Guidelines to be used in the evaluation of proposed development projects. The community noise control standards within the County's Noise Abatement and Control Ordinance are used in conjunction with the Noise Element in considering the environmental impacts of noise exposure. The Noise Element addresses transportation and non-transportation noise sources, noise-sensitive land uses, and existing and future noise levels. This element was developed to preserve County residents' quality of life by protecting from the obtrusive impacts of noise and noise-generating uses such as traffic, construction, airplanes and certain industrial uses.

The Housing Element is a policy framework that sets forth a range of programs designed to meet the varying needs of the different communities within the unincorporated area. This element documents and discusses the housing needs of County residents, includes an inventory of the resources and constraints relevant to meeting current and future housing needs, and seeks to reconcile housing needs with competing land use interests (e.g., agricultural operations, sensitive species habitat). The key issues addressed in this element are compliance with state housing requirements, the regional housing needs allocation (RHNA) process, village issues and semi-rural and rural lands issues. The goals and policies in the element address housing development, community character and environment, housing affordability, preservation of affordable housing, governmental constraints and the delivery of housing services.

The General Plan Land Use Map shows the Proposed Project site as having two Semi-Rural Land Use Element designations: SR-1 and SR-2 (refer to EIR Figure 3.1.4-2). The SR-1 designation allows for one du per one, two or four gross acres, and the SR-2 designation allows for one du per two, four or eight gross acres. The maximum density of SR-1 and SR-2 designated lands is based upon the slope of the site; steeper on-site slopes equate to larger lot size requirements.

The General Plan policies adopted for protection of environmental resources or values are discussed under Project analysis of Guideline 1.

San Dieguito Community Plan

In general, community plans have been adopted as integral parts of the General Plan to provide the framework for addressing the issues and concerns unique to each community that are not reflected in the broader policies of the General Plan.

The San Dieguito Community Plan augments the 2011 General Plan and contains goals and policies specific to the San Dieguito CPA. Each community/subregional plan in San Diego County identifies specific community character attributes and outlines goals and policies intended to preserve those attributes. The Proposed Project site is located in the northernmost portion of the San Dieguito community planning area. The community of Eden Valley, within which the Project is located, was added to the San Dieguito CPA from the North County Metropolitan Subregional Area with the General Plan Update in 2011.

The San Dieguito Community Plan has a Community Character Element that identifies the community as a low-density estate residential area surrounded by the rapidly urbanizing areas of North San Diego County. The general goal of the Community Character Element is to “provide for the orderly development of the San Dieguito CPA while maintaining the identities of historically established neighborhoods and preserving a more rural environment.” The Community Plan discusses the distribution of land uses relative to their compatibility with the existing character and rural nature of the community, as well as consistency with the goals and policies of the Land Use Element of the General Plan, in addition to providing specific goals and policies for residential, commercial, industrial and agricultural uses and specific planning areas. Circulation goals and policies relate to a logical and balanced transportation network that is designed to accommodate a diversity of modes, including automobile, bicycle, equestrian,

pedestrian and mass transit networks with safe and efficient circulation, parking, bus use and trails/pathways. The Community Plan also includes goals and policies pertaining to Public Safety, Services and Facilities, specifically related to balancing the demands on public services by providing necessary facilities as they are required to accommodate growth. The COS Element provides specific goals and policies related to the preservation and enhancement of San Dieguito's unique natural resources and open space areas, protection of archaeological resources, provision of adequate water supplies and restrictions on exterior lighting. The Recreation Element sets forth the goals and policies for establishing a well-balanced system of recreational facilities and services. Additional elements include Scenic Highways, Noise and Energy, which provide policies and goals related to these issue areas.

Elfin Forest and Harmony Grove Portion of the San Dieguito Community Plan

The Elfin Forest and Harmony Grove Portion of the San Dieguito Community Plan covers the planning areas of Elfin Forest and Harmony Grove, which total approximately 6,793 acres in size and fall within the San Dieguito CPA. The southern portion of the Proposed Project site falls within the Harmony Grove community. Land Use goals for the Harmony Grove community include preservation of the rural small town feeling, open access community design that unifies multiple developments into "one neighborhood," and continued preservation and dedication of natural and cultural resources and open space. The Land Use Element encourages environmentally sensitive, responsible equestrian uses; preservation of a rural visual environment and visually significant resources; continued agricultural uses; and buffers between urban areas and rural residential uses. Goals of the Circulation and Mobility Element include providing safe roads for vehicle, pedestrian, bicycle and equestrian use, and adequately identified emergency response service providers. The COS Element outlines goals and policies for resource conservation and management, parks and recreation, and community open space planning. Other elements include the Safety Element, which discusses hazards/risk avoidance and mitigation, emergency preparedness and response and law enforcement; and the Noise Element.

County of San Diego Board of Supervisors Policies

The Board of Supervisors is charged with the responsibility of establishing a Policy Manual to guide the various functions of the County. There are nine board policies that are applicable to the Proposed Project.

Policy I-17, "Right-of-Way Dedication and Public Improvement Requirements in Connection with Zone Reclassifications," requires that when a project is to obtain a zoning reclassification, it shall provide public improvements, facilities, and the lands, easements and right-of-way necessary to make the property suitable for the proposed zoning classification. The policy emphasizes improvements related to roads, drainage, sewage, and fire protection.

Policy I-18, "Right-of-Way Dedication and Public Improvement Requirements in Connection With Major and Minor Use Permits," requires that when a project is granted a use permit, it shall provide public improvements, facilities, and the lands, easements and right-of-way necessary to assure that the special use would not be materially detrimental to the public health, safety or welfare, or the property or improvements in the vicinity and zone in which the subject property is

located. Similar to Policy I-17, the policy emphasizes improvements related to roads, drainage, sewage and fire protection.

Policy I-36, “Prohibition of Sewer Extensions and Connections in Areas Not Annexed to the San Diego County Sanitation District,” prohibits sewer extensions and connections in areas not annexed to the County Sanitation District.

Policy I-49, “Distribution of Notification of Land Use Hearings,” establishes a minimum standard of public notification on land use matters that are to be considered before the Board of Supervisors, Planning Commission or Director of PDS.

Policy I-63, “General Plan Amendment Initial Review,” specifies the manner in which amendments to the County General Plan shall be initiated, pursuant to Government Code Section 65358.

Policy I-70, “Reporting Complaint and/or Violations History for Planning Actions Brought before Hearing Boards,” establishes a policy for providing the Planning Commission and/or Board of Supervisors with a record of complaints and/or violations on property for a land use division, use permit, Rezone or General Plan Amendment for which project approval is requested.

Policy I-73, “Hillside Development Policy,” minimizes the effects of disturbing natural terrain and provides for creative design for hillside developments. The policy provides guidelines to assist the Board of Supervisors, Planning Commission, Director of PDS and staff in the evaluation of hillside development in San Diego County. It is intended that this policy serve as a guideline and supplement to other applicable regulations, including the RPO.

Policy I-78, “Small Wastewater Treatment Facilities,” establishes a policy for the location of future small wastewater treatment facilities. In addition, the policy calls for these facilities to be subject to all appropriate plans, ordinances, statutes and regulations including, but not limited to, County General Plan and adopted population forecasts, Land Use Element of the County General Plan, County Zoning Ordinance, CEQA and County EIR Guidelines, and RWQCB rules and regulations.

Policy I-84, “Project Facility Availability and Commitment for Public Sewer, Water, School and Fire Services,” establishes procedures for using Project Facility Availability forms and Project Facility Commitment forms in the processing of land divisions and certain projects requiring discretionary approval by the County.

County of San Diego Zoning Ordinance

The County Zoning Ordinance (effective December 19, 1978, as amended) identifies the permitted uses of the Project site, consistent with the land use designations of the General Plan. The Project site has a zoning designation of Limited Agriculture (A70; refer to Figure 3.1.4-3, *Existing Zoning Designations*).

County of San Diego Resource Protection Ordinance

The County regulates natural and cultural resources via the RPO, which provides development controls for unique topography, ecosystems and natural characteristics within the County deemed to be fragile, irreplaceable and vital to the general welfare of the County's residents. Resources addressed by the RPO include wetlands, wetland buffers, floodways, floodplain fringes, steep slopes, sensitive habitat lands, and significant prehistoric or historic sites. The site contains 3.91 acres of RPO wetlands (refer to Table 2.4-4), comprised of freshwater marsh, herbaceous wetland, mule fat scrub, open water/pond, southern riparian forest, southern riparian woodland and southern willow scrub. The entire Project site is designated as an area determined to be outside the 500-year (and 100-year) floodplain (FEMA 2012). There are approximately 35.6 acres (15 percent of Project site) of slopes on the property that meet the definition of steep slopes under the RPO (Figure 1-33). No RPO sensitive habitat lands occur on site. In addition, none of the cultural sites within the Project site are considered significant under the RPO.

County of San Diego Park Land Dedication Ordinance

The PLDO is the mechanism that enables the funding or dedication of local parkland. The ordinance establishes several methods by which developers may satisfy their park requirements including payment of park fees, dedication of a public park, provision of private recreational facilities, or a combination of these methods.

Natural Community Conservation Planning Program

Regional conservation planning strategies under the California ESA that provide protection, preservation, and conservation of listed and candidate species, their habitats, natural communities, and natural resources, while continuing to allow appropriate development and growth within the state, are authorized and implemented under the NCCP Act of 1991. These strategies are designed to allow for growth as well as provide protection and conservation to threatened and endangered species through multi-species, habitat-based and long-term approaches that ensure both the conservation of, and net benefits to, the affected species. Development and implementation of regional multi-species open space systems is intended to protect viable populations of key sensitive plant and animal species and their habitat while accommodating continued economic development and quality of life for residents of the region.

The Proposed Project site is not within an adopted MSCP Subarea Plan. Refer to Subchapter 2.4, *Biological Resources*, for additional information on NCCP implementation through the Habitat Loss Permit (HLP) Ordinance.

County of San Diego Subdivision Ordinance

The County Subdivision Ordinance sets forth development standards for the subdivision of land with respect to design, dedication and access, and required improvements. Applicable standards for the Proposed Project include several design regulations associated with lot size, orientation and configuration.

County of San Diego Light Pollution Code

The LPC is a County regulatory ordinance that restricts the use of outdoor lighting that emits undesirable light rays into the night sky that would have a detrimental effect on astronomical research. Although the primary intent of the code is to curb lighting that may affect astronomical research at the Mount Palomar and Mount Laguna observatories, it also contains language to minimize spill light into the dark night sky and adjacent neighborhoods. The LPC defines two zones in the unincorporated portion of San Diego County. Zone A consists of areas within a 15-mile radius of Mount Laguna and Mount Palomar. Zone B pertains to all remaining areas that are not defined as Zone A. The Proposed Project site falls within Zone B of the ordinance, which is defined as all areas within the territorial limits of the unincorporated portion of San Diego County that are not within a 15-mile radius of the Palomar Observatory or the Mount Laguna Observatory.

Congestion Management Program Update

The Congestion Management Program (CMP) guidelines stipulate that any development project generating 2,400 or more ADT, or 200 or more peak hour trips, must be evaluated in accordance with requirements of the Regional CMP, which requires enhanced CEQA review. The CMP requires that, as part of the additional CMP analysis, freeway links with 50 or more peak hour project trips (in either direction) must be addressed as part of the traffic impact analysis. Also, a ramp meter analysis would be required if the project trips would generate 20 or more trips at freeway on-ramps with existing ramp meters.

3.1.4.2 Analysis of Project Effects and Determination as to Significance

Goals, Policies and Objectives of Applicable Land Use Plans

Guideline for the Determination of Significance

A significant land use impact would occur if the Proposed Project would:

1. Conflict with the land use goals, objectives, policies, and recommendations of the adopted applicable plans, policies, ordinances, guidelines or regulations adopted for protection of environmental resources or values.

Guideline Sources

This land use guideline is based on Appendix G of the CEQA Guidelines and County staff guidance. This guideline is intended to ensure conformance with existing regional and local planning efforts.

Analysis

County of San Diego General Plan

Aesthetics. This section is divided into four separate issues. Refer to Subchapter 2.1, *Aesthetics*, for the details of the aesthetics impact analysis for implementation of the Proposed Project.

Scenic Vistas. To preserve scenic vistas and resources, the Proposed Project must apply General Plan goals and policies from the Land Use, Mobility and Conservation and Open Space Elements by requiring development to preserve or conserve scenic features of the County. The relevant policies are: LU-6.6, LU-6.7, LU-6.9, LU-10.1, LU-10.2, M-2.3, COS-11.1, COS-11.3 and COS-11.7 (refer to the County General Plan [County 2011] for the text of these policies). The Project complies with these policies by proposing development in the former agricultural area and away from natural areas with intact sensitive resources. In addition, the Project complies with these policies by proposing a conservation-oriented design, conserving open space and natural resources, providing open space on steep slopes to protect natural topography, and to minimize and mitigate visual impacts from roads and vistas. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Scenic Resources. The General Plan policies associated with scenic resources are discussed above under *Scenic Vistas*.

Visual Character or Quality. To maintain the visual character and quality, the Proposed Project must apply General Plan goals and policies from the Land Use, Mobility and Housing Elements. The relevant policies are: LU-2.5, LU-12.4, M-10.6 and H-2.1 (refer to the County General Plan [County 2011] for the text of these policies). The Project complies with these policies by implementing a Specific Plan to reflect the community character including the equestrian uses, providing greenbelts to define the community, incorporating measures to minimize visual environmental impacts and promoting a well-designed development that would not detract from the existing community. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Light or Glare. To maintain dark skies, the Proposed Project must apply General Plan goals and policies from the Conservation and Open Space Element by reducing the potential for light or glare impacts. The relevant policies are COS-13.1 and COS-13.2 (refer to the County General Plan [County 2011] for the text of these policies). The Project complies with these policies by preservation of the dark skies that are consistent with the rural character of the community by implementing a lighting plan that regulates the Project's outdoor lighting. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project at the project level (Aes-1.2, 1.6 and 4.2; refer to Chapter 7.0 of the County General Plan EIR [2011] for full language). These measures are also imposed upon the Proposed Project. The Project is subject to the San Dieguito Community Plan

that ensures that the development would reflect the character and vision of the area and avoid scenic resource impacts. The Design Review process requires consistency during site design. Protection of sensitive biological habitats and natural/scenic resources is implemented through RPO requirements and development of the NCMSCP. The Project implements Conservation Subdivision requirements to conserve visual resources on site. The Light Pollution Code and Zoning Ordinance regulations have been applied to protect the environment from excessive artificial lighting impacts.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for protection of aesthetics. **Potential land use impacts would be less than significant.**

Air Quality. This section is divided into five separate issues. Refer to Subchapter 2.2, *Air Quality*, for the details of the air quality impact analysis for implementation of the Proposed Project.

Air Quality Plans. There are no General Plan goals or policies associated with air quality plans that are specifically applicable to the Proposed Project. No impacts would occur.

Air Quality Violations. To maintain air quality, the Proposed Project must apply General Plan goals and policies from the Conservation and Open Space Element by reducing impacts associated with air quality violations. The relevant policies are COS-14.1, COS-14.9, COS-14.10, COS-15.1 and COS-15.4 (refer to the County General Plan [County 2011] for the text of these policies). The Project complies with these policies because the Project would implement best available control technologies (BACT) and practices into its design. The Project would be built in accordance with the Building Industry Association's California Green Building Program to reduce impacts to air quality. The key CGB design features would account for 15 percent greater energy efficiency than the current Title 24 2008 energy code. Adherence to these policies would reduce impacts associated with air quality from Project implementation. Construction would include site dust control measures, use of low-emissions construction equipment and low-VOC paint requirements for the reduction of toxic air contaminants. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Non-attainment Criteria Pollutants. The General Plan policies associated with non-attainment criteria pollutants are discussed above under *Air Quality Violations*.

Sensitive Receptors. The County General Plan does not include policies related specifically to sensitive receptors. No impacts would occur.

Objectionable Odors. There are no General Plan goals or policies associated with odors that are specifically applicable to the Proposed Project. No impacts would occur.

General Plan Mitigation Measures. The General Plan EIR implemented a mitigation measure that is applicable to the Proposed Project at the project level (Air-2.5; refer to Chapter 7.0 of the County General Plan EIR [2011] for full language). This measure requires application of

standards (listed as project design features [refer to Table 1-3 and Chapter 7.0 of this EIR]) that would prevent release of construction-related pollutants, thereby substantially reducing the potential for air quality violations from the Project, even though it was not foreseen in RAQS or SIP. Finally, the County would update SANDAG on the status of the Proposed Project so that the regional plans can be adjusted.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for protection of air quality. **Potential land use impacts would be less than significant.**

Agricultural Resources. This section is divided into three separate issues. Refer to Subchapter 2.3, *Agricultural Resources*, for the details of the agricultural resource impact analysis for implementation of the Proposed Project.

Conversion of Agricultural Resources. To reduce impacts due to the direct conversion of agricultural resources, the Proposed Project must apply policies from the Land Use and Conservation and Open Space Elements. The relevant policies are LU-6.4, LU-7.1 and COS-6.4 (refer to the County General Plan [County 2011] for the text of these policies). The Proposed Project complies with these policies because it has been designed to group proposed development to increase the amount of contiguous open space; approximately 36.5 acres of existing on-site agricultural uses would be preserved in an agricultural easement in the northwestern portion of the Project site. The proposed trails have been designed to be adjacent to existing and proposed development in order to minimize impacts to agricultural resources. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Land Use Conflicts. To avoid agricultural resource impacts related to land use conflicts, the Proposed Project must apply policies from the Land Use and Conservation and Open Space Elements. The relevant policies are LU-7.1 and COS-6.3 (refer to the County General Plan [County 2011] for the text of these policies). The Proposed Project complies with these policies because it has been designed to group proposed development to increase the amount of preserved on-site agricultural uses in an agricultural easement in the northwestern portion of the Project site. The Proposed Project would include a public multi-use trail network within the site that would be compatible with the proposed agricultural preserve. In addition, the agricultural preserve would be fenced. Pesticide use (and the potential for associated residues) at the Project site is considered low, as orchards typically entail only minor pesticide use, and any pesticides used in the proposed agricultural preserve would not be applied directly adjacent to residences. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Indirect Conversion of Agricultural Resources. To protect against indirect conversion of agricultural operations, the Proposed Project must apply policies from the Land Use and Conservation and Open Space Elements. The relevant policy is COS-6.3 (refer to the County General Plan [County 2011] for the text of this policy). The Proposed Project complies with these policies because it would include a public multi-use trail network within the site that would be compatible with the proposed agricultural preserve. The agricultural preserve would be

fenced. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures associated with agricultural resources (refer to Chapter 7.0 of the County General Plan EIR [2011]); however, none are applicable to the Proposed Project as the mitigation measures are at a regional level and not project level.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for protection of agricultural resources. **Potential land use impacts would be less than significant.**

Biological Resources. This section is divided into six separate issues. Refer to Subchapter 2.4, *Biological Resources*, for additional information regarding Proposed Project compliance with the General Plan.

Special Status Species. To minimize impacts to special status species, the Proposed Project must apply goals and policies from the Conservation and Open Space and Land Use Elements. The relevant policies are LU-6.4, LU-6.6, LU-6.7, LU-10.2, COS-1.9, COS-2.1 and COS-2.2 (refer to the County General Plan [County 2011] for the text of these policies). The Proposed Project complies with these policies because it was designed to minimize impacts to biologically sensitive areas, including habitat for sensitive species. Due to grouping of the proposed development, larger areas of open space can be preserved on site. Specifically, approximately 28.2 acres (11.8 percent of the Project site) would be protected within a biological open space easement. Biological open space on the site would primarily consist of wetlands, wetland buffers, riparian, oak woodland and grassland habitats. Preservation of these habitats would continue to provide foraging and breeding habitat for a variety of species. In addition, the Project would mitigate for impacts to sensitive species and their habitats through on- and off-site preservation. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources.

Riparian Habitat and Other Sensitive Natural Communities. To help preserve riparian habitat and other sensitive natural communities, the Proposed Project must apply General Plan goals and policies from the Land Use and Conservation and Open Space Elements. The relevant policies are LU-6.4, LU-6.6, LU-6.7, LU-10.2, COS-1.9, COS-2.1, COS-2.2 and COS-3.1 (refer to the County General Plan [County 2011] for the text of these policies). The project complies with these policies by grouping residences together to protect sensitive habitats, steep slopes and agricultural lands. Open space areas were selected primarily to avoid and preserve sensitive vegetation communities. Approximately 146.5 acres (or approximately 61.3 percent of the site) of open space (consisting of biological set-asides, slope easements, groves or park/recreational/undeveloped areas) would be located on site (Figure 1-13). This would include approximately 28.2 acres (11.8 percent of the Project site) of biological open space easement. In addition, the Project would mitigate for impacts to sensitive habitats through on- and off-site preservation. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources.

Federally Protected Wetlands. To avoid impacts to federally protected wetlands, the Proposed Project must apply goals and policies from the Conservation and Open Space Element. The relevant policies are COS-3.1 and COS-3.2 (refer to the County General Plan [County 2011] for the text of these policies). The project complies with these policies by including mitigation for impacts to wetlands, including a 1:1 creation component. Therefore, no net loss of wetlands would occur due to Project implementation. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources.

Wildlife Movement Corridors. To address potential impacts to wildlife movement corridors and nursery sites, the Proposed Project must apply goals and policies from the Land Use and Conservation and Open Space Elements. The relevant policies are LU-6.1, LU-6.7 (refer to the County General Plan [County 2011] for the text of these policies). The project complies with these policies by situating development at the western edge of existing development where there is limited opportunity for wildlife movement to the south, east and north of the Project site. Project development and roadways would mainly be placed in areas of non-sensitive habitats, and by adherence to these policies the Proposed Project would not in conflict with applicable policies adopted for protection of environmental resources.

Local Policies and Ordinances. There are no General Plan goals or policies associated with local policies and ordinances that are specifically applicable to the Proposed Project. No impacts would occur.

Habitat Conservation Plans and Natural Community Conservation Plans. There are no General Plan goals or policies associated with habitat conservation plans and natural community conservation plans that are specifically applicable to the Proposed Project. No impacts would occur.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project at the project level (Bio-1.5, 1.6, 1.7, 2.2 and 2.3; refer to Chapter 7.0 of the County General Plan EIR [2011] for full language). These measures are also imposed upon the Proposed Project. These measures require application of standards (listed as mitigation [refer to Chapter 7.0 of this EIR]) that would avoid and/or minimize biological resources impacts. The Project is subject to the County Guidelines for Determining Significance for Biological Resources, RPO, BMO and HLP Ordinance, which ensure that the development would avoid and minimize impacts to sensitive species and vegetation communities to the extent possible and that significant impacts are mitigated in accordance with these regulations. The Project is subject to state and federal regulatory wetland permitting requirements to protect biological resources; required regulatory permits would be obtained prior to construction of the project. In addition, the Project would preserve wetlands and wetland buffers, in accordance with RPO. Project development has also been consolidated to reduce edge effects and concentrated in the portions of the site with the lowest, relative biological value.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for protection of biological resources. **Potential land use impacts would be less than significant.**

Cultural Resources. This section is divided into four separate issues. Refer to Subchapter 2.5, *Cultural Resources*, for additional information regarding Proposed Project compliance with the General Plan.

Historical Resources. To protect historic resources, the Proposed Project must apply General Plan goals and policies from the Conservation and Open Space Element. The relevant policy is COS-8.1 (refer to the County General Plan [County 2011] for the text of this policy). The Proposed Project complies with these policies because it results in less than significant impacts to historic resources. Two farm/ranch complexes are located within the Proposed Project site. Both of these complexes were evaluated and determined to not be significant resources under CEQA or RPO. These structures were determined to not be significant because they do not contain historic, architectural, or informational value. In addition, the Project would include preservation of one of the equestrian complexes in Neighborhood 5. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Archaeological Resources. To minimize or avoid impacts to archaeological resources, the Proposed Project must apply General Plan goals and policies from the Conservation and Open Space Element. The relevant policy is COS-7.1, COS-7.2, COS-7.3 and COS-7.4 (refer to the County General Plan [County 2011] for the text of these policies). The Proposed Project complies with these policies because of the nine archaeological sites and one isolate were documented and evaluated on site for significance according to CEQA, eight were determined not to be significant resources under CEQA or RPO; their research potential has been fulfilled through documentation, and no mitigation measures are required. One site, CA-SDI-17,506, was assessed as a significant resource under CEQA, but it does not meet the requirements for significance under RPO. There is also a potential that grading activities associated with the Project could result in the discovery of previously unrecorded, potentially significant archaeological resources. These potentially significant impacts would be mitigated according to the applicable policies. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Paleontological Resources. To address impacts to paleontological resources, the Proposed Project must apply General Plan goals and policies from the Conservation and Open Space Element. The relevant policy is COS-9.1 (refer to the County General Plan [County 2011] for the text of this policy). The Proposed Project complies with these policies because the geologic formations underlying the Project site and proposed off-site roadway improvement areas were assessed for the potential to contain paleontological resources and found to contain deposits with both high and moderate paleontological sensitivity ratings. In addition, the Project would include approximately 1,090,000 cy of cut and fill within the site. These potentially significant impacts would be mitigated in accordance with the applicable policies. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values. Refer to Subchapter 2.7, *Paleontological Resources*, for additional information regarding Proposed Project compliance with the General Plan.

Human Remains. To protect human remains, the Proposed Project must apply General Plan goals and policies from the Conservation and Open Space Element. The relevant policy is COS-7.5 (refer to the County General Plan [County 2011] for the text of this policy). The Proposed Project complies with this policy because it will not result in impacts to human remains. This is due to the fact that no evidence of human remains or religious, ritual or other special activities were found during the current archaeological evaluation. A grading monitoring program will be included in the mitigation monitoring and reporting program, which includes State law requirements should human remains be identified during ground disturbing activities. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project at the project level (Cul-1.1, 1.6, 2.4, 2.5, 2.6, 3.1, 3.2 and 4.1; refer to Chapter 7.0 of the County General Plan EIR [2011] for full language). These measures are also imposed upon the Proposed Project. The Project is subject to the County Guidelines for Determining Significance for Cultural Resources, County Guidelines for Determining Significance for Paleontological Resources, RPO, CEQA, Grading and Clearing Ordinance and Zoning Ordinance, which ensure that the development would avoid and minimize impacts to cultural (and paleontological) resources to the extent possible and that significant impacts are mitigated in accordance with these regulations. The Project is also required to protect undiscovered buried archaeological resources by utilizing a qualified archaeologist and Native American monitor for ground-disturbing activities. In addition, the Project would require the promotion of preservation and proper handling of human remains, if discovered during ground disturbance.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for protection of cultural resources. **Potential land use impacts would be less than significant.**

Noise. This section is divided into five separate issues. Refer to Subchapter 2.6, *Noise*, for additional information regarding Proposed Project compliance with the General Plan.

Excessive Noise Levels. To address impacts related to excessive noise levels, the Proposed Project must apply policies from the Land Use, Mobility, and Noise Elements. The relevant policies are LU-2.8, M-2.4, N-2.1, N-4.1 and N-4.2 (refer to the County General Plan [County 2011] for the text of these policies). The Proposed Project complies with these policies because it would comply with these General Plan policies by implementing Project design considerations and mitigation measures to demonstrate that the project complies with the applicable standards through testing and reporting. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Excessive Groundborne Vibration. To avoid impacts related to excessive groundborne vibration, the Proposed Project must apply policies from the Noise Element. The relevant policies are N-6.3 and N-6.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies through preparation of a blast plan to demonstrate that the project complies with the applicable standards through testing and

reporting. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Permanent Increase in Ambient Noise Levels. The General Plan policies associated with permanent increase in ambient noise levels that are applicable to the Proposed Project are discussed above under *Excessive Noise Levels*.

Temporary Increase in Ambient Noise Levels. To avoid impacts associated with temporary increases in ambient noise levels, the Proposed Project must apply policies from the Noise Element. The relevant policies are N-6.3 and N-6.4 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies through compliance with the County Noise Ordinance. Noise levels associated with ripping, rock breaking and blasting could result in potentially significant impacts to off-site residential uses without the implementation of mitigation measures. Accordingly, mitigation measures are proposed for some construction activities. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Excessive Noise Exposure from a Public or Private Airport. To avoid noise impacts associated with airports, the Proposed Project must apply policies from the Land Use, Safety and Noise Elements. There are no General Plan policies applicable to the Proposed Project because the Project is not located near any airports or in the vicinity of aircraft flight patterns. No impacts would occur.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project (Noi-1.1, 1.3 and 3.2; refer to Chapter 7.0 of the County General Plan EIR [2011]). These measures are also applicable to the Proposed Project. A Project acoustical analysis was prepared to identify potential noise impacts and recommended noise reduction and mitigation measures. Refer to Subchapter 2.6 and Chapter 7.0 of this EIR for noise mitigation measures.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for protection of the noise environment. **Potential land use impacts would be less than significant.**

Paleontological Resources. This issue area is discussed above under Cultural Resources. Refer to Subchapter 2.7, *Paleontological Resources*, for additional information regarding Proposed Project compliance with the General Plan. The Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for protection of paleontological resources. **Potential land use impacts would be less than significant.**

Transportation/Traffic. This section is divided into six separate issues. Refer to Subchapter 2.8, *Transportation/Traffic*, for additional information regarding Proposed Project compliance with the General Plan.

Unincorporated County Traffic and LOS Standards. To address impacts related to County traffic and LOS standards, the Proposed Project must apply policies from the Land Use and Mobility Elements. The relevant policies are LU-12.2, M-1.1, M-1.2, M-2.1, M-2.3, M-3.1, M-3.2 and M-9.1 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by providing a development that accommodates multi-modal transportation options (automobiles, walking, bicycling and horseback riding) and an interconnected local roadway network, implementing traffic mitigation to reduce County roadway impacts to less than significant, implementing roadway improvements, and providing multiple access points to the Project. Proposed roadways and trails have been designed to meet County standards to accommodate facility users. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Adjacent Cities Traffic and LOS Standards. To avoid impacts associated with traffic and LOS standards of adjacent cities, the Proposed Project must apply policies from the Land Use and Mobility Elements. The relevant policies are LU-4.3 and M-4.6 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies in that the Project traffic analysis evaluated potential traffic impacts using both the County and cities of Escondido and San Marcos methodology and significance thresholds since the Project would potentially impact roadway segments and intersections within these three jurisdictions. With implementation of the Proposed Project, the following significant and unavoidable impacts would occur in the City of Escondido: (1) direct and cumulative impacts would occur to the segment of Country Club Drive from Auto Park Way to Hill Valley Drive in the City of Escondido (Impacts TR-1a and TR-1b); (2) a considerable contribution to the cumulative impact at the signalized intersection of Auto Park Way and Mission Road in the City of Escondido (Impact TR-3); and (3) a considerable contribution to the cumulative impact at the signalized intersection of Auto Park Way and Country Club Drive in the City of Escondido (Impact TR-4). For Impacts TR-1a, TR-1b and TR-4, mitigation measures M-TR-1a and 1b would mitigate direct and/or cumulative impacts to the segment of Country Club Drive from Auto Park Way to Hill Valley Drive and the intersection of Auto Park Way and Country Club Drive; however, the improvements necessary to reduce the cumulative impact is the responsibility of another jurisdiction (City of Escondido) and it cannot be guaranteed that the City would implement the recommended improvements or that the improvements would be completed in time to avoid the significant cumulative impact. As discussed in detail in Subchapter 2.8, the 2012 *Escondido General Plan Update FEIR* included improvements to the intersection of Auto Park Way and Mission Road to improve traffic flow; however, impacts still remained significant and unavoidable. As such, the Escondido City Council approved a Statement of Overriding Considerations. No additional mitigation measures were recommended. The Proposed Project's contribution to this cumulative impact in the City of Escondido remains significant and unavoidable. The County TIF does not cover improvements to intersections in the City of Escondido and there are no reasonable improvements that this Proposed Project could implement to increase the intersection capacity. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Rural Road Safety. To avoid impacts related to rural road safety, the Proposed Project must apply policies from the Land Use and Mobility Elements. The relevant policies are LU-2.8, LU-6.10, M-4.3, M-4.4, M-4.5 and M-9.1 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by designing proposed roadways to meet County standards to avoid traffic safety hazards and accommodate emergency vehicle access, providing roadway improvements to Country Club Drive and incorporating design guidelines of the Project Specific Plan to include rural elements along Project roadways and trails. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Emergency Access. To avoid impacts related to emergency access, the Proposed Project must apply policies from the Land Use, Mobility and Safety Elements. The relevant policies are LU-6.10, LU-12.2, M-1.2, M-3.3, M-4.4, S-3.5 and S-14.1 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by preparing and implementing a fire protection plan, implementing traffic mitigation to reduce impacts and providing multiple access points to the Project and an interconnected roadway network. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Parking Capacity. To address impacts associated with parking capacity, the Proposed Project must apply policies from the Mobility Element. The relevant policies are M-10.1 and M-10.2 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by providing vehicular parking that meets County standards, as well as a staging area for trail and equestrian use. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Alternative Transportation. To avoid impacts related to alternative transportation, the Proposed Project must apply policies from the Land Use and Mobility Elements. The relevant policies are LU-5.5, M-3.1, M-3.2, M-4.3, M-11.1 and M-11.7 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by providing a development that accommodates multi-modal transportation options (automobiles, walking, bicycling and horseback riding) and an interconnected local roadway and multi-use trails network. Proposed roadways, bike routes and trails have been designed to meet County standards to accommodate facility users. In addition, design guidelines of the proposed Specific Plan would be incorporated into Project roadways and trails to include rural elements along these facilities. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project (Tra-1.3, 1.4, 1.7, 2.1, 4.2, 4.3 and 4.4; refer to Chapter 7.0 of the County General Plan EIR [2011]). These measures are also applicable to the Proposed Project. The Project is subject to the County Public Road Standards, County Guidelines for Determining Significance for Transportation and Traffic, County Guidelines for Determining Significance for Wildland Fire and Fire Protection, San Diego County TIF Ordinance, Building and Fire Codes and Subdivision Ordinance. Associated potential Project

impacts are analyzed in this EIR pursuant to the relevant significance guidelines (see Subchapters 2.8 and 2.9). Project impacts were evaluated using the County and cities of Escondido and San Marcos methodology and significance thresholds because traffic impacts would occur on roadway segments and intersections located within these three jurisdictions. Traffic impacts were identified in Subchapter 2.8, as well as recommended mitigation measures to reduce such impacts.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for transportation and traffic. **Potential land use impacts would be less than significant.**

Hazards and Hazardous Materials. This section is divided into nine separate issues. Refer to Subchapter 2.9, *Hazards and Hazardous Materials*, for additional information regarding Proposed Project compliance with the General Plan.

Transport, Use and Disposal of Hazardous Materials. The General Plan does not include policies related specifically to transport, use and disposal of hazardous materials. No impacts would occur.

Accidental Release of Hazardous Materials. The General Plan does not include policies related specifically to accidental release of hazardous materials. No impacts would occur.

Hazards to Schools. The General Plan does not include policies related specifically to hazards to schools. No impacts would occur.

Existing Hazardous Materials Sites. The General Plan does not include policies related specifically to existing hazardous materials sites. No impacts would occur.

Public Airports. To avoid hazards associated with public airports, the Proposed Project must apply policies from the Land Use, Safety and Mobility Elements. There are no policies applicable to the Proposed Project because the Project is not located near any airports or within an Airport Influence Area. No impacts would occur.

Private Airports. To avoid hazards associated with private airports, the Proposed Project must apply policies from the Land Use, Safety and Mobility Elements. There are no policies applicable to the Proposed Project because the Project is not located near any airports. No impacts would occur.

Emergency Response and Evacuation Plans. To address hazards associated with emergency response and evacuation plans, the Proposed Project must apply policies from the Mobility and Safety Elements. The relevant policies are M-1.2, M-3.3, M-4.3 and S-1.3 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by implementing roadway improvements. Specifically, the FPP demonstrates that the Project is consistent with the applicable fire codes and includes specific features to address potential fire protection issues such as those related to roadway access, premises identification, gates, water supply, fire sprinklers, fire-resistant construction, vegetation management and fuel

modification zones. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Wildland Fires. To avoid hazard impacts associated with wildland fires, the Proposed Project must apply policies from the Land Use and Safety Elements. The relevant policies are LU-6.11, S-3.1, S-3.2, S-3.3, S-3.4, S-3.6 and S-4.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by preparing an FPP (Firewise 2015; Appendix L of this EIR), incorporating adequate fuel modification zones and implementing roadway improvements to facilitate improved emergency vehicle movement and response times. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Vectors. The General Plan does not include policies related specifically to vectors. No impacts would occur.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project (Haz-3.2, 4.1 and 4.3; refer to Chapter 7 of the County General Plan EIR [2011]). These measures are also applicable to the Proposed Project. The Project is subject to the County Guidelines for Determining Significance for Emergency Response Plans and County Guidelines for Determining Significance for Wildland Fire and Fire Protection, and associated potential Project impacts are analyzed in this EIR pursuant to the relevant significance guidelines (see Subchapter 2.9). The Project also incorporates features to reduce fire risks, such as establishment of adequate fuel modification zones and use fire resistant materials (refer to Subchapter 2.9, Table 1-3 and Chapter 7.0 of this EIR).

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for hazards and hazardous materials. **Potential land use impacts would be less than significant.**

Public Services. This section is divided into four separate issues. Refer to Subchapter 2.10, *Public Services*, for additional information regarding Proposed Project compliance with the General Plan.

Fire Protection Services. To address impacts to fire protection services, the Proposed Project must apply policies from the Land Use and Safety Elements. The relevant policies are LU-6.4, LU-6.11, LU-12.3, LU-12.4, S-3.4, S-6.1, S-6.2, S-6.3, S-6.4 and S-6.5 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by providing adequate fuel modification zones, coordinating with the Rincon MWD to ensure adequate fire flows are provided, paying applicable development impact fees for public services and coordinating with the San Diego County Fire Authority to ensure fire protection services are available to serve the Project. In addition, the Project would be located less than one mile from a new fire station to be constructed in conjunction with Harmony Grove Village directly to the south of the Project site. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Police Protection Services. To address impacts to police protection services, the Proposed Project must apply policies from the Land Use Element. The relevant policies are LU-12.3 and LU-12.4 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by paying applicable development impact fees for public services and coordinating with the San Diego County Sheriff to ensure police protection services are available to serve the Project. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

School Services. There are no General Plan goals or policies associated with other public services that are specifically applicable to the Proposed Project. No impacts would occur.

Other Public Services. There are no General Plan goals or policies associated with other public services that are specifically applicable to the Proposed Project. No impacts would occur.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project (Pub-1.4, 1.7 and 1.9; refer to Chapter 7.0 of the County General Plan EIR [2011]). These measures are also applicable to the Proposed Project. The Project and its associated proposed GPA are being reviewed for consistency with General Plan goals and policies related to wildfire risk and fire protection and applicable development impact fees would be assessed and paid by the applicant to fund the Project's fair-share contribution towards fire protection services.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for public services. **Potential land use impacts would be less than significant.**

Geology and Soils. There are no General Plan policies related to geology and soils. **No land use impacts would occur.**

Global Greenhouse Gases. This section is divided into two separate issues. Refer to Section 3.1.1, *Global Greenhouse Gases*, for additional information regarding Proposed Project compliance with the General Plan.

Compliance with AB 32. To address compliance with AB 32, the Proposed Project must apply policies from the Conservation and Open Space Element. The relevant policies are COS-15.1, COS-17.1 and COS-20.4 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by providing opportunities to utilize solar power, incorporating sustainability and efficiency design features into the Project, and achieving or exceed Title 24 standards. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Potential Effects of Global Climate Change on the Proposed Project. To address potential effects of global climate change, the Proposed Project must apply policies from the Conservation and Open Space Element. The relevant policies are COS-15.1, COS-17.1 and COS-20.4 (refer to

the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by providing opportunities to utilize solar power, incorporating sustainability and efficiency design features into the Project, and achieving or exceed Title 24 standards. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures to minimize potentially significant impacts related to global climate change (refer to Chapter 7 of the County General Plan EIR [2011]); however, none are applicable to the Proposed Project because they are not specific to the development of the Proposed Project.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for greenhouse gas reduction. **Potential land use impacts would be less than significant.**

Energy. This issue area is discussed under Utilities and Service Systems. Refer to Section 3.1.2, *Energy*, for additional information regarding Proposed Project compliance with the General Plan. The Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for energy systems and use. **Potential land use impacts would be less than significant.**

Hydrology and Water Quality. This section is divided into nine separate issues. Refer to Section 3.1.3, *Hydrology and Water Quality*, for additional information regarding Proposed Project compliance with the General Plan.

Water Quality Standards and Requirements. To address conformance with water quality standards and requirements, the Proposed Project must apply policies from the Land Use and Conservation and Open Space Elements. The relevant policies are LU-6.5, LU-6.9, LU-14.1, LU-14.2, LU-14.3, LU-14.4, COS-4.2, COS-4.3, COS-4.4, COS-5.2, COS-5.3 and COS-5.5 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by implementing low impact development (LID) features (e.g., detention basins, bioswales, permeable surfaces in applicable areas [such as multi-purpose trails]), avoiding development on ridgelines and steeper slopes, providing drainage improvements that includes erosion protection, providing treatment for wastewater generated by the Project in accordance with required standards, and installing drought tolerant landscaping. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Groundwater Supplies and Recharge. To avoid impacts related to groundwater supplies and recharge, the Proposed Project must apply policies from the Land Use and Conservation and Open Space Elements. The relevant policies are LU-13.1, LU-13.2, COS-4.1, COS-4.2, COS-4.3, COS-4.4 and COS-5.2 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by coordinating with the Rincon MWD to ensure availability of water services for residents, incorporating water conservation features (e.g., use of “smart irrigation” technology), installing drought tolerant landscaping and implementing LID features (e.g., detention basins, bioswales, permeable surfaces in applicable

areas [such as multi-purpose trails]). By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Erosion or Siltation. To address impacts associated with erosion and siltation, the Proposed Project must apply policies from the Land Use and Conservation and Open Space Elements. The relevant policies are LU-6.5, LU-6.9 and COS-5.3 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by implementing LID features (e.g., detention basins, bioswales, permeable surfaces in applicable areas [such as multi-purpose trails]), avoiding development on ridgelines and steeper slopes, and providing drainage improvements that includes erosion protection. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Flooding. To address flooding impacts, the Proposed Project must apply policies from the Land Use and Safety Elements. The relevant policies are LU-6.5, LU-6.10, S-9.2, S-10.2, S-10.3, S-10.4 and S-10.6 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by implementing LID features (including use of permeable surfaces and features), avoiding development within mapped floodplain and providing drainage improvements to avoid potential flooding. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Exceed Capacity of Stormwater Systems. To address stormwater system capacity impacts, the Proposed Project must apply policies from the Land Use, Conservation and Open Space and Safety Elements. The relevant policies are LU-6.5, LU-6.9, COS-4.3, COS-5.2, S-9.2, S-10.2, S-10.3, S-10.4, S-10.5 and S-10.6 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by implementing LID features (e.g., detention basins and bioswales), maintaining overall existing drainage patterns, avoiding habitable development within mapped floodplains, constructing crossing structures associated with Mt. Whitney Road to provide adequate capacity to accommodate associated peak 100-year flows, construction applicable pad elevations in Neighborhood 3 a minimum of 12 inches above the 100-year peak flow surface water elevations and providing drainage improvements to accommodate Project runoff. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Housing within a 100-year Flood Hazard Area. The Proposed Project would not include placement of housing within a 100-year floodplain. Therefore, no General Plan goals or policies associated with housing within a 100-year floodplain are specifically applicable to the Proposed Project. No impacts would occur.

Impeding or Redirecting Flood Flows. To address impacts related to impeding or redirecting flood flows, the Proposed Project must apply policies from the Safety Element. The relevant policies are S-9.3 and S-10.1 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by avoiding habitable development within mapped floodplains, constructing crossing structures associated with Mt.

Whitney Road to provide adequate capacity to accommodate associated peak 100-year flows, construction applicable pad elevations in Neighborhood 3 a minimum of 12 inches above the 100-year peak flow surface water elevations and providing drainage improvements to accommodate Project runoff. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Dam Inundation and Flood Hazards. To address impacts related to dam inundation and flood hazards, the Proposed Project must apply policies from the Safety Element. The relevant policies are S-9.3 and S-10.1 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by avoiding habitable development within mapped floodplains, constructing crossing structures associated with Mt. Whitney Road to provide adequate capacity to accommodate associated peak 100-year flows, construction applicable pad elevations in Neighborhood 3 a minimum of 12 inches above the 100-year peak flow surface water elevations and providing drainage improvements to accommodate Project runoff. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Seiche, Tsunami and Mudflow Hazards. To avoid hazards related to seiches, tsunamis and mudflows, the Proposed Project must apply policies from the Safety Element. The relevant policies are S-8.1, S-8.2 and S-9.3 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by avoiding habitable development within mapped floodplains and engineering Project development in accordance with required regulatory standards to ensure slope stability. According to the Project geotechnical studies (GEOCON 2012a and 2012b; refer to Appendix K of this EIR), there is no evidence of previous landslides, and the potential for landslides within the Project site is low. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project (Hyd-1.3, 1.5, 1.6, 1.8, 2.1, 3.2, 6.1 and 8.2; refer to Chapter 7.0 of the County General Plan EIR [2011]). These measures are also applicable to the Proposed Project. The Project is subject to the County Guidelines for Determining Significance for Surface Water Quality, Hydrology and Groundwater Resources, and associated potential Project impacts are analyzed in this EIR pursuant to the relevant significance guidelines (see Section 3.1.3 of this EIR). The Project is also subject to the RPO to restrict encroachment into steep slopes. Additionally, an MUP is required for the proposed WTWRF.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for hydrology and water quality. **Potential land use impacts would be less than significant.**

Land Use and Planning. Significance of land use issues related to the Proposed Project and General Plan conformance is analyzed throughout this section.

Physical Division of an Established Community. To address the physical division of an established community, the Proposed Project must apply policies from the Land Use, Mobility,

and Housing Elements. The relevant policies are LU-2.3, LU-2.5, LU-12.4, M-10.6 and H-2.1 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies as discussed within the analysis in “Community Character.” In summary, the existing Proposed Project area is described as a semi-rural community. There is a lack of established neighborhoods, as well as public services. As such, there is no existing community on site to divide. To the contrary, the Proposed Project would create a semi-rural residential development. The planned public facilities proposed by the Project (parks and trails) may provide a point of cohesion and a place for surrounding residents to gather. All utility lines would be located underground on site and/or within existing/proposed roadways. No impacts associated with physical division of an established community would occur from Project implementation. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures associated with land use and planning (refer to Chapter 7.0 of the County General Plan EIR [2011]); however, none are applicable to the Proposed Project as the Project would not result in impacts associated with land use and planning.

The Proposed Project is not in conflict with applicable policies of the County General Plan for land use and planning. **Potential land use impacts are less than significant.**

Population and Housing. There are no General Plan policies related to population and housing. **No impacts would occur.**

Recreation. This section is divided into two separate issues. Refer to Section 3.1.6, *Recreation*, for additional information regarding Proposed Project compliance with the General Plan.

Deterioration of Parks and Recreational Facilities. To address impacts related to deterioration of parks and recreational facilities, the Proposed Project must apply policies from the Land Use, Mobility, Housing, and Conservation and Open Space Elements. The relevant policies are LU-12.1, LU-12.2, M-12.2, M-12.8, M-12.10, COS-21.1 and COS-24.1 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by provision of a public neighborhood park and staging area, a public multi-use trail system, two private parks, and a private Recreation Facility with a small community building, swimming pool, picnic areas, lawn area and children’s play area. The Project would also comply with the County’s PLDO by providing in lieu fees, parkland or a combination of both. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Construction of New Recreational Facilities. To avoid impacts associated with construction of new recreational facilities, the Proposed Project must apply policies from the Land Use, Mobility, Housing and Conservation and Open Space Elements. The relevant policies are LU-6.4, M-12.9, M-12.10 and COS-21.3 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by providing public and private parks and a public multi-use trail system within appropriate areas throughout the development. The proposed parks and Recreation Facility would incorporate design guidelines

of the Specific Plan to reflect the surrounding character. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project (Rec-1.5; refer to Chapter 7.0 of the County General Plan EIR [2011]). This measure is also applicable to the Proposed Project. The Project is subject to the PLDO and would fulfill its associated requirements through provision of on-site public and private parks and payment of in lieu fees.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for recreation. **Potential land use impacts would be less than significant.**

Utilities and Service Systems. This section is divided into eight separate issues. Refer to Section 3.1.7, *Utilities and Service Systems*, for additional information regarding Proposed Project compliance with the General Plan.

Wastewater Treatment Requirements. To address compliance with wastewater treatment requirements, the Proposed Project must apply policies from the Land Use Element. The relevant policies are LU-12.1, LU-14.1, LU-14.2 and LU-14.4 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies by providing infrastructure improvements to serve the Project and treatment for wastewater generated by the Project in accordance with required standards. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

New Water or Wastewater Treatment Facilities. To avoid impacts related to new water or wastewater treatment facilities, the Proposed Project must apply policies from the Housing Element. The relevant policy is H-1.3 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with this policy by locating the Proposed Project in an area served by existing roadways and that is near employment centers (in Escondido). Adherence to this policy would reduce impacts associated with new water or wastewater treatment facilities from Project implementation.

Sufficient Stormwater Drainage Facilities. To avoid impacts related to sufficient stormwater drainage facilities, the Proposed Project must apply policies from the Land Use and Conservation and Open Space Elements. The relevant policies are LU-6.5, LU-6.9 and COS-4.3 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by incorporating LID features into the Project and avoiding alteration of ridgelines and steep slopes to preserve major topographic site features and maintain overall drainage patterns. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Adequate Water Supplies. To address impacts associated with adequate water supplies, the Proposed Project must apply policies from the Land Use and Conservation and Open Space

Elements. The relevant policies are LU-13.1, LU-13.2, COS-4.1, COS-4.2, COS-4.3, COS-5.2 and COS-5.5 (refer to the County General Plan [County 2011] for the text of this policy). The Project would comply with these policies by incorporating water conservation measures incorporating water conservation features (e.g., use of “smart irrigation” technology), installing drought tolerant landscaping and on-site infiltration areas (detention basins and other pervious areas). The Proposed Project’s a demand for potable water would be met by water supplies that are planned for and intended to be available over a 20-year planning horizon, under normal conditions and in both single and multiple dry years. Adherence to these policies would reduce impacts associated with water supplies from Project implementation.

Adequate Wastewater Facilities. The General Plan does not include policies related to adequate wastewater facilities that are specifically applicable to the Proposed Project. No impacts would occur.

Sufficient Landfill Capacity. To avoid impacts associated with sufficient landfill capacity, the Proposed Project must apply policies from the Land Use and Conservation and Open Space Elements. The relevant policies are LU-12.1, COS-17.1, COS-17.2, COS-17.6 and COS-17.8 (refer to the County General Plan [County 2011] for the text of these policies). The Project would be consistent with these policies through compliance with construction and demolition waste recycling requirements and provision of recycling containers within the Project. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

Solid Waste Regulations. There are no General Plan goals or policies related to solid waste regulations. No impacts would occur.

Energy. To address impacts related to energy, the Proposed Project must apply policies from the Conservation and Open Space Element. The relevant policies are COS-14.7, COS-15.1 and COS-15.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by providing opportunities to utilize solar power, incorporation of energy efficiency features into Project facilities and meeting or exceeding Title 24 standards. By adherence to these policies, the Proposed Project would not be in conflict with applicable policies adopted for protection of environmental resources or values.

General Plan Mitigation Measures. The General Plan EIR implemented mitigation measures that are applicable to the Proposed Project (USS-1.2, 2.2, 2.3, 3.3, 3.4, 3.5, 4.2, 4.3, 4.5, 6.2, 6.3, 6.8 and 8.1; refer to Chapter 7.0 of the County General Plan EIR [2011]). These measures are also applicable to the Proposed Project. The Project is subject to the County Guidelines for Determining Significance for Surface Water Quality and Hydrology and the County Guidelines for Determining Significance for Groundwater Resources, and associated potential Project impacts are analyzed in this EIR pursuant to the relevant significance guidelines (see Section 3.1.3, *Hydrology and Water Quality*). The Project would incorporate LID features into the Project and provide space for recycled containers within the development.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the County General Plan adopted for utilities and services. **Potential land use impacts would be less than significant.**

Mineral Resources. While the General Plan contains policies related to mineral resources in the Conservation and Open Space Element, none are applicable to the Proposed Project because there are no mineral extraction operations or resources on site or in the vicinity. **No impacts would occur.**

San Dieguito Community Plan

Community Character. Policies applicable to the Proposed Project include General Policies 1 through 7, 9 and 10 (refer to the Community Plan [County 2011] for the text of these policies). The Proposed Project would be consistent with these policies. The Project proposes to develop the Eden Valley area of the San Dieguito Community Plan Area in accordance with the Valiano Specific Plan, which provides the framework for the orderly phased development of the Project site. The site design and layout of the Project would not substantially contrast with the existing visual character and quality of the Project area. The Project would not introduce a new land use that does not currently exist in the immediate area. The Proposed Project would construct a semi-rural residential community with associated park and recreational uses on a 239-acre site located on sloping hillsides and valley floor surrounded by existing and developing residential uses and hillsides and steep ridgelines. Residential lots would be grouped to limit the impact footprint and provide large areas of open space and retention of rustic on-site visual resources, such as large mature tree stands, steep hillsides, avocado orchards, a pond and the equestrian complex. Approximately 146.5 acres (or approximately 61.3 percent of the site) of open space (consisting of biological set-asides, groves, fuel management zones, or park/recreational/undeveloped areas) would be located on site. Extensive landscaping, utilizing species consistent with the existing character of the Project area, would be planted along the site perimeter, along Project roadways, within residential neighborhoods, within parks and recreation uses, and in open space areas. Other open space (including a Trail Head Park) in Neighborhood 3 would provide a buffer between larger lot uses in the vicinity of Milpas Drive. Similarly, the Neighborhood Park and wet weather storage area in Neighborhood 5 would provide visual buffers from larger lots across Country Club Drive and on the north side of Mt. Whitney Road. In addition, the development of the Proposed Project would not impact or block views to any unique landforms or topographic features in the immediate vicinity, such as Mt. Whitney or other prominent ridgelines or hills. Proposed signage would be at the four primary Project entries, which would include entry monuments comprised of low rock walls and boulders with drought-tolerant landscaping.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the San Dieguito Community Plan adopted for community character. **Potential land use impacts would be less than significant.**

Land Use. Policies applicable to the Proposed Project include General Policies 1, 2 and 3; Residential Policies 2, 3, 4, and 5; and Agricultural Policies 1, 2, 5, 6, 8, and 9 (refer to the Community Plan [County 2011] for the text of these policies). The Proposed Project would be

consistent with these policies. The Proposed Project is not a “leap frog” development because it proposes semi-rural residential development within the Semi-Rural Regional Category. As stated above under Community Character Element, the Project proposes to develop the Eden Valley area of the San Dieguito Community Plan Area in accordance with the Valiano Specific Plan, which provides the framework for the orderly phased development of the Project site. The site design and layout of the Project would not substantially contrast with the existing visual character and quality of the Project area, and the Project would not introduce a new land use that does not currently existing in the immediate area. In addition, the proposed residences within the Project site would also be grouped to allow more areas to be retained within open space. Curbs and sidewalks within the Project (consistent with ADA requirements) would be constructed along Project roadways; however, curbs would be wedge curbs, which are more in concert with a rural character, and sidewalks would be adjacent to Project-installed and maintained landscaping. Where appropriate, pathways would be soft textured (e.g., decomposed granite) rather than concrete. Additionally, consistent with the existing surrounding area, extensive use of streetlights is not proposed within the Project (primary intersections would be lighted). The project includes 36.5 acres of agricultural open space to be owned and operated by the HOA. Farming is also allowed as an accessory use on the residential lots.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the San Dieguito Community Plan adopted for land use. **Potential land use impacts would be less than significant.**

Circulation. Policies applicable to the Project include Policies 1 through 5, 7, 13 and 14 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. The internal roads proposed by the Project would be two-lane, undivided roads. The roads have been designed to conform to the site’s topography and would curve to create a meandering feel through the Project site and encourage reduced speeds. In addition, proposed multi-use trails along Project roadways would be separated from vehicular traffic by landscaped parkway or fencing. Consistent with the existing surrounding area, extensive use of streetlights is not proposed within the Project (primary intersections would be lighted). Curbs and sidewalks (consistent with ADA requirements) would be constructed along Project roadways; however, curbs would be wedge curbs, which are more in concert with a rural character, and sidewalks would be adjacent to Project-installed and maintained landscaping. Where appropriate, pathways would be soft textured (e.g., decomposed granite) rather than concrete. Regarding Level of Service, development of the Proposed Project would result in potentially significant direct and cumulative traffic impacts to a few of the study area roadway segments and intersections; however, the Project would only have cumulative (and no direct) impacts to one roadway segment in the County. Implementation of improvements to Country Club Drive, as detailed in Subchapter 2.8, *Transportation/Traffic*, would adequately mitigate the roadway impacts.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Community Plan adopted for circulation. **Potential land use impacts would be less than significant.**

Public Safety, Services and Facilities. Policies applicable to the Project include Safety Policies 1 and 2 and Facilities Policies 1 through 7 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. Police and fire protection service demands would likely increase with implementation of the Proposed Project. It is anticipated, however, that expanded police and fire protection services would be funded, as necessary, from increased property taxes and other revenues to the County resulting from the Proposed Project. As a result, the Project would not generate a significant impact to police protection. With regard to fire protection, substantial fire protection facilities are available in the Project vicinity with the construction of the proposed Harmony Grove Fire Station. A two-acre lot has been transferred to the County for the new fire station and a Community Facilities District (CFD) has been established with a funding mechanism in place. The Project would contribute its fair share to construction and operation of the station. Landscaping at the public park and the wastewater treatment plant will be installed by the developer and then maintained by the County. On-site sewage transport follows natural drainage basins. With regard to facilities, the Proposed Project would include undergrounding proposed utility lines on site. Proposed houses within the Project would include water conservation features that would reduce water use. In addition, the Project's landscape concept plan includes native and drought-tolerant species to reduce the amount of required irrigation. Reclaimed water would be used on common areas. Refer to Section 3.1.7, *Utilities and Service Systems*, for details on minimizing potable water dependence.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Community Plan adopted for Public Safety, Services and Facilities. **Potential land use impacts would be less than significant.**

Conservation. The Conservation Element is divided into several issues. The following issue areas are applicable to the Proposed Project.

General. Policies applicable to the Project include General Policies 1 through 3 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. The Project proposes a GPA to change the land use designation to SR-0.5, a Semi-Rural designation compatible with the surrounding area. The site plan for the Proposed Project has been designed to maintain the semi-rural character of the adjacent Eden Valley by retaining agricultural and biological resources within open space areas, promoting equestrian use and providing a Trail Head Park and a multi-use trail network. In addition, the existing residences further to the north and east of the Project site (in the cities of San Marcos and Escondido) and the majority of the proposed homes in Harmony Grove Village are on smaller-sized lots and grouped, similar to the Proposed Project. The development plan also concentrates residences to protect sensitive habitats, steep slopes and agricultural lands. This would include approximately 28.2 acres (11.8 percent) of the Project site being protected within a biological open space easement. In addition, 36.5 acres (15.3 percent of the site) of existing on-site agricultural uses would be preserved in an agricultural easement in the northwestern portion of the site. In addition, the proposed residential development has been designed to minimize impacts associated with water pollution, air pollution, fire hazard, soil erosion, silting, slide damage, flooding, and hillside cutting and scarring, as analyzed throughout this EIR.

Floodplains and Watercourses. Floodplains and Watercourse Policy 1 is applicable to the Project (refer to the Community Plan [County 2011] for the text of this policy). Consistent with this policy, the Project would include limited impacts to on-site streambeds as allowed by the Resource Protection Ordinance; however, the Project would include mitigation to reduce impacts to streambeds to less than significant levels. Refer to Subchapter 2.4, *Biological Resources*, for further details.

Natural Habitat Protection. Policies applicable to the Project include Natural Habitat Protection Policies 1 through 3 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. Construction of the Proposed Project would result in significant direct impacts to 1.0 acre of isolated Diegan coastal sage scrub and significant indirect impacts to 0.8 acre of Diegan coastal sage scrub, as well as 3.1 acres of granitic southern mixed chaparral. Proposed biological open space in the northwestern corner and other portions of the Proposed Project site would conserve a total of 28.2 acres of habitat, primarily associated with wetland, riparian, oak woodland and grassland habitats. The project will dedicate steep slope easements over RPO steep slopes. The Project footprint would mainly be placed in areas of non-sensitive habitats, and all impacts to sensitive habitats would be mitigated through off-site preservation in areas of high integrity, function and long-term viability.

Soils. Policies applicable to the Project include Soils Policies 1 through 9 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. Residential lots would be clustered to limit the impact footprint and provide large areas of open space and to retain existing landforms. Retaining walls are also proposed to further reduce grading and associated landform modification. Grading would be balanced on site. There are approximately 35.6 acres of RPO steep slopes (i.e., slopes with a natural gradient of 25 percent or greater and a minimum rise of 50 feet) on the property. The Project would impact a total of approximately 1.1 acres of RPO steep slopes in the western portion of the site. Impacts are consistent with steep slope thresholds in the RPO and in substantial conformance with the San Dieguito soils policy. The Project also proposes an extensive landscape concept plan, utilizing species consistent with the existing character of the Project area to cover all disturbed areas. When the natural terrain is altered, new landscaping shall utilize at least 50% native species. Most existing riparian habitat and wetlands would not be impacted by the Project. Furthermore, the Proposed Project would include drainage facilities, including detention basins to accommodate Project runoff such that adjacent properties would not be affected.

Dark Sky. Policies applicable to the Project include Dark Sky Policies 1 through 3 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. Proposed Project lighting would adhere to the County LPC. Lighting design (including street lighting) would include the use of full cut off light fixtures and glare louvers, ensuring that light rays are projected downward and that glare and spillage into the sky or onto adjacent property are limited. Consistent with the existing surrounding area, streetlights generally are not proposed within the Project, and would only be included at primary intersections. Streetlights would be low level, timed, directed downward, and screened to minimize the impact of lights on the dark sky.

Cultural Sites. Cultural Sites Policy 3 is applicable to the Project (refer to the Community Plan [County 2011] for the text of this policy). The Project would be consistent with this policy. The Proposed Project would result in a significant impact to one CEQA-significant archaeological site (CA-SDI-17,506; Impact CR-1). This impact would be reduced to a less than significant level through implementation of a data recovery program at the site prior to approval of any grading or improvement plans that would cause the direct impact. The data recovery program would be implemented prior to any grading and/or improvements and prior to the approval of the Final Map. There also is a possibility that potential unknown buried CEQA-significant cultural sites could be discovered during grading activities (Impact CR-2). A grading monitoring and data recovery program would be implemented to mitigate potential impacts to undiscovered buried archaeological resources on the Project site.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Community Plan Conservation Element. **Potential land use impacts would be less than significant.**

Recreation. Policies applicable to the Project include Recreation Policies 1 through 9 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. The Proposed Project would include a 2.7-acre public neighborhood park and staging area and 1.2-acre equestrian facility in the southeastern corner of the site within Neighborhood 5, a 2.3-acre private community recreation facility within Neighborhood 1, a 1.2-acre private park, a Trail Head Park, and a system of public multi-use trails and private internal trails. The Project's system of public multi-use trails would link key open space features of the Project site and would connect to proposed off-site public trails and nearby residential uses. The trails are intended to serve equestrians, pedestrians and bicyclists. The trails would run entirely along the community parkway, in addition to connecting with parks and open space. The Trail Head Park proposed within the eastern portion of the Project site in Neighborhood 2 would provide the public with convenient access to the trail system to the east of the Project site. The project also includes separate private trails for the use of Project residents. Biological open space is proposed adjacent to both the private recreation center and the public park. Park sites are being planned along with the development to insure minimal cost, proper location and adequate size. The trail network, trail head park, and equestrian facility with trailer parking for the public trail would enhance horseback riding opportunities.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Community Plan adopted for recreation. **Potential land use impacts would be less than significant.**

Open Space. Policies applicable to the Project include Open Space Policies 1 through 5 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. The proposed development would be to increase open space areas, including biological, agricultural, and steep slope open space. The development plan concentrates residences to protect sensitive habitats and steep slopes. Public trails are proposed adjacent to open space areas. There is a narrow band of wetland habitat preserved in open space at the northern edge of Harmony Grove Village, directly south of Neighborhood 5. Neighborhood 5 includes biological open space and the project design has been revised to

propose installation of an arched culvert with a natural/earthen bottom to allow wildlife movement between the two adjacent projects.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Community Plan adopted for open space. **Potential land use impacts would be less than significant.**

Noise. Noise Policy 1 is applicable to the Project (refer to the Community Plan [County 2011] for the text of this policy). The Project would be consistent with this policy. In order to reduce the Proposed Project's footprint on sensitive resources, some proposed houses would be grouped adjacent to Country Club Drive. Noise levels at the Project's residential exterior use areas facing Country Club Drive may exceed 60 CNEL (Impact N-1), and would require exterior use area noise control. Mitigation for this impact would include three noise control walls (between 5.5 and 6 feet in height) installed along the outer perimeter of the affected residential use areas to reduce noise impacts in the outdoor use area to less than 60 CNEL. Other techniques to reduce significant noise impacts were evaluated; however, construction of a relatively short noise barrier would minimize the Project's footprint (as opposed to placement of earthen berms). The wall will be screened with landscaping and be visually appealing.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Community Plan adopted for noise. **Potential land use impacts would be less than significant.**

Energy. Policies applicable to the Project include Energy Policies 5 and 6 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. The Project proposes a circulation network that would accommodate vehicles, bicycles, pedestrians and equestrians, and would connect to the existing and proposed circulation network in the Project vicinity. The Project's system of public multi-use trails would link key open space features of the Project site and would connect to proposed off-site public trails and nearby residential uses. The proposed roadways and trails have been designed to be safe and practical for all users and compatible with the Project area.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Community Plan adopted for energy. **Potential land use impacts would be less than significant.**

In summary, the Proposed Project would be consistent with the San Dieguito Community Plan. Accordingly, **potential land use impacts would be less than significant.**

Elfin Forest and Harmony Grove Portion of the San Dieguito Community Plan

Neighborhood 5 is the only portion of the Specific Plan area that is within the Harmony Grove CPA; therefore, the Elfin Forest and Harmony Grove Portion of the San Dieguito Community Plan is only applicable to Neighborhood 5.

Land Use. The Land Use Element is divided into six issues and contains goals and policies relative to these issues.

Community Character. Policies applicable to the Proposed Project include LU-1.5.2, LU-1.5.3, LU-1.5.4, LU-1.6.1, LU-1.6.2, LU-1.7.1, LU-1.8.1, LU-1.9.1, LU-1.9.2, LU-1.9.3, LU-1.9.5, LU-1.9.7 and LU-1.10.1 (refer to the Community Plan [County 2011] for the text of these policies). The Proposed Project would be consistent with these policies. The Project proposes to group residential development generally within the flatter and gently sloping portions of the site to limit the impact footprint and provide large areas of open space and retention of rustic on-site visual resources, such as large mature tree stands, steep hillsides, avocado orchards, a pond and equestrian complex. Additionally, the Project would include trails that would connect off-site County planned trails to provide connectivity within the CPA, and would provide a neighborhood park and staging area in Neighborhood 5 that would welcome all community residents. Keeping the existing pond and mature trees as open space contributes to the semi-rural feel of the area and acts as a visual amenity. The Project would blend with the existing community character of the area through landscaping, setbacks and provision of a multi-use trail that can accommodate equestrian users and equestrian features at the Neighborhood Park (e.g., water trough, tie-ups). Neighborhood 5 includes 35 equestrian lots, defined as lots with a usable area of at least 15,000 square feet. A 15,000 square foot lot could accommodate a home, horse stable, shade structure, and horse trailer parking while meeting the proposed setbacks. The remaining 19 lots would likely be too small to keep horses, but smaller animals could still be kept. In addition, all of the future residents would be able to use the equestrian center even if they chose not to keep horses on their property. The L animal designator allows boarding and riding lessons for up to 3 horses not owned by the property owner. The project CC&Rs and HOA would allow grazing in residential fenced front yards. The project proposes single-family residences, provides public multi-use trail connections to the public park and views into biological open space, The proposed architecture, fences and walls, lighting and landscaping are all consistent with a rural, country theme as discussed in the Specific Plan.

Community Growth. Policies applicable to the Proposed Project include LU-2.1.3 and LU-2.1.4 (refer to the Community Plan [County 2011] for the text of these policies). The Proposed Project would be consistent with these policies. The Project has been designed in context with the setting of the Project site. The preserved wetlands and buffers within neighborhood 5 will be preserved in a biological open space easement to preserve the rural character and habitat. The preservation of habitat combined with landscape buffers would preserve the semi-rural character of the surrounding community.

Community Conservation and Protection. Policies applicable to the Proposed Project include LU-3.1.1, LU-3.1.2, LU-3.1.4 and LU-3.3.1 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. The Proposed Project would protect wetland and riparian areas in conformance with the Resource Protection Ordinance. Motorized vehicles and dirt bikes would not have access to such areas. In addition, the Proposed Project would embrace the historic rural theme of the Harmony Grove CPA through selected design elements and would include multi-use trails that can accommodate equestrians. The architecture of the proposed residential units is intended to be compatible with the rural ranch setting found in the existing valley and surrounding area. In addition, the project

will be conditioned to demonstrate conformance with biological mitigation policies when selecting off-site mitigation.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Land Use Element of the Elfin Forest and Harmony Grove Community Plan. **Potential land use impacts would be less than significant.**

Circulation and Mobility. The Circulation and Mobility Element is divided into 10 issues and contains goals and policies applicable to the Project relative to four of these issues.

Local Road Network. Policies applicable to the Project include CM-2.3.1 and CM-2.3.2 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. The internal roads proposed by the Project would be two-lane, undivided roads. The roads have been designed to conform to the site's topography and would curve to create a meandering feel through the Project site and encourage reduced speeds. Traffic control elements would include items such as stop signs, posted speed limits, crosswalks and directional signage. Additional traffic calming measures might occur at trail crossings to further reduce speed along the main parkway, if approved by the San Marcos Fire Department.

Pedestrian. Policy CM-5.1.1 is applicable to the Project (refer to the Community Plan [County 2011] for the text of this policy). Consistent with this policy, every lot in Neighborhood 5 would be connected to a pedestrian or multi-use trail or pathway that links homes with on- and off-site open space areas and trails.

Trip Reductions. Policy CM-8.1.1 is applicable to the Project (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with this policy. The internal roads proposed by the Project would be two-lane, undivided roadways. The roads would be designed to conform to the site's topography and would be curving in nature to create a meandering feel through the Project site and encourage reduced speeds. Traffic control elements would include items such as stop signs, posted speed limits, crosswalks and directional signage.

Infrastructure and Utilities. Policy CM-10.1.1 is applicable to the Project (refer to the Community Plan [County 2011b] for the text of this policy). Consistent with this policy, the landscape plan for the Proposed Project emphasizes native and drought-tolerant species that are also "firewise." An FPP has been prepared for the Project and identifies specific maintenance requirements for buffers and vegetation to ensure fire safety requirements are met.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Elfin Forest and Harmony Grove Community Plan adopted for circulation and mobility. **Potential land use impacts would be less than significant.**

Conservation and Open Space Element. The Conservation and Open Space Element is divided into three issues and contains goals and policies relative to these issues.

Resource Conservation and Management. Policies applicable to the Project include COS-1.1.1, COS-1.2.1, COS-1.2.4, COS-1.3.2, and COS-1.7.1 (refer to the Community Plan [County 2011])

for the text of these policies). The Project would be consistent with these policies. The development within the Specific Plan area has also been designed to adapt to the current site topography in compliance with the Resource Protection Ordinance. The agricultural operation will be managed by an Agricultural Manager hired by the HOA pursuant to an agricultural easement that will not allow growing of invasive vegetation. Neighborhood 5 includes biological open space surrounding the existing pond and drainage. The site does not support a regional wildlife corridor; however, the project will be conditioned to preserve off-site mitigation land that supports continuous wildlife corridors. In addition, proposed houses would be “solar ready,” which would make it easier for future residents to take advantage of alternative sources of energy.

Parks and Recreation. Policy COS-2.1.1 is applicable to the Project (refer to the Community Plan [County 2011] for the text of this policy). Consistent with this policy, the Proposed Project would include a 2.7-acre public neighborhood park and staging area in the southeastern corner of the site within Neighborhood 5. The park does not include organized sports fields. Paved areas and lighting would be minimized within the park to the extent feasible, while meeting County standards.

Community Open Space Plan. Policies applicable to the Project include COS-3.1.1, COS-3.2.1, COS-3.2.2, COS-3.2.3 and COS-3.2.4 (refer to the Community Plan [County 2011] for the text of these policies). The Project would be consistent with these policies. The Proposed Project was designed to minimize impacts to sensitive biological resources and steep slopes. Overall, 28.2 acres (11.8 percent) of the Project site would be protected within a dedicated biological open space easement, including RPO wetland and buffer in Neighborhood 5. In addition, all impacts to sensitive habitats would be mitigated through off-site preservation. The Proposed Project would not result in impacts to critical populations of sensitive species. In addition, the Proposed Project would conform to applicable County and NPDES storm water standards, with such conformance to include the use of appropriate post-construction LID/site design, source control and LID/treatment control BMPs. Specific proposed BMPs are identified in the Project SWMP (Appendix N), with these measures summarized in Section 3.1.3, *Hydrology/Water Quality*.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Conservation and Open Space Element of the Elfin Forest and Harmony Grove Community Plan. **Potential land use impacts would be less than significant.**

Safety Element. The Safety Element is divided into three issues and contains goals and policies relative to these issues.

Hazards/Risk Avoidance and Mitigation. Policy S-1.5.1 and S-1.6.1 are applicable to the Project (refer to the Community Plan [County 2011] for the text of these policies). The project will contribute its fair share to the construction and maintenance of the Harmony Grove Village fire station. The project applicant wrote a letter of support for the annexation of Harmony Grove into CSA 17.

Emergency Preparedness and Response. The Elfin Forest and Harmony Grove portion of the San Dieguito Community Plan does not include policies in this section. No impacts would occur.

Other Topics – Law Enforcement. Policy S-3.1.1 is applicable to the Project (refer to the Community Plan [County 2011] for the text of this policy). The Proposed Project would not preclude implementation of this policy. Proposed residences would be grouped in a community, and appropriate lighting would be provided for safety.

Accordingly, by adherence to these policies, the Proposed Project would not be in conflict with applicable policies of the Elfin Forest and Harmony Grove Community Plan adopted for safety.

Potential land use impacts would be less than significant.

Noise Element. The Noise Element is divided into three issues, including Noise Sources, Noise Standards and Mitigation, and Other Topics/Issues. The Noise Element, however, does not contain any policies that are applicable to the Project.

In summary, the Proposed Project would be consistent with the Elfin Forest and Harmony Grove Portion of the San Dieguito Community Plan and **associated impacts to land use and planning would be less than significant.**

County of San Diego Board of Supervisors Policies

As stated above, there are nine Board of Supervisors Policies applicable to the Proposed Project. Regarding Policy I-17, the Project would provide the public improvements, facilities, and the lands, easements and rights-of-way necessary to make the property suitable for the proposed zoning reclassification. The Proposed Project would construct a WTWRP to handle the sewage of the new development. A SWMP would identify drainage improvements to ensure that the Proposed Project would be suitable for the increased development. FMZ zones would be implemented to assure proactive and effective fire protection. In addition, numerous improvements to roadways and intersections would be implemented. Therefore, the Proposed Project would be consistent with Policy I-17.

Project improvements to sewers, drainage, fire protection and roads, as described above, would ensure that the Proposed Project would provide the public improvements, facilities, and the lands, easements and rights-of-way necessary to assure that the Project would not be materially detrimental to the public health, safety, or welfare. Therefore, the Proposed Project would be consistent with Policy I-18.

The Proposed Project would comply with Policy I-36, as the Project site would be annexed through a LAFCO action into the County Sanitation District for sewer service.

The County sent notices to all property owners within 300 feet of the Project site when the project application was received, and notices will be sent again prior to each public hearing. The San Dieguito Community Planning Group also receives notification of each Tentative Map re-submittal and prior to hearings. In addition, pursuant to the State CEQA Guidelines, an NOP was

distributed on June 20, 2013, and a 30-day public review period was initiated in which public agencies and private citizens commented on the Proposed Project (Appendix A). Therefore, the Project would be consistent with Policy I-49.

The Proposed Project would require a GPA (PDS2013-GPA-13-001) to increase the Project's residential density. This amendment was initiated with an Initial Consultation and a Major Pre-Application conference pursuant to Government Code Section 65358, and the Proposed Project would thereby be consistent with Policy I-63.

As Project implementation would include a GPA, Rezone and MUP, PDS will provide a written report of past complaints and/or violations of the Zoning Ordinance to the Planning Commission and the Board. Therefore, the Proposed Project would be consistent with Policy I-70.

The Proposed Project contains development near hillsides. In accordance with Policy I-73, the Proposed Project would be planned and designed to minimize the permanent impact upon site resources including existing natural terrain, established vegetation, and portions of a site which have significant public or multiple-use value. The Proposed Project would not impact dominant landforms or topographic features in the immediate vicinity, such as Mt. Whitney or other prominent ridgelines or hills. There are approximately 35.6 acres of RPO steep slopes on the property; the Proposed Project would impact a total of approximately 1.1 acres of RPO steep slopes in the western portion of the site and would comply with the RPO. In addition, 3.9 acres of RPO steep slope easements would be provided. Therefore, the Proposed Project would be consistent with Policy I-73.

The Project's WTWRF is subject to all appropriate plans, ordinances, statutes and regulations in the adopted population forecasts of the County General Plan, County General Plan's Land Use Element, County Zoning Ordinance, CEQA and County EIR Guidelines, and RWQCB rules and regulations. The WTWRF would follow the specific design criteria and standards developed by the County. The Project would meet the RWQCB's requirement for approximately 90 days of recycled water storage through the construction of wet weather storage. Through this EIR, the WTWRF would be reviewed and in compliance with CEQA and County EIR Guidelines. In addition, the Proposed Project is located within the urban limit line. Therefore, the Proposed Project would be consistent with Policy I-78.

To ensure that adequate facilities would be provided concurrent with growth and development from the Project, Project Facility Availability Forms have been submitted to Rincon MWD, Escondido Union High School District, Escondido Union School District and County Sanitation District (see Appendix O). An affirmative PFAF will be required from the County Sanitation District prior to hearing. Therefore, the Proposed Project would be consistent with Policy I-84.

County of San Diego Zoning Ordinance

The Proposed Project proposes residential lot sizes that are not consistent with existing zoning. The Project site has a zoning designation of Limited Agriculture (A70), with minimum lot sizes of one or two acres, depending on the parcel. While residential development is a permitted use within the A70 zone, the proposed lot sizes range from approximately 5,630 to over 19,230 s.f.

In order for the Proposed Project to be found consistent with the County Zoning Ordinance, the Project would include a Rezone, which would rezone the entire site as Specific Plan Area (S88). Minimum lot sizes under the proposed zone classification would be 5,630 to 9,650 s.f. (depending on the neighborhood), as shown on Sheet 2 of the Vesting Tentative Map and Section 2.1.2 of the Specific Plan. Approval of the GPA and the Rezone would remedy current inconsistencies between the current and proposed minimum lot sizes, and **land use impacts associated with the County Zoning Ordinance would be less than significant.**

County of San Diego Resource Protection Ordinance

As stated above, applicable policies of the RPO include those that address wetlands, wetland buffers and steep slopes. No RPO floodways, floodplain fringes, sensitive habitat lands, or significant prehistoric or historic sites are located within the Project site.

Wetlands. The Proposed Project would impact 0.18 acre of County RPO wetlands comprised of 0.17 acre of southern riparian forest and 0.01 acre of mule fat scrub (Table 2.4-6 and Figure 2.4-8). Impacts to 0.01 acre of RPO mule fat scrub adjacent to the northern edge of Mt. Whitney Road are unavoidable because improvements to this existing road are required for Project approval. There is no feasible alternative that avoids the mule fat scrub because of its location directly adjacent to the existing roadway. Impacts to 0.17 acre of RPO southern riparian forest in Neighborhood 3 would result from a necessary road crossing to access the Project site. No feasible alternative avoids the wetland due to site grading constraints. Therefore, these impacts to RPO wetlands are allowed, per Section 86.604(a)(5) of the RPO, and with mitigation (M-BI-6), as described in Subchapter 2.4, *Biological Resources*, the Proposed Project would comply with the RPO wetland avoidance provisions.

Wetland Buffers. The Proposed Project provides minimum 50-foot wetland buffers around all preserved wetlands on site (HELIX 2014d). These minimum 50-foot buffers are included as part of the on-site biological open space to be preserved in perpetuity. Therefore, the Proposed Project would comply with the RPO wetland buffer avoidance provisions.

Steep Slopes. The Proposed Project would impact a total of approximately 1.1 acres of RPO steep slopes in the western portion of the site, but the encroachments within each lot would not exceed the percent of the steep slope that is specified as the maximum allowable by the RPO as demonstrated in the Steep Slope Analysis for the Project (refer to Figure 1-33). Therefore, the Project would comply with the RPO steep slope avoidance provisions.

The purpose of the County RPO is to protect and preserve features, resources and habitats unique to San Diego County. As evidenced by Figure 1-33 and the Biological Technical Report (HELIX 2014d; EIR Appendix E), the Proposed Project is in conformance with the purpose and guidelines set forth in the RPO with regard to wetlands, wetland buffers and steep slopes. Therefore, **impacts associated with the RPO would be less than significant.**

County of San Diego Park Land Dedication Ordinance

The Proposed Project would include the development of parks and other recreational facilities on site. Specifically, the Project would include a 2.5-acre public Neighborhood Park, a 1.6-acre private Central Oak Park, a 2.3-acre private Community Park and Recreation Center, a public 0.5-acre Trail Head Park, and system of public multi-use trails and private trails. Provision of these new parks and recreational facilities to serve the Project and the public would be in compliance with the PLDO. Refer to Subchapter 3.1.7, *Recreation*, for more discussion on impacts to parks. Therefore, **impacts associated with the PLDO would be less than significant.**

Natural Community Conservation Planning Program

The Proposed Project site falls within the North County Subarea of the MSCP, for which the County is currently processing a Subarea Plan. Since this regional planning document is not yet approved, NCCP compliance would be required for upland impacts. Therefore, pursuant to the 4(d) rule of the federal ESA, impacts to coastal sage scrub are limited to five percent of the total acreage occurring within the County, and require an HLP pursuant to Habitat Loss Ordinance 8365. The Proposed Project would directly impact 0.9 of 1.8 acres (50 percent) of the Diegan coastal sage scrub on site, but the entire 1.8 acres would be considered lost due to habitat fragmentation and edge effects. The loss of 1.8 acres of sage scrub would not be in excess of the County's 5 percent habitat loss threshold, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines. While the Proposed Project would remove coastal sage scrub habitat, implementation of mitigation for this impact would ensure that the Proposed Project would ultimately comply with the NCCP guidelines.

The Proposed Project would not preclude or prevent the preparation of the subregional NCCP as the Project does not propose development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.

The Proposed Project site is outside of the adopted MSCP but is within the boundary of the Draft North County Subarea Plan, and the Project would not preclude the implementation of the Draft Subarea Plan. Accordingly, **Project impacts related to the NCCP would be less than significant.**

County of San Diego Subdivision Ordinance

The Proposed Project is subject to the provisions and standards contained in Section 81.401 – Design of Subdivision, which includes 14 design regulations associated with lot size, orientation and configuration. The Proposed Project would comply with 10 of these design regulations upon Project approval. Four of the regulations would require modification through waivers (Sections 81.401(b), (d), (e) and (i)).

Section 84.401(b) of the Subdivision Ordinance states that subdivisions should have a minimum lot size of 6,000 s.f. Six reduced size lots are included in the Proposed Project to allow the development to comply with the County's General Plan policies regarding clustering and to

reduce the development footprint to maximize open space areas. A clustered design is more beneficial than meeting the standard minimum lot size as it allows for increased open space areas.

Section 84.401(d) of the Subdivision Ordinance states that subdivisions should have 50-foot frontage independent of side yard setbacks. With 5-foot side yard setbacks, this means the required frontage is 60 feet. The Proposed Project includes lots that are less than 60 feet wide. As those lots are located in flatter areas of the Project site that would not require grading in the side yards, the 50-footwide lots would be able to accommodate suitably sized single-family residences. These narrower lots are proposed to comply with the County's General Plan policies regarding clustering and to reduce the development footprint and maximize open space.

Section 84.401(e) states that cul-de-sac frontage must be a minimum of 33 feet. Six of the proposed cul-de-sacs in the Specific Plan area do not meet this minimum. These reduced sized cul-de-sacs were included in the Proposed Project to allow for the development to comply with the County's General Plan and to reduce the development footprint and maximize open space.

Section 81.401(i) of the Subdivision Ordinance states that lots should have a length to width ratio of 3:1 or less. The developable pads satisfy the 3:1 ratio. In some instances, however, the rear lot lines were extended to the Proposed Project boundary, top/toe of slope or adjacent lot line in order to avoid oddly shaped lots and to give the homeowners the benefit of additional lot area.

Subdivision Ordinance Section 81.401(o) states that if the Board approves a specific plan that provides subdivision design requirements contrary to the requirements in subsections (b), (d), (e) or (i), the provisions of the approved specific plan shall govern. These proposed deviations are preferable for the reasons stated above. Each of these waivers are considered by the decision maker and, upon approval of the Tentative Map, the Proposed Project is determined to be in general conformance with the development standards within the County Subdivision Ordinance, and **associated impacts would be less than significant.**

County of San Diego Light Pollution Code

Project-proposed lighting would include lights similar to or lesser in intensity than other developed areas in the County. Consistent with the existing surrounding area, streetlights are not proposed within the Project. Project lighting would include safety and accent lighting at Project entries, parks, trails heads and the WTWRP consistent with the LPC. Additionally, proposed houses would be illuminated from interior lights or outdoor safety lighting. Although Project lighting would be expected to produce light levels brighter than currently exists on the Project site, all lighting would adhere to the County's LPC. Lighting design would include the use of full cut off light fixtures and glare louvers, ensuring that light rays are projected downward and that glare and spillage into the sky or onto adjacent property are limited.

The Project site is located approximately 25 miles from Palomar Observatory, in Zone B as identified by the LPC. Project lighting would not adversely affect nighttime views or astronomical observations because the proposed lighting would conform to the lamp type and shielding requirements as well as the hours of operation detailed in the LPC. Therefore, **impacts associated with the LPC would be less than significant.**

Congestion Management Program Update

As noted previously, the CMP requires an Enhanced CEQA Review for all large projects that are expected to generate more than 2,400 ADT or more than 200 peak hour trips. The Proposed Project is projected to generate 3,462 ADT and a maximum of 278 and 347 peak hour trips during the a.m. and p.m. peak hours, respectively (refer to Table 2.8-6 of this EIR). In conformance with this program, an enhanced CEQA review was completed for the Proposed Project. This enhanced review focused on the regional freeways/highways (I-15 and SR-78), and concluded that the CMP LOS standard would not be met with or without the Proposed Project. Refer to Subchapter 2.8, *Transportation/Traffic*, for additional details on potential impacts and mitigation measures. Therefore, **associated impacts would be less than significant.**

Community Character

Guidelines for the Determination of Significance

A significant land use/community character impact would occur if the Proposed Project would:

2. Conflict with the established community character, as defined by the Community Plan.
3. Physically divide an established community.

Guideline Sources

These land use guidelines are based on Appendix G of the CEQA Guidelines and County staff guidance. These guidelines are intended to maintain and enhance the character, structure and dynamics of established communities in the Project vicinity.

Analysis

Community character/land use compatibility can be defined as those features of a neighborhood or community that give it an individual identity, as well as the unique or significant resources that comprise the larger community. Community character/land use compatibility are also functions of the existing land uses and natural environmental features based on a sense of space and boundaries, physical characteristics (e.g., geographic setting, presence of unique natural and man-made features, ambient noise, air quality, etc.), and qualitative psychological responses held in common (e.g., “rural,” “friendly”).

Determination of a proposed project’s effect on existing community character is derived from evaluating and comparing the introduced development to the existing community character of the area. If the proposed land uses conflict with the nature and character of the existing setting of the community, a significant impact would be anticipated. Evaluation of potential community character impacts is based on Project consistency with applicable goals and policies in relevant planning documents because these documents reflect the community’s prioritization of what is important—to retain, improve or change.

The Proposed Project would provide a higher residential density in a rural setting. Such development would constitute an intensification of land uses that could be perceived as detracting from the rural community character of the CPA. While the Project would construct a consolidated residential development in a generally rural setting, some areas of open space/easements would be preserved to retain the rural character. Approximately 28.2 acres (11.8 percent) of the Project site would be protected within a biological open space easement. In addition, 36.5 acres (15.3 percent) of existing on-site agricultural uses (avocado orchards) would be preserved in an agricultural easement in the northwestern portion of the site. Approximately 48 percent of the Project site would be outside of the proposed graded areas.

The Proposed Project maintains the semi-rural residential community character for its 326 single-family dwelling units (du) by its use of homes, open space and related facilities. The natural character of the site and surroundings provide both constraints and opportunities for the Proposed Project design.

The architecture would be compatible with the rural ranch setting found in the existing valley and surrounding area. The conceptual landscape plan that has been developed for the Proposed Project has been designed to incorporate the existing natural and agricultural character of the Project site and surrounding area (Figure 1-24) by utilizing the existing oaks and agriculture, which offer the opportunity to incorporate several distinct landscape zones and shown on Figure 1-25. Where the proposed homes are adjacent to existing residences, buffer landscaping would be provided along the boundaries of the Project site (refer to Figure 1-26) in order to add visual separation between the proposed semi-rural residential development and existing residences. Architectural and landscaping guidelines contained in the Valiano Specific Plan and depicted in Chapter 1.0 of this EIR provide general design criteria.

The Proposed Project also would maintain its semi-rural character by incorporating elements of the existing community's substantial focus on horse keeping (and equestrian activities). The Proposed Project would contribute to this presence by allowing horse keeping within Neighborhoods 3 and 5. Neighborhood 3 would accommodate animal enclosures on 21 lots and Neighborhood 5 would accommodate animal enclosures on 33 lots. In addition, the Project would include the construction of multi-use trails for use by equestrians (in addition to pedestrians and bicyclists). Accordingly, the Proposed Project would support, as well as contribute to, the substantial presence of horses in the surrounding community in support of the area's semi-rural character.

While the Project site is located in the rural San Dieguito CPA, this portion of the CPA is located in close proximity to a major freeway (I-15), a major highway (SR-78) and two major city jurisdictions (Escondido and San Marcos). The areas along the I-15 and SR-78 corridors contain more intense uses by design and have been planned for large-scale residential and commercial/industrial uses. The recently approved Harmony Grove Village, located immediately to the south will construct mixed-use development (up to 742 single-family residences, commercial services, park and community gathering locales, and equestrian facilities). Taken together with Harmony Grove Village, the Proposed Project would be part of a larger developed area along the western side of I-15 and southern side of SR-78.

Given that the Proposed Project would preserve biological and agricultural resources in open space areas, incorporate design elements that are compatible with the surrounding areas, and mitigate for visual impacts associated with proposed noise barriers, **less than significant impacts to community character are identified.**

As stated above, the existing Proposed Project area is described as a semi-rural community. The location of the Project illustrates this; there are ongoing agribusiness activities and large lot residential uses, and some residents in the area perceive it as a distinct locale. There is a lack of established neighborhoods, however, as well as public services. For instance, no schools, general stores, post offices, etc. are present within the areas of potential Project development. As such, there is no existing community to divide. Nonetheless, the Project would not construct new major roadways and no pathways or travel routes would be eliminated. To the contrary, the Proposed Project would create a semi-rural residential development. Existing roads would remain but be improved. The planned public facilities proposed by the Project (parks and trails) may provide a point of cohesion and a place for surrounding residents to gather. All major water and sewer lines would be located underground and within existing/proposed roadways, while other utilities (gas and electric, etc.) would tie in to existing off-site facilities and be located underground within the Project site. Based on the described conditions, **no impacts are assessed to physical division of a community.**

3.1.4.3 Cumulative Impact Analysis

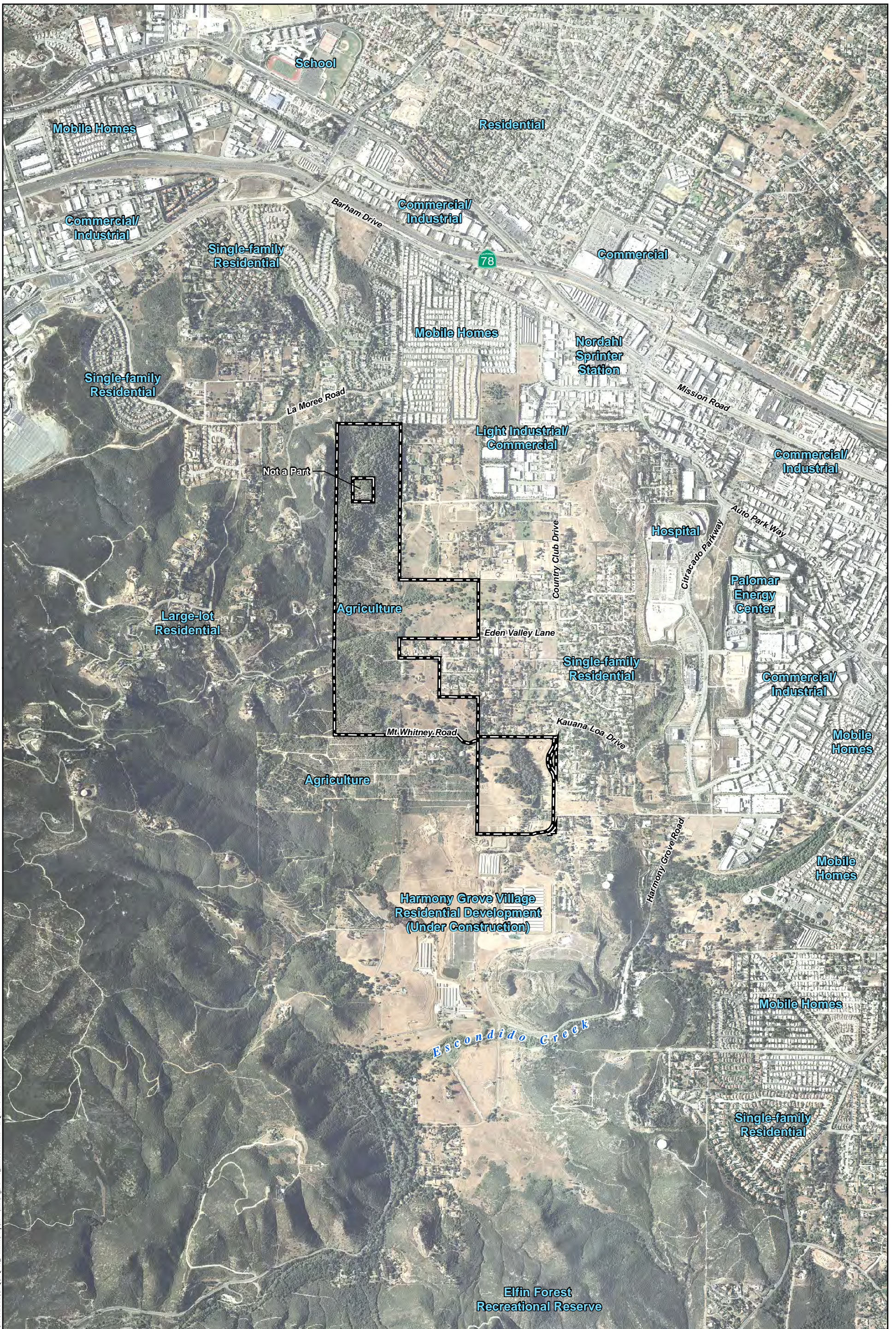
Cumulative land use and planning impacts may occur when project-specific impacts evaluated in an EIR are combined with the effects of other projects which, when examined individually, may not be considered to be significant. All of the projects depicted on Figure 1-34 were included in review of the potential for significant cumulative land use impacts. As noted in Table 1-5, six projects (three in the unincorporated County and three in the City of San Marcos), in addition to the Proposed Project, include GPAs. The inclusion of all projects from Figure 1-34 and Table 1-5 in the following analysis was based on the location of these projects in the general site vicinity and the possibility that these projects, in combination with the Proposed Project, would conflict with their respective land use plans and policies. Particular attention was paid to those other projects that include GPAs that may, in combination with the Proposed Project, contribute to increased land use density not envisioned in the general or community plans.

Completion of these various residential projects is anticipated to increase the urban intensity of the area, which may not be in conformance with the land use designations, policies and goals of the existing County General Plan, applicable community plans and County ZO, and may alter the overall community character and land use compatibility of the area over the long-term. A total of approximately 15,494 residences would be constructed by the Proposed Project and the other related projects listed in Table 1-5. Approval of the seven GPA projects, involving a total of 2,094 du (14 percent of the total cumulative residential units), would potentially result in a significant cumulative impact to the existing land use densities and character of the region. For the Proposed Project and cumulative projects, including the GPA projects, to be approved, each one must be found consistent with the goals and policies of the County General Plan and any

applicable community plans. Accordingly, **cumulative impacts associated with land use and planning would be less than significant.**

3.1.4.4 Significance of Impacts

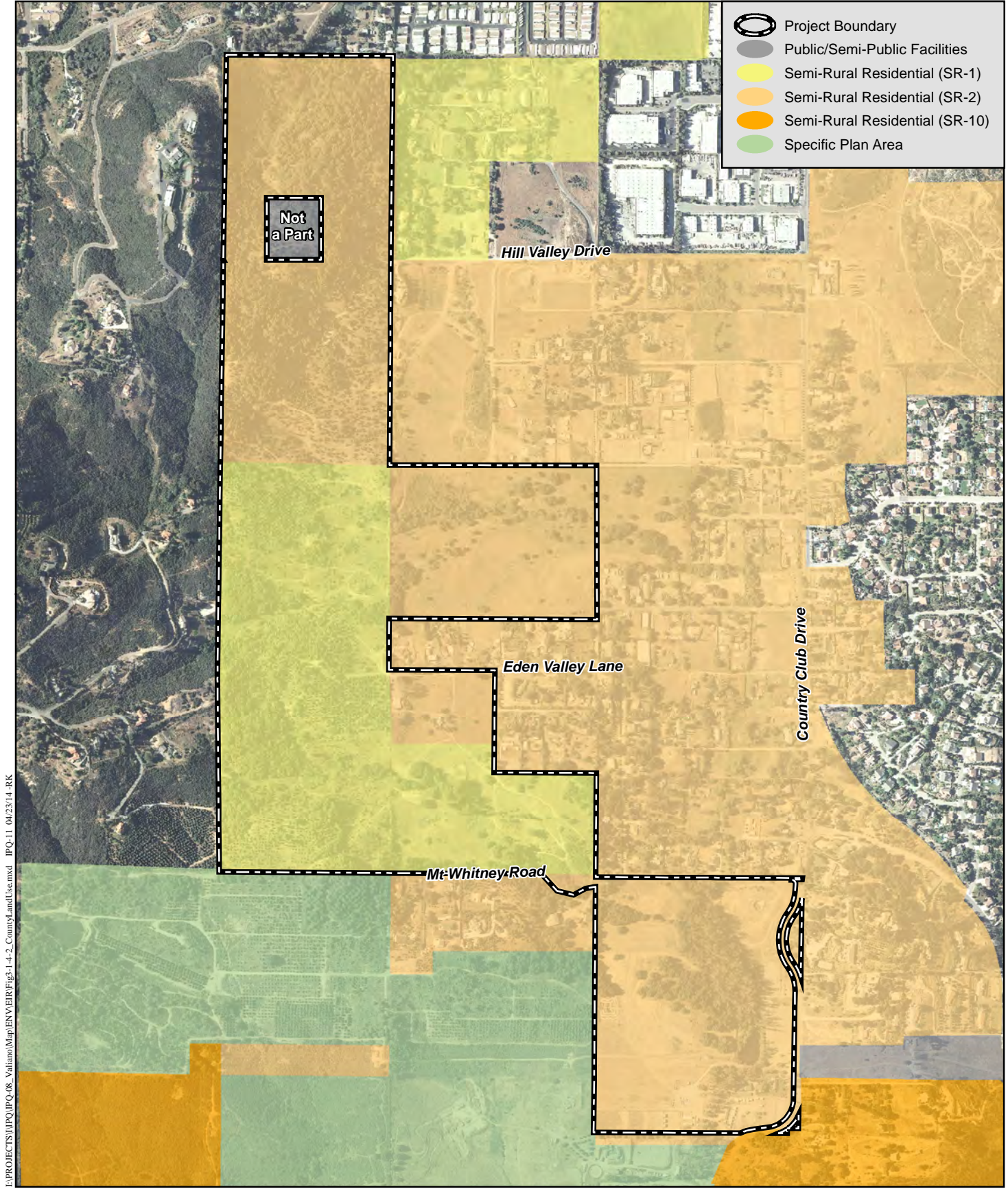
Based on the analysis provided above, the Proposed Project would have **less than significant** impacts related to land use and planning.



Existing Land Uses

VALIANO

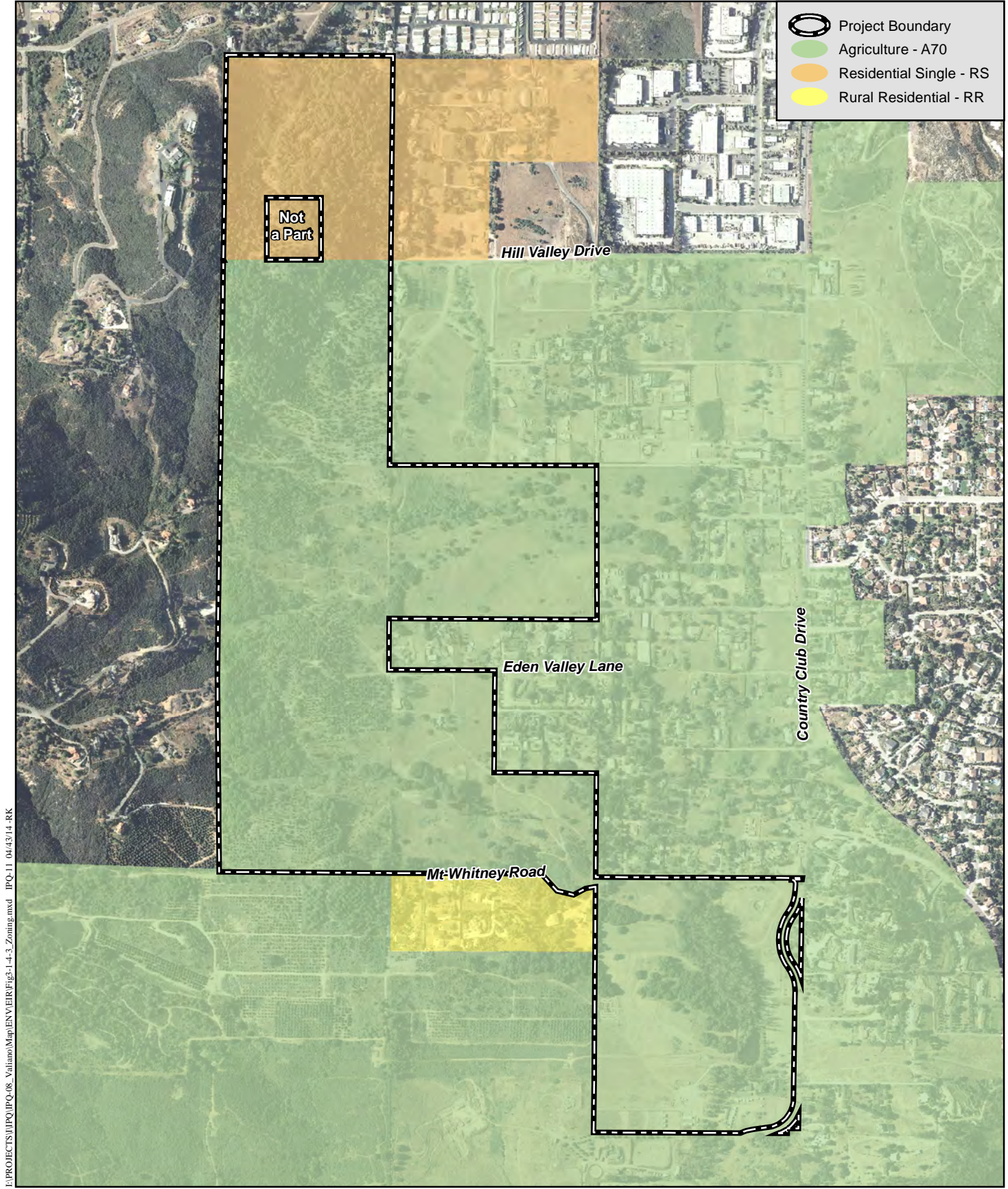
Figure 3.1.4-1



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Existing County General Plan Land Use Designations

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Existing Zoning Designations

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Figure 3.1.4-3