

COUNTY OF SAN DIEGO GENERAL PLAN GOALS & POLICIES

BONSALL COMMUNITY PLAN CONSISTENCY ANALYSIS		
Policy Number	Policy Text	Consistency Analysis
Goal LU-1.1	A unique balance of Bonsall’s rural agriculture, estate lots, ridgelines, equestrian uses, and open space land uses within the community, including open space and low density buffers that separate the community from adjacent cities and unincorporated community and new development that conserves natural resources and topography.	
Policy LU-1.1.1	Require development in the community to preserve the rural qualities of the area, minimize traffic congestion, and to not adversely affect the natural environment.	<p>Consistent. The project is consistent with the Community Development Model, locating housing close to retail, services, schools, and jobs, allowing for the preservation of open space, natural habitat, and agriculture that will contribute to the retention of the rural setting and lifestyle of the adjacent community. The project will protect 104.1 acres of sensitive biological resources. (one-sixth of the entire project site.) Approximately 20 additional acres would be available for agriculture, outside of the biological open space. The project also incorporates various design features that will reduce visual effects along the project perimeter, achieve compatibility with the community and retain the rural character of the community. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes. Along the west side of the project, the large riparian woodland would be preserved.</p> <p>An agricultural buffer of a minimum 50 feet wide will be planted with fruit trees to provide a transition from the project to the existing off-site agricultural uses. Under the Community Development Model the project will minimize traffic congestion because the project is pedestrian-oriented with every home within a ten minute walk of commercial goods and services and with over 16 miles of community pathways and trails linking all major community amenities. Project design guidelines for landscaping and architecture also contain rural concepts. See Specific Plan, Sections II and III. Therefore the project is consistent with this policy.</p>
Policy LU-1.1.2	Maintain the existing rural lifestyle by continuing the existing pattern of residential, equestrian, and agricultural uses within the Bonsall CPA.	<p>Consistent. The project will establish a new Village located less than one-half mile from east of the I-15 corridor consistent with the Community Development Model. The establishment of a new Village is consistent with the General Plan goals and objectives to accommodate future growth in an</p>

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		orderly fashion. The project has been designed to be mindful of the surrounding communities including providing a trail network that includes equestrian trails. The project includes approximately 20 acres that would be available for community gardens and orchards, and offsite permanently protects 43.8 acres of prime farmland and farmland of statewide importance. Landscaped buffers will include two rows of orchard trees in areas adjacent to off-site agricultural operations. Adjacent agriculture will be protected by residential CC&Rs that discourage complaints. Therefore the project is consistent with this policy.
Policy LU1.1.3	Require development to be sensitive to the topography, physical context, and community character of Bonsall.	Consistent. The project will protect 99.7% of existing RPO steep slopes encroaching on only 1.6 acres. One-sixth of the site will remain physically undisturbed. The grading guidelines ensure natural topography is adhered to by applying refined grading techniques. Therefore the project is consistent with this policy.
Goal LU-2.1	Development that centers inside the core Village in Bonsall and discourages spot development outside that area.	
Policy LU-2.1.1	Encourage development inside the Village boundaries (see Figure 3) which are centered around the Mission Road/Olive Hill Road and State Route 76 intersections.	Consistent. The project will establish a new Village less than one half mile east of the I-15 corridor consistent with the General Plan. The establishment of a new Village is consistent with the General Plan goals and objectives to accommodate future growth in an orderly fashion. Therefore the project is consistent with this policy.
Goal LU-3.1	Estate lot residential development that provides adequate housing opportunities for all residents, while maintaining and enhancing the existing rural atmosphere of the community.	
Policy LU-3.1.1	Require residential development application documents to show residential building pads and envelopes on all Tentative Maps for public review, along with the Health Department layouts and grading plan.	Consistent. The project will comply with all County submittal and review requirements for subdivisions, thus ensuring project Tentative Maps provide adequate information. All project maps will require County planning and engineering review, and mixed use areas are specially designated to ensure community review. Therefore the project is consistent with this policy.
Policy LU-3.1.2	Require subdivision design to minimize adverse impacts to community character, or to the environment, and to mitigate any impacts from other constraints on the land that could not be avoided. Require mitigation actions to remain within the CPA.	Consistent. The project has included design measures or mitigation measures to minimize, where feasible, significant impacts to the community and the environment. See EIR, Project Description and Table S-1. The project includes extensive onsite mitigation for impacts to sensitive habitat and agriculture. Project design guidelines for landscaping and architecture contain rural

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		concepts. See Specific Plan, Sections II and III. Therefore the project is consistent with this policy.
Policy LU-3.1.3	Buffer residential areas from incompatible activities, which create heavy traffic, noise, dust, unsightly views, or from incompatibility with the surrounding environment.	Consistent. Between the landscape plan, the parks, the trails, and the juxtaposition of the biological open space and agricultural buffers, the project layout ensures adequate buffering between residential and non-residential uses. See EIR, Figure 1-4a. Therefore the project is consistent with this policy.
Policy LU-3.1.4	For proposed major subdivisions, require open space easements that first are considered for agricultural or equestrian needs of the Bonsall Community.	Consistent. The project includes approximately 20 acres on-site that would be available for community gardens and orchards, and offsite permanently protects 43.8 acres of prime farmland and farmland of state wide importance. The 16 plus miles of project trail network includes equestrian trails where they coincide with and connected to regional trails. Therefore the project is consistent with this policy.
Policy LU-3.1.5	Preserve ridgelines by siting buildings below ridges or set back with sufficient distance to minimize visual impacts. Encourage screening to visually shield all structures, including the use of vegetation, as well as appropriate and varied building materials.	Consistent. The project will not obstruct any ridgelines. Project facilities will be adequately landscaped as described in the Specific Plan that will allow the project to be both aesthetically pleasing and functional. Project architectural guidelines require the use of varied building materials. Therefore the project is consistent with this policy.
Policy LU-3.1.6	Encourage the development of assisted living facilities within or adjacent to the Bonsall River Village, while maintaining a balance of assisted living and conventional residential units.	Consistent. The project features an assisted living and senior care facility thus balancing the project conventional residential units. Therefore the project is consistent with this policy.
Goal LU-4.1	Residential, commercial and other development that is compatible with the rural environment and enhances the community's quality of life. All commercial uses have aesthetically pleasing and functionally adequate operations with appropriate onsite parking, internal circulation, setbacks and landscaping and do not cause any adverse impacts on neighborhood properties such as visual unsightliness, excessive noise, unpleasant odors, air pollution, health hazards, etc.	
Policy LU-4.1.1	Require the design of commercial development to enhance the character of a rural village and not take on an urban type design.	Consistent. Project architectural guidelines contain rural-themed concepts. The Specific Plan includes illustrations to show the rural village theme expressed in all land use contexts, including commercial. The Specific Plan contains no urban concept themed concept. Therefore the project is consistent with this policy.

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Policy LU-4.1.2	Require commercial development to be compatible with the rural environment and enhance the community's quality of life. Require all commercial uses to have aesthetically pleasing and functionally adequate operations with appropriate onsite parking, internal circulation, setbacks, and landscaping; and not cause any adverse impacts on neighborhood properties.	Consistent. Project architectural guidelines contain rural-themed concepts. The Specific Plan includes illustrations to show the rural village theme expressed in all land use contexts, including commercial. The Specific Plan includes plans for onsite parking, internal circulation, setbacks, and landscaping that ensure they will be both aesthetically pleasing and functional. Parking lots will include interior trees. Roads will be narrowed, curved and landscaped. Commercial areas will be reminiscent of historic California villages of the 1920s and 1930s. Therefore the project is consistent with this policy.
Policy LU-4.1.3	Prohibit commercial development in Bonsall that principally serves regional needs, rather than the needs of the local community.	Consistent. The project commercial areas will include special retail, farmer's markets, and a rural scaled general store. The project will not include regional scale, big box commercial. Therefore the project is consistent with this policy.
Policy LU-4.1.6	Prohibit those commercial activities, which generate visual unsightliness, excessive noise, unpleasant odors, air pollution, health hazards, and do not comply with internal or screened onsite parking.	Consistent. Project aesthetics will be unified and ensured by the design guidelines in the Specific Plan for all land uses, including commercial and commercial parking areas. The project is pedestrian-oriented and will discourage the use automobiles and parking lots for accessing commercial goods and services. All project commercial activities must comply with local, state, and federal laws controlling air pollution and health hazards. Therefore the project is consistent with this policy.
Policy LU-4.1.7	Discourage incompatible land uses on areas of agricultural use and land suitable for agricultural usage.	Consistent. Although the site is currently located in an area of agricultural and rural residential uses, the project incorporates mitigation measures and project design features to assure the protection of agricultural operations. Specifically, on-site prime and statewide importance soils that would be converted to non-agricultural uses would be mitigated through the purchase of agricultural conservation easements at a 1:1 ratio. Additionally, as part of the project design approximately 20 acres of agriculture would be preserved for and ongoing agricultural cultivation. Adjacent agriculture will be protected by residential CC&Rs that discourage complaints. As discussed in subchapter 3.2.3 of the EIR, the project would include on-site biological open space, common open space, LBZ buffers, as well as Mitigation Measures M-

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		AG-2, M-AG-3, and M-AG-4, which would ensure that urban/agriculture compatibility conflicts are less than significant. Therefore the project is consistent with this policy.
Policy LU4.1.9	Require Commercial development to provide buffers between adjacent residential areas; this can be accomplished through increased setbacks or other techniques such as grade differentials, walls, and/or landscaping.	Consistent. Between the landscape plan, the parks, the trails, and the juxtaposition of the biological open space and agricultural buffers, the project layout ensures adequate buffering between residential and non-residential uses. See EIR, Figure 1-4a. Therefore the project is consistent with this policy. Therefore the project is consistent with this policy.
Goal LU-5.1	A physical environment where degraded riparian areas have been restored and the natural topography retained.	
Policy LU-5.1.1	Consider restoration and rehabilitation of former or degraded riparian areas as a form of mitigation.	Consistent. The project will protect 104.1 acres of sensitive biological resources. This constitutes one-sixth of the entire project site. Resource management plan for the site provide for habitat restoration and revegetation of wetland riparian habitat. Therefore the project is consistent with this policy.
Policy LU-5.1.2	Require grading to be contoured to blend with natural topography, rather than consist of straight edges.	Consistent. The project will protect 99.7% of existing RPO steep slopes encroaching on only 1.6 acres. One-sixth of the site will remain physically undisturbed, primarily wetland drainages. The grading guidelines ensure natural topography on the remainder of the site is adhered to by applying refined grading techniques, including curvilinear and undulating shapes. Therefore the project is consistent with this policy.
Policy LU-5.1.3	Minimize grading to preserve natural landforms, major rock outcroppings and areas of existing mature trees. Integrate hillside development with existing topography and landforms.	Consistent. The project will protect 99.7% of existing RPO steep slopes encroaching on only 1.6 acres. One-sixth of the site will remain physically undisturbed, primarily wetland drainages, including oak woodland. The grading guidelines ensure natural topography on the remainder of the site is adhered to by applying refined grading techniques, including curvilinear and undulating shapes. Therefore the project is consistent with this policy.

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Policy LU-5.1.4	Restrict, to the maximum extent feasible, extensive grading for development projects in areas with slopes that are 20 percent or greater, in order to preserve and protect the environment, and to lessen grading and erosion.	Consistent. The project will protect 99.7% of existing RPO steep slopes encroaching on only 1.6 acres. One-sixth of the site will remain physically undisturbed, primarily wetland drainages, which will be engineered by design into the stormwater management plan to absorb water without erosive effects or habitat degrading consequences. Therefore the project is consistent with this policy.
Policy LU-5.1.5	Require development on slopes to be stepped to follow and preserve topography to the maximum extent feasible.	Consistent. The project will protect 99.7% of existing RPO steep slopes encroaching on only 1.6 acres. Development must conform to County guidelines for development of steep slopes and will thus ensure preservation of the topography to the maximum extent feasible. Therefore the project is consistent with this policy.
Policy LU-5.1.6	Minimize cut and fill grading for roads and access ways to the absolute minimum necessary.	Consistent. The project will protect 99.7% of existing RPO steep slopes encroaching on only 1.6 acres. The grading guidelines ensure natural topography on the remainder of the site is adhered to by applying refined grading techniques, including curvilinear and undulating shapes, and minimizing grading for roads to the minimum necessary without compromising safety. Therefore, the project is consistent with this policy.
Goal LU-5.2	The preservation of groundwater resources, community character and protection of sensitive resources in the Bonsall Community Planning Area.	
Policy LU-5.2.2	Allow further reductions in minimum lot sizes indicated in Policy LU-5.2.1, through Planned Development, Lot Area Averaging, or Specific Plan projects only when setbacks, building scale, and design are appropriate to retain the equestrian and agricultural community character in the area.	Consistent. The project layout is efficient and compact following the concepts of a pedestrian- oriented village as set forth in the Community Development Model. The project includes approximately 20 acres on-site that would be available for community gardens and orchards, and offsite permanently protects 43.8 acres of prime farmland and farmland of state wide importance. The 16 plus mile of project trail network includes equestrian trails where they coincide with and connected to regional trails. Therefore the project is consistent with this policy.
Goal LU-6.1	Infrastructure and public utilities that are provided concurrent to development in a manner compatible with community character while minimizing visual and environmental impacts.	
Policy LU-6.1.2	Provide development on an orderly, phased basis so that it will not overload public facilities.	Consistent. The project will be phased in in five phases over an 8-10 year period. The project is a master planned community which provides adequate public facilities such as a large main community park, ten smaller parks, a

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		water reclamation facility, civic buildings, a recycling facility (RF), a town center, extensive multi-use trails, a K-8 school, a country inn, agricultural orchards and gardens. Therefore the project is consistent with this policy.
Goal LU-7.1	An adequate supply of water that meets current and projected needs of both residential and agricultural users in Bonsall CPA.	<p>Consistent. The project proposes to amend the General Plan Semi Rural Lands land use designation to create a new Village. While the project would increase the density allowed and convert existing agricultural lands to non-agricultural uses, the project would still comply with the intent of this policy in the following ways: (1) The project would preserve approximately 43.8 acres of agriculture off-site through the purchase of PACE program mitigation credits or through the preservation of off-site agricultural resources based on the County's Guidelines for the Determination of Significance for Agriculture (CEQA). (2) The site is not located within a Williamson Act Contract or an Agricultural Preserve. (3) Approximately 20 acres of agriculture would remain on-site for agricultural cultivation, and agriculture could be established within the manufactured open space areas, which could include community gardens (page II-19 of the Lilac Hills Ranch Specific Plan). (4) Impacts to off-site agriculture would be less than significant through the implementation of mitigation measures, including agricultural buffers, fencing, and fuel modification zone restrictions. (5) Other compatible agricultural uses would be allowed by the Specific Plan, such as farmers' markets (page III-62 of the Lilac Hills Ranch Specific Plan), community gardens (page III-55 of the Lilac Hills Ranch Specific Plan) and vineyards (see Vineyard Park P-9 in the Lilac Hills Ranch Specific Plan).</p> <p>The General Plan is intended to reflect an "environmentally sustainable approach to planning that balances the need for adequate infrastructure, housing, and economic vitality, while maintaining and preserving each unique community within the County, agricultural areas, and extensive open space." (General Plan, p. 1-2). Furthermore, the General Plan states that "the policies contained within this General Plan were written to be a clear statement of policy but also to allow flexibility when it comes to implementation. Policies cannot be applied independently; rather, implementation of the policies must</p>

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		be balanced with one another and will address details such as how and when the policy is applied and any relevant exceptions. For example, a policy to conserve open space is not a mandate for preservation of 100 percent of the existing undeveloped land in the County. It must be balanced with other policies that allow development and other uses of the land." (General Plan, p. 1-5.) Therefore, policy LU-7.1 should not be interpreted independently or as requiring the preservation of 100 percent of the agricultural land in the County. Rather, the policy should be balanced with other policies in the General Plan that allow for new growth and the establishment of new villages. In balancing this policy with other policies in the General Plan, the County may give more weight to the policies that allow new, well-designed development that complies with policies LU-1.2 Leapfrog Development, LU-3.1 Diversity of Residential Designations and Building Types, LU-3.2 Mix of Housing Units in Large Projects and LU-3.3 Complete Neighborhoods.
Policy LU-7.1.1	When reclaimed water and gray water becomes available, encourage its use in new development by requirements, such as dual piping systems.	Consistent. The project includes a Wastewater Reclamation Facility (WRF). Common areas and homes will be "purple" piped to accept reclaimed water delivery for landscape irrigation. Grey water will be permitted. Therefore the project is consistent with this policy.
Policy LU-7.1.2	Promote the use of high efficiency low volume sprinklers and accurate programmable controllers in new and old developments, as well as individual residences.	Consistent. The project Water Conservation and Landscape Plans include the use of high efficiency low volume sprinklers and accurate programmable controllers, and other high efficiency irrigation technologies. The project must comply with the County of San Diego landscape water efficiency ordinance. Therefore the project is consistent with this policy.
Policy LU-7.1.5	Support water conservation and minimize wastewater by requiring the use of reclaimed water and gray water in new development and major renovations for landscaping and agriculture irrigations, as well as fire suppression systems, where feasible.	Consistent. The project includes a WRF. Common areas and homes will be "purple" piped to accept reclaimed water delivery for landscape irrigation. Grey water will be permitted. Therefore the project is consistent with this policy. All uses of reclaimed water will be governed by the Valley Center MWD. Therefore the project is consistent with this policy.

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Policy LU-7.1.6	Encourage storm runoff to be captured and retained in reservoirs for use with reclamation water.	Consistent. The project will be required to comply with all local, state, and federal laws governing stormwater management. The project drainage plan includes detention basins to settle and filter stormwater before releasing discharges into the project natural drainages. Therefore the project is consistent with this policy.
Policy LU-7.1.8	Aquifer locations and their watersheds must be considered when siting facilities or reviewing proposed land uses which have the potential to contaminate or otherwise adversely affect these resources. Land uses or facilities which have the potential to jeopardize these resources shall be discouraged.	Consistent. The project must comply with the County Groundwater Ordinance to ensure protection of groundwater and must comply with the County Stormwater Ordinance to ensure protection of watersheds downstream of the project. Therefore the project is consistent with this policy.
Goal LU-7.2	Bonsall's solid waste disposal needs are met on a timely basis with the least possible impact on the environment.	
Policy LU-7.2.1	Encourage the use of transfer stations to reduce overall truck traffic to landfills, allow increased recycling, and reduce solid waste volumes. Coordinate the siting of transfer stations with the location of new landfill sites to minimize truck traffic through predominantly residential areas.	Consistent. The project includes a RF in the Town Center and will function as a transfer station thus increasing recycle volumes and decreasing truck traffic through surrounding residential areas. Therefore the project is consistent with this policy.
Goal CM-1.1	A circulation system which preserves the rural character of the community and provides a safe, balanced transportation system, which includes automobile, bicycle, equestrian and pedestrian users.	
Policy CM-1.1.1	Reduce traffic volume on roads recognized as future "poor level of service" with methods such as, but not limited to, providing alternate routes and reducing density.	Consistent. General Plan Mobility Element Policy 2.1, provides that adequate road capacity to reasonably accommodate build-out of the Land Use Element, must be balanced with the need to support other General Plan goals such as providing environmental protections. Policy 2.1 acknowledges that the preservation of valuable resources may outweigh the benefits of road improvements. Therefore, a lower LOS along specified roadways may be acceptable. Table M-4 of the Mobility Element identifies the deficient roadways and describes the rationale for accepting deficient roadway segments. Mobility Element Policy 2.1 requires development projects to provide associated road improvements necessary to achieve a level of service of "D" or higher on all Mobility Element roads except for those where a failing level of service has been accepted by the County pursuant to the

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		<p>specified criteria. The project proposes to add roadway segments to Table M-4 because the adverse impacts of increasing capacity would not justify the increase in traffic capacity. The Traffic Section of the EIR describes the number of environmental impacts and impacts to community character that would result in such improvements.</p> <p>The applicable situations for accepting a road classification where a LOS E or F is forecast includes those instances when the adverse impacts of adding travel lanes do not justify the resulting benefit of increased traffic capacity. This would include the following relevant situations:</p> <ul style="list-style-type: none"> i. When marginal deficiencies are characterized along a short segment of a road and classifying the road with a designation that would add travel lanes for the entire road would be excessive; or ii. Regional connectivity issues would apply when congestion on State freeways and highways causes regional travelers to use County roads, resulting in congestion on the County road network. Rather than widening County roads to accommodate this traffic, the deficiencies in the regional road network should be addressed. <p>When adding travel lanes to a road would adversely impact environmental and cultural resources or in areas with steep slopes where widening roads would require massive grading, which would result in adverse environmental impacts and other degradation of the physical environment.</p> <p>Therefore, the project complies with this policy while still addressing the other policies of the General Plan.</p>
Policy CM-1.1.2	Require development that increases truck traffic to use Interstate 15, State Route 76 and East Vista Way (S13), whenever feasible.	<p>Consistent. The project is less than one half mile east of the I-15 corridor. Project truck traffic, for example, generated by commercial goods and services and waste hauling, will use I-15 as the primary route in and out of the project. Therefore the project is consistent with this policy.</p>

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Policy CM-1.1.3	Coordinate with Caltrans to design and construct State Route 76, East Vista Way (S13), and Interstate 15 to efficiently carry traffic through the Bonsall CPA. Design and construct interior roads, such as Camino del Rey, West Lilac, Gopher Canyon, and Olive Hill to carry primarily local traffic and remain rural to the degree consistent with safety requirements.	Consistent. West Lilac Road is designed to comply with County Mobility Element standards (as submitted with noted exceptions) for public streets and with the Valley Center Community Right of Way Development Standards, which provides standards for public road improvements. In addition, Section II of the Specific Plan’s Goals and Policies, provides that the project’s local road network be interconnected, appropriately scaled, and adhere to the character of the community. The project would also make improvements to the intersection of Gopher Canyon Road and East Vista Way within the Bonsall Community. Therefore the project is consistent with this policy.
Policy CM-1.1.4	Prioritize the preservation and protection of sensitive habitats, such as wetlands, over road location, relocation, or realignment. Encourage all mitigation to be on-site and site-specific. Require mitigation within the Bonsall CPA where on- site and site-specific mitigation is not appropriate, whenever feasible.	Consistent. The project includes the preservation of onsite habitat within a dedicated 104.1 acre biological open space easement. Road crossings have been minimized to the extent feasible and fully mitigated for, resulting in no net loss of habitat value or function. Therefore the project is consistent with this policy.
Policy CM-1.1.5	Minimize direct access points onto Mobility Element roads to produce unimpeded traffic flow in commercial areas. Require new Commercial development to provide, where possible, indirect access through the use of existing road access points, loop, or frontage roads, common driveways or similar means.	Consistent. The project would minimize access points onto Mobility Element roads. The project would include two connections to West Lilac Road along the northern portion of the project and a third connection further to the south. An internal road system will provide access to the commercial areas within the project site. The private roads will be open to the public, interconnected with other private roads within the project and improved consistent with the County’s private road standards, with certain exceptions approved by the County. All private roads will be designed and built to accommodate accessibility for fire vehicles and will be connected to the County public road system. Therefore the project is consistent with this policy.
Policy CM-1.1.6	Minimize the use of cul-de-sacs in the Bonsall CPA and require new subdivisions to provide local connectivity by providing linkages for long-term circulation improvement.	Consistent. The Lilac Hills Ranch circulation network includes an interconnected network of private roads that provide multiple internal connections. Lilac Hills Ranch includes four connecting points to existing roads, ensuring that both local and surrounding residents have alternate routes. Therefore the project is consistent with this policy.

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Goal CM-4.1	A circulation system which preserves the rural character of the community and provides a safe, balanced transportation system, which includes automobile, bicycle, equestrian, and pedestrian users.	
Policy CM-4.1.2	Prohibit the use of all on street parking on Mobility Element Roads outside the Village Boundaries and require development to provide adequate onsite parking	Consistent. Parking will be minimized along West Lilac Road and the project will comply with all County parking requirements. Therefore the project is consistent with this policy.
Goal CM-5.1	Scenic routes where community character and natural resources are preserved by minimizing the impacts of public or private development along roadways in Bonsall.	
Policy CM-5.1.1	Design, maintain and/or improve scenic areas, road alignments, and realignments to minimize the alteration of the natural landform by following the contours of the existing, natural topography without sacrificing safety or sight distance criteria.	<p>Consistent. A number of Specific Plan Policies require roadways in the Project to be designed in a manner that will minimize impacts to significant biological, environmental and visual resources. Policy 8 in the Specific Plan limits disturbance and development to only those areas shown on the Specific Plan.</p> <p>Policy 9 in the Specific Plan requires a safe and efficient circulation system that supports the Project, links to regional transportation elements when appropriate and minimizes impacts to residential neighborhoods and environmentally sensitive areas. All internal roads are designed to reinforce the rural atmosphere of the community. The road pattern follows the terrain while still providing a safe and efficient road network.. The engineer for the project would be required to certify that the County’s sight distance requirements can be met before receiving approval of a final map and the County may condition the project to comply with sight distance requirements. . Therefore the project is consistent with this policy.</p>
Policy CM-5.1.2	Preserve, to the maximum extent feasible, existing trees and vegetation located within the right-of-way of all public roads and determined to be of significant visual benefit, such as the 100-plus year old oak trees along Camino del Rey, and require removal of trees to have public or community sponsor group review. If no alternative realignment can preserve such vegetation, mitigation shall be required in the form of re-vegetation of equal or better trees, with a minimum 24-inch box, prior to, or phased with,	<p>Consistent. A number of Specific Plan Policies require roadways in the Project to be designed in a manner that will minimize impacts to significant biological, environmental and visual resources. Policy 8 of the Specific Plan limits disturbance and development to only those areas shown on the Specific Plan.</p> <p>Policy 9 of the Specific Plan requires a safe and efficient circulation system that supports the Project, links to regional transportation elements when appropriate and minimizes impacts to residential neighborhoods and</p>

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	the proposed project.	environmentally sensitive areas. All internal roads are designed to reinforce the rural atmosphere of the community. The road pattern follows the terrain while still providing a safe and efficient road network The engineer for the project would be required to certify that the County’s sight distance requirements can be met before receiving approval of a final map and the County may condition the project to comply with sight distance requirements. Therefore the project is consistent with this policy. Therefore the project is consistent with this policy.
Policy CM-5.1.3	Require new development to provide trees, in compliance with the suggested trees for defensible space, within the development but along and outside of the public right of way.	Consistent. The project will include regionally appropriate, fire wise, and drought tolerant trees. Therefore the project is consistent with this policy.
Goal COS-1.1	The preservation of the unique natural and cultural resources of Bonsall and the San Luis Rey River and associated watershed, with continued support for its traditional rural and agricultural life- style.	
Policy COS-1.1.1	Encourage the preservation of all areas of critical habitat identified under the Multiple Species Conservation Program in their natural state, allowing for maintenance and/or management for fire safety.	Consistent. The project is not within the MSCP but the 104.1 acre Biological Open Space is adjacent to the planned North County PAMA. The open space will be managed to protect habitat value and functions including fire safety. Therefore the project is consistent with this policy.
Policy COS-1.1.2	Promote a coordinated approach to work with landowners to meet the community’s needs in preserving habitat and conserving biological resources.	Consistent. The project includes a 104.1 acre Biological Open Space. The open space will be managed to protect habitat value and functions and will also include multi-use trails accessible by the community. Therefore the project is consistent with this policy.
Policy COS-1.1.3	Encourage the conservation of water for residential use through the implementation of water saving techniques, such as xeriscaping and dual piping.	Consistent. The project Water Conservation Plan includes built in dual piping throughout the community and the project Landscape Plan includes drought tolerant, native species for all the common areas. Therefore the project is consistent with this policy.
Policy COS-1.1.4	Require development to be compatible with adjacent natural preserves, sensitive habitat areas, agricultural lands, and recreation areas, or provide transition or buffer areas.	Consistent. The project includes a 104.1 acre Biological Open Space, approximately 20 acres available for community gardens and orchards, and includes a minimum 50-foot buffer planted with two rows of orchard trees along areas adjacent to off-site agricultural operations. s. Therefore the project is consistent with this policy.

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Policy COS-1.1.5	Require that landscaping be designed to prevent erosion on graded sites and, if adjacent to sensitive habitats, require re-vegetation with the appropriate drought tolerant plant species with specific restrictions on the use of any invasive species.	Consistent. The project Landscape Plan is designed to prevent erosion on graded sites, and includes many species of plants and trees. Areas near the Biological Open Space will be planted with native and drought tolerant plants and trees, and will exclude all invasive species. Therefore the project is consistent with this policy.
Policy COS-1.1.6	Encourage development to plant an appropriate variety of trees to stabilize soil conditions and contribute to atmospheric oxygen production.	Consistent. The project Landscape Plan tree list includes many varieties of trees. Therefore the project is consistent with this policy.
Goal COS-1.2	The continuation of agriculture as a prominent use throughout the Bonsall community	
Policy COS-1.2.2	Encourage the use of agriculture easement in the CPA, especially as part of the Conservation Easement Program, while maintaining community character with rural and semi-rural homes.	<p>Consistent. Policy COS 1.2.2.: The proposed Project would be consistent with Policy COS-1.2.2 as it includes mitigation that requires the applicant to purchase agricultural conservation easements to mitigate the significant impacts to Prime and Statewide Important soils that would result from Project implementation. (See Mitigation Measure M-AG-1.) The acquisition would be made either through the County’s PACE program, or independently at a location within the cumulative project area or one approved by the Director of Planning & Development Services. On-site, the Project will include a 50-foot agricultural buffer along the perimeter of a substantial portion of the Project site that will be planted with two rows of the appropriate tree crop (e.g., citrus or avocado) shall be provided.</p> <p>The buffer is required by Mitigation Measure M-AG-2 and would function as an agricultural easement to the extent it would ensure the continuation of agricultural uses within the designated areas. In addition, as detailed in Section III of the Specific Plan, existing agricultural uses in the Biological Open Space will be allowed to continue. (Project Description, p. 1-18.) Groves of orchard trees could also be integrated throughout the Project site and could be located within HOA-maintained open space. Approximately 20 acres of common area would also be available for agriculture. (Project Description, p. 1-19.)</p>

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		Additionally, the proposed Project would maintain the existing rural and semi-rural community character. The conceptual landscape plan establishes a California foothills landscape theme that proposes the conservation and integration of the existing environment. (Project Description, p. 1-28.) Native trees and shrubs such as sycamores, oaks, madrone, currant and toyon would be planted along parkways. (Id.) The Specific Plan also requires the use of fruit trees, which are a rural agricultural characteristic that exemplifies this area. Natural materials, rural styled fencing, and grove-like plantings of trees would be utilized throughout the project to relate to and enhance the rural visual setting consistent with the Valley Center Design Guidelines. (Id.)
Goal COS-1.4	An “astronomical dark sky” that retains the rural setting and facilitates the astronomical research in San Diego County and the continued operation of the Mt. Palomar observatory.	
Policy COS-1.4.1	Discourage street lighting, unless necessary for safety. Require street lighting to meet basic safety standards and the County Light Pollution Code, Ordinance #7155.	Consistent. The project is 3,700 feet beyond the permit radius for Palomar Observatory. The project is however, designed to comply with the safety standards of the County Light Pollution Code. Street lighting will include downward directed lighting, shielded lighting, low voltage decorative lighting, and lighting lower than what would typically be found on an urban street. See Specific Plan, Section III.D. The project Lighting Fixture Schedule illustrates sensitive and rural-themed lighting designs. Therefore the project is consistent with this policy.
Policy COS-1.5.1	Require adequate setbacks from all watercourses and drainages to protect property, improve water quality, provide buffer for riparian habitat and wildlife, and enhance aesthetic quality of the riparian environment.	Consistent. The project is being developed outside the water and natural drainage courses onsite. Therefore the project is consistent with this policy.
Policy COS-1.5.2	Utilize the linear geographic qualities provided by the floodplain as locales for nature preserves, open space corridors, community footpaths, and parkland.	Consistent. The project is not within an inundation zone or other hazardous floodplain. The project preserves 104.1 acres of Biological Open Space, which forms a major tributary to Moosa Canyon, a valuable part of the proposed North County MSCP preserve system. The project trail network traverses the Biological Open Space and project parks are located adjacent to it. Therefore the project is consistent with this policy.

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Goal COS-1.6	Important historic and prehistoric archaeological resources are identified and preserved through adequate protection for new sites, as they are discovered.	
Policy COS-1.6.1	Prevent development, trenching, grading, clearing and grubbing and other related activities that can be damaging to significant prehistoric or historic sites.	Consistent. The project will conserve in place, without further disturbance, the two culturally valuable sites identified in the project cultural resources site assessment and inventory. Therefore the project is consistent with this policy.
Goal COS-2.1	A balanced system of local parks, open space, riding and hiking trails, with outdoor recreation facilities and services, which incorporate the outstanding natural features of the CPA and meet the needs of the residents of the Bonsall community.	
Policy COS-2.1.1	Encourage the acquisition and development of parklands that will protect outstanding, scenic, and riparian areas, and cultural, historical, and biological resources.	Consistent. The project will protect 104.1 acres of sensitive wetland and biological resources, or one-sixth of the entire project site. Approximately 20 acres would be available for agriculture, outside of the biological open space. Another 23.6 acres of parkland will be distributed over 11 parks, including a large main community park. A 16 plus mile trail network will provide opportunities for the community to enjoy the scenic qualities of the aforementioned amenities. Therefore the project is consistent with this policy.
Policy COS-2.1.4	Require appropriate wetland preservation buffers in recreational facilities located adjacent to wetlands to use parkland to provide a transition to the wetland buffer area and buffers for additional passive recreational uses, as permitted.	Consistent. The project Biological Open Space will include buffers from 50 to 100 feet wide. There are no planned recreational areas located directly adjacent to the wetlands. There are four parks adjacent to the Biological Open Space buffer. Therefore the project is consistent with this policy.
Policy COS-2.1.5	Coordinate with the Bonsall Community Sponsor Group on the future siting, naming, and planning of community parks in Bonsall.	Consistent. The project includes one 13.5 acre, centrally located community park within the Valley Center Community Plan area. The park site will be dedicated to the County and accordingly, will be required to follow County park planning procedures and guidelines. Therefore the project is consistent with this policy.
Goal COS-3.1	Natural resources, including existing trees, viewsheds, rock outcroppings, foothills, and meadows, and the San Luis Rey River Valley that are protected and contribute to the character and beauty of the Bonsall community.	
Policy COS-3.1.1	Encourage agricultural and equestrian open spaces and only encourage linking of open space if it is biological and supports a wildlife corridor system.	Consistent. The project will protect 104.1 acres of biological open space, which flows into Moosa Canyon, a valuable part of the planned North County MSCP. Approximately 20 acres would be available for agriculture, outside of the biological open space. The project trail network will provide three links

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		to the regional trail system and will include equestrian trails. Therefore the project is consistent with this policy.
Policy COS-3.1.2	Encourage incorporation of publicly-owned land into a functional recreation/open space system, wherever feasible.	Consistent. The project includes one 13.5 acre, centrally located community park within the Valley Center Community Plan area. The park site will be dedicated to the County and so will be required to follow County park planning procedures and guidelines. Therefore the project is consistent with this policy.
Policy COS-3.1.3	Require channelization that uses natural materials for bank protection to protect existing structures, whenever feasible. An exception may be at road crossings, and even then, natural materials shall be given preference to minimize the visual impact.	Consistent. The project Drainage Plan relies on natural drainages; however improvements will be required in select areas to protect roads and development. The project Landscape Plan includes a variety of plants and trees for common areas and will minimize the visual impact of the development. Therefore the project is consistent with this policy.
Policy COS-3.1.4	Support low intensity land use zoning in undeveloped mapped floodplains, such as agricultural and low density residential zoning, to protect downstream areas from flooding hazards to minimize impacts on wildlife habitat and to provide scenic open space.	Consistent. The project, located near Keyes Creek, is not within a mapped inundation zone or within any mapped flood hazard area. Project development is located outside wetland drainages except for road crossings. Therefore the project is consistent with this policy.
GOAL S-1	Adequate law enforcement, fire protection, and emergency services that contribute to a safe living and working environment for the residents of Bonsall.	
Policy S-1.1	Support the provision of adequate law enforcement, fire protection, and emergency services for the residents of Bonsall.	Consistent. The project will be serviced by Deer Springs Fire Protection District (DSFPD) or CalFIRE in accordance with a Fire Protection Plan that meets County emergency and fire protection standards. DSFPD has sufficient capacity to service the Project. (See Capability Assessment, attached as an exhibit to the Specific Plan.) The County Sheriff's Department's Valley Center substation will provide law enforcement services. Therefore the project is consistent with this policy.

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GOAL N-1	Protect and enhance Bonsall’s acoustical environment by supporting the control of noise at its source, along its transmission path and at the site of sensitive receivers. Maintain an environment free of excessive noise by providing control of noise at its source.	
Policy N-1.1	Require site design and building design controls to minimize noise emissions from noise sources.	<p>Consistent. The project Noise Report, or acoustical study, has been prepared (EIR, Noise Report, Appendix M). Project noise impacts have been comprehensively analyzed in the EIR at Chapter 2.8. Twenty measures and practices will be required to minimize project noise, (M-N-1 through M-N-20) see Table S-1, EIR.</p> <p>Supplemental acoustical studies may be required prior to the issuance of individual building permits. Therefore the project is consistent with this policy.</p>
Policy N-1.2	Encourage land use and circulation patterns, which will minimize noise in residential neighborhoods and sensitive wildlife habitat.	<p>Consistent. Land use intensities are highest in the Town Center and the two Neighborhood Centers which are located in the central portion of the project while land uses intensities are lower in the residential neighborhoods. The project circulation network includes an interconnected network of private roads (open to the public) that provide multiple connections. Therefore the project is consistent with this policy.</p>
Policy N-1.3	Support limiting truck traffic to designated routes to reduce noise in residential areas.	<p>Consistent. The project truck traffic in residential areas will be limited to waste hauling services and other residential services. Trucking for commercial goods and services trucking will be provided from the north. See further noise measures at Bonsall CP Policy N-1.2. Therefore the project is consistent with this policy.</p>

**LILAC HILLS RANCH CONSISTENCY ANALYSIS –
VALLEY CENTER COMMUNITY PLAN GOALS & POLICIES**

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Goal 1 A	Community Character Goal: Preserve And Enhance The Rural Character Of Valley Center By Maintaining A Pattern Of Land Use Consistent With The Following Regional Categories. A. Village: Enhance The Rural Village Character Of Valley Center’s North And South Villages Defined By The Current Nodes Of Industrial, Commercial And Higher Density Village Residential Land Use Designations. Balanced Road Network. A safe and efficient road network that balances regional travel needs with the travel requirements and preferences of local communities.	
	Require that future projects are consistent with the goals, policies, and recommendations contained in the Valley Center Community Plan.	Consistent. The General Plan Amendment proposes to remove the current Semi-Rural Regional Category and replace it with the Village Regional Category, making the Lilac Hills Ranch a third village on the westernmost edge of the Valley Center Community Plan area, less than one half mile the I-15 corridor. The Lilac Hills Ranch Specific Plan provides as one of its Goals and Policies that it will “... further implement the policies and development standards set forth in the County General Plan, and the Valley Center and Bonsall Community Plans.” For example, the project would provide a pattern of development that accommodates people of diverse ages, lifestyles, and occupations. In addition, the project includes a wide variety of architectural styles and designs, which is encouraged by the Valley Center Community Plan. (VCCP, Ch.1, p.8)) Site Plan approval is required for all development within the project and, in particular, all Commercial, civic, institutional, and mixed-use development will require Site Plan review to determine conformance with the Valley Center Design Guidelines. (The Valley Center Design Guidelines only require design review for multi-family development not single-family.) Also, community landscaping will require compliance with the applicable requirements of the Valley Center and Bonsall Design Guidelines.
	Maintain the existing rural character of Valley Center in future developments by prohibiting monotonous tract developments. Require site design that is consistent with the rural community character	Consistent. The Lilac Hills Ranch Specific Plan provides as one of its Goals and Policies that it will “... further implement the policies and development standards set forth in the County General Plan, and the Valley Center and Bonsall Community Plans.” (Page I-2.) Site Plan approval is required for all development within the project and, in particular, all Commercial, civic, institutional, and mixed-use development will require Site Plan approval to

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		<p>determine conformance with the Valley Center Design Guidelines. (The Valley Center Design Guidelines only require design review for multi-family development.) Also, community landscaping will require compliance with the applicable requirements of the valley Center and Bonsall Design Guidelines.</p> <p>By incorporating the design principles of the Community Plans and requiring site plan approval, the rural community character will be ensured. In addition, the Specific Plan, Chapter 3 establishes design guidelines that will, among other things, establish transitions from adjacent residential and agricultural uses to the denser uses within the Village. Single family attached units would all be located in the Town Center and Neighborhood Center. Project development along West Lilac Road, east of the western entrance, would consist of single- family detached homes on 100- foot minimum width lots. The wide spacing between these homes combined with the landscaping and multi-use trail on the south side of West Lilac Road provides a transition from the existing homes and users of West Lilac Road to the denser areas of the project. The project also incorporates various design features to reduce visual effects along the project perimeter. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes. Along the west side of the project, the large riparian woodland would be preserved, providing separation from the project and existing homes. In areas adjacent to existing agriculture, a 50 foot wide buffer planted with fruit trees will provide a transition from the project to the existing uses. Finally, the Design Guidelines require the use of natural materials, rural styled fencing, and grove-like plantings of trees throughout the Project to relate to and enhance the rural character of the surrounding community.</p>

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Goal 2	Two Economically Viable And Socially Vibrant Villages Where Dense Residential Uses, As Well As Commercial And Industrial Uses, Are Contained.	
	A pattern of development that conserves Valley Center’s natural beauty and resources, and retains Valley Center’s rural character.	Consistent. The Project is consistent with the Community Development Model, locating housing close to retail, services, schools, and jobs, allowing for the preservation of open space, natural habitat, and agriculture that will contribute to the retention of the rural setting and lifestyle of the adjacent community. The project will preserve 104.1 acres of sensitive biological resources (one-sixth of the entire project site). Approximately 20 acres will be available for agricultural use outside of the biological open space. The project also incorporates various design features that will reduce visual effects along the project perimeter, achieve compatibility with the community and retain the rural character of the community. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes. Along the west side of the project, the large riparian woodland would be preserved, providing separation from the project and existing homes. In areas adjacent to existing off-site agricultural operations, a 50 foot wide buffer planted with orchard trees will provide a buffer, transitioning from the project to the existing uses.
	A pattern of development that accommodates people of diverse ages, lifestyles, occupations, and interests with opportunities for village, semi-rural and rural living.	Consistent. The project locates a mixture of uses in a Town Center and two smaller neighborhood centers. The Town Center will consist of commercial uses, office uses, a farmers’ market, and single-family attached uses. The second node of development will include commercial development, a school, park, private recreation center, a fire station site and single family attached homes. The third node of intensity is located in the Senior Community. The Town Center and Neighborhood Centers are surrounded by single family homes on lots of varying sizes. The project will offer a diverse range of housing types, including single family attached and detached homes, residential and commercial mixed-uses, and age-restricted Senior Citizen housing. In addition, a Group Residential and Group Care facility will be provided.
	Development that maintains Valley Center’s rural character through appropriate location and suitable site design.	Consistent. The project incorporates various design features that will reduce visual effects along the project perimeter, achieve compatibility with the

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		community and retain the rural character of the community. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes. Along the west side of the project, the large riparian woodland would be preserved, providing separation from the project and existing homes. In areas adjacent to existing agriculture, a 50 foot wide buffer planted with fruit trees will provide a transition from the project to the existing uses. The project also incorporates various design features to reduce visual effects along the project perimeter. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes. The project is located within an area where existing or planned infrastructure can serve and support the project. It is located less than one half mile from the I-15 corridor in the unincorporated area of San Diego County with freeway access off the Interstate 15 at the Old Highway 395 Interchange. The project is also within the boundaries of the Valley Center Municipal Water District (VCMWD) and the DSPFD, both of which have provided Availability Forms.
Residential Goal	Preserve and enhance the rural character of the Valley Center Planning Area.	Consistent. See response above.
	<p><u>POLICIES AND RECOMMENDATIONS</u></p> <p>A. <u>Environmental Concerns and Issues:</u></p> <p>1. Require that discretionary permits preserve environmentally significant and/or sensitive resources such as undisturbed steep slopes, canyons, floodplains, ridge tops and unique scenic views in order to reinforce the rural character of the area through sensitive site design and, where appropriate, with open space easements.</p>	Consistent. The Lilac Hills Ranch Specific Plan is designed so that 99.7% of all grading will occur outside of the RPO steep slope areas. Less than 1.6 acres of RPO defined steep slopes are disturbed which will help to preserve sensitive biological resources. The major drainage (wetlands) features of the site will be placed into open space easements to avoid or minimize impacts to them. The project will protect 104.1 acres of sensitive biological resources (one-sixth of the entire project site). Approximately 20 acres of agriculture will be available for agricultural use outside of the biological open space.
	2. Require preservation of unique features such as oak woodlands, riparian habitats, steep slopes, archaeological sites, and ecologically sensitive areas.	Consistent. The most sensitive natural feature on the property are the drainages with their mature oak woodlands, almost all of which have been integrated into the preserved open space system of the project.

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	3. Prohibit ridgeline residential development unless it can be shown through a viewshed analysis that there would be only minimal impact to adjacent properties.	Consistent. The project would preserve the surrounding ridgelines, although project grading would impact 1.6 acres of RPO steep slopes, this amount is within the 10 percent allowance permitted under the RPO. The disturbance of a relatively small area of steep slopes would not degrade the visual quality of that resource. In addition, the project site does not contain prominent ridgelines that would be developed.
	<p>B. Rural Compatibility Issues:</p> <p>4. Require new residential development to adhere to site design standards which are consistent with the character and scale of a rural community. The following elements are particularly important:</p> <ul style="list-style-type: none"> • Roads that follow topography and minimize grading; • Built environment that is integrated into the natural setting and topography; • Grading that follows natural contours and does not disturb the natural terrain; • Structure design and siting that allows preservation of the site's natural assets; • Retention of natural vegetation, agricultural groves, rock outcroppings, riparian habitats and drainage areas. [PP] 	Consistent. The project complies with this policy because 99.7% of existing RPO steep slopes encroaching on only 1.6 acres. One-sixth of the site will remain physically undisturbed, primarily wetland drainages. The grading guidelines ensure natural topography on the remainder of the site is adhered to by applying refined grading techniques, including curvilinear and undulating shapes. The proposed roads would follow the natural topography and minimize grading for roads to the minimum necessary without compromising safety. Therefore the project is consistent with this policy. Therefore the project is consistent with this policy.
	<p>C. Clustering</p> <p>Clustering, planned development, lot area averaging and Specific Plan projects which utilize the clustering technique shall in no instance within the Valley Center CPA be used to create a greater number of lots than the property would have been entitled without the use of the above mentioned techniques...</p>	Consistent. The proposed Specific Plan does not propose clustering and includes a residential component consisting of a maximum of 1,746 dwelling units which cannot be exceeded and equates to an overall density of not more than 2.9 dwelling units per acre (du/ac) over the entire project site.
	<p>D. Infrastructure Issues:</p> <p>Prohibit residential development which would prematurely subdivide land and require expansion of public utilities and services to such developments.</p>	Consistent. Lilac Hills Ranch is located within an area where existing or planned infrastructure can service and support the project. It is located less than one half mile from the I- 15 corridor in the unincorporated area of San Diego County with freeway access off the Interstate 15 at the Old Highway 395 Interchange. The project is also within the boundaries of the VCMWD and the

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		DSFPD. A Capabilities Assessment was prepared by Dudek and Hunt (2014) that shows there is capacity to serve the project at build out. There is existing water infrastructure on and to the site. There are transmission lines to the site, numerous meters, and two water tanks. The Water Supply Assessment approved by the VCMWD confirmed that the Community's imported water use will be equal to or less than the imported water use after project implementation.
Commercial Goal	Commercial uses are concentrated within the boundaries of two compact scale, "rural villages" that are consistent in scale and design with a low density rural residential and agricultural community.	Consistent. The General Plan Amendment proposes to remove the current Semi-Rural Regional Category and replace it with the Village Regional Category, making the Lilac Hills Ranch a third village within the Valley Center Community Plan. The proposed General Plan Amendment includes a revision to this policy to add a description of a third village within Valley Center.
	1. Prohibit strip commercial development on Cole Grade Road.	Consistent. No commercial development is being proposed for Cole Grade Road.
	2. Require new commercial development to comply with the Design Guidelines for Valley Center including, but not limited to, the retention of significant natural features characteristic of the community's landscape. Existing topography, land forms, drainage courses, rock outcroppings, vegetation and viewshed shall be incorporated in the design of the future development of commercial land via the "B" Community Design Area.	Consistent. Commercial and mixed use areas within Lilac Hills Ranch will include the "B" and "D" designator and require Site Plan approval prior to issuance of a building permit. The Site Plans will be reviewed for compliance with the Design Guidelines for Valley Center.
	3. Ensure that all commercial areas are served by Mobility Element roads or local roads which meet the standards of the County of San Diego. Whenever possible, require new commercial development to provide secondary road access as opposed to access from major through roads.	Consistent. The internal road system which will provide access to the commercial areas within the project site, would consist of private roads, open to the public, interconnected and improved consistent with the County's private road standards, with certain exceptions approved by the County. All private roads will all be designed and built to accommodate accessibility for fire vehicles and services. This street system will be owned, operated, and maintained by the Community HOA. The community road system, with the exception of the Senior Citizen Neighborhood in Phases 4 and 5 will be available to the public traveling from the County's public maintained road system. Access to the Village Center will be provided via West Lilac Road, a

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		Mobility Element public road that will be improved to County public road standards with certain exceptions approved by the County, to Main Street within the project site. Additional access to the Town Center will be provided by Lilac Hills Ranch Road.
	4. Commercial and civic uses shall be located in areas which have adequate roads for circulation and provide easy and safe multi-purpose pathways and trails.	Consistent. See response 3 above. In addition, the project includes an extensive pedestrian walkway system, including trails and paths with both hard and soft surfaces. The design of the project encourages the use of bicycles and walking due to its compact design.
	5. Future commercial development shall be planned so that strip commercial development will be avoided.	Consistent. No strip commercial development is allowed within the Lilac Hills Ranch Specific Plan.
	6. Commercial/civic uses shall not interfere either functionally or visually with adjacent land uses or the rural atmosphere of the community.	Consistent. Project design guidelines for landscaping and architecture also contain rural concepts. See Specific Plan, Sections II and III. Site Plan approval for civic, and commercial structures in the Town Center and Neighborhood Centers (pursuant to the "B" or "D" Special Area Designator) will ensure that development will conform to the appropriate design guidelines. Finally, the project incorporates various design features that will reduce visual effects along the project perimeter, achieve compatibility with the community and retain the rural character of the community. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes.
	7. Commercial/civic uses shall be periodically reviewed to ensure that the standards for noise, light, traffic, odors and all other conditions of approval are continuing to be met.	Consistent. All commercial and civic uses require Site Plan approval prior to issuance of building permits. All Site Plans include on-going conditions to ensure that the development complies with all standards related to noise, lighting, traffic, odors and any other requirements.
	8. Discourage commercial and civic uses outside of the Villages and limit all such uses to those that are clearly demonstrated as needed and which are compatible with the rural lifestyle of the Valley Center Community Plan.	Consistent. The project is proposing to amend its land use designation to Village. A description of the village would be added to the Valley Center Community Plan, indicating that the Lilac Hills Ranch project includes commercial and civic uses.
	9. The application of Land Use Designation Semi-Rural and Regional Category of Semi-Rural Lands are proposed for those properties that are currently zoned commercial and are located outside of the Villages.	Consistent. The project would change the existing Semi-Rural Regional Category to Village. Therefore, the project complies with this policy.

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	<p><u>AGRICULTURAL GOAL</u></p> <p>Preserve and enhance existing and future agricultural uses in the Valley Center community plan.</p>	<p>Consistent. T The project proposes to amend the General Plan Semi Rural Lands land use designation to create a new Village. While the project would increase the density allowed and convert existing agricultural lands to non-agricultural uses, the project would still comply with the intent of this policy in the following ways: (1) The project would preserve approximately 43.8 acres of agriculture off-site through the purchase of PACE program mitigation credits or through the preservation of off-site agricultural resources based on the County's Guidelines for the Determination of Significance for Agriculture (CEQA); (2) The site is not located within a Williamson Act Contract or an Agricultural Preserve; (3) Approximately 20 acres of agriculture would remain for agricultural cultivation, including the manufactured open space areas, which could include community gardens (page II-19 of the Lilac Hills Ranch Specific Plan); (4) Impacts to off-site agriculture would be less than significant through the implementation of mitigation measures, including agricultural buffers, fencing, and fuel modification zone restrictions; (5) Other compatible agricultural uses would be allowed by the Specific Plan, such as farmers' markets (page III-62 of the Lilac Hills Ranch Specific Plan), community gardens (page III-55 of the Lilac Hills Ranch Specific Plan), and vineyards (see Vineyard Park P-9 in the Lilac Hills Ranch Specific Plan).</p>
	<p>1. Support agricultural uses and activities throughout the CPA by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center.</p>	<p>Consistent. The Project is designed to be compatible with the rural/agricultural nature of Valley Center; thus, the Specific Plan does not preclude agriculture within the project site and is an allowed use in any zone within the project. The project includes the continuation of existing agricultural uses within the RPO buffer. The Project EIR determined that impacts related to the Specific Plan or rezoning was found less than significant.</p> <p>In addition, the project includes groves of orchard trees integrated throughout the project site and would be located within HOA-maintained open space, such as manufactured slopes. Approximately 20 acres of common area would be available for agriculture activities. Mitigation measures were included were included to ensure that no significant impacts to existing off-site</p>

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		<p>agriculture would occur, such as:</p> <ol style="list-style-type: none"> 1. A minimum of 50-foot wide buffers planted with two-rows of citrus, avocado, or olive trees (M-AG-2). 2. Installing 6-foot high fencing to protect adjacent agricultural activities from unwanted intrusions by people and domestic pets (M-AG-3). 3. Prohibiting habitable structures as well as any structure that could attract residents, visitors, or children to congregate nearby (M-AG-4).
	2. Encourage the formation of Agricultural preserves in areas with active agricultural operations and in location that will be optimal for future agricultural production.	<p>Consistent. The project does not involve the formation of an agricultural preserve, but includes the purchase of an agricultural conservation easement that would permanently protect agricultural land of prime and statewide importance soils at a 1:1 ratio. The project would be required to purchase 43.8 acres of agricultural or credits through the County’s PACE program (or equivalent) which will ensure that the agriculture land will be preserved for future agricultural production. Therefore, the project conforms to this policy.</p>
	3. Prohibit residential development which would have an adverse impact on existing agricultural uses.	<p>Consistent. The project was analyzed pursuant to the County’s LARA Model and was found to have a significant direct impact to 43.8 acres of Prime and Statewide Importance soils. However, Mitigation measure M- AG-1 would require the Project applicant to purchase and preserve 43.8 acres of agriculture off-site or purchase credits through the County’s PACE program. This would reduce the adverse impact on existing agricultural uses by preserving agriculture land in perpetuity.</p> <p>In addition, the project was found to have a less than significant impact as a result of land use conflicts with implementation of Mitigation Measures M-AG-2 through M-AG-5 along with implementation of proposed project design considerations.</p>
Goal 4	Mobility. A circulation system that achieves the combined objectives of connectivity and safety for all users (automobiles, bicyclists, equestrians and pedestrians), and also preserves the rural character of the community.	
	<p><u>POLICIES AND RECOMMENDATIONS</u></p> <ol style="list-style-type: none"> 1. Where appropriate, minimize private driveway and private road access on to Mobility Element roads. 	<p>Consistent. The project would minimize private road access onto West Lilac Road, a Mobility Element road. The project includes two connections onto West Lilac Road at the northern end of the project site and a third connection to the east via Covey Lane. These connections are necessary in order to</p>

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		ensure safe and adequate access in and out of the project site. Therefore, the project complies with this policy.
	2. Road design shall reflect the rural character and needs unique to the Planning Area. For example, turn radii shall be such that agricultural vehicles and equestrian rigs can be safely accommodated.	<p>Consistent. Section II of the Specific Plan’s Goals and Policies, provides that the project’s local road network be interconnected, appropriately scaled, and adhere to the character of the community. All private streets will be designed and developed in accordance with the County’s private road standards, with any modifications approved by the County in accordance with its policy for Roadway Exceptions. In addition, special standards established by the Specific Plan to reflect the traditional character and rural theme of the Community will be applied. Notwithstanding the above, all proposed roads are designed and built to accommodate fire vehicles and emergency services, in accordance with the County of San Diego Consolidated Fire Code.</p> <p>Approval of any such street exceptions for the project would be consistent with Policy 2 of the Valley Center Community Plan’s Mobility Goal relating to rural character. Chapter III.B.2.a of the Specific Plan establishes special standards for development of the project’s private roads to ensure they “reflect the traditional character and rural theme of the Community.” Special standards established by the Specific Plan to reflect the traditional character and rural theme of the Community will be applied. A number of Specific Plan Policies require roadways in the project to be designed in a manner that would minimize impacts to significant biological, environmental, and visual resources. Policy 8 of the Specific Plan limits disturbance and development to only those areas shown in the Specific Plan. Policy 9 of the Specific Plan requires a safe and efficient circulation system that supports the project, links to regional transportation elements when appropriate, and minimizes impacts to residential neighborhoods and environmentally sensitive areas. The Specific Plan also sets forth project road design standards, as well as the site plan processes, to ensure consistent application to the project. All internal roads are designed to reinforce the rural atmosphere of the community by reducing design speed and retaining two lanes.</p>

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	3. Conflicting traffic movements such as uncontrolled access and uncontrolled intersections shall be minimized	Consistent. The project complies with this policy. All intersections will be designed in conformance with County of San Diego standards for signage and intersection controls.
	4. Road alignment shall minimize the necessity of altering the landscape by following, as much as possible, the contours of the existing, natural topography without sacrificing safety or sight distance criteria. 5. Required roadside and median landscaping shall reflect standards as outlined in the Valley Center Design Guidelines	Consistent. The project would comply with applicable regulations and would not result in a significant traffic hazard. The engineer for the project would be required to certify that the County's sight distance requirements can be met before receiving approval of a final map and the County may condition the project to comply with sight distance requirements.
	6. Existing trees and vegetation located within the "Right-of-Way" of all public roads, and determined to be of significant visual benefit shall be transplanted or replaced consistent with the Valley Center Design Guidelines.	Consistent. The Specific Plan requires that the Valley Center Design Guidelines, which include landscape design standards and suggested planting pallets, be applied to both the West Lilac Road frontage and the Town Center Landscape zone.
	7. To promote unimpeded traffic flow in commercial areas, minimize direct access points on to Mobility Element roads by recommending new commercial development to provide indirect access through the use of existing road access points, loop or frontage roads, common driveways or similar means.	Consistent. The project would minimize direct access points onto West Lilac Road, a Mobility Element Road. An internal road system will provide access to the commercial areas within the project site. The private roads will be open to the public, interconnected with other private roads within the project and improved consistent with the County's private road standards, with certain exceptions approved by the County. All private roads will be designed and built to accommodate fire vehicles and will be connected to the County public road system.
	8. Woods Valley Road from Valley Center Road, east to Paradise Mountain Road and, Lilac Road from Old Castle Road to Highway 76 are significant aesthetic resources. Future improvements should maintain as much of their original character as possible without compromising safety.	Consistent. The project involves an option for minor improvements to Lilac Road to mitigate cumulative impacts. The improvements would include the installation of turn lanes at two existing intersections. These improvements are minor and would not result in a change to the aesthetic character of Lilac Road. The improvements would enhance the safety increase the capacity of the roadway. Generally the project cumulative impact analysis is provided for each separate impact subchapter found in Chapters 2.0 and 3.0 the EIR, consistent with the County's Environmental Impact Format and General Content Requirements

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		(September 26, 2006). For additional detail on cumulative impacts analysis see response to comment 03f-2.
	9. Require that the road system function at a service level no worse than "C" at peak hours as development occurs	Consistent. A Traffic Impact Study (TIS) was prepared for the project in conformance with County Guidelines and standards. The TIS identifies traffic impacts to roadway segments and intersections and includes mitigation to mitigate the impacts. Therefore, the project complies with this policy.
	10. Right-of-way development standards for private roads shall be compatible with the standards as outlined in Policy 6 of this section	<p>Consistent. Section II of the Specific Plan's Goals and Policies, provides that the project's local road network be interconnected, appropriately scaled, and adhere to the character of the community. All private streets will be designed and developed in accordance with the County's private road standards, with any modifications approved by the County.</p> <p>In summary, the project is consistent with VCCP Goal 4 regarding Mobility.</p> <ul style="list-style-type: none"> • The proposed street system is interconnected and provides residents with at least two ways to access the project site via public roads. • Roads are curved to fit the topography and are all two-lane, as is appropriate for a village of this size. The circulation plan designs roadways to flow with the natural terrain (see Figure 70). • The project does include ten requests for exceptions to County Road Standards as part of this project and are described in Figures 1-4A and 1-4B. The purpose of the exceptions requests are to avoid impacts to surrounding properties and to support traffic calming measures. All of the exceptions being requested for the roadway improvements were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the EIR. The exceptions could be granted by the County where capacity and safety are not unduly affected. (EIR, subchapter 2.3.2.3.) The proposed roadway exceptions would not affect road capacity. As detailed in Table 1-2 of Chapter 1 of the EIR, four of the 10 proposed roadway exception requests would affect design speed. Two of those roads are internal to the project site. See also comment C1e-61.

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	<p>11. Implement community right-of-way development standards for the Valley Center Planning Area to achieve a rural character and alternative features within the shoulder portion of dedicated right-of-way. Such improvements will identify the community's desire to modify County development standards permitted by Board of Supervisors Policy J-36.</p>	<p>Consistent. West Lilac Road is designed to comply with County Mobility Element standards (as submitted with noted exceptions) for public streets and the Valley Center Community Right of Way Development Standards which provides standards for public road improvements. In addition, Section II of the Specific Plan's Goals and Policies, provides that the project's local road network be interconnected, appropriately scaled, and adhere to the character of the community. All private streets will be designed and developed in accordance with the County's private road standards, with any modifications approved by the County in accordance with its policy for Roadway Exceptions. In addition, special standards established by the Specific Plan to reflect the traditional character and rural theme of the Community will be applied.</p>
	<p>12. Access to new subdivisions shall be carefully examined. Where a clear circulation need which benefits the overall community can be demonstrated, public roads consistent with Department of Public works policy shall be dedicated and constructed. Where appropriate, future subdivisions shall be required to access public roads via at least two separate access points</p>	<p>Consistent. The Lilac Hills Ranch circulation network includes an interconnected network of private roads that provide multiple internal connections. Lilac Hills Ranch includes four connecting points to existing roads, ensuring that both local and surrounding residents have alternate routes.</p> <p>The Lilac Hills Ranch circulation network includes an interconnected network of private roads that provide multiple connections. Lilac Hills Ranch includes four connecting points to existing roads, ensuring that both local and surrounding residents have alternate routes. The mitigation measures listed on Table 10.5 of the project's TIA, would reduce impacts associated with traffic congestion to less than significant where feasible. All of the roads within the project will meet the requirements of the Consolidated Fire Code. The Specific Plan sets forth project road design standards, as well as the site plan processes, to ensure consistent application to the project. Please also refer to responses to comments C1c-161 or C1c-181 for a thorough discussion of the application of design standards to the project. Concerning illegal access points, please refer to the Global Response: Road Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion of this topic.</p>

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	13. Safely separate pedestrian, equestrian and bicycle traffic from vehicular traffic when these modes share rights-of-way.	Consistent. The street system design has been specifically designed to maximize the use of pedestrian and bicycle transportation within the community as recommended by the recent Complete Streets Report by SANDAG. Streets are designed to narrow the field of vision of the automobile driver with landscaping and building placement to reduce vehicle speeds while providing maximum pedestrian visibility and safety.
	14. To mitigate cumulative traffic impacts, endorse a Bridge and Thoroughfare Traffic Mitigation Program for the establishment of a fee to be collected at the building permit stage.	Consistent. The County has adopted a Transportation Impact Fee (TIF) program to mitigate cumulative traffic impacts. The Lilac Hills Ranch project would require an update to the TIF program. After the TIF program has been updated to reflect the changes to the General Plan, the project would be required to pay the TIF fee prior to issuance of building permits.
Goal 5	Public Facilities and Services	
	General Goals Adopt an active program of coordination between the allowable growth of population and the infrastructure serving it, to ensure at all times that the public welfare and safety are guaranteed.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in adopting policies set forth throughout the General Plan.
	General Goals Provide a means for establishing the expansion or construction of roads the construction of an adequate school facilities and the approved staffing of police and fire agencies before Valley Center's residential population overburdens existing faculties.	Consistent. Infrastructure and public services will be paid for by the developer or through a financing mechanism that is applied only to the residents of Lilac Hills Ranch. The developer will be responsible for the payment of transportation impact fees, school fees and other similar fees. In addition, the development will result in increased property taxes and assessments that will be paid by the residents of the community for the services provided to them. Project Facility Availability Forms have been provided for water, sewer, fire, police and schools.
	Fire Protection Goal Protect all life and property from fire hazard potential and minimize those elements within the natural and human made environment which pose a clear and significant fire hazard ensure adequate levels of Fire protection.	Consistent. The Project is located within the DSFPD. There are four stations located within the DSFPD. Miller Station is located adjacent to the development and approximately 2.3 miles from the furthest structure when the development is fully constructed. DSFPD would have the existing capacity to respond to expected calls from the proposed Lilac Hills Ranch project See, Capabilities Assessment (Dudek & Hunt Research Corp. 2015)). A Fire Protection Plan ("FPP") for Lilac Hills Ranch was prepared in accordance with

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		the DSFPD Ordinance No. 2010-01 (“District Standards”) and the County guidance and referenced material in the 2011 Consolidated Fire Code, Guidelines for Determining Significance (See Appendix J to the EIR). The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard. The wildfire threat will be mitigated to less than significant levels by the incorporation of the design features described in the FPP.
	<p>Policies and Recommendations</p> <p>1. All new development utilizing imported water shall provide infrastructure for fire suppression (such as pipes and hydrants) in accordance with the prevailing standards.</p>	Consistent. The project will be required to construct the project in accordance with the County Consolidated Fire Code, which includes water related fire suppression requirements.
	<p>2. Encourage the establishment of a community fuel management program and fire safety program in accordance with fire district policy.</p>	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent in adopting policies set forth throughout the General Plan. However, a Fuel Management Zone (FMZ) is required for the management of flammable vegetation in accordance with the Fire Protection Plan (“FPP”). Each Final Map will designate the location of the required Fuel Management Zones as required by the analysis conducted based upon the procedure and protocol set forth in the FPP. Where the standard FMZ building setback zone is modified by the FPP for each Implementing Map, the alternative measures identified within that FPP will be used as permitted by the Fire Code and as set forth within the FPP for such Implementing Map.
	<p>3. New site locations for fire stations within the plan area should be centrally and strategically located.</p>	Consistent. The Project proposes a four options, the implementation of which would provide fire service to the site to meet the County’s General Plan travel response time standards. See, Global response to Comments: Fire and Emergency Services. Therefore, the project complies with this policy.

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	<p><u>EDUCATION GOAL</u></p> <p>Ensure the provision of adequate services and facilities to meet the educational needs of all the residents of the Community Planning Area.</p>	<p>Consistent. The project will be located within two public school districts: the Valley Center- Pauma Unified School District and Bonsall Union School District (the Bonsall District is in the final stages of being unified and will be unified prior to accepting students from the Project). The project will pay all fees required by state law and/or enter into an agreement with the School district. In addition, a 12 acre, K-8 school site is provided within the project site.</p> <p>Therefore, the project would provide adequate services and facilities to meet the educational needs of the future residents and conforms to this policy.</p>
	<p>Policy</p> <p>1. Coordinate school facility planning with residential development to ensure that school facilities will be available to accommodate the increase in enrollment without overcrowding.</p>	<p>Consistent. Please see the response above under Educational Goal.</p>
	<p>2. Develop schools in conjunction with neighborhood and community recreation facilities.</p>	<p>Consistent. The Community’s main public park (13.5 acres) will be located adjacent to the K-8 School site (12 acres).</p>
	<p><u>WATER SERVICE GOAL</u></p> <p>Ensure that enough water is available from both local and outside sources to adequately supply all users in the community plan area.</p>	<p>Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent in adopting policies set forth throughout the General Plan. However, the project will be served by the VCMWD for water service. The district has verified that the district has adequate water supplies to serve the project and has approved a Water Supply Assessment for the project. Therefore, the project conforms to this policy.</p>
	<p><u>POLICIES AND RECOMMENDATIONS</u></p> <p>1. Adopt and Support the Board of Supervisors’ water supply and conservation policies.</p>	<p>Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent in adopting policies set forth throughout the General Plan.</p>
	<p>2. The delivery of imported water service to the CPA shall be coordinated and the infrastructure adequately sized so that service can be provided to all land within the Valley Center Municipal Water District Territory in a cost effective manner.</p>	<p>Consistent. Water Service will be provided to the project by VCMWD. New water service facilities within the development will consist of a 12-inch backbone water line extending from north to south through the Community. This new 12-inch water main will connect to the existing 12-inch water line in West Lilac Road as well as connecting to the existing 18- inch water line running east- west through the south portion of the community. Extending</p>

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		from the 12-inch backbone water main will be 8-inch lines in the residential neighborhoods and appropriately sized lines to serve the schools and park area. Pressure regulators are provided to maintain appropriate pressure in lower elevations of the site. Offsite water facilities are not anticipated because the existing network of potable water distribution piping in the vicinity of the community is capable of providing adequate flow and pressure to the site. In addition, existing potable water storage within the water service zone is sufficient to accommodate the storage needs of the community.
	3. All new development shall provide programs for water conservation in accordance with County policy.	Consistent. Landscaping within the Project shall conform to the requirements of the County’s Water Conservation and Landscape Design Manual, and will be designed in conjunction with the Lilac Hills Ranch Water Reclamation Plan. Measures within this Plan will ensure that water use within the project’s landscape is well managed.
	<p><u>SEWAGE DISPOSAL AND TREATMENT GOAL</u></p> <p>Ensure the provision of sewage disposal and treatment in a manner that minimizes any adverse impacts to the health, safety, and welfare of the community.</p>	<p>Consistent. The project is consistent with the VCCPG Sewage Disposal and treatment Goal. The initial development of the project would be provided wastewater service by the transfer of wastewater from a collection point on-site, to the Lower Moosa Canyon Water Reclamation Facility (LMCWRF), up to a maximum of 250,000 gallons of wastewater per day. The project proposes four potential permanent wastewater treatment system scenarios options which could serve the project. Each option so analyzed in EIR subchapter 3.1.7. All options would ensure that necessary infrastructure and equipment required to serve the project would be upgraded and/or installed. All options include adequate treatment and processes and implementation of any of the aforementioned options would provide adequate wastewater service. All options would be designed to meet VCMWD criteria. In addition the San Diego RWQCB would need to permit all aspects of the treatment and reuse for each options. The State Water Resources Control Board, Division of Drinking Water Health Department would also need to review and approve all of the recycled water system.</p> <p>More specifically, EIR subchapters 1.8.4.3 and 3.1.7 discuss various options</p>

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		<p>for construction and operation of an onsite WRF, which onsite WRF would be sized to serve only the proposed project and not any other properties. One possible option for physical expansion of the LMCWRF would be limited to a potential maximum 1.0 mgd treatment capacity for the facility, which possible expansion project was already approved by the VCMWD in 1996 and studied under a separate CEQA document. Further, the VCMWD will determine which of the wastewater treatment options will be utilized for the proposed project, and it is therefore speculative as to whether an expansion of the LMCWRF will occur. Any VCMWD requirement for the project to modify the LMCWRF would be limited, under applicable law, to expanded treatment capacity at the facility only for the project's needs, not the needs of other properties. Also, even if the LMCWRF was expanded by the VCMWD up to the 1.0 mgd maximum treatment capacity studied under the separate 1996 CEQA document, it is presently speculative to presume that such capacity expansion would be growth-inducing. Potential future projects would still be required to extend sewer service lines for project sites to the LMCWRF from possibly distant areas, which extensions could be economically and practically infeasible due to physical and environmental constraints. Accordingly, the EIR determines, consistent with CEQA Guidelines section 15145, that potential adverse environmental effects due to growth inducement related to wastewater treatment services are speculative and presently unknown.</p> <p>EIR subchapters 1.8.4.3 and 3.1.7 also explain that the VCMWD has sufficient existing capacity to serve the potable water demands of the project and the community based on the VCMWD's replacement of the Country Club reservoir with two (2) <u>5 mg</u> reservoirs. The project would not require the construction of any new major water storage facilities. The project would only extend water service lines from the project boundaries to the existing VCMWD water storage facilities with pipes designed to serve the project's needs. No growth-inducing impacts would therefore result related to any of the project's water infrastructure improvements.</p>

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Goal 6	Conservation	
	<u>GENERAL GOALS</u> Preserve Valley Center's unique, natural and cultural resources while supporting its traditional semi-rural lifestyle.	Consistent. The project preserves biological open space, agricultural areas, and protects cultural resources. The project also incorporates rural themes and characteristics throughout the project design. See responses to VCCP Policy 6.4, 8.4, 8.6 and 9.5.
	Preserve native vegetation and wildlife habitat in the Valley Center community planning area.	Consistent. See responses to VCCP Policies 6.4, 6.6, and 6.9.
	Minimize soil erosion incidental to development in order to preserve valley center's unique soil characteristics.	Consistent. The project will minimize soil erosion incidental to development in order to preserve valley center's unique soil characteristics by planting adequate landscaping and protecting natural water courses from project stormwater flows. See responses to VCCP Policies 6.10, 6.12, and 6.13. Therefore the project is consistent with this goal.
	Encourage and promote a system of interconnecting trails and paths for horses, pedestrians and bicyclists.	Consistent. The project will include a system of interconnecting trails and paths for horses, pedestrians and bicyclists. See response to VCCP Policies 7.2 and 7.5. Therefore the project is consistent with this goal.
	Provide for a dark sky which would retain the rural setting and not detract from astronomical research at Palomar Mountain.	Consistent. The project will provide for a dark sky which would retain the rural setting and not detract from astronomical research at Palomar Mountain by including rural style, photometric sensitive lighting designs, in keeping with the rural setting. See response to VCCP Policy 6.18. Therefore the project is consistent with this goal.
	Preserve archeological and historical sites and encourage further identification and protection of these community resources.	Consistent. The project will preserve archeological and historical sites and encourage further identification and protection of these community resources by incorporating the protection of sensitive cultural historical resources into the project open space. See response to VCCP Policy 8.6 and 8.8. Therefore the project is consistent with this goal.
	<u>POLICIES AND RECOMMENDATIONS</u> 1. Subdivisions should be designed to preserve scenic viewsheds. Radio and T.V. antennas that obscure scenic ridgelines are discouraged.	Consistent. The project does not propose any radio and television antennas that would obscure any ridgelines within the project viewshed. All utilities will be placed underground and shall be coordinated so as not to be exposed, except where required by the utility owner, for example at the point of connection. See also response to Policy COS-11.7. Further, mixed use commercial land uses planned for the project Town Center and Neighborhood

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		<p>Centers would require review by the Valley Center Design Review Board before County Site Plan approval to ensure substantial compliance with the Valley Center Design Guidelines. The design and architectural guidelines of the Specific Plan would ensure that the project's contrast is minimized and enable it to relate to the surrounding visual environment. Grading and roadways would be designed to follow the natural topography. Preserved riparian and agricultural open space would provide visual buffers and screening, serving as transitional elements between the project and surrounding areas while providing breaks in patterns of development. Residential and commercial areas would implement architectural treatments to enable them to better relate to other elements in the project viewshed. Tall manufactured slopes would be softened with natural appearing plantings that relate to the surrounding hillsides while visually screening project elements from area residences. Informal patterns of medium- sized street trees with broad canopies would provide additional screening of project elements and offer visual context by relating to tree patterns in the surrounding area. Additionally, pockets of domestic landscaping would visually buffer and screen project elements from view and provide additional visual context by relating to surrounding residential landscapes.</p> <p>Consistent with Section III, D-4 of the Lilac Hills Ranch Specific Plan, single-family residential design guidelines would be implemented to assure variability in design, use of wider and/or larger lots along roads, and construction of walls.</p>
	2. Restrict hillside cutting and scarring, loss of wildlife habitat, loss of riparian habitat and loss of floodplains.	<p>Consistent. There are no prominent ridgelines on the property and steep slopes over 25% occupy roughly 20 acres of the 608 acre property. The project encroaches into 1.6 acres or 8% of the RPO protected steep slopes, within the 10% encroachment allowance allowed under the County RPO. See EIR, Section 2.1 Visual Resources. The project site topography consists of a series of rolling hills dissected by drainage courses that drain primarily to the south and southwest. Elevations across the project range from 960 to 590 mean sea level. The project, located near Keyes Creek, is not within the mapped</p>

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		inundation zone or within any mapped flood hazard area. For discussion of restricting the loss of wildlife habitat and riparian habitat see response to VCCP Policy 6.4. Therefore the project is consistent with this policy.
	3. Support the goals and policies of the Comprehensive Species Management Habitat Conservation Plan for the least Bell's vireo as it pertains to Valley Center.	Consistent. No state or federal listed species would be impacted by the project. Eight focused survey were conducted for the least Bell's vireo and none were discovered on the project site.
	4. Protect riparian habitat and other types of wetlands from loss or modification by dedicating open space easements with adequate buffer zones and by other means to avoid impacts from adjacent land uses. Road crossings or other disturbances of riparian habitat should be minimized and only allowed when alternatives have been considered and determined infeasible.	Consistent. Total project impacts to the local wildlife corridors and linkages along the major drainage courses that support riparian habitat have been minimized to essential road crossings required to meet circulation and community safety requirements. Mitigation measure M-BIO-1 requires the preservation, enhancement, and creation of impacted riparian habitat and sensitive natural communities at the ratios required by the County Biological Guidelines. This mitigation measure would effectively reduce significant impacts to riparian and sensitive habitats through the adequate preservation of impacted habitat-type on- and/or off-site. The amount of preserved acreages are based on mitigation ratios designed to provide adequate preservation of each habitat type within the unincorporated County and to comply with the federal ESA, state Endangered Species Act, and state Natural Communities Conservation Planning Act. The proposed 104.1 acre Biological Open Space assures the permanent conservation of wetlands and associated riparian and upland habitats, the restoration of degraded wetland habitat, and the provision of opportunities for wetland enhancement. Wetland buffers, as contained within the designated limits of the proposed biological open space areas are a minimum of 50 feet wide for the preserved wetlands, with some wetland buffer widths exceeding 100 feet for limited distances. The project, in total, will mitigate for all impacts to wetlands and associated riparian and upland areas, onsite and offsite. A Conceptual Resource Management Plan has been prepared that describes the protection and maintenance of wetland areas and associated riparian and upland habitats being preserved on the site. See EIR, Ch. 2.5, Biological Resource Report, Attachments 15 (Wetlands) and 16 (Biological Open Space).

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		The 104.1-acre Biological Open Space will require a permanent conservation easement and Revegetation Plan for impacts to wetlands. In addition, while the project uses avoidance as the foremost site design concept to minimize impacts to wetlands, where unavoidable impacts may occur, and the project is required to obtain permits for project- related impacts. These permits ensure no net loss of habitat functions and values and protect wetland from exposure to pollutants, hydro-modification, vegetation clearing, and the introduction of invasive species.
	5. Projects within or in the vicinity of a Resource Conservation Area should be designed to minimize adverse impacts on the resources the RCA was created to protect.	Not applicable. The project is not located in or within the vicinity of a designated Resource Conservation Area in Valley Center. See VCCP, Figure 5, Valley Center Resource Conservation Area Map, p.56.
	6. Preserve the native habitat of sensitive plants and animals by dedication of open space easements and other means that will ensure their long term protection and survival.	Consistent. The project will include conservation of 104.1 acres of permanently protected Biological Open Space as discussed in VCCP Policy 6.4. As discussed under VCCP Policy 6.4, the project will preserve the native habitat of sensitive plants and animals by dedication of open space easements and other means, such as a comprehensive Resource Management Plan, reviewed and approved by local, state, and federal resource agencies, which will ensure their long term protection and survival.
	7. Preserve oaks, sycamores, eucalyptus, olive trees, pines and other individual specimen trees which contribute to the community character and provide wildlife habitat.	Consistent. See response to VCCP Policy 6.4. The project Landscape Plan relies heavily on an extensive list of drought tolerant and regionally appropriate trees and plant materials. A number of the trees and plants and included on the Valley Center Plant Selection Guide. The tree list includes Olives, Sycamores, Oaks, Madrone, Currant, Toyon, as well as Avocado, Apricot, Guava, Lemon, and Orange, thus providing wildlife habitat and contributing to the semi-rural agricultural character of the community. Therefore the project is consistent with this policy.
	8. Preserve and encourage wildlife corridors which are essential to the long term viability of wildlife populations through open space easements or other appropriate means.	Consistent. The project would not impact regional wildlife corridors or linkages. Minor improvements to roadways within regional wildlife corridor/linkages along the I-15 freeway would not affect the widths of these existing areas. The widths of local wildlife corridors along the major drainage courses would be preserved in biological open space. The proposed minimum 50-foot buffer around the biological open space would help preserve the

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		existing local wildlife corridor.
	9. Landscaping should be required to prevent erosion on graded sites and, if the area is contiguous with undisturbed wildlife habitat, the plan should include re-vegetation with native plant species.	Consistent. As discussed in response to Policy COS-4.2, the project Landscape Plan will require efficient irrigation systems and encourage the use of native plant species and non- invasive drought tolerant/low water use plants in landscaping. The Specific Plan includes a Landscaping Plan which is expressly designed, among other things, to prevent erosion on graded sites, for example by planting trees on slopes. Landscaping plans must be prepared by a licensed landscape architect and must comply with County water conservation, landscape design, and grading ordinances. (See Specific Plan, Sec.III.D) Therefore the project is consistent with this policy.
	10. It is strongly encouraged that trees be planted wherever possible to stabilize soil conditions and contribute to atmospheric oxygen production.	Consistent. The project landscape plan is detailed in the Specific Plan. The planting of the suggested landscape palate within the 608 acre site would stabilize soils and contribute to atmospheric oxygen production. Therefore the project is consistent with this policy.
	11. Grading associated with discretionary permits shall not change natural land contours and shall be minimized to reduce erosion and siltation and damage to downstream properties.	Consistent. The project Conceptual Grading Plan is designed so that 99.7% of all grading will occur outside of RPO- protected steep slope areas. Natural landforms and biological areas, including drainages, will be preserved within open space. Landform grading techniques will require blending and rounding of slopes, roadways, and pads to reflect the existing surrounding contours by undulating slopes and replicating the natural terrain. All grading will be conducted in accordance with the County Grading Ordinance and RPO (See Specific Plan, Section II.F.6. and Section III.G.). Based on the cross-sections provided on the Master Preliminary Grading Plan, the natural topography of the site would be maintained. Therefore the project is consistent with this policy.
	12. Retain water courses in their natural state and prohibit all structures and future development within flood prone areas.	Consistent. As discussed in response to VCCP Policies 6.4, the project will retain onsite water courses in their natural state through the dedication of biological open space easements. Further, as discussed in response to VCCP Policy 6.2, the project is outside any mapped inundation zone or flood hazard area. Therefore the project is consistent with this policy.
	13. New developments shall be required to provide on and off	Consistent. The existing natural drainage system flows in a southwesterly direction to the I-15 corridor and is largely retained within the design of the

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	site natural flood control improvements, when necessary, to ensure that water released from the project will not have an adverse environmental impact.	project through the Biological Open Space Plan. The project has developed a comprehensive Drainage Plan which relies on three, grass-lined, 100-year storm, detention basins to settle and filter stormwater before discharge into the natural drainages. The intent of the plan is to use natural drainages wherever feasible, which will allow the runoff to infiltrate into non-hardened native soil and recharge groundwater. Balancing the need for flood control, artificial drainage structures, such as wing walls and culvert pipes, will be selectively used. For example, where an existing creek bed intersects with a roadway or to protect built structures. Using these methods, the project will become hydrologically invisible such that there are no significant impacts to downstream drainage facilities, either man-made or natural. Retention and enhancement of natural vegetation within the drainages would occur pursuant to the Resource Protection Ordinance, the Biological Open Space Plan and the Revegetation Plan. The project is designed to and must comply with the County Watershed Protection Ordinance, governing watershed protection, stormwater management, and discharge control. Therefore the project is consistent with this policy.
	14. Prohibit discretionary permits that exacerbate problems in a currently identified downstream flooding area.	Consistent. See discussion of project requirements for protection of areas downstream from flooding in response to VCCP Policy 6.13. Therefore the project is consistent with this policy.
	15. Discourage the use of imported water for agriculture, irrigation, recreation, industry, and other uses.	Consistent. Project water-related plans will employ efficient technologies and conservation efforts to reduce the use of potable water and minimize dependence on imported water and groundwater resources. The project includes obtaining non potable water from groundwater, grey water, and reclaimed water offsite from the Valley Center MWD and onsite from a WRF. The project must meet the Valley Center MWD Article 190.7 Conservation and Local Supply Use Requirements policy requirements guiding how and where reclaimed water can be used. The project Landscape Plan relies on and includes an extensive list of drought tolerant and regionally appropriate trees and plant materials. The plan must conform to the County Water Conservation and Landscape Design Manual and will be designed in conjunction with the project Water Reclamation Plant. Bark, mulches, bubblers, and drip irrigation,

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		will be used where appropriate. Low water use irrigation technologies, such as rain sensing equipment, low precipitation heads, anti- drainage valves, separated irrigation systems, and automatic controllers, will be used. The HOA will ensure the system is regularly inspected and maintained. These and regular water audits will ensure water application efficiency. If mandatory potable water restrictions should be imposed by government agencies a range of measures, such as replacing groundcover with bark or mulch, reducing watering schedules, and deploying rain barrels on each lot will be implemented,. Groundwater will be used to supplement reclaimed water supplies for irrigation only when needed and subject to the approval of the Valley Center MWD. Therefore the project is consistent with this policy.
	18. Use low sodium lights and light shielding for new subdivisions and use permits as required by the "Dark Sky" Ordinance for those properties within a specified radius of the observatory at Palomar Mountain.	Consistent. The project is 3,700 feet beyond the Zone A radius to protect Palomar Observatory. However, the project is designed to comply with the County Light Pollution Code, also referred to as the Dark Sky Ordinance. More specifically, lighting will be in accordance with the project photometric study, including several sensitive lighting measures, for example, downward directed lighting, shielded lighting, low voltage decorative lighting, and lighting lower than what would typically be found on an urban street (See Specific Plan, Section III.D.8. and EIR, Section 2.1 Visual Resources). The project Photometric Design Concept, Lighting Fixture Schedule, Sheet 3 illustrates sensitive and rural- themed lighting designs. As stated, the project is required to comply with the County Light Pollution Code, which regulates the placement of many types of lighting sources including low sodium. The project restricts outdoor light and glare, while maintaining safety, thus retaining dark skies and minimizing light pollution and is therefore consistent with this policy.
	19. Support implementation and enforcement of the County's ordinance on lighting standards including lamp types and shielding for both public and private sector projects.	Consistent. As discussed at VCCP Policy 6.18, the project supports and implements the County's ordinance, within the project area, on lighting standards including lamp types and shielding. The project Photometric Design Concept, Lighting Fixture Schedule, Sheet 3 illustrates sensitive and rural-themed lighting designs that are consistent with County lamp type standards. Therefore the project is consistent with this policy.

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Goal 7	Open Space. Support a system of open space that is adequate to preserve the unique natural elements of the Community, enhance recreational opportunities, conserve scenic resources and retain the rural community character.	
	<u>POLICIES AND RECOMMENDATIONS</u>	
	1. Encourage coordination with other jurisdictions in trading otherwise negotiating land transfers to consolidate holdings for conservation and recreation uses.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in adopting policies set forth throughout the General Plan.
	2. Integrate open space dedications in private developments with surrounding uses to maximize a functional open space/recreation and wildlife management system.	Consistent. Project parks and trails are integrated with the dedicated 104.1 acre Biological Open Space. EIR, Figure 1-9 (Open Space and Parks) illustrates the adjacency of the open space to four parks, including the largest Community Park and to the school site recreational area. EIR, Figure 1-4a (Lotting Study) and Figure 1-8 (Trails Plan) show its direct integration with the Ranch Multi- Use and Community Trails. Therefore the project is consistent with this policy.
	5. Design new residential development in a way that preserves an atmosphere of openness and access to surrounding open space.	Consistent. EIR, Figure 1-4a (Lotting Study) and Figure 1-8 (Trails Plan) show the integration between the developed areas, the 104.1 acre open space and the 23 points of access to the 16 plus mile trail system. The trails plan also shows three links to the regional trail system. See also response to Policy LU-9.11. Therefore the project is consistent with this policy.
	6. Sensitive plant life or irreplaceable, high quality plant and animal communities shall be preserved through planned residential developments and dedicated open space easements.	Consistent. As discussed in response to VCCP Policy 6.4, the 104.1 acre Biological Open Space will be required to be dedicated and placed in a permanent open space easement. The easement will be owned by a conservancy, the County, or other similar, experienced entity subject to approval by the County. Therefore the project is consistent with the policy.
Goal 8	Parks and Recreation Goal. Develop a comprehensive plan of local, neighborhood, community and regional parks and facilities directed to the needs of all age levels and which use, whenever feasible, outstanding natural features of the Community Planning Area Open Space. Support a system of open space that is adequate to preserve the unique natural elements of the Community, enhance recreational opportunities, conserve scenic resources and retain the rural community character.	
	1. Prior to the expenditure of Park Lands Dedication Ordinance (PLDO) funds for development of a park in the Valley Center Community Planning Area a funding agency for operations and maintenance of that park must be identified.	Consistent. The project Community Park will be developed in conformance with County park development standards, including funding, as determined by the Park Lands Dedication Ordinance. (See Specific Plan, Section III.) Therefore the project is consistent with the policy.

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	3. Development of local and neighborhood park and recreation facilities will be coordinated with local school facilities whenever possible by establishing Joint Powers Agreements to promote joint development, operation and maintenance.	Consistent. The project includes 23.6 acres of parks including 10.1 acres of private parks, and one main 13.5 acre community public park. The project also includes a 12.0 acre elementary school site. The main public park and the school site are collocated, as shown in EIR, Figure 1-4a. Maintenance of the public park would be the responsibility of the HOA in perpetuity and the park must be maintained to County standards. Therefore the project is consistent with the policy.
	4. In keeping with the rural character of the Valley Center community, Community and Neighborhood Parks will be encouraged.	Consistent. The project includes 23.6 acres of parks, including 10.1 acres of private parks and a main 13.5 acre community public park, centrally located within the project area. The main public park will be developed in conformance with County park development standards. Therefore the project is consistent with the policy.
	5. Establish priorities and encourage the early acquisition of park lands to minimize public cost. Implement a park acquisition program which will use all possible acquisition and funding mechanism.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in adopting policies set forth throughout the General Plan. However, the project design includes 23.6 acres of parks, consisting of 10.1 acres of private parks, and one main 13.5 acre community public park. This exceeds the PLDO requirements. The project includes a Temporary Park Plan which ensures parks will be phased in with each successive implementing Tentative Map. Therefore the project is consistent with the policy.
	6. Acquire and develop outstanding scenic areas, cultural, biological and historical resources. The establishment of park locations and design shall incorporate these features whenever possible.	Consistent. As discussed in VCCP Policy 6.4, the project will preserve 104.1 acres of Biological Open Space, 25.6 acres of parks, Approximately 20 acres of common area available for agricultural use, and over 16 miles of trails. A Cultural Resources Inventory and Assessment (EIR, Appendix H) was prepared which determined the existence of two sensitive sites on-site. One is an RPO significant site and is proposed to be located in open space; the other RPO significant site and is proposed to be preserved in open space (See EIR, Section 2.6- Cultural Resources). Further, response to VCCP Policy 7.2 describes the incorporation of sensitive resource features into the design of park and trail locations. Therefore the project is consistent with the policy.
	7. All park lands dedicated in conjunction with the development of a Specific Plan Area (SPA) land use	Consistent. The main 13.5 acre community public park will consist of mostly flat land suitable for play fields and other community park activities.

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	designation will consist of a reasonable amount of flat land suitable for play fields and other similar local park activities.	Therefore the project is consistent with the policy.
	8. Development of parks facilities shall comply with the County's Ordinance No. 7155 relating to the regulation of Light Pollution.	Consistent. Both the 10.1 acres of private parks and the 13.5 acre main community park must comply with the County Light Pollution Code. Therefore the project is consistent with the policy.
	9. Provide riding and hiking trails, staging areas and other facilities within existing or proposed parks when appropriate to complement the Valley Center Trails System.	Consistent. The project includes an extensive 16 plus mile Trail Network, including pedestrian and bike paths linking together the major project components, including the Town Center, Neighborhood Centers, Neighborhoods, the school, and the main park. The Multi-Use and Ranch Multi-Use trails will be dedicated to the County. The Trail Network includes one mile of trails as identified in the Valley Center Community Trails and Pathways Plan. The trails include a staging area in the Town Center, and three trail connections at the north and south ends of the project to trails defined in the County Master Trail Plan. Therefore the project is consistent with this policy.
Goal 9	Noise Goal Maintain an environment free of excessive noise by providing control of noise at its source, along the noise transmission path and at the receiver site.	
	<u>POLICIES AND RECOMMENDATIONS</u> 1. Develop and implement land use plans and circulation patterns that will minimize noise in residential neighborhoods.	Consistent. The project Noise Report, or acoustical study has been prepared (EIR, Noise Report, and Appendix M). Project noise impacts have been analyzed in the EIR at Chapter 2.8. Twenty measures and practices will be required to minimize project noise. EIR, Table S-1 for a summary of those measures. For a discussion of project cumulative impacts please refer to response to comment 03f-2. The project must demonstrate comply with the County Noise Ordinance Section 36.404 Supplemental acoustical studies may be required prior to the issuance of individual building permits. Therefore the project is consistent with this policy.

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	2. Permit residential development in areas with projected exterior Community Noise Equivalent Levels (CNELs) exceeding 60 decibels near main roads only when traffic noise impacts can be mitigated.	Consistent. See response to VCCP Policy 9.1. Dedicated “noise protection easements” will be required to protect residential lots within the 60 CNEL contour. Prior to issuance of any building permit within a “noise protection easement, the project must demonstrate a suitable method for compliance with noise easement standards.” Therefore the project is consistent with this policy.
	3. Design subdivisions to retain natural and landscaped sound barriers in preference to earth berms or walls, where they are needed.	<p>Consistent. As discussed in VCCP Policy 9.2, the project must demonstrate a method for compliance with project noise easement standards. The project employs comprehensive noise management strategies, among them, an interconnected road system, protection of noise sensitive uses, acoustical studies, noise protection easements, and best management practices to shield large equipment generated noise. The Fence Guidelines in the Specific Plan intend to minimize the use of earthen berms and sound walls in order to enhance the pedestrian experience. Where they cannot otherwise be avoided, noise walls will be used but will be, if feasible, a combination of earthen berms, and will strive for a style and design that complements the rural village- themed architecture present throughout the project. Use of rustic themed designs and materials, plus landscaping will be used to soften the appearance of walls. Such designs will conform to the Valley Center Design Guidelines, Section 5 – Architectural Character, E. Walls, Fences, and Accessory Structures, which require designs and forms consistent with the rural character of the community. See conceptual fence and wall designs at EIR, Figure 15. Man- made sound attenuation will be required in the Town Center areas nearest to West Lilac Road.</p> <p>Sound wall locations are depicted in the EIR, Noise Report, Appendix M, Figures 6a and 6b. Therefore because the use of earthen berms and sound walls are minimized as much as is feasible, the project is consistent with this policy.</p>

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	4. Encourage the use of buffering devices on off-road vehicles And provide strict enforcement of noise regulations for off- road vehicles.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent in adopting policies set forth throughout the General Plan. The project site does not provide for off-road vehicle trails.
	5. Minimize traffic noise impacts by means of roadway alignment and design and the management of traffic flows.	Consistent. The major noise generator in Lilac Hills Ranch is residential traffic. This has been minimized as much as possible through the use of an interconnected road network that disperses traffic throughout. Roads are two-lanes and the design of the streets is intended to keep speed at a reduced level, which reduces noise levels. Such street designs include landscaped parkways, meandering sidewalks, cul de sacs, roundabouts, slight curves, community pathways and trails, and other features to slow traffic and effect rural character, and thereby minimize noise. See EIR, Section 2.8, Noise and EIR, Appendix M. Therefore the project is consistent with this policy.
	6. Encourage activities to increase public awareness of and enrollment in the Department of Agriculture program pursuant to the Agricultural Enterprises and Consumer Information Ordinance. (This Ordinance was designed to protect established farm operations from being declared a nuisance when following accepted agricultural practices.)	Consistent. Project CC&Rs will require new residents to recognize and acknowledge the existence of agriculture in surrounding areas, limiting their ability to file nuisance complaints. The project has been designed to, where feasible; locate open space or large lots where proposed on-site residences would be adjacent to existing agricultural operations. The EIR Agricultural Resources Report includes additional measures where deemed necessary to ensure that no significant unmitigated impacts to existing agriculture will occur. Therefore the project is consistent with this policy.

LILAC HILLS RANCH CONSISTENCY ANALYSIS – COUNTY OF SAN DIEGO GENERAL PLAN GOALS & POLICIES ADOPTED AUGUST 2012

GENERAL PLAN CONSERVATION AND OPEN SPACE ELEMENT WILDLIFE CORRIDORS AND HABITAT LINKAGES		
Policy Number	Policy Text	Consistency Analysis
Goal COS 1	Inter-Connected Preserve System. A regionally managed, interconnected preserve system that embodies the regional biological diversity of San Diego County.	
Goal COS 2	Sustainability of the Natural Environment. Sustainable ecosystems with long term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.	
Policy COS-2.2	Habitat Protection through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design	Consistent. The site design of Lilac Hills Ranch places development within the less sensitive upland areas where no significant populations of native species have been located. The more sensitive wetland habitats would be preserved in permanent open space adjacent to the proposed Draft North County Multiple Species Conservation Program (NC MSCP). Therefore, the loss of the most sensitive natural habitat on the project site is minimized. See EIR, Section 2.5 Biology; Specific Plan, Section II.C. See also response to Goal COS-2. Therefore the project would be consistent with this policy.
Goal COS 3	Protection and Enhancement of Wetlands. Wetlands that are restored and enhanced and protected from adverse impacts.	
COS-3.1	Wetland Protection. Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.	Consistent. The proposed Biological Open Space plan assures the permanent conservation of wetlands and associated riparian habitats, the restoration of degraded wetland habitat, and the provision of opportunities for wetland enhancement, in accordance with an approved and funded Resource Management Plan that meets wetland conservation and mitigation criteria required by local, state, and federal natural resource agencies. For example, the County RPO limits impacts to wetlands, wetland buffers, and sensitive habitat lands and requires a wetland buffer where development is adjacent to wetland areas. According to the EIR Biological Resource Report, the proposed wetland buffers are a minimum of 50 feet wide for the preserved wetlands, with some wetland buffer widths exceeding 100 feet for limited distances. The project, in total, will mitigate for all impacts to wetlands and associated riparian and upland areas, onsite and offsite, through the following mitigation: coast live oak woodland (preserve 3.3 acres on-site; purchase 1.2 acres off-site); coastal sage scrub (preserve 2.9 acres on-site; purchase 39.4 acres off-site); coastal/valley freshwater marsh (preserve 0.5

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		<p>acre on-site; create 0.3 acre off-site); southern coast live oak riparian woodland (preserve 22.8 acres on-site; create/purchase 4.8 acres off- site); southern mixed chaparral (preserve 27.1 acres on-site; purchase 26.9 acres off-site); southern willow riparian woodland (preserve 4.2 acres on-site; create/purchase 1.5 acres off- site); southern willow scrub (preserve 5.8 acres on-site; create/purchase 1.8 acres off- site); mule fat scrub (create/purchase 0.3 acre off- site), open water/freshwater wetland (create/purchase 1.5 acres off-site); and disturbed wetland (preserve 0.3 acre on-site; create/purchase 0.3 acre off-site). In addition, the project will create 6.0 acres of wetland and enhance 12.0 acres of existing disturbed wetland resources on-site to help offset a portion of the creation/purchase of wetland habitat mitigation off-site. A Conceptual Resource Management Plan has been prepared that describes the protection and maintenance of wetland areas and associated riparian and upland habitats being preserved on the site. See EIR, Ch. 2.5, Biological Resource Report, Attachments 15 (Wetlands) and 16 (Biological Open Space). These plans require, among other measures, the removal of invasive species and fencing and signage to prevent site disturbance and degradation. As stated, the final Resource Management Plan must be reviewed and approved by local, state and federal resource agencies and meet all sensitive habitat and wetland regulatory standards including no net loss of habitat functions and values. Therefore the project would be consistent with this goal.</p>
Policy COS-3.2	<p>Minimize Impacts of Development. Require development projects to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and <input type="checkbox"/> Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species. 	<p>Consistent. See response to Policy COS-3.1. In addition, while the project uses avoidance as the foremost site design concept to minimize impacts to wetlands, where unavoidable impacts may occur, the project is required to obtain permits and mitigate for impacts per the RPO. These permits ensure no net loss of habitat functions and values and protect wetland from exposure to pollutants, hydromodification, vegetation clearing, and the introduction of invasive species:</p> <ul style="list-style-type: none"> <input type="checkbox"/> 4(d) Habitat Loss Permit issued by the County, U.S. Fish and Wildlife Service and the California Department of Fish and

GENERAL PLAN CONSERVATION AND OPEN SPACE ELEMENT WILDLIFE CORRIDORS AND HABITAT LINKAGES		
Policy Number	Policy Text	Consistency Analysis
		<p>Wildlife. (See EIR, Habitat Loss Permit application and Habitat Loss Permit Exhibits)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Section 404 Permit by the U.S. Army Corps of Engineers. <input type="checkbox"/> 1603 Streambed Alteration Agreement from the California Department of Fish and Wildlife. <input type="checkbox"/> NPDES General Permit for Stormwater Discharges (State Water Resources Control Board) and NPDES Municipal Stormwater Permit Compliance (County and Regional Water Quality Control Board). <input type="checkbox"/> Section 401 Water Quality Certification or waiver from the Regional Water Quality Control Board. <p>Therefore the project is consistent with this wetland protection policy.</p>
Goal COS 4	Water Management. A balanced and regionally integrated water management approach to achieve the long-term viability of the County's water quality and supply.	
Policy COS-4.1	Water Conservation. Require development to reduce the waste of potable water through use of efficient technologies and conservation efforts that minimize the County's dependence on imported water and conserve groundwater resources.	<p>Consistent. Project water-related plans will employ efficient technologies and conservation efforts to reduce the waste of potable water and minimize dependence on imported water and groundwater resources. The project Infrastructure/Public Facilities and Services Plan includes obtaining non potable water from groundwater, grey water, and reclaimed water offsite from the Valley Center MWD and onsite from a WRF. The project must meet the Valley Center MWD Article 190.7 Conservation and Local Supply Use Requirements policy requirements guiding how and where reclaimed water can be used. The project Landscape Plan includes an extensive list of drought tolerant and regionally appropriate trees and plant materials. The tree list includes for example, Olives, Sycamores, Oaks, Madrone, Currant, Toyon, as well as Apricot, Lemon, Orange, Guava, and Avocado. The plant, shrub, and groundcover lists include at least a dozen drought tolerant varieties. The plan must conform to the County Water Conservation and Landscape Design Manual and will be designed in conjunction with the project Water Reclamation Plant. The project Water Conservation Plan and Landscape Plan</p>

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		require community plantings to be grouped in hydrozones, meaning plants with similar water requirements are grouped together. Bark, mulches, bubblers, and drip irrigation, will be used where appropriate. Low water use irrigation technologies, such as rain sensing equipment, low precipitation heads, anti- drainage valves, separated irrigation systems, and automatic controllers, will be used. The HOA will ensure the system is regularly inspected and maintained. These and regular water audits by VCMWD will ensure water application efficiency. If mandatory potable water restrictions should be imposed by government agencies a range of measures, such as replacing groundcover with bark or mulch, reducing watering schedules, and deploying rain barrels on each lot, will have already been contemplated, as contained in the Water Conservation Plan. Project groundwater resources will be conserved. With sixty individual properties incorporated into the project, the property includes a number of existing producing wells. To conserve groundwater resources, a safe yield of 191 acre-feet of water has been established through a Preliminary Hydrogeology Study, EIR Appendix P. Groundwater will be used to supplement reclaimed water supplies for irrigation only when needed and subject to the approval of the Valley Center MWD. Therefore the project is consistent with this policy.
Policy COS-4.2	Drought Efficient Landscaping. Require efficient irrigation systems and in new development encourage the use of native plant species and non-invasive drought tolerant/low water use plants in landscaping.	Consistent. See response to Policy COS-4.1.

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Policy Number	Policy Text	Consistency Analysis
Policy COS-4.3	Stormwater Filtration. Maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces. This policy shall not apply in areas with high groundwater, where raising the water table could cause septic system failures, moisture damage to building slabs, and/or other problems.	Consistent. This policy applies because the project area is not in an area with high groundwater table. The existing natural drainage system flows in a southwesterly direction to the I-15 corridor and is largely retained within the design of the project through the Biological Open Space Plan. The project has developed a comprehensive Drainage Plan which relies on three, grass-lined, 100-year storm, detention basins to settle and filter stormwater before discharge into the natural drainages. The intent of the plan is to use natural drainages wherever feasible which will allow the runoff to infiltrate into non-hardened native soil and recharge groundwater. Balancing the need for flood control, artificial drainage structures, such as wing walls and culvert pipes, will be selectively used, for example, where an existing creek bed intersects with roadways or to protect built structures. Using these methods, the project will become hydrologically invisible such that there are no significant impacts to downstream drainage facilities, either man-made or natural. Retention and enhancement of natural vegetation within the drainages is assured through the Resource Protection Plan, the Biological Open Space Plan and the Revegetation Plan. Pervious surfaces will be maximized throughout the project. For example, the project General Use and Performance Standards allow the use of permeable road pavers (subject to private road and fire code requirements) throughout the private road system. Further, the 16-mile project trail network will use permeable materials such as decomposed granite. Project area parking lots will include interior tree planting areas too. Finally, the project must comply with the County WPO Ordinance, governing watershed protection, stormwater management, and discharge control, and with the Groundwater Ordinance, preventing interference with groundwater recharge. Therefore the project is consistent with this policy.

GENERAL PLAN CONSERVATION AND OPEN SPACE ELEMENT WILDLIFE CORRIDORS AND HABITAT LINKAGES		
Policy Number	Policy Text	Consistency Analysis
Policy COS-4.4	Groundwater Contamination. Require land uses with a high potential to contaminate groundwater to take appropriate measures to protect water supply sources.	Consistent. Project residential, commercial, and institutional land uses would not include hazardous substances. The RF would supplement recycling opportunities in addition to the weekly collection of waste, recycling material and green waste provided by franchised waste haulers, but it would not accept hazardous household products such as pesticides, leftover paint, solvents, and automotive fluids. Therefore the RF would not be a land use with high potential to contaminate groundwater. A MUP is being processed concurrently for the WRF which will require a Risk Management Plan or Hazardous Materials Business Plan pursuant to the California Accidental Release Program requirements to ensure proper handling, storage, and disposal of chlorinated products used to disinfect the wastewater. See EIR, Ch. 2.7. The foregoing safety precautions are required by state law and are thus appropriate to protect water supply sources. Therefore the project is consistent with this policy.
Policy COS-4.5	Recycled Water. Promote the use of recycled water and gray water systems where feasible.	Consistent. A MUP is being processed concurrently for a WRF. The project Infrastructure/Public Facilities and Services Plan, promoting gray water usage, discusses obtaining non potable water from grey water. The plan identifies that grey water systems are an allowed residential use and calculates that gray water systems could offset half of the potable exterior demand for water, a savings of 91 acre feet per year. The total project demand per year is estimated at 967 acre feet per year. The project Infrastructure/ Public Facilities and Services Plan, promoting the use of recycled water, includes securing reclaimed water both from offsite, from the Valley Center MWD, and onsite, from a Water Reclamation Facility. A MUP is being processed concurrently for a WRF. The WRF, contemplated for Phase 3 of the project, must be designed per the requirement of the Valley Center MWD and must adhere to Valley Center MWD Article 190.7 Conservation and Local Supply Use Requirements policy governing the use of how reclaimed water can be used. Therefore the project is consistent with this policy.
Policy COS-5.1	Impact to Floodways and Floodplains. Restrict development in floodways and floodplains in accordance	Not applicable. The project site topography consists of a series of rolling hills dissected by drainage courses that drain primarily to the south and

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	with policies in the Flood Hazards section of the Safety Element.	southwest. Elevations across the project range from 960 to 590 mean sea level. The project, located near Keyes Creek, is not within the mapped inundation zone or within any mapped flood hazard area.
Policy COS-5.2	Impervious Surfaces. Require development to minimize the use of directly connected impervious surfaces and to retain stormwater run-off caused from the development footprint at or near the site of generation	Consistent. The project is designed to encourage pervious surfaces and retain stormwater run-off caused by the development. Pervious surfaces are encouraged and designed to occur throughout the project site thus minimizing directly connected impervious surfaces. The residential areas are themselves interspersed among large swaths of biological open space. There are 10 private parks (10.1 acres) scattered throughout the residential areas and one large park (13.5 acres) in the middle of the community. Turf and other pervious surfaces within these developed areas will disconnect impervious surfaces from each other. Also, the 16- mile project trail network will use permeable materials such as decomposed granite and project area parking lots will include interior tree planting areas. Moreover, the project General Use and Performance Standards allow the use of permeable road pavers (subject to certain private road and fire code requirements) throughout the private road system. The project Drainage Plan ensures the project will retain stormwater run-off caused by the development. The Drainage Plan is comprehensive. It relies on three, grass-lined, 100-year storm, detention basins to settle and filter project stormwater from developed areas before discharge into the natural drainages. The intent of the plan is to use natural drainages wherever feasible which will allow the runoff to infiltrate into non-hardened native soil and recharge groundwater. Balancing the need for flood control, artificial drainage structures, such as wing walls and culvert pipes, will be selectively used, for example, where an existing creek bed intersects with roadways or to protect built structures. Using these methods, the project will become hydrologically invisible such that there are no significant impacts to downstream drainage facilities, either man-made or natural. Retention and enhancement of natural vegetation, necessary to promote absorption of stormwater, within the drainages is assured through the Resource Protection Plan, the Biological Open Space Plan and the Revegetation Plan. The project must comply with

GENERAL PLAN CONSERVATION AND OPEN SPACE ELEMENT WILDLIFE CORRIDORS AND HABITAT LINKAGES		
Policy Number	Policy Text	Consistency Analysis
		the County WPO Ordinance, governing watershed protection, stormwater management, and discharge control, and with the Groundwater Ordinance, preventing interference with groundwater recharge. The project design must also comply with the County Storm Water Ordinance and be designed to conform to the Stormwater Standards Manual. Therefore the project is consistent with this impervious surface policy.
Policy COS-5.3	Downslope Protection. Require development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources.	Consistent. See response to Policy COS-4.3. In addition, the project would be required to conform to erosion and stormwater requirements under the NPDES General Permit for Stormwater Discharges (State Water Resources Control Board) and the NPDES Municipal Stormwater Permit Compliance (County and Regional Water Quality Control Board). Therefore the project is consistent with this downslope protection policy.
Policy COS-5.4	Invasive Species. Encourage the removal of invasive species to restore natural drainage systems, habitats, and natural hydrologic regimes of watercourses.	Consistent. See responses to Policy COS-3.1 and Policy COS-3.2. Invasive species will be removed as described in the project Resource Management Plan. See EIR, Appendix G, Biological Resource Report. Therefore the project is consistent with this policy.
Policy COS-5.5	Impacts of Development to Water Quality. Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.	<p>Consistent. See response to Policies COS- 5.2 and 5.3. In addition, the project is required to obtain the following permits which require measures to protect water quality with the project area and downstream:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Section 404 Permit by the U.S. Army Corps of Engineers. <input type="checkbox"/> 1603 Streambed Alteration Agreement from the California Department of Fish and Wildlife. <input type="checkbox"/> NPDES General Permit for Stormwater Discharges (State Water Resources Control Board) and NPDES Municipal Stormwater Permit Compliance (County and Regional Water Quality Control Board). <input type="checkbox"/> Section 401 Water Quality Certification or waiver from the Regional Water Quality Control Board. <p>The project must comply with the County WPO Ordinance, governing watershed protection, stormwater management, and discharge control, and with the Groundwater Ordinance, preventing interference with groundwater recharge. The project design must also comply with the County Storm Water</p>

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		Ordinance and be designed to conform to the Stormwater Standards Manual. The effect of the foregoing local, state, and federal requirements when taken together will avoid and control the impacts of the project to water quality in local reservoirs, to groundwater resources, to recharge areas, watersheds, and other local water sources. Therefore the project is consistent with this water quality policy.
Policy COS-6.1	Economic Diversity. Support the economic competitiveness of agriculture and encourage the diversification of potential sources of farm income, including value added products, agricultural tourism, roadside stands, organic farming, and farmers markets.	<p>Consistent. The project Town Center is specifically intended to support a farmers’ market, specialty boutiques with products such as homemade jams, and small wineries. As a result of the San Diego County Agricultural Enterprises and Consumer Information Ordinance, the CC&R’s for the project would require new residents to recognize and acknowledge the existence of agriculture in surrounding areas, limiting their ability to file nuisance complaints and other actions to limit existing agricultural operations. The site plan has been designed to, where feasible; locate open space or larger, ranchette-style lots where proposed on-site residences would be adjacent to existing agricultural operations, and could compatibly engage in hobby farming. The project includes project design and mitigation measures to ensure that no significant impacts to existing agriculture will occur, such as:</p> <ol style="list-style-type: none"> 1. A minimum 50-foot wide buffers planted with two-rows of orchard trees (M-AG-2). 2. Installing 6-foot high fencing to protect adjacent agricultural activities from unwanted intrusions by people and domestic pets (M-AG-3). 3. Prohibiting habitable structures as well as any structure that could attract residents, visitors, or children to congregate nearby (M-AG-4). 4. An interim 100-foot limited building zone shall be required between ongoing agricultural uses and residential development for each phase of development. In addition to the restriction of aerial pesticide application, which is stated in the Specific Plan, the limited building zone shall also limit pesticide use to only organic materials (M-AG-5). The project includes groves of orchard trees integrated throughout the project site and would be located within HOA-maintained open space, such as manufactured slopes. Approximately 20 acres

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		of common area would be available for agriculture activities. Therefore, the project is consistent with this agricultural support and management policy.
Policy COS-6.2	<p>Protection of Agricultural Operations. Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:</p> <ul style="list-style-type: none"> ■ Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations ■ Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development. ■ Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture. 	Consistent. See response to Policy COS-6.2.
Policy COS-6.3	Compatibility with Recreation and Open Space. Encourage siting recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses.	Consistent. See response to Policy COS 6.2. No trails are proposed through adjacent, off- site agriculture areas, and with the exception of regional Multi-Use Trails, nor would trails generally be constructed through the latter phases of the Specific Plan area, where agricultural operations are ongoing. Therefore the project is consistent with this specific land use compatibility policy.
Goal COS 7	Protection and Preservation of Archaeological Resources. Protection and preservation of the County's important archeological resources for their cultural importance to local communities, as well as their research and educational potential.	
Policy COS-7.1	Archaeological Protection. Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.	Consistent. One cultural resource site is considered an RPO significant site and is located within a proposed open space easement. Another site was deemed to be CEQA significant and would be preserved in a proposed open space easement. See EIR, Section 2.6 Cultural Resources. Mitigation measures to adequately protect sensitive archaeological resources have

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		<p>been incorporated into the project.</p> <p>See EIR, Table S-1, Mitigation Measures for a summary of these measures. These measures must be implemented variously prior to approval of the Final Map, prior to grading or improvement plans, or prior to off-site improvement plans under certain conditions. Therefore the project architectural requirements are consistent with this policy.</p>
Policy COS-7.2	Open Space Easements. Require development to avoid archeological resources whenever possible. If complete avoidance is not possible, require development to fully mitigate impacts to archeological resources.	Consistent. See response to Policy COS 7.1.
Policy COS-7.3	Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner	Consistent. See response to Policy COS 7.1. The EIR, Cultural Resources Report requires curation at a San Diego facility that meets federal standards per 36 CFR Part 79, and therefore would be professionally curated and made available to other archaeologists/ researchers for further study. These treatment and preservation techniques are culturally appropriate and consistent with the County RPO. See EIR, Section 2.6 Cultural Resources. Therefore the project treatment and preservation of archaeological collections is consistent with this policy.
Policy COS-7.4	Consultation with Affected Communities. Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources.	Consistent. As noted in the Cultural Resources report, local tribes were all notified about the project and Native American monitors employed as required. In addition, the County consulted with the affected tribes as required by SB-18. See EIR, Section 2.6 Cultural Resources. Therefore the project tribal consultation requirement is consistent with this policy.
Goal COS 11	Preservation of Scenic Resources. Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized.	
Policy COS-11.7	Underground Utilities. Require new development to place utilities underground and encourage “undergrounding” in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and to keep pace with current and future technologies.	Consistent. In accordance with the project General Use and Performance Standards, all utilities will be placed underground within the project. Utility connections will be coordinated with the site architectural elements so as not to expose utility connections and apparatus except when required by the utility provider. See EIR, Section 2.1 Visual Resources. Therefore the project undergrounding of utilities is consistent with this policy.

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Policy COS-12.1	Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.	Consistent. There are no prominent ridgelines on the property and steep slopes over 25% occupy roughly 20 acres of the 608 acre property. The project encroaches into 1.8 acres or 8% of the RPO steep slopes, well within the 10% encroachment allowance stated in County RPO. See EIR, Section 2.1 Visual Resources. Therefore the project protects steep hillsides within the locally adopted regulatory range and is consistent with this policy.
Policy COS-12.2	Development Location on Ridges. Require development to preserve the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.	Not applicable. There are no prominent ridgelines on which to locate development within the project. Homes will not be silhouetted against the sky. See EIR, Section 2.1 Visual Resources.
Policy COS-13.1	Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.	Consistent. The project is designed to comply with the County Dark Sky Ordinance. More specifically, project lighting will be in accordance with the photometric study submitted for the Implementing Tentative Map, thus ensuring that the effects of lighting on dark skies are minimized. The programmatic photometric study requires lighting to be addressed with each tentative map, again ensuring that light pollution is minimized for rural areas in the community while still providing the level of lighting needed for public safety. Lighting measures include for example, downward directed lighting, shielded lighting and low voltage decorative lighting. See EIR, Section 2.1 Visual Resources. Hence the project adequately restricts outdoor light and glare thus retaining dark skies and minimizing light pollution and is therefore consistent with this policy.
Policy COS-14.1	Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.	Consistent. See response to Policy LU-1.2 for a complete description of the full incorporation of pedestrian oriented, mixed use, Community Development Model project design. The project is located less than one half mile from the I-15 corridor, providing efficient access to a regional interstate highway. The design of the project and project character is defined by a compact, pedestrian oriented, mixed use form that maximizes the use of the space and minimizes fragmentation of natural habitat and surrounding agricultural area. This will result in reduced automobile use and will encourage walking and bicycling. This will result in less consumption of gasoline and less generation of air pollution and will reduce greenhouse gas

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		<p>emissions. A Town Center, school, parks and private recreation facility are all located within a half-mile, ten minute walk or even shorter bike ride.</p> <p>The inclusion of a RF further reduces the need for long drives, both public and private. Residents from surrounding areas may also rely less on long auto trips for basic essentials as they can access the commercial and public facilities located in the project. The EIR at Section 2.3 Traffic includes quantitative analyses of internal capture of trips and overall reduction of VMT. Therefore the project is consistent with this land use development form policy.</p>
Policy COS-14.2	Villages and Rural Villages. Incorporate a mixture of uses within Villages and Rural Villages that encourage people to walk, bicycle, or use public transit to reduce air pollution and GHG emissions.	<p>Consistent. See response to Policy LU-1.2 for a complete description of the full incorporation of pedestrian oriented, mixed use, Community Development Model design. Long trips to Escondido or Temecula for school or basic supplies will be reduced by the commercial uses proposed on-site, including an appropriately scaled, general store, planned for the Village Town Center. See EIR, Section 1 Project Description. Therefore the project is consistent with this village and rural village policy.</p>
Policy COS-14.3	Sustainable Development. Require design of residential subdivisions and nonresidential development through “green” and sustainable land development practices to conserve energy, water, open space, and natural resources.	<p>Consistent. See response to Policy LU-1.2 for a complete description of the full incorporation of pedestrian oriented, mixed use, Community Development Model design. The project features a Recycling Facility and a Water Reclamation Facility. The use of gray water systems would be encouraged through dual water piping for reclaimed and recycled water. The compact development footprint and requirements for drought tolerant landscaping and state of the art irrigation systems reduce the individual yard landscaping that must be maintained using potable water.</p> <p>The project will install 2,000 kilowatts (kW) of on-site solar/photovoltaic systems, which are estimated to produce 3,400,000 kW hours of electricity, or approximately 22 percent of the project’s total electricity needs at build-out. In order to achieve this total photovoltaic energy production volume, the project shall produce or cause to be produced renewable electricity by one of the following methods to be determined by the applicant:</p>

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		(1) installation of the equivalent of one photovoltaic (i.e., solar) power system no smaller than 2 kW on 500 single-family homes, and a photovoltaic power system(s) no smaller than 1,000 kW on 90,000 square feet of non-residential roof area; or (2) the installation of the equivalent of one photovoltaic (i.e., solar) power system no smaller than 2 kW on 1,000 single-family homes. The actual capacity and/or conversion efficiency of the photovoltaic panels may alter the actual number of roofs or non-residential roof space requirements to meet the annual 3,400,000 kWh requirement at project build-out. See EIR, Section 1 Project Description, Section 2.5 Biology, Section 3.1.3, covering wastewater services and facilities, and Section 3.1.2, covering Greenhouse Gas. Therefore the project is consistent with this sustainable development policy.
Policy COS-14.4	Sustainable Technology and Projects. Require technologies and projects that contribute to the conservation of resources in a sustainable manner, that are compatible with community character, and that increase the self-sufficiency of individual communities, residents, and businesses.	Consistent. See response to Policy LU-1.2 for a complete description of the full incorporation of pedestrian oriented, mixed use, Community Development Model design. The project includes facilities for collection and separation of recyclable discards, use of recycled water, and energy conserving appliances and plumbing fixtures in homes. The project is designed to encourage non-automotive movement throughout the community including walking and bicycling for individual communities, residents, and businesses. The Town Center, school, parks, private recreation facility and institutional site all contribute to the development of a sense of community. See EIR, Section 1-Project Description. Therefore the project is consistent with this sustainable development policy.
Policy COS-14.5	Building Siting and Orientation in Subdivisions. Require that buildings be located and oriented in new subdivisions and multi-structure non-residential projects to maximize passive solar heating during cool seasons, minimize heat gains during hot periods, enhance natural ventilation, and promote the effective use of daylight.	Consistent. See response to Policy LU-1.2 for a complete description of the full incorporation of pedestrian oriented, mixed use, Community Development Model design. The site planning for single family attached and mixed use buildings will incorporate building siting practices including orienting buildings to create outdoor rooms, such as courtyards connected by landscaped walkways, and to consider solar access. Therefore the project is consistent with this sustainable building siting and orientation policy.

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Policy COS-14.7	Alternative Energy Sources for Development Projects. Encourage development projects that use energy recovery, photovoltaic, and wind energy.	Consistent. See response to Policies COS-14.3 and COS-14.4.
Policy COS-14.9	Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.	Consistent. See response to Policy COS-14.3 and Policy COS-14.4. The project will reduce GHG emissions through a compact site design that provides significant opportunities for residents to access all areas of the community by walking or bicycling. In addition, the Air Quality Technical Report and project EIR include best management practices for control of dust and other pollutants during construction. The project will require the County to provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projections used in updating the RAQS and the SIP will accurately reflect anticipated growth due to the proposed project. See Appendices D and O, Air Quality and Greenhouse Gas Emission respectively, and Sections 2.3 and 3.1.2 of EIR. Therefore the project is consistent with this air pollution control policy.
Policy COS-14.10	Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.	Consistent. The project construction equipment will be required to be Tier III, or higher, except where such equipment is not commercially and feasibly available. Therefore, the project complies with this policy. In addition, the project's HOA will require that all open space areas under its control be landscaped and maintained with electrical equipment, to the extent feasible.
Policy COS- 14.11	Native Vegetation. Require development to minimize the vegetation management of native vegetation while ensuring sufficient clearing is provided for fire control.	Consistent. Thinning and clearing of native or naturalized vegetation (vegetation management) outside of the grading necessary to implement the project will only be done for fuel management purposes as required by the appropriate fire agency and the Fire Protection Plan, EIR Appendix J. Therefore the project is consistent with this native vegetation management policy.
Policy COS-14.12	Heat Island Effect. Require that development be located and designed to minimize the "heat island" effect as appropriate to the location and density of development, incorporating such elements as cool roofs, cool pavements, and strategically placed shade trees.	Consistent. "Heat Islands" generally occur where there are large expanses of hardscape. Within the project, these are reduced primarily through the use of broad dome and vertical trees casting shade shadows along streets, trails, in parking lots, parks, and in public plazas. Additional relief could also be achieved through the use of permeable paving materials that reduce the amount of heat that radiates from a specific area. Also, the project as a

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		whole integrates 104.1 acres of Biological Open Space, approximately 20 acres of Common Areas that would be available for Agricultural use, 23.6 acres of private and public parks, and 7.9 acres of grass-lined detention basins strategically located to minimize the creation of heat islands. Therefore the project is consistent with this heat island management policy.
Goal COS 15	Sustainable Architecture and Buildings. Building design and construction techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment.	
Policy COS-15.1	Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with “green building” programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce and toxic air contaminants.	Consistent. The Specific Plan requires orderly and sensitive design, and in particular, green building design and construction, that maximizes energy efficiency, minimizes air pollution, and includes substantial solid waste recycling. Therefore the project is consistent with this sustainable design and construction policy.
Policy COS-15.4	Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.	Consistent. All project buildings will meet all applicable energy standards, and will exceed 2008 Title 24 energy standards by 30%. See EIR, Section 3.1.2, and EIR, Appendix O, Greenhouse Gas Report. Therefore the project is consistent with this green building policy.
Policy COS-15.6	Design and Construction Methods. Require development design and construction methods to minimize impacts to air quality.	Consistent. The project is designed based on the Community Development Model which incorporates sustainable community design practices that minimize impacts to air quality through pedestrian-oriented, mixed-use land uses. The project includes 16 plus miles of pedestrian and bike paths, walkways, and trails linking together all parts of the project. Project construction equipment will meet Tier III, or higher, construction equipment, except where such equipment is not commercially and feasibly available. The project Air Quality Technical Report (EIR Appendix D) and project EIR, Section 2.2 Air Quality includes construction best management practices that will be required for control of dust and other pollutants during construction. Therefore the project is consistent with this air quality by design and construction policy.

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Goal COS-17	Sustainable Solid Waste Management. Perform solid waste management in a manner that protects natural resources from pollutants while providing sufficient, long term capacity through vigorous reduction, reuse, recycling, and composting programs.	
Policy COS-17.1	Reduction of Solid Waste Materials. Reduce greenhouse gas emissions and future landfill capacity needs through reduction, reuse, or recycling of all types of solid waste that is generated. Divert solid waste from landfills in compliance with State law.	Consistent. See response to Policy COS-15.1. All waste haulers would be required to comply with state solid waste laws.
Policy COS-17.5	Methane Recapture. Promote efficient methods for methane recapture in landfills and the use of composting facilities and anaerobic digesters and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity.	Not applicable. The Wastewater Management Technical Report (EIR, Appendix S) provides information about the type of infrastructure and services facilities to be constructed. Methane will not be generated with the methods being used.
Policy COS-17.6	Recycling Containers. Require that all new land development projects include space for recycling containers.	Consistent. The project will include space for recycling containers in mixed-use, commercial and public use areas in accordance with project General Use and Performance Standards. Therefore the project is consistent with this recycling policy.
Goal COS-18	Sustainable Energy. Energy systems that reduce consumption of non-renewable resources and reduce GHG and other air pollutant emissions while minimizing impacts to natural resources and communities.	
Policy COS-18.2	Energy Generation from Waste. Encourage use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites.	Consistent. Methane will not be produced by the project. The project will institute recycling and composting services to reduce solid waste by 20%, through the project RF located at the Town Center. The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste .Multiple methodologies were utilized to evaluate the project’s reduction in GHG emissions, including solid waste emissions (see, EIR subchapter 3.1.2 and EIR Appendix O). As shown in EIR Tables 3.1-4 through 3.1-7, the project will achieve all reductions appropriate under each methodology evaluated. As detailed in the EIR, the project will achieve a 20 percent reduction in waste disposal, relative to the waste disposal rates identified by CalRecycle and used in CalEEMod, through the siting of an on-site RF. Taking this project design feature into account, the project achieves the percentage reduction targets under all methodologies

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		analyzed demonstrating that the project’s GHG emissions including that from solid waste, and impacts on global climate change would be less than significant. Therefore the project is consistent with this energy from waste policy.
Goal COS-19	Sustainable Water Supply. Conservation of limited water supply supporting all uses including urban, rural, commercial, industrial, and agricultural uses.	
Policy COS-19.1	Sustainable Development Practices. Require land development, building design, landscaping, and operational practices that minimize water consumption.	Consistent. The project includes a comprehensive Water Conservation Plan that requires development, building design, landscaping, and operational practices that minimize water consumption. The project General Use and Performance Standards include constructing all new buildings to install water saving technologies, to reduce water consumption by 20%, such as low flow showerheads and faucets, as well as, and high-efficiency appliances in new homes, including washers, dish washers, fans, refrigerators. The project will use Smart Meter technology to encourage water conservation. A MUP for an onsite Wastewater Treatment Facility is being processed concurrently with this project. Accordingly, the project would be designed with dual piping to use recycled water for irrigation of all community area landscaping. Irrigation of private yards for single family homes will be designed to support drought tolerant vegetation. State of the art irrigation controllers will be required that match water use to plant type and weather conditions. See EIR, Section 3.1.3. Therefore the project is consistent with this water conservation policy.
Policy COS-19.2	Recycled Water in New Development. Require the use of recycled water in development wherever feasible. Restrict the use of recycled water when it increases salt loading in reservoirs.	Consistent. A MUP for an onsite Wastewater Treatment Facility is being processed concurrently with this project. See EIR, Section 3.1.3. The use of reclaimed water must comply with the policies and regulations, including those for the protection of reservoir water quality, of the VCMWD. Therefore the project is consistent with this recycled water policy.

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Goal COS-21	Park and Recreational Facilities. Park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of County residents and visitors, protect natural resources, and foster an awareness of local history, with approximately ten acres of local parks and 15-acres of regional parks provided for every 1,000 persons in the unincorporated County.	
Policy COS-21.5	Connections to Trails and Networks. Connect public parks to trails and pathways and other pedestrian or bicycle networks where feasible to provide linkages and connectivity between recreational uses.	Consistent. The project includes an extensive and thoroughly integrated, 16-mile Community Trail Network, including pedestrian and bicycle trails and pathways, connecting and linking together all project components, including the Town Center, Neighborhood Centers, Neighborhoods, the school, all 11 parks, and featuring trail connections to the County regional trail network at the north and south ends of project. Therefore, the proposed trail connections are consistent with this policy.

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Goal H-1	Housing Development and Variety. A housing stock comprising a variety of housing and tenancy types at a range of prices, which meets the varied needs of existing and future unincorporated County residents, who represent a full spectrum of age, income, and other demographic characteristics.	
Policy H-1.2	Development Intensity Relative to Permitted Density. Encourage a development intensity of at least 80 percent of the maximum permitted gross density for sites designated at 15 to 30 dwelling units per acre in development projects	Consistent. Lilac Hills Ranch Specific Plan has been designed to ensure that the full number of homes will be constructed. As shown on Figure 15 of the Specific Plan, certain areas within or adjacent to the Town Center and central Neighborhood Center will provide opportunities for housing at densities of 25 units per acre.
Policy H-1.5	Senior and Affordable Housing near Shopping and Services. Provide opportunities for senior housing and affordable housing development within town centers, transit nodes, and other areas that offer access to shopping and services.	Consistent. The Lilac Hills Specific Plan includes nearly 26 percent of its residential units within a Senior Neighborhood dedicated to providing senior citizen housing with individual homes for seniors and necessary facilities and amenities including a senior community center, assisted and communal living properties within a private gated active adult community are included in the project. See response above for additional information.

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Policy H-1.6	Land for All Housing Types Provided in Villages. Provide opportunities for small-lot single family, duplex, triplex, and other multi-family building types in Villages	Consistent. Lilac Hills Ranch includes a large variety of housing type and residential land use designations. The Specific Plan provides for a variety of single family detached, single family attached and mixed use development lot sizes, building types and densities. Section III of the Specific Plan includes site plan concepts and conceptual elevations for a variety of detached and attached homes as well design guidelines.
Goal H-2	Neighborhoods That Respect Local Character. Well-designed residential neighborhoods that respect unique local character and the natural environment while expanding opportunities for affordable housing.	
Policy –2.1	Development that Respects Community Character. Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element	Consistent. Lilac Hills Ranch will expand the variety of housing opportunities available to residents of the unincorporated area in a well-designed Village and will be constructed in accordance with a comprehensive set of design guidelines. This will not degrade or detract from the character of homes in the area. Such homes range from expensive custom homes on large lots to older, small, modest residential structures modeled on homes built in past decades. Open space along project boundaries will provide a buffer in other areas. See response to LU 2.3.
Policy-2.2	Projects with Open Space Amenities in Villages. Require new multi-family projects in Villages to be well designed and include amenities and common open space areas that enhance overall quality of life	Consistent. The attached single family and mixed-use units must be designed in accordance with the design guidelines included in Chapter 3 of the Specific Plan. The attached and mixed-use units would be located in close proximity to parks and trails. Therefore, the project is consistent with this policy.
Goal H-3	Housing Affordability for All Economic Segments. Affordable and suitable housing for all economic segments, with emphasis on the housing needs of lower income households and households with special needs.	
	The policies that implement Housing Goal 3 are direction to the County in their pursuit of funding for various forms of low income housing. Nevertheless, the Lilac Hills Ranch Specific Plan includes everything from modest entry level homes to custom homes on large lots, age-restricted homes and assisted living facilities.	Not applicable.

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Goal M-1	Balanced Road Network. A safe and efficient road network that balances regional travel needs with the travel requirements and preferences of local communities.	
Policy M-1.1	Prioritized Travel within Community Planning Areas. Provide a public road network that accommodates travel between and within community planning areas rather than accommodating overflow traffic from State highways and freeways that are unable to meet regional travel demands.	Consistent. West Lilac Road is a public road that is designed to accommodate travel from the Project to and from the adjacent public road system and other community planning areas. The project will have two permanent access points directly onto West Lilac Road. The Mobility Element designation for West Lilac Road is proposed to be changed from a Light Collector 2.2C to a Light Collector 2.2F from Main Street to Road 3 (Running Creek Road) to ensure that it remains compatible with the character of the area and minimize impacts to adjacent residences. While West Lilac Road provides access to I-15, this road was not designed to serve as overflow routes for I-15, nor is it expected to do so in the future.
Policy M-1.2	Interconnected Road Network. Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.	Consistent. The Lilac Hills Ranch circulation network includes an interconnected network of private roads that provide multiple connections. Lilac Hills Ranch includes four connecting points to existing roads, ensuring that both local and surrounding residents have alternate routes. The Mitigation measures listed on Table 10.5 of the Project's TIA, would reduce impacts associated with traffic congestion to less than significant where feasible. All of the roads within the project will meet the requirements of the Consolidated Fire Code. Mountain Ridge Road provides emergency access to the south and will have controlled gated access in accordance with the Consolidated Fire Code. Gates will be able to be opened in the event of an emergency, providing residents with additional ways to evacuate through Lilac Hills Ranch. Another gated connection from Phase 4 to Rodriguez Road will be used only for emergency access.
Policy M-1.3	Treatment of High-Volume Roadways. Consider narrower rights-of-way, flexibility in design standards, and lower design speeds in areas planned for substantial development in order to avoid bisecting communities or town centers. Reduce	Consistent. A number of Specific Plan Policies require roadways in the Project to be designed in a manner that will minimize impacts to significant biological, environmental and visual resources. Policy 8 of the Specific Plan limits disturbance and development to only those areas shown in the Specific Plan.

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	noise, air and visual impacts of new freeways regional arterials, and Mobility Element roads, through landscaping, design and/or careful location of facilities.	Policy 9 of the Specific Plan requires a safe and efficient circulation system that supports the Project, links to regional transportation elements when appropriate and minimizes impacts to residential neighborhoods and environmentally sensitive areas. All internal roads are designed to reinforce the rural atmosphere of the community by reducing design speed and retaining two lanes.
Goal M-2	Responding to Physical Constraints and Preservation Goals. A road network that provides adequate capacity to reasonably accommodate both planned land uses and regional traffic patterns while supporting other General Plan goals such as providing environmental protections and enhancing community character.	
Policy M-2.1	Level of Service Criteria. Require development projects to provide associated road improvements necessary to achieve a level of service of “D” or higher on all Mobility Element roads except for those where a failing level of service has been accepted by the County pursuant to the criteria specifically identified in the accompanying text box (Criteria for Accepting a Road Classification with Level of Service E/F). When development is proposed on roads where a failing level of service has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network	<p>Consistent. As explained in Chapter 9 of the TIS, the changes to the Regional Category and Land Use Designations result in additional traffic on Mobility Element roads that was not previously anticipated by the General Plan. Therefore, a plan to plan analysis was conducted to determine the impacts to the County’s Mobility Element roadway network as a result of the changes in the density and intensity of the project site.</p> <p>As identified in the TIS, the project would result in inconsistencies in the following eight roadway segments: 1) West Lilac Road, between Old Highway 395 and Main Street; 2) West Lilac Road, between Main Street and Street “F”; 3) West Lilac Road, between Street “F” and Road 3; 4) Old Highway 395, between SR-76 and E. Dulin Road 5) Old Highway 395, between E. Dulin Road and West Lilac Road; 6) Old Highway 395, between W. Lilac Road and I-15 SB Ramps; 7) Lilac Road, between New Road 19 (east of Betsworth Road and Valley Center Road; 8) Valley Center Road, between Miller Road and Indian Creek Road.</p> <p>The reason for accepting the above roadway segments at LOS E or F is because the adverse impacts of adding travel lanes would not justify the resulting benefit of increased traffic capacity. This would include the following relevant situations:</p>

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		<ul style="list-style-type: none"> • When marginal deficiencies are characterized along a short segment of a road and classifying the road with a designation that would add travel lanes for the entire road would be excessive; or • When adding travel lanes to a road that would adversely impact environmental and cultural resources or in areas with steep slopes where widening roads would require massive grading, which would result in adverse environmental impacts and other degradation of the physical environment. <p>The County General Plan Update has already accepted LOS E/F along three of the roadway segments identified above: 1) Old Highway 395, between SR-76 and E. Dulin Road; 2) Lilac Road, between New Road 19 (east of Betsworth Road and Valley Center Road; 3) Valley Center Road, between Miller Road and Indian Creek Road. As a result of the project, these segments would have to be reaccepted at LOS E/F.</p> <p>The project would pay the Transportation Impact Fee to mitigate cumulative impacts to all Mobility Element roadways.</p> <p>General Plan Mobility Element Policy 2.1, provides that adequate road capacity to reasonably accommodate build-out of the Land Use Element, must be balanced with the need to support other General Plan goals such as providing environmental protections. Policy 2.1 acknowledges that the preservation of valuable resources may outweigh the benefits of road improvements. Therefore, a lower LOS along specified roadways may be acceptable.</p>

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Policy- M-2.2	Access to Mobility Element Designated Roads. Minimize direct access points to Mobility Element roads from driveways and other non-through roads to maintain the capacity and improve traffic operations.	Consistent. West Lilac Road is the only Mobility Element road in the vicinity of the proposed project. There are no new private driveway access points to West Lilac Road. The project would provide a limited number of connections to West Lilac Road to the on-site private roads in order to provide access into and out of the project. However, existing homes in the area that currently take access from West Lilac Road will continue to do so.
Policy M-2.3	Environmentally Sensitive Road Design. Locate and design public and private roads to minimize impacts to significant biological and other environmental and visual resources. Avoid road alignments through floodplains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. Design new roads to maintain wildlife movement and retrofit existing roads for that purpose. Utilize fencing to reduce road kill and to direct animals to under crossings	Consistent. A number of Specific Plan Policies require roadways to be designed in a manner that will minimize impacts to significant biological, environmental and visual resources. Policy 8 of the Specific Plan limits disturbance and development to only those areas shown on the Specific Plan. Policy 9 of the Specific Plan requires a safe and efficient circulation system that supports the Project, links to regional transportation elements when appropriate and minimizes impacts to residential neighborhoods and environmentally sensitive areas. The Project's EIR identifies mitigation measures (<i>M-BIO1 through M-BIO 4</i>) to reduce impacts to sensitive natural resources on-site and enhance connectivity to preserve areas to levels below significant. The major wetlands and drainages onsite are preserved although road crossings are provided to ensure a safe inter-village road network. The use of a compact development footprint also minimizes the need for wildlife movement through the project and wildlife can continue to move through the general area.

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Policy- 2.4	Roadway Noise Buffers. Incorporate buffers or other noise reduction measures consistent with standards established in the Noise Element into the siting and design of roads located next to sensitive noise-receptors to minimize adverse impacts from traffic noise. Consider reduction measures such as alternative road design, reduced speeds, alternative paving, and setbacks or buffers, prior to berms and walls.	Consistent. As indicated in Table 2.8-4 and Figures 2.8-2a and 2.8-2b of the Project’s EIR, there are areas proposed for NSLU development that would be exposed to noise levels in excess of 60 CNEL. The project includes structures and the site has topography that results in separation of NSLU from adjacent roads. In addition, traffic generated noise is mitigated by a number of mitigation measures detailed in the EIR section and summarized in Table S-1. In addition, noise on the controlled access roads (Mountain Ridge Road) will be maintained at low levels by limiting traffic volumes through the use of gates. Noise levels along West Lilac Road along the project frontage will be significantly decreased because traffic will be re-routed to the new Main Street (on-site) and no project homes will take access directly onto that road.
Policy- 2.5	Minimize Excess Water Runoff. Require road improvements to be designed and constructed to accommodate stormwater in a manner that minimize demands upon engineered stormwater systems and to maximize the use of natural detention and infiltration techniques to mitigate environmental impacts.	Consistent. Potential Site Design BMPs, LID requirements, Source Control BMPs and Treatment Control BMPs are detailed in the Project’s Major SWMP. (Table 1-3, of the Hydrology and Water Quality Section of the Project EIR, identifies all the measures that are included). In addition, the Project has developed a comprehensive drainage plan. Runoff is directed from natural channels through development areas, collected at specified points, and released into existing drainage courses as it exits the development footprint. The future use of rainwater capturing and permeable pavers as design elements could reduce the size of the detention basins. The project’s impacts associated with the exceedance of the storm water drainage system capacity would be less than significant and it would not contribute to a significant cumulative impact associated with the capacity of storm water systems.
Goal M-3	Transportation Facility Development. New or expanded transportation facilities that are phased with and equitably funded by the development that necessitates their construction.	
Policy –3.1	Public Road Rights-of-Way. Require development to dedicate right-of-way for public roads and other transportation routes identified in the Mobility Element roadway network (see Mobility Element Network Appendix), Community Plans, or Road Master Plans. Require the provision of sufficient right-of-	Consistent. West Lilac Road along the project frontage is proposed to be re-designated from a 2.2C Light Collector to a 2.2F Light Collector per the project’s Mobility Element General Plan Amendment. The roadway will be improved and the right-of-way dedicated based upon the improvement standards for a half-width 2.2F Light Collector road. The road improvements

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	way width, as specified in the County Public Road Standards and Community Trails Master Plan, to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians.	<p>would also include a fully improved 12-foot pathway within the road right-of-way.</p> <p>All of the private roads within the Project will be designed and built to include road sections which will accommodate the traffic needs as identified by the project TIS and meet the County standards with certain modifications as described in the Traffic section of the EIR. All of the Private roads will be built to accommodate project traffic and emergency vehicles. A system of pedestrian ways and multi-modal trails are incorporated in the design of the roadways</p>
Policy- 3.2	Traffic Impact Mitigation. Require development to contribute its fair share toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, pedestrian and bicycle facilities, and equestrian.	Consistent. Lilac Hills Ranch will pay TIF fees and make road improvements as identified in the EIR. A system of pedestrian ways, multi-modal trails and bicycle paths are incorporated in the design of the roadways The project will also construct two segments of multi-use trails identified on the County Master Trail Plan.
Policy -3.3	Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with State law and local	Consistent. The Lilac Hills Ranch circulation network includes an interconnected network of private roads that provide multiple internal connections. The Project's road system meets the County Fire standards in regards to multiple access alternatives. Mountain Ridge Road, providing emergency access to the south, will have controlled access via a gate, in accordance with the requirements of the Consolidated Fire Code. The gates will be able to be opened in the event of an emergency, providing residents with additional ways to evacuate through Lilac Hills Ranch.

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Goal M-4	Safe and Compatible Roads. Roads designed to be safe for all users and compatible with their context.	
Policy M-4.1	Walkable Village Roads. Encourage multi-modal roads in Villages and compact residential areas with pedestrian-oriented development patterns that enhance pedestrian safety and walkability, along with other non-motorized modes of travel, such as designing narrower but slower speed roads that increase pedestrian safety.	Consistent. Lilac Hills Ranch establishes a Village that is compact and configured to encourage residents to walk to commercial and civic uses. Residential and mixed-use uses are located adjacent to the Town Center, central Neighborhood Center, school site and a County park. This will encourage residents to walk to these public areas. An extensive pedestrian walkway system and bike paths along major internal roads provide multiple opportunities for residents to walk and bike the short distances to the Town Center and school-park complex. Traffic-calming mechanisms such as roundabouts and/or couplets will further slow traffic through the community.
Policy- 4.2	Interconnected Local Roads. Provide an interconnected and appropriately scaled local public road network in Village and Rural Villages that reinforces the compact development patterns promoted by the Land Use Element and individual community plans	Consistent. The project would provide four connections to existing roads, ensuring that both local and surrounding residents have alternate routes. The internal road system within the project site would consist of private roads, open to the public, interconnected and appropriately scaled, allowing all internal roads to be two lanes, reinforcing a rural atmosphere. Access to the Village Center will also be provided by West Lilac Road, a Mobility Element public road that will be improved to County standards as modified. As shown in EIR Figure 2.7-1, gates would be placed throughout Phases 4 and 5, for use by residents and/or emergency apparatus. The gates would be used by residents to go in and out of the project and would have automatic openers (for exiting) that are triggered by either a buried sensor or an optical sensor. During an emergency requiring evacuation of residents, the gates would open allowing surrounding residents to use Lilac Hills Ranch roads. Even with this gated system, the roads would still be interconnected because they allow traffic from off-site to enter the project, and also provide emergency evacuation routes. Finally a separate system of pedestrian and bicycle paths will ensure that walkers and bicyclists are encouraged to walk to commercial and civic uses.
Policy 4.3	Rural roads Compatible with Rural Character. Design and construct public roads to meet travel demands in Semi-Rural and	Consistent. The Project is requesting a General Plan Amendment to change the project sites land use designation under the General Plan from Semi-Rural

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	Rural Lands that are consistent with rural character while safely accommodating transit stops, when deemed necessary, along with bicyclists, pedestrians, and equestrians. Where feasible, utilize rural road design features (e.g. no curb and gutter improvements) to maintain community character.	to Village which would make this policy not applicable. However, with that said, the Project is also seeking to change the Mobility Element designation for West Lilac Road from a Light Collector 2.2C to a Light Collector 2.2F from Main Street to Road 3 (Running Creek Road) to ensure that it remains compatible with the character of the area and minimizes impacts on adjacent residences. In addition, exceptions have been requested as part of the Project approvals including a segment of West Lilac Road along the project frontage which does not meet public road standards that would avoid significant grading of steep slopes and disruption of existing driveways.
Policy 4.4	Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents	Consistent. Roads in Lilac Hills Ranch are designed to meet the requirements of the Consolidated Fire Code in order to accommodate emergency service vehicles and allow residents to evacuate efficiently. The internal road system also provides an interconnected network that provides at least two ways in and out for the community.
Policy-4.5	Context Sensitive Road Design. Design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. Provide wildlife crossings in road design and construction where it would minimize impacts in wildlife corridors.	Consistent. Earthwork will be minimized (especially along all perimeters of the site) by focusing density in locations where slope is minimal. The road pattern follows the terrain while still providing a safe and efficient road network. The project includes four connections to existing roads, ensuring that both local and surrounding residents have alternate routes. The points of ingress and egress ensure adequate access while reducing effects on surrounding rural areas. The Project's EIR identifies mitigation measures (M-BIO1 through M-BIO 4) to reduce impacts to sensitive natural resources on-site and enhance connectivity to preserve areas to less than significant. The wetlands and drainages onsite are preserved in permanent open space although road crossings are provided to ensure a safe inter-village road network. The use of a compact development footprint also minimizes the need for wildlife movement through the project and wildlife can continue to move through the general area.
Policy 4.6	Interjurisdictional Coordination. Coordinate with adjacent jurisdictions so that roads within Spheres of Influence (SOIs) or that cross jurisdictional boundaries are designed to provide a	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in adopting policies set forth throughout the General Plan.

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	consistent cross section and capacity. To the extent practical, coordinate with adjacent jurisdictions to construct road improvements concurrently or sequentially to optimize and maintain road capacity.	
Goal M-5	Safe and Efficient Multi-Modal Transportation Systems. A multi-modal transportation system that provides for the safe, accessible, convenient, and efficient movement of people and goods within the unincorporated County.	
Policy -5.1	Regional Coordination. Coordinate with regional planning agencies, transit agencies and adjacent jurisdictions to provide a transportation system with the following:	Consistent. The County coordinated with all regional planning agencies, including SANDAG, CALTRANS and the North County Transit District (NCTD) along with other jurisdictions.
Policy -5.2	Impact Mitigation for New Roadways and Improvements. Coordinate with Caltrans to mitigate negative impacts from existing, expanded, or new State Freeways or highways and to reduce impacts of road improvements and/or design modifications to State facilities on adjacent communities.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in coordinating with other jurisdictions.
Goal M-6	Efficient Freight Service Linked to Other Transportation Modes.	Freight services that efficiently move goods and that are effectively linked to other transportation modes.
Policy -6.1	Designated Truck Routes. Minimize heavy truck traffic (generally more than 33,000 pounds and mostly used for long-haul purposes) near schools and within Villages and Residential Neighborhoods by designating official truck routes, establishing incompatible weight limits on roads unintended for frequent truck traffic, and carefully locating truck-intensive land uses.	Not applicable. There are no designated truck routes in or adjacent to Lilac Hills Ranch, nor is there any requirement to make such a designation. This policy provides guidance to the county with respect to ensuring that goods are moved efficiently and in a manner that does not unduly affect residents' quality of life. There are no truck intensive land uses proposed within Lilac Hills Ranch.
Policy-6.2	Existing Rail Line Use. Support the use of existing rail lines for freight, public transit, and tourism.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent to support the use of existing rail lines
Policy-6.3	Visual Impacts on Scenic Corridors. Coordinate with railroad and transit operators to ensure that infrastructure for freight and passenger services is planned and designed to limit visual impacts on scenic corridors.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in coordinating with railroad and transit operators.

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Policy-6.4	Locate Rail Facilities in Established Communities. Encourage railroad operators to use existing right -of-way and locate stations and support facilities in established communities.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent in coordinating with railroad and transit operators.
Policy-6.5	Adaptive Reuse of Abandoned Rail Lines. Support the retention of abandoned railroad rights-of- way and adaptation for uses that benefit the general public, such as public transit, new road connections, regional trails and bike paths or protected habitat areas where appropriate.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent to pursue future application of this policy.
Goal M-7	Airport Facilities. Viable and accessible airport facilities whose continuing operations effectively serve the evolving needs of the region while minimizing any adverse impacts of airport operations.	
Policy -7.1	Meeting Airport Needs. Operate and improve airport facilities to meet air transportation needs in a manner that adequately considers impacts to environmental resources and surrounding communities and to ensure consistency with Airport Land Use Compatibility Plans.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent to pursue future application of this policy.
Goal M-8	Public Transit System. A public transit system that reduces automobile dependence and serves all segments of the population.	
Policy 8.1	Maximize Transit Service Opportunities. Coordinate with SANDAG, the CTSA, NCTD and MTS to provide capital facilities and funding where appropriate, et al.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent in coordinating with railroad and transit operators.
Policy- 8.2	Transit Service to Key Community Facilities and Services. Locate key County facilities, healthcare services, educational institutions and other civic facilities so that they are accessible by transit in areas where transit is available. Require those facilities to be designed so that they are easily accessible by transit, whenever possible.	Consistent. The project would include a provision for a transit stop within the Town Center and would include a Transportation Demand Management Plan that would include ride sharing programs and private interim transit.

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Policy 8.3	Transit Stops That Facilitate Ridership. Coordinate with SANDAG, NCTD, and MTS to locate transit stops and facilities in areas that facilitate transit ridership, and designate such locations as part of planning efforts for Town Centers, transit nodes, and large-scale commercial or residential development projects. Ensure that the planning of Town Centers and Village Cores incorporates uses that support the use of transit, including multi-family residential and mixed-use transit-oriented development, when appropriate.	Consistent. Lilac Hills Ranch includes a Town Center with commercial/mixed-use and attached residential uses. An area for a transit stop within the Town Center that will be provided when NCMTD determines that such a site is necessary. The project also includes a Community Park and Ride facility within Phase 1 and a Transportation Demand Management Program that includes such measures as van services to connect the Community with the planned NCTD stop located at the intersection of I-15 and SR 76.
Policy 8.4	Transit Amenities. Require transit stops that are accessible to pedestrians and bicyclists; and provide amenities for these users' convenience.	Consistent. An area for a transit stop will be provided in the Town Center when NCMTD determines that such stop is necessary. The project also includes a Community Park and Ride facility within Phase 1 and a Transportation Demand Management Program that includes such measures as van services to connect the Community with the planned NCTDB transit stop located at the intersection of I-15 and SR 76.
Policy-8.5	Improved Transit Facilitates. Require development projects, when appropriate, to improve existing nearby transit and/or park and ride facilities, including the provision of bicycle and pedestrian facilities, provisions for bus transit in coordination with NCTD, and MTS as appropriate including but not limited to, shelters, benches, boarding pads, and/or trash cans and to provide safe, convenient, and attractive pedestrian connections.	Consistent. Lilac Hills Ranch includes a Town Center with commercial/mixed-use and attached residential uses. An area for a transit stop will be provided when NCMTD determines that such is necessary. The project also includes a Community Park and Ride facility within Phase 1 and a Transportation Demand Management Program that includes such measures as van services to connect the Community with the planned NCTDB transit stop located at the intersection of I-15 and SR 76.
Policy 8.6	Park and Ride Facilities. Coordinate with SANDAG, CALTRANS and tribal governments to study transit connectivity and address improving regional opportunities for park-and-ride facilities and transit service to gaming facilities and surrounding rural areas to reduce congestion on rural roads.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in coordinating with other jurisdictions.

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Policy -8.7	Inter-Regional Travel Modes. Coordinate with SANDAG, CALTRANS and the California High-Speed Rail Authority, where appropriate, to identify alternative methods for inter-regional travel to serve the unincorporated County residents.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in coordinating with other jurisdictions.
Policy -8.8	Shuttles. Coordinate with Tribal governments, the Reservation Transportation Authority and other large employers to provide shuttles and other means of connecting transit stops with job locations. Civic and commercial uses, where appropriate.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in coordinating with other jurisdictions.
Goal M-9	Effective Use of Existing Transportation Network. Reduce the need to widen or build roads through effective use of the existing transportation network and maximizing the use of alternative modes of travel throughout the County.	
Policy -9.1	Transportation Systems Management. Explore the provision of operational improvements (i.e. adding turn lanes, acceleration lanes, intersection improvements, etc.) that increase the effective vehicular capacity of the public road network prior to increasing the number of road lanes. Ensure operational improvements do not adversely impact the transit, bicycle, and pedestrian networks.	Consistent. Stop signs, signals and roundabouts are used to ensure that traffic movements are controlled when warranted by specific traffic levels. Turn lanes are recommended in appropriate locations instead of full widening, for instance the impact on both E. Vista Way and Gopher Canyon Rd are mitigated through the construction of right turn lanes instead of widening these roads to 4 lanes. In addition, the impact to Lilac Rd between Old Castle Rd and Anthony Road is being mitigated with turn lanes as opposed to full widening.
Policy-9.2	Transportation Demand Management. Require large commercial and office development to use TDM programs to reduce single-occupant vehicle traffic generation, particularly during peak periods to maximize the capacity of existing or improved road facilities.	Consistent. Although the project does not include a large commercial or office development, it does include a Transportation Demand Management Program that includes such measures as van services to connect the Community with the planned NCTDB transit stop located at the intersection of I-15 and SR 76.
Policy -9.3	Preferred Parking. Encourage and provide incentives for commercial, office and industrial development to provide preferred parking for carpools, vanpools, electric vehicles and flex cars. ...Encourage parking cash out programs to reimburse employees for the cost of "free" on-site parking to provide incentives to use alternate modes of travel and to reduce parking requirements.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in adopting policies set forth throughout the General Plan.

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Policy-9.4	Park-and- Ride Facilities. Require developers of large projects to provide, or to contribute to park-and-ride facilities near freeway interchanges and other appropriate locations that provide convenient access to congested regional arterials. Require park-and-ride facilities that are accessible to pedestrians and bicyclists and include bicycle lockers and transit stops whenever feasible.	Consistent. Lilac Hills Ranch includes a Community Park and Ride facility within Phase 1. In addition, Park-and-Ride facilities are available a short distance from the project site at the intersection of Old Highway 395 and Gopher Canyon Road.
Goal M-10	Parking for Community Needs. Parking regulations that serve community needs and enhance community character	
Policy -10.1	<p>Parking Capacity. Require new development to:</p> <ul style="list-style-type: none"> ■ Provide sufficient parking capacity for motor vehicles consistent with the project’s location, use, and intensity ■ Provide parking facilities for motorcycles and bicycles ■ Provide staging areas for regional and community trails 	Consistent. Lilac Hills Ranch will provide sufficient residential parking through garages and residential streets, through a combination of on-site parking areas for the single-family attached residential units, and shared parking agreements with the mixed use and commercial areas. As required by County standards, the commercial and public park areas will have parking facilities for motorcycles and bicycles. Trails will connect with the public parks where parking areas will be provided. A trailhead is provided adjacent to the RF to provide additional access from the Town Center to the trail system that runs throughout the new Village. The Specific Plan provides detail guidelines related to parking.
Policy-10.2	Parking for Pedestrian Activity; Require the design and placement of on-site automobile, motorcycle, and bicycle parking in Villages and Rural Villages that encourages pedestrian activity by providing a clear separation between vehicle and pedestrian areas and prohibit parking areas from restricting pedestrian circulation patterns.	Consistent. The Project’s Specific Plan provides guidelines that require views of parking areas, carports, and garages to be minimized. In addition, the Specific Plan integrates parking into the overall design of the Town Center in a manner that does not detract from the pedestrian orientation of the area, and in a manner that does not detract from the overall focus of the community.
Policy - 10.3	Maximize On-street Parking. Encourage the use of on-street parking in commercial and/or high-density residential town center areas to calm traffic and improve pedestrian interaction. Traffic operations and pedestrian safety must not be compromised	Consistent. The Project’s circulation plan utilizes on-street parking in areas where traffic calming and pedestrian safety should be enhanced and/or where demand is anticipated for additional parking.
Policy - 10.4	Shared Parking. Support town center plans, when desired by the community that incorporate on- street and/or shared	Consistent. Lilac Hills Ranch will provide sufficient residential parking through garages and residential streets, through a combination of on-site parking

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	vehicular parking facilities to reduce on-site parking requirements.	areas for the single-family attached residential units, and shared parking agreements with the mixed use and commercial areas.
Policy - 10.5	Reduced Parking. Accommodate appropriate reductions in on-site parking requirements in situations such as: development of low income and senior housing, development located near transit nodes, employments centers that institute Transportation Demand Management programs, development that integrates other parking demand reductions techniques such as parking cash out, when ensured by ongoing permit conditions.	Not Applicable.
Policy - 10.6	On-Street Parking. Minimize on-street vehicular parking outside Villages and Rural Villages where on-street parking is not needed, to reduce the width of paved shoulders and provide an opportunity for bicycle lanes to retain rural character in low-intensity areas. Where on-street parking occurs outside Villages and Rural Villages, require the design to be consistent with the rural character.	Not Applicable. The Project is requesting a General Plan Amendment to change its designation under the General Plan from Semi-Rural to Village. Therefore, this policy does not apply.
Policy - 10.7	Parking Area Design for Stormwater Runoff. Require that parking areas be designed to reduce pollutant discharge and stormwater runoff through site design techniques such as permeable paving, landscaped infiltration areas, and unpaved but reinforced overflow parking areas that increase infiltration. Require parking areas located within or adjacent to preserve areas to also include native landscaping and shielded lighting.	Consistent. The stormwater management plan has been prepared per County and State standards. Multiple designs have been explored in order to incorporate alternative design techniques to increase infiltration where possible. See the SWMP (Appendix U to the EIR) for additional information.
Goal M-11	Bicycle and Pedestrian Facilities. Bicycle and pedestrian networks and facilities that provide safe, efficient, and attractive mobility options as well as recreational opportunities for County residents.	
Policy -11.1	Bicycle Facility Design. Support regional and community-scaled planning of pedestrian and bicycle networks.	Consistent. An extensive system of multi-modal trails provides multiple opportunities for residents to walk and bike throughout the project.
Policy-11.2	Bicycle and Pedestrian Facilities in Development. Require development and Town Center plans in Villages and Rural	Consistent. An extensive system of multi-modal trails provides multiple opportunities for residents to walk and bike throughout the project. These

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	Villages to incorporate site design and on-site amenities for alternate modes of transportation, such as comprehensive bicycle and pedestrian networks and facilities, including both on-street facilities as well as off-street bikeways, to safely serve the full range of intended users, along with areas for transit facilities, where appropriate and coordinated with the transit service provider.	include bikeways along main project streets. Bicycle parking spaces shall be designated on all Site Plans in accordance with the Zoning Ordinance and on all Site Plans for the civic uses allowed outside of the town and neighborhood centers (School, Private Recreation, Senior Center, etc.). The Private Community Ride Share facility at the western entrance to the Community also provides secured bicycle parking. All of these requirements are described in the Specific Plan performance standards and shown on the Parks and Trails Plan.
Policy -11.3	Bicycle Facilities on Roads Designated in the Mobility Element. Maximize the provision of bicycle facilities on County Mobility Element roads in Semi-Rural and Rural Lands to provide a safe and continuous bicycle network in rural areas that can be used for recreation or transportation purposes, while retaining rural character.	Consistent. The project roadways would provide designated bike lanes and bike parking in the town center and within the private park and ride to integrate bicycle facilities.
Policy-11.4	Coordination with the County Trails Program. Coordinate the proposed bicycle and pedestrian network and facilities with the Community Trails Master Plan's proposed trails and pathways.	Consistent. A comprehensive network of public hard and soft surface trails is proposed throughout the project site. These trails vary in width depending upon their location near homes or within open space.
Policy -11.5	Funding for Bicycle Network Improvements. Seek outside funding opportunities for bicycle and pedestrian network improvements projects particularly those that provide safe and continuous pedestrian and bicycle routes to schools, town centers, parks, parks park-and-ride facilities and major transit stops.	Not Applicable.
Policy-11.6	Coordination for Bicycle and Pedestrian Facility Connectivity. Coordinate with Caltrans to provide alternative connections for past, existing or planned bicycle and pedestrian routes that were or would be served by state freeway and highway projects that intersect pathways or divide communities.	Not Applicable.
Policy -11.7	Bicycle and pedestrian Facility Design. Promote pedestrian and bicycle facility standards for facility design that are	Consistent. The proposed trails along West Lilac Road and the VCMWD easement would be consistent with the County's CTMP and Valley Center

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	tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village.	Community Plan Design Guidelines. The CTMP trails along the northern and southern edges of the project would allow horseback riding.
Policy -11.8	Coordination with the County Trails Program. Coordinate the proposed bicycle and pedestrian network and facilities with the Community Trails Master Plan's proposed trails and pathways	Consistent. There are two County Master Plan Trails crossing the property that will be built as part of the project. Additional trails within the project will connect to these Master Plan Trails. All trails except within phases 4 and 5 (which is the gated Senior Citizen Neighborhood) within the project are public trails.
Goal M-12	County Trails Program. A safe, scenic, interconnected, and enjoyable non-motorized multi-use trail system developed, managed, and maintained according to the County Trails Program, Regional Trails Plan, and the Community Trails Master Plan.	
Policy -12.1	M-12.1 County Trails System. Implement a County Trails Program by developing the designated trail and pathway alignments and implementing goals and policies identified in the Community Trails Master Plan.	Consistent. The project proposes developing a system of multi- purpose trails that traverse the project site, linking the northern and southern public trails. This trail network would provide connectivity to parks, private recreation, schools, and commercial areas within the project site. The multi-purpose trail network is proposed as a combination of smaller feeder and natural trails in the open space area of the project site, and a community pathway that traverses the project site providing connectivity to the existing County Regional Trail System. All trails would be designed to County standards to ensure the safety of pedestrians and bicyclists.
Policy-12.2	Trail Variety. Provide and expand the variety of trail experiences that provide recreational opportunities to all residents of the unincorporated County, including urban/suburban, rural, wilderness, multi-use, staging areas, and support facilities.	Consistent. A comprehensive network of public hard and soft surface trails is proposed throughout the project site. These trails vary in width depending upon their location near homes or within open space. There are two CTMP trails that cross the property.
Policy -12.3	Trail Planning. Encourage trail planning, acquisition, development and management with other public agencies that have ownership or jurisdiction within or adjacent to the County.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent in coordinating with other jurisdictions
Policy-12.4	Land Dedication for Trails. Require development projects to dedicate and improve trails or pathways where the development will occur on land planned for trail or pathway segments shown on the Regional Trails Plan or Community Trails Master Plan.	Consistent. The project would dedicate and construct the designated Community Trails segment along the entire length of the south side of West Lilac Road and along the southern part of the project.

GENERAL PLAN MOBILITY ELEMENT		
Policy Number	Policy Text	Consistency Analysis
Policy -12.5	Future Trails. Explore opportunities to designate or construct future trails on County-owned lands, lands within the Multiple Species Conservation Program (MSCP) or other lands already under public ownership or prosed for public acquisition.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent in adopting policies set forth throughout the General Plan.
Policy-12.6	Trail easements, Dedications and Joint Use Agreements. Promote trail opportunities by obtaining easements, dedications, licenses agreements, or joint use agreement from other government agencies and public and semi-public agencies.	Consistent. The project will work with any government agencies and public or semi-public agencies to obtain onsite easements, dedications or joint use agreements.
Policy -12.7	Funding for Tails. Seek funding opportunities for trail acquisition, implementation, maintenance and operations.	Consistent. The project would dedicate and install the designated Community Trails segment along the entire length of the south side of West Lilac Road and along the southern part of the project.
Policy -12.8	Trails on Private Lands. Maximize opportunities that are fair and reasonable to secure trail routes across private property, agricultural and grazing lands, from willing property owners	Consistent. The project would dedicate and install the designated Community Trail segment along the entire length of the south side of West Lilac Road and along the southern part of the project.
Policy -12.9	Environmental and Agricultural Resources. Site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors, and agricultural lands. Within the MSCP preserves, conform siting and use of trails to County MSCP Plans and MSCP resource management plans.	Consistent. There are limited biological resources onsite and the project is not located within the proposed NC MSCP PAMA. Trails may be located along the prominent drainages and through the oak woodlands. Existing dirt roads will be used as trails to minimize the need for clearing of natural vegetation. These will be designed to minimize impact to these habitats while still allowing residents to enjoy a natural experience.
Policy -12.10	Recreational and Educational Resources. Design trail routes that meet a public need and highlight the County’s biological, recreational and educational resources, including natural, scenic, cultural, and historic resources.	Consistent. Trails will be located along the prominent drainages and through the oak woodlands. These will be designed to minimize impact to these habitats while still allowing residents to enjoy a natural experience.

GENERAL PLAN NOISE ELEMENT		
Policy Number	Policy Text	Consistency Analysis
Goal N-1	Land Use Compatibility. A noise environment throughout the unincorporated County that is compatible with the land uses.	
Policy N-1.2	Noise Management Strategies. Require the following strategies as higher priorities than construction of conventional noise barriers where noise abatement is necessary: Orient buildings such that the noise sensitive portions of a project are shielded from noise sources.	Consistent. The project employs noise management strategies, including an interconnected road system, sound walls, protection of noise sensitive uses, acoustical studies, noise protection easements, and best management practices to shield large equipment generated noise. The major noise generator in Lilac Hills Ranch is residential traffic. This has been minimized as much as possible through the use of an interconnected road network that disperses traffic throughout the project. Roads are two-lane and the design of the streets keep traffic speed at reduced levels. Other noise generators such as the WRF are located away from residential areas and are contained in enclosed buildings. To minimize traffic-generated noise the project would dedicate “noise protection easements” on the Tentative Map, Site Plans, Major Use Permits and building plans. The project must comply with the County Noise Ordinance Section 36.404. See EIR, Section 2.8, Noise. Therefore the project is consistent with this noise management policy.
Policy N-1.3	Sound Walls. Discourage the use of noise walls. In areas where the use of noise walls cannot be avoided, evaluate and require where feasible, a combination of walls and earthen berms and require the use of vegetation or other visual screening methods to soften the visual appearance of the wall.	Consistent. See response to Policy N-1.2. The project Fence Concepts intend to minimize walls in order to enhance the pedestrian experience. Where they cannot otherwise be avoided, noise walls will be used but will be, if feasible, in combination with earthen berms, and will strive for a style and design that complements the rural village-themed architecture present throughout the project. Use of rustic themed designs and materials, plus landscaping will be used to soften the appearance of the walls. Such designs will conform to the Valley Center Design Guidelines, Section 5 – Architectural Character, E. Walls, Fences, and Accessory Structures, which require designs and forms consistent with the rural character of the community. Therefore the project is consistent with this noise sound wall siting and design policy.
Goal N-2	Protection of Noise Sensitive Uses. A noise environment that minimizes exposure of noise sensitive land uses to excessive, unsafe, or otherwise disruptive noise levels.	
Policy N-2.1	Development Impacts to Noise Sensitive Land Uses. Require an acoustical study to identify inappropriate noise	Consistent. A Noise Report was prepared (EIR, Noise Report, Appendix M) for the project and noise impacts were analyzed in the EIR at Chapter 2.8.

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	level where development may directly result in any existing or future noise sensitive land uses being subject to noise levels equal to or greater than 60 CNEL and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2.	Twenty mitigation measures and practices will be required to minimize project noise as detailed therein. The project must comply with the County Noise Ordinance Section 36.404. Supplemental acoustical studies may be required prior to the issuance of individual building permits. Therefore the project is consistent with this sensitive noise management policy.
Policy N-2.2	Balconies and Patios. Assure that in developments where the exterior noise level on patios or balconies for multi-family residences or mixed-use developments exceed 65 CNEL, a solid noise barrier is incorporated into the building design of the balconies and patios while still maintaining the openness of the patio or balcony.	Consistent. See response to Policy N-2.1.
Goal N-4	Transportation Related Noise Generators. A noise environment that reduces noise generated from traffic where feasible.	
Policy N-4.1	Traffic Noise. Require that projects proposing General Plan amendments that increase the average daily traffic beyond what is anticipated in this General Plan do not increase cumulative traffic noise to off-site noise sensitive land uses beyond acceptable levels.	Consistent. See response to Policy N-2.1. The project has been designed to be sensitive to surrounding uses. Existing West Lilac Road will not be used for direct access from project homes. Project roads are all kept interior to the project and are not located along project boundaries. See EIR, Section 2.8-Noise. Therefore the project is consistent with this transportation noise policy.
Policy N-4.2	Traffic Calming. Include traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise in development that may impact noise sensitive land uses.	Consistent. See response to Policy N 1.2.
Policy N-4.5	Roadway Location. Locate new or expanded roads designated in the Mobility Element in areas where the impact to noise sensitive land uses would be minimized.	Consistent. See response to Policy N-1.2. The project includes a General Plan Amendment to the Mobility Element to change the classification of West Lilac Road, reducing it to a Light Collector 2.2F from the current 2.2C from Main Street to Road 3 (Running Creek Road). See EIR, Section 2.3 Traffic and Section 2.8 Noise. Therefore the project is consistent with this roadway location policy.

GENERAL PLAN NOISE ELEMENT		
Policy Number	Policy Text	Consistency Analysis
Goal N-5	Non-transportation-Related Noise Sources. A noise environment that provides minimal noise spillovers from industrial, commercial, agricultural, extractive, and similar facilities to adjacent residential neighborhoods.	
Policy N-5.1	Truck Access. Design development so that automobile and truck access to industrial and commercial properties abutting residential properties is located at the maximum practical distance from residential zones.	Consistent. See response to Policy N-1.2. Access to commercial and mixed use areas are located as far as possible from residential uses while still being convenient for deliveries. See EIR, Section 1 Project Description. Therefore the project is consistent with this truck spillover noise policy.
Goal N-6	Temporary and/or Nuisance Noise. Minimal effects of intermittent, short-term, or other nuisance noise sources to noise sensitive land uses.	
Policy N-6.1	Temporary and/or Nuisance Noise. Minimal effects of intermittent, short-term, or other nuisance noise sources to noise sensitive land uses.	Consistent. The project employs noise management strategies, including an interconnected road system, sound walls, protection of noise sensitive uses, noise reports for high- noise equipment, supplemental noise protection easements, and best management noise practices. The project must comply with the County Noise Ordinance Section 36.404. The noise study prepared for Lilac Hills Ranch (EIR, Noise Report, Appendix M) and the project EIR, Section 2.8 include measures to minimize the effects of temporary noise (e.g. construction noise) on residents. Therefore the project is consistent with this temporary and nuisance noise policy goal.
Policy N-6.2	Recurring Intermittent Noise. Minimize impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in Table N-2, but can have other adverse effects.	Consistent. See response to Policy N-1.2. This is addressed in the acoustical study and project EIR. See EIR, Section 2.8 Noise and Noise Report, Appendix M. Therefore the project is consistent with this recurring intermittent noise policy.
Policy N-6.3	High-Noise Equipment. Require development to limit the frequency of use of motorized landscaping equipment, parking lot sweepers, and other high-noise equipment if their activity will result in noise that affects residential zones.	Consistent. See response to Policy N-1.2. EIR, Section 2.8 The noise study identifies the requirement for supplemental noise reports to be prepared when site plans with potential noise generating activities are proposed. See EIR, Section 2.8- Noise. Therefore the project is consistent with this high noise equipment noise policy.

GENERAL PLAN SAFETY ELEMENT		
Policy Number	Policy Text	Consistency Analysis
Goal S-1	Public Safety. Enhanced Public safety and the protection of public and private property.	
Policy S-1.1	Minimized Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.	Consistent. Various sections of the EIR (e.g., Sections regarding Geology and Soils and Hazards) evaluate potential health and safety issues related to people and property within the Project. The EIR either identified no impacts associated with potential hazards or required mitigation to ensure that all potentially significant hazards are reduced to less than significant. In addition, the Project is located within the DSFPD. There are four fire stations located within the DSFPD. Miller Station is located adjacent to the development and approximately 2.3 miles from the furthest structure when the development is fully constructed. DSFPD would have the capacity to respond to expected calls from the proposed Lilac Hills Ranch project (Dudek and Hunt Capacity Report 2015). A Fire Protection Plan (“FPP”) for Lilac Hills Ranch was prepared in accordance with the DSFPD Ordinance No. 2010-01 (“District Standards”) and the County guidelines and referenced material in the 2011 Consolidated Fire Code, Guidelines for Determining Significance (See Appendix J to the EIR). The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard. The wildfire threat will be mitigated to less than significant with the incorporation of the design features described in the FPP.
Policy S-1.2	Public Facilities location. Advise, and where appropriate require, new development to locate future public facilities, including new essential and sensitive facilities, with respect to the County’s hazardous areas and State law.	Consistent. The EIR evaluated potential health and safety issues of certain public facilities within the Project. The EIR either identified no impact associated with a potential hazard or required mitigation to ensure that all potentially significant hazards are reduced to less than significant. The project includes a RF to supplement recycling opportunities for residents. As discussed in Chapter 1.0, these facilities would not handle, generate, or store hazardous substances. No impacts associated with the handling of hazardous substances would occur in conjunction with the on-site RF. A WRF is proposed on-site which has the potential to handle regulated substances. As shown in Figure 1-4 (Specific Plan Map), the on-site WRF shall be located a minimum of 250 feet from any residence, and a risk

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		<p>management plan would be required for the facility. CalARP requires that the risk management plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan. Based on conformance with the described requirements for hazardous materials, the project would result in a less than significant impact related to use of hazardous substances.</p> <p>A school site is proposed as a part of the project. The on-site WRF would be located 0.13 miles or within one-quarter mile of the school site. Based on conformance with applicable state law and county requirements for hazardous materials, impacts related to the location of the proposed school site would be less than significant.</p>
Policy S-1.3	Risk Reduction Programs. Support efforts and programs that reduce the risk of natural and manmade hazards and that reduce the time for responding to these hazards.	Not applicable. The proposed Project does not impact the County's efforts to promote efforts and programs that reduce the risk of natural and manmade hazards and that reduce the time for responding to these hazards.
Policy S-1.4	Multi-Jurisdictional Hazard Mitigation Plan. Review and update the County's Multi-Jurisdictional Hazard Mitigation Plan every five years.	Not applicable. The proposed Project does not impact the County's efforts to review and update the County's Multi- Jurisdictional Hazard Mitigation Plan every five years.
Policy S-1.5	Post-disaster Reconstruction. Participate in the development of programs and procedures that emphasize coordination between appropriate public agencies and private entities to remove debris and promote the rapid reconstruction of the County following a disaster event and facilitate the upgrading of the built environment as expeditiously as possible.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent to support programs that implement other policies set forth throughout the General Plan.
Goal S-2	Emergency Response. Effective emergency response to natural or human-induced disaster that minimizes the loss of life and damage to property, while also reducing the disruptions in the delivery of vital public and private services during and following a disaster.	
Policy S-2.1	Emergency Management System Training. Conduct annual training sessions using adopted emergency management systems. Coordinate with other jurisdictions to execute a variety of exercises to test operational and emergency plans.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent to support programs that implement other policies set forth throughout the General Plan.
Policy- 2.2	Participate in Mutual Aid Systems. Maintain participation in	Not applicable. This policy is not subject to project-specific application,

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	local, regional, State and national mutual aid systems to ensure that appropriate resources available for response and recovery during and following a disaster.	but rather memorializes the County’s intent to support programs that implement other policies set forth throughout the General Plan. The Project proposes a number of options to provide fire service to the site to meet the County’s travel time standard.
Policy- 2.3	Familiarity with National and State Response Plans. Ensure that all relevant and pertinent County of San Diego personnel are familiar with the National Incident Management System, the national Response Plan, the State of California Master Mutual Aid Agreement, and any other relevant response plans consistent with their position in the County’s Emergency Management Plan.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent to support programs that implement other policies set forth throughout the General Plan.
Policy- 2.4	Familiarity with National and State Response Plans. Ensure that all relevant and pertinent County of San Diego personnel are familiar with the National Incident Management System, the national Response Plan, the State of California Master Mutual Aid Agreement, and any other relevant response plans consistent with their position in the County’s Emergency Management Plan.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent to support programs that implement other policies set forth throughout the General Plan.
Policy- 2.5	Existing Development within 100-year Flood Zones. Implement flood warning systems and evacuation plans for areas that are already developed within 100-year flood zones.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent to support programs that implement other policies set forth throughout the General Plan.
Policy- 2.6	Effective Emergency Evacuation Programs. Develop, implement and maintain an effective evacuation program for areas of risk in the event of a natural disaster.	Consistent. The community emergency evacuation plan is a significant component of the Lilac Hills Ranch Evacuation Plan. The project’s Evacuation Plan is a project design feature which includes: 1) identification of evacuation routes (subject to change as each phase is constructed); 2) implementation of “ready, set, go” program; and (3) development of the resident awareness and education program. The project’s Evacuation Plan (Appendix K) of the EIR does include multiple components intended to create an orderly and safe evacuation of the project site in time of emergency. As discussed in subchapter 2.7 of the EIR, the Evacuation Plan provides evacuation routes, evacuation

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		<p>points, and specific measures to keep future residents and employees informed about what to do if a wildfire occurs and safe at a time of evacuation. See also responses to comment letter I51m.</p> <p>In addition to the education materials that will be provided to all residents and businesses and the implementation of a “Ready, Set, Go” Program, the Evacuation Plan includes both primary and secondary evacuation routes for use during an emergency. The evacuation routes include project egress at multiple locations, directing traffic as shown in Figure 2.7-3 of the EIR. As shown highlighted in red on Figure 2.7-3, primary evacuation routes consist of Main Street, Street “Z,” Lilac Hills Ranch Road, Covey Lane, and Mountain Ridge Road. Additionally, the project site would also be served by secondary emergency evacuation routes using Street “F” and Birdsong Drive on the north and Rodriguez Road in the south.</p> <p>Specifically, existing Mountain Ridge Road would provide access to Circle R Drive with a direct connection to Old Highway 395. While the project does propose to amend the road standard for West Lilac Road from 2.2C to 2.2F, along certain locations, this would not affect the road’s actual capacity. See Appendix E (TIS).</p> <p>Overall, the availability of the Evacuation Plan to all residents and businesses, along with the multiple exits available for egress from the site, would assure that impacts associated with an evacuation process would be less than significant.</p>
Goal S-3	Minimized Fire Hazards. Minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards.	
Policy S-3.1	Minimized Fire Hazards. Minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards.	<p>Consistent. The Project is located within the DSFPD). There are four fire stations located within the DSFPD. Miller Station is located adjacent to the development and approximately 2.3 miles from the furthest structure when the development is fully constructed. DSFPD would have the existing capacity to respond to expected calls from the proposed Lilac Hills Ranch</p>

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		<p>project (Dudek and Hunt Capacity Report 2015). A Fire Protection Plan (“FPP”) for the Lilac Hills Ranch project was prepared in accordance with DSFPD Ordinance No. 2010-01 (“District Standards”) and the County guidance and referenced material in the 2011 Consolidated Fire Code, Guidelines for Determining Significance (See Appendix J to the EIR). The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard. The wildfire threat will be mitigated to less than significant by the incorporation of the following:</p> <p>Project design features: FMZs; the use of ignition resistant building materials; fire and building code guidance for the protection of non-residential structures; the provision of fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. In addition, mitigation measure M- HZ-1 provides alternative measures to achieve the same level of protection from potential wildfires, when the 100 foot FMZ cannot be met on-site. All structures within the Project will be required to comply with the Ignition-resistant construction requirements of Chapter 7A of the Building Code. All streets and gates within the project site would be designed in accordance with the DSFPD’s road standards and the County Consolidated Fire Code and Private Road Standards complying with travel lane width, grade, surface, radius, and other requirements except for the exceptions requested for design speed. In addition a number of options to meet the County’s Travel Time standards are provided in the Capabilities Assessment.</p>

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Policy S-3.2	Development in Hillsides and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.	Consistent. The project’s fuel modification treatments, fire protection features, landscaping, and the use of ignition resistive building construction standards, take into account slopes and other topography. For example, FPP Section 4.5.1.5 provides that groups of trees must be separated horizontally by at least 10 feet, if planted on less than 20 percent slope, and 20 feet, if planted on greater than 20 percent slope. Section 4.5.1.14 requires the distance between mature tree canopies to be based upon the percentage of slope. Section 4.7.1 contains setback requirements measured from the slope to the farthest projection of a roof.
Policy S-3.3	Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development	Consistent. Access points to pockets of islands of open space/flammable vegetation, as shown in the appendix of the FPP, would be provided for fire and emergency service apparatus. The use of a compact development footprint combined with an emphasis on offsite mitigation in a regional preserve allows for areas of natural vegetation to be minimized.
Policy S-3.4	Service Availability. Plan for development where fire and emergency services are available or planned.	Consistent. The Project is located within the DSFPD. There are four fire stations located within the DSFPD. Miller Station is the closest fire station, located adjacent to the development and approximately 2.3 miles from the furthest structure when the development is fully constructed. DSFPD would have the capacity to respond to expected calls from the proposed Lilac Hills Ranch project (Dudek and Hunt Capabilities Report 2015).
Policy S-3.5	Access Roads. Require development to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently.	Consistent. There will be two public access points on the northwest corner of the project and one in the northeast area, both off West Lilac Road that would provide access to Phase 1. The additional phases of the development would include access via Covey Lane and an additional gated emergency ingress/egress via Mountain Ridge Road and Rodriquez Road. Mountain Ridge Road is accessed from Circle R Road, and Rodriquez Road is accessed via Covey Lane. All streets and gates within the project site would be designed in accordance with the DSFPD’s road standards and the County Consolidated Fire Code complying with travel lane width, grade, surface, radius, and other requirements.

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Policy S-3.6	Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.	Consistent. A Fire Protection Plan for Lilac Hills Ranch was prepared in accordance with DSFPD Ordinance No. 2010-01 (“District Standards”) and the County guidelines and referenced material in the 2011 Consolidated Fire Code, Guidelines for Determining Significance (See Appendix J to the EIR). The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard. The wildfire threat will be mitigated to less than significant by the incorporation of the following Project design features: FMZs; the use of ignition resistant building materials; fire and building code guidance for the protection of non-residential structures; the provision of fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. In addition, mitigation measure M- HZ-1 provides alternative measures to achieve the same level of protection from potential wildfires, when the 100 foot FMZ cannot be met on-site. All structures within the Project will be required to comply with the Ignition-resistant construction requirements of Chapter 7A of the Building Code. All streets and gates within the project site would be designed in accordance with the DSFPD’s standards and the County Consolidated Fire Code complying with travel lane width, grade, surface, radius, and other requirements. In addition a number of options to meet the County’s Travel Time standards are provided, as identified in the Capabilities Assessment.
Policy S-3.7	Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire threat areas.	Consistent. All structures within the Project will be required to comply with the Ignition-resistant construction requirements of Chapter 7A of the Building Code.
Goal S-4	Managed Fuel Loads. Managed fuel loads, including ornamental and combustible vegetation	
Policy S-4.1	Fuel Management Programs. Support programs consistent with state law, that require fuel management/modification within established defensible space boundaries when strategic fuel modification is necessary outside of defensible space,	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent to support programs that implement other policies set forth throughout the General Plan. However, the Project generally includes a minimum Fuel Management Zone of 100

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	balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.	foot throughout the project in accordance with the County Consolidated Fire Code. As shown in the Fire Protection Plan, some Fuel Management Zones may be reduced, pursuant to Fire District Approval, due to the fact that the adjacent areas are irrigated agriculture. Additional clearance may be required as necessary depending on specific conditions on the site. Typically, the area 50 feet from the edge of all structures in the development would be cleared of all vegetation that is not fire resistant and re-planted with irrigated fire-resistant landscaping. In the area between 50 to 100 feet from the edge of structure, all dead and dying vegetation shall be removed. Where native vegetation does exist adjacent to this zone (50 to 100 feet), native vegetation may remain provided that the vegetation is modified so that combustible vegetation does not occupy more than 50 percent of the square footage of this area. Even with the implementation of such measures, indirect impacts to riparian habitat and sensitive natural communities within the Project are less than significant.
Policy S-4.2	Coordination to Minimize fuel Management Impacts. Consider comments from CAL FIRE, U.S. Forest Service, local fire districts, and wildfire agencies for recommendations regarding mitigation for impacts to habitat and species into fuel management projects.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent to support programs that implement other policies set forth throughout the General Plan. However, the project would comply with the RPO, NCCP, federal ESA and California Endangered Species Act, , MBTA, and Bald and Golden Eagle Protection Act.
Policy S-4.3	Forest Health. Encourage the protection of woodlands, forests, and tree resources and limit fire threat through appropriate fuel management such as removal of dead, dying and diseased trees.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County's intent to support programs that implement other policies set forth throughout the General Plan.
Goal S-5	Regional Fire Protection. Regional coordination among fire protection agencies.	
Policy S-5.1	Regional Coordination Support. Advocate and support regional coordination among fire protection and emergency service providers.	Consistent. As discussed in the EIR, fire service to the site would meet the County's travel time requirements with the implementation of any of the four options identified in the EIR and Capabilities Assessment. See, Global Response to Comments: Fire and Emergency Services.

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Policy S-5.2	Fire Service Provider Agreements. Encourage agreements between fire service providers to improve fire protection and to maximize service levels in a fair, efficient, and cost effective manner.	Consistent. As discussed in the EIR, fire service to the site would meet the County's travel time requirements with the implementation of any of the four options identified in the EIR and Capabilities Assessment. See Global Response to Comments: Fire and Emergency Services.
Policy S-5.3	Reassessment of Fire Hazards. Coordinate with fire protection and emergency service providers to reassess fire hazards after wildfire events to adjust fire prevention and suppression needs, as necessary, commensurate for both short and long term fire prevention needs.	Not applicable. The policy establishes the County's intent to coordinate with regional fire protection agencies. The proposed Project would not impede the County's achievement of this intent.
Goal S-6	Adequate Fire and Medical Services. Adequate Levels of fire and emergency medical services (EMS) in the unincorporated County	
Policy S-6.1	Water Supply. Ensure that water supply systems for development are adequate to combat structural and wildland fires.	Consistent. The VCMWD will provide water service to the project. This water supply and pressure meets the requirements of the County Consolidated Fire Code and County of San Diego Fire Code.
Policy S-6.2	Coordinate with fire services providers to improve fire protection services for multi-story construction.	Consistent. The County and applicant have coordinated with the DSFPD to ensure structural fire protection can be provided to all buildings in the project. Building heights are limited to three stories with a maximum height of 35 feet, as set forth in the Specific Plan. Emergency vehicle turnarounds for aerial ladder trucks are provided to accommodate fire vehicles needed to provide fire service to multiple story structures.
Policy S-6.3	Funding Fire Protection Services. Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.	Consistent. The Project is required to pay fees in accordance with the Fire Mitigation Fee Ordinance, adopted by the County and DSFPD to collect fees from new projects. See, Global response to Comments: Fire and Emergency Services.
Policy S-6.4	Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).	Consistent. The "closest" fire station to Lilac Hills Ranch is CAL FIRE's Miller Station located adjacent to the development and approximately 2.3 miles from the furthest structure when the development is fully constructed. Fire service to the site would meet the County's General Plan travel time requirement with the implementation of any of the four options identified in the EIR and Capabilities Assessment. See, Global response to Comments: Fire and Emergency Services.
Policy S-6.5	Concurrency of Fire Protection Services. Ensure that fire protection staffing, facilities and equipment required to serve	Consistent. Any of the four fire options identified in the EIR and Capabilities Assessment would ensure that fire protection staffing,

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	development are operating prior to, or in conjunction with, the development. Allow incremental growth to occur until a new facility can be supported by development	facilities and equipment are operating in conjunction with development.
Goal S-7	Reduced Seismic Hazards. Minimized personal injury and property damage resulting from seismic hazards.	
Policy S-7.1	Development Location. Locate development in areas where the risk to people or resources is minimized. In accordance with the California Department of Conservation Special Publication 42, require development be located a minimum of 50 feet from active or potentially active faults, unless an alternative setback distance is approved based on geologic analysis and feasible engineering design measures adequate to demonstrate that the fault rupture hazard would be avoided.	Consistent. As noted in the Geotechnical Report, (Appendix N-1 of the EIR) there are no active or potentially active faults on the property.
Policy S-7.2	Engineering Measures to Reduce Risk. Require all development to include engineering measures to reduce risk in accordance with the California Building Code, Uniform Building Code, and other seismic and geologic hazard safety standards, including design and construction standards that regulate land use in areas known to have or potentially have significant seismic and/or other geologic hazards.	Consistent. The Geotechnical Report, attached as Appendix N-1 to the Project's EIR, indicates that there are no significant seismic or other hazards on the property. The design of the project complies with all requirements of the California Building Code and Uniform Building Code.
Policy S-7.3	Land Use Location. Prohibit high occupancy uses, essential public facilities, and uses that permit significant amounts of hazardous materials within Alquist-Priolo and County special studies zones.	Not applicable. The property is not located within any Alquist-Priolo or County special study zone. See EIR Appendix N-1 and the geology portion of EIR Section 3.
Policy S-7.4	Unreinforced Masonry Structures. Require the retrofitting of unreinforced masonry structures to minimize damage in the event of seismic or geologic hazards.	Not applicable. The project does not include any unreinforced masonry structures.
Policy S-7.5	Retrofitting of Essential Facilities. Seismic retrofit essential facilities to minimize damage in the event of seismic or geologic hazards.	Not applicable. The project does not include the use of any existing essential facilities that would need to be retrofitted.

GENERAL PLAN SAFETY ELEMENT		
Policy Number	Policy Text	Consistency Analysis
Goal S-8	Reduce Landslide, Mudslide, and Rock Fall Hazards.	
Policy S-8.1	Landslide Risks. Direct development away from areas with high landslide, mudslide, or rock fall potential when engineering solutions have been determined by the County to be infeasible.	Consistent. The project site and off-site improvement areas are not within or adjacent to a “Landslide Susceptibility Area,” as designated by the County’s Multi-jurisdictional Hazard Mitigation Plan (County of San Diego 2010d). The majority of the project site and off-site improvement areas are not considered susceptible to mass sliding. No evidence of past landslides or debris flows have been mapped within the project site or off-site improvement areas. The potential for rock fall is considered to be very low given the lack of rock outcrops within the proposed limits of the development and off-site improvement areas. The potential for seismically induced landslides on engineered fill slopes is considered to be very low. Likewise, the potential for seismically induced landslides on cut slopes excavated in the granitic rock, or on the remaining shallow natural slopes, is considered to be very low. Overall, impacts associated with landslides would be less than significant.
Policy S-8.2	Risk of Slope Instability. Prohibit development from causing or contributing to slope instability.	Consistent. All slopes have been designed using accepted engineering design practices and evaluated in the Geotechnical Report (Appendix N-1) as being “grossly stable”. The project will not contribute to slope instability.
Goal S-9	Protection of Life and Property. Minimized personal injury and property damage losses resulting from flood event.	
Policy S-9.1	Floodplain Maps. Manage development based on federal floodplain maps. County maps shall also be referred to and in case of conflict(s) between the County flood plain maps and the federal flood plain maps, the more stringent of restrictions shall apply.	Not applicable. This policy is not subject to project-specific application, but rather memorializes the County’s intent to support programs that implement other policies set forth throughout the General Plan.
Policy S-9.2	Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.	Not applicable. The project site is not within a mapped flood hazard area. Therefore, development of the project would not result in the placement of housing within a flood hazard area. Project impacts associated with placing housing in a flood hazard area would be less than significant.

GENERAL PLAN SAFETY ELEMENT		
Policy Number	Policy Text	Consistency Analysis
Policy S-9.3	Development in Flood Hazard Areas. Require development within mapped flood hazard areas be sited and designed to minimize on and off-site hazards to health, safety and property due to flooding.	Not applicable. The project site is not located within a mapped floodplain or within a County Dam Inundation Zone.
Policy S-9.4	Development in Villages. Allow new uses and development within the flood plain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a flood plain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.	Not applicable. The project site is not located within a mapped floodplain, floodplain fringe or within a County Dam Inundation Zone.
Policy S-9.5	Development in the Floodplain Fringe.	Not applicable. The project site is not located within a mapped floodplain or within a County Dam Inundation Zone.
Policy S-9.6	Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.	Not applicable. The project site is not located within a County Dam Inundation Zone.
Goal S-10	Floodway and Floodplain Capacity. Floodways and floodplains that have acceptable capacity to accommodate flood events	
Policy S-10.1	Limiting Land Uses Within Floodways. Limit new or expanded land uses within floodways to agriculture, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. this policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure. Support this goal by limiting new or expanded land uses within floodways.	Not applicable. The project site is not located within a mapped floodplain or within a County Dam Inundation Zone.

GENERAL PLAN SAFETY ELEMENT		
Policy Number	Policy Text	Consistency Analysis
Policy S-10.2	Use of Natural Channels. Require the use of natural channels for County flood control facilities except where necessary to protect existing structures from a current flooding problem and where natural channel use is deemed infeasible. The alternative must achieve the same level of biological and other environmental protection, such as water quality, hydrology, and public safety.	Not applicable. This policy applies to County flood control facilities. There are no such facilities on the property and none are proposed. There are no mapped floodways or floodplains on the property.
Policy S-10.3	Flood Control Facilities. Require flood control facilities to be adequately sized, constructed, and maintained to operate effectively.	Consistent. All of the Project's storm drain and drainage channels, as shown on the Tentative Map, are designed to County standards.
Policy S-10.4	Stormwater Management. Require development to incorporate low impact design, hydromodification management, and other measures to minimize stormwater impacts on drainage and flood control facilities.	Consistent. The Project's Stormwater Management Plan, attached as Appendix U-1 to the EIR, includes low impact design and other measures to minimize stormwater impacts to existing drainage systems.
Policy S-10.5	Development Site Improvements. Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.	Consistent. The Project's onsite stormwater drain system is designed to meet all County requirements. The onsite storm drain system will collect runoff within a sub-basin and convey it to an appropriately sized detention facility. Stormwater runoff will be released at a rate equal to the existing condition.
Policy S-10.6	Stormwater Hydrology. Ensure development avoids diverting drainages, increasing velocities, and altering flow rates to off-site areas to minimize adverse impacts to the area's existing hydrology.	Consistent. The project would not divert stormwater runoff. Runoff from each sub-basin would be collected in a detention basin and released into existing channels. Stormwater would be released at a rate similar to the existing condition. The overall runoff pattern is not altered.
Goal S-11	Floodway and Floodplain Capacity. Floodways and floodplains that have acceptable capacity to accommodate flood events	
Policy S-11.1	Land use location. Require that land uses involving the storage, transfer or processing of hazardous materials be located and designed to minimize risk and comply with all applicable hazardous materials regulations.	Consistent. A Water Reclamation Facility is proposed on-site which has the potential to handle regulated substances. As shown in Figure 1-4 (Specific Plan Map), the on-site WRF shall be located a minimum of 250 feet from any residence, and a risk management plan would be required for the facility. CalARP requires that the Risk Management Plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan prior to the issuance of a building permit for the facility. A MUP will be required for the WRF and is being processed

GENERAL PLAN SAFETY ELEMENT		
Policy Number	Policy Text	Consistency Analysis
		concurrent with the Specific Plan. Based on conformance with the described requirements for hazardous materials, the project would result in a less than significant impact related to the use of hazardous substances.
Policy S-11.2	Use of Natural Channels. Require the use of natural channels for County flood control facilities except where necessary to protect existing structures from a current flooding problem and where natural channel use is deemed infeasible. The alternative must achieve the same level of biological and other environmental protection, such as water quality, hydrology, and public safety.	Not applicable. This policy applies to County flood control facilities. There are no such facilities on the property nor will any be built.
Policy S-11.3	Hazards-Sensitive Uses. Require that land uses, using hazardous materials be located and designed to ensure sensitive uses such as schools, hospitals, day care centers and residential neighborhoods are protected. Similarly, avoid locating sensitive uses near established hazardous material users or High Impact industrial areas where incompatibilities would result.	Consistent. As shown in Figure 1-4 (Specific Plan Map), the on-site WRF shall be located a minimum of 250 feet from any residence, and a risk management plan would be required for the facility. This would assure safety measures, as discussed in the RMP, are in place. In addition, the on-site WRF would be located 0.13 miles or within one-quarter mile of the school site. Where such facilities are present within one-quarter mile of a proposed school site, the local education agency is required to evaluate the site for consideration of such hazards. The Education Code establishes requirements for assessments and approvals before the local education agency can receive final site approval and funds under the School Facilities Program, from the Department of Education. Therefore, based on conformance with the described requirements for hazardous materials, the project would result in a less than significant impact related to the location of the proposed school site.
Policy S-11.4	Contaminated Lands. Require areas of known or suspected contamination to be assessed prior to reuse. The reuse shall be in a manner that is compatible with the nature of the contamination and subsequent remediation efforts.	Consistent. Phase I Environmental Site Assessments (ESAs) were prepared for the project site, along with off-site improvement areas. There are several small areas, identified in the ESAs prepared for the project that identified small quantities of pesticides that will be disposed of during grading activities. With respect to agricultural activities and the past application of fertilizers, herbicides and pesticides, Section 2.7.2.2 of the Project EIR describes the process for handling any contaminated soils. Although legally applied pesticides, and the resulting residues in the soil

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Policy Number	Policy Text	Consistency Analysis
		are not regulated as hazardous waste, prior to issuance of a building permit, the impacted soils would be excavated and disposed of off- site, and confirmation samples would be collected to verify removal. Therefore, compliance with existing regulations would ensure that impacts associated with contaminated soils would be less than significant.
Policy 11.5	Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.	Not applicable. A General Plan Amendment to designate the property as “Village” is proposed. Upon approval of the General Plan amendment, this policy will not be applicable. However, as discussed in the agricultural resources technical report (EIR Appendix F) mitigation measures are proposed to ensure that significant impacts to adjacent off-site existing agricultural operations do not occur. These measures include the use of agricultural buffers on- site to separate the proposed uses from the off-site agriculture. Moreover, the Specific Plan will specifically prohibit interim on-site agricultural operations from applying pesticides.
Goal S-12	Adequate Law Enforcement Facilities. Timely development of law enforcement facilities in locations that serve the unincorporated areas of the County.	
Policy S-12.1	New Law Enforcement Facilities. Coordinate new law enforcement facilities and services with new development in ways that sustain the provision of comprehensive services at levels consistent with substantially similar areas of the County.	Consistent. No new facilities are required to provide law enforcement services to Lilac Hills Ranch.
Goal S-13	Safe Communities. Law enforcement facilities and services that help maintain safe communities.	
Policy S-13.1	Sheriff Facility locations. Locate Sheriff facilities to best serve existing and planned development and the corresponding demand for services.	Not applicable. No new facilities are required to provide law enforcement services to Lilac Hills Ranch.

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Policy S-13.2	Sheriff facilities in Non-Residential Areas. Locate future Sheriff facilities in commercial, industrial, or mixed use areas, they may also be located within residential areas when other sites are unavailable or unsuitable based on circulation geography, proximity to demand and other factors that impact the practical provision services.	Not applicable. No new facilities are required to provide law enforcement services to Lilac Hills Ranch.
Goal S-14	Crime Prevention. Crime prevention through building and site design.	
Policy S-14.1	Vehicular Access to Development. Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.	Consistent. There will be two public access points on the northwest corner of the project and one in the northeast area, both off West Lilac Road. Future phases of development will include an access point via Covey Lane and an additional gated emergency ingress/egress via Mountain Ridge Road and Rodriquez Road. Mountain Ridge Road is accessed from Circle R Road, and Rodriquez Road is accessed via Covey Lane. All streets and gates within the project site would be designed in accordance with the County Consolidated Fire Code and Private Road Standards complying with travel lane width, grade, surface, radius, and other requirements.
Policy S-14.2	Development Safety Techniques. Require development within Village areas to utilize planning and design techniques, as appropriate, that deter crime.	Consistent. The project’s design includes techniques to enhance public safety including placing higher density housing around public spaces and locating trails adjacent to housing so that the trails are visible from homes in the area. Roads are designed to slow traffic. Lighting, while using techniques to reduce glare and “spillover” onto adjacent property, will illuminate public spaces to a level considered adequate for safety.

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Policy Number	Policy Text	Consistency Analysis
Goal LU-1	Primacy of the Land Use Element. A land use plan and development doctrine that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories	
Policy 1.1	Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.	Consistent. This project proposes to amend the General Plan Regional Category to re- designate the entire project site as Village (as shown in Figure 1-1 of the Project’s EIR). The project proposes development that is consistent with the Community Development Model See Attachment “A” – LU-1.2 Analysis.

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Policy Number	Policy Text	Consistency Analysis
Policy 1.2	Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries.	Consistent. . See Attachment “A” – LU-1-2 Analysis With respect to the project being inside established water and sewer service boundaries, please see response to comments C1c-96 and 97.
Policy 1.3	Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.	Consistent. The designation of the Project as a Village will establish a community consistent with the Community Development Model and General Plan policies. By providing housing opportunities consistent with the Community Development Model, the surrounding semi-rural and rural lands will be preserved.
Policy 1.4	Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing planned Village and where all of the following criteria are met: Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding Potential Village development would be accommodated by the General Plan road network Public facilities and services can support the expansion without a reduction of services to other County residents The expansion is consistent with community character, the scale, and the orderly contiguous growth of a Village area	Not applicable. This policy applies to the expansion of existing or planned villages by allowing contiguous land to be re-designated “Village” under the circumstances outlined in the policy. It does not address the development of a new village. Lilac Hills Ranch is considered a new village consistent with the Community Development Model.
Policy 1.5	Relationship of County Land Use Designation with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdiction as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent	Not applicable. The land use designation being requested for the project is based upon the Community Development Model because of an adjacent jurisdiction.

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	cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.	
Policy 1.6	Conversion of Public Land to Private Ownership. Assign lands in public use an underlying designation of Rural Lands 80. When such lands are transferred to private ownership, the RL-80 designation shall apply until the appropriate long-term use of the property is determined and a general plan amendment is approved for redesignation of the property.	Not applicable. The project site is under private ownership.
Policy 1.7	Maximum Residential Densities. Determine the maximum number of dwelling units permitted within the boundaries of any subdivision or single lot based on the applicable land use designation(s). When the total number of dwelling units is less than one, this shall be interpreted as permitting one dwelling unit. When more than one dwelling unit is permitted, fractional dwelling units are rounded down to the nearest whole number of dwelling units.	Consistent. The Lilac Hills Ranch General Plan Amendment is requesting a land use designation of Village Residential and Village Core mixed Use, which will be implemented by a Specific Plan, rezoning and subsequent tentative maps, all of which will be consistent with the land use designation being provided by the GPA.
Policy 1.8	Density Allocation on Project Sites. Permit changes in density within a project site with parcels that have more than one land use designation to provide flexibility in project design only when approved by Major Use Permit or Specific Plan. The policy does not allow a project to receive more units than is established by the Land Use Maps nor to supersede Housing Element requirements related to achieving the County's Regional Housing Needs Allocation.	Consistent. The Lilac Hills Ranch General Plan Amendment (implemented by the Specific Plan) proposes a density entitlement which equates to a maximum of 1,746 residential units at build out. The GPA application proposes two land use designations; Village Residential (VR 2.9) and Village Core Mixed Use (C-5) (See EIR Section 1, Project Description).
Policy 1.9	Achievement of planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.	Consistent. Subdivision maps for the project will be consistent with the densities provided by the land use designations of Village Residential (VR 2.9) and Village Core Mixed Use (C-5) proposed by the GPA.

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Policy Number	Policy Text	Consistency Analysis
Goal LU-2	Maintenance of the County's Rural Character. Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.	
Policy 2.1	Community Plans. Maintain updated Community Plans, as part of the General Plan to guide development to reflect the character and vision for each individual unincorporated community, consistent with the General Plan.	Consistent. This policy reflects direction by the County to maintain community plans. The proposed Project would not impede the County's achievement of this policy.
Policy 2.2	Relationship of Community Plans to the General Plan. Community Plans are part of the General Plan. These plans focus on a particular region or community within the overall General Plan area. They are meant to refine the policies of the General Plan as they apply to a smaller geographic region and provide a forum for resolving local conflicts. As legally required by State law, Community Plans must be internally consistent with General Plan goals and policies of which they are a part. They cannot undermine the policies of the General Plan. Community Plans are subject to adoption, review and amendment by the Board of Supervisors in the same manner as the General Plan.	Consistent. General Plan Policy LU-2.2 provides that community plans must be internally consistent with General Plan goals and policies of which they are part. This means that community plans cannot be interpreted to undermine the policies of the General Plan. Likewise, Specific Plans implement the General Plan, and by default the community plans, and so also cannot be interpreted to undermine the policies of the General Plan. Occasionally, gaps or lack of specificity in development and design standards in the General Plan or Community Plan texts will be addressed, in a manner that does not conflict with other Plans, through the project-specific refinements to standards that are contained in the Specific Plan.
Policy -2.3	Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.	Consistent. This project proposes to amend the General Plan Regional Land Use Map to re- designate the entire project site as Village consistent with the Community Development Model. Land use densities will be assigned based upon this Village designation. In addition the project proposes to modify the text of both community plans by adding Lilac Hills Ranch as an additional Village. The project has been designed to be consistent with relevant community plan policies by incorporating the design principles set forth in both these community plans. For example, the Valley Center Community Plan requires "Rural Character" to be maintained in future developments by prohibiting monotonous tract developments and requiring site design that is consistent with the rural community character. The Specific Plan, Chapter 3 establishes design guidelines that will, among other things, establish transitions from adjacent residential and agricultural uses to the denser uses within the Town Center. Single family

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		attached units would all be located internally in the Town Center and Neighborhood Center. Project development along West Lilac Road, east of the western entrance, would consist of single- family detached homes on 100- foot wide lots. The wide spacing between these homes combined with the landscaping and multi- use trail on the south side of West Lilac Road provide a transition from the existing homes and users of West Lilac Road to the denser areas of the project. The project also incorporates various design features to reduce visual effects along the project perimeter. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes. Along the west side of the project, the large riparian woodland would be been preserved, providing separation from the project and existing homes. In areas adjacent to existing agriculture, a minimum 50 foot wide agricultural buffer planted with orchard trees will provide a transition from the project to the existing uses.
Policy- 2.4	Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.	Consistent. The project is located less than one half mile from the I-15 corridor. There are many approved Specific Plans along the I-15 corridor. A number of projects (Circle R, Hidden Meadows, Vista Valley, and Meadowood) include urban residential densities with multi-family homes at up to 25 units per acre. In addition, the project has been designed to be consistent with the character and development objectives of the surrounding communities by incorporating the design polices set forth in both the Valley Center and Bonsall Community plans. See discussion under Policy LU-2.3 for further explanation.
Policy- 2.5	Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.	Consistent. The project would provide open space, parks, trails, and other common areas that will reinforce its rural village identity. The project will provide 104.1 acres of open space for resource preservation and 25.3 acres of recreational open space (public and private parks and recreation etc.). Groves of orchard trees would be integrated throughout the project site and would be located within the HOA-maintained open space, such as manufactured slopes. Approximately 20 acres of common area would also be available for agriculture. Along the west side of the project, the large

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		<p>riparian woodland would be preserved, providing separation from the project and existing homes.</p> <p>In addition, a minimum 50-foot-wide agricultural buffer planted with orchard trees will provide a buffer and transition from the project to the existing off-site agricultural operations.</p>
Policy -2.6	Development near Neighboring Jurisdictions. Require that development in the proximity of neighboring jurisdictions retain the character of the unincorporated community and use buffers or other techniques where development in the neighboring jurisdiction incompatible.	Not applicable. The project is not located in close proximity to a neighboring jurisdiction.
Policy -2.7	Commercial Viability. Ensure that new commercial centers maintain or enhance the viability of existing commercial areas.	Consistent. There are no commercial uses within the immediate vicinity of Lilac Hills Ranch. The commercial uses proposed within the project are designed to serve the needs of the residents and surrounding area and would not affect areas outside of the community.
Policy -2.8	Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.	Consistent. An EIR was prepared for the Project which includes mitigation measures whenever feasible for impacts resulting from the Project. In particular with the issue of noise vibrations, dust, and aesthetics the following has been identified: The implementation of mitigation measure M-AQ-2 through M-AQ-5, would reduce impacts related to dust, to less than significant. Mitigation measures (M-N-11) and (M-N-12) would reduce groundborne vibration impacts to less than significant. Mitigation measures (M-N-1 and M-N-2) would require analysis of noise compatibility at the time sufficient detail is available, to determine appropriate site specific mitigation, which will reduce noise impacts to less than significant. However, a significant noise increase would occur along Covey Land and future Lilac Hills Ranch, impacting existing off-site NSLUs (Impact N-3). No feasible mitigation measures exist, and therefore, these off-site impacts are considered significant and unavoidable direct and cumulatively considerable impacts of the project. Other noise impacts (Impacts N-4 through N-8, and N-9 and N-10) would be reduced to less than significant by mitigation measures M-N-3 through

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		<p>M-N-7. As the location of rock crushing activities has not been identified, rock crushing activities could exceed the County construction noise level limits and is considered a significant impact (Impact N-13). Impacts associated with rock crushing activities would be mitigated with the incorporation of M-N-10. The project would change the composition of the visual environment and continuity and would replace the existing views of domestic and grove vegetation along approximately 0.6 mile of West Lilac Road and within areas viewed by local residences (Impacts V-1 and V-2). The project includes implementation of architectural measures and a detailed landscape plan, included in the project's Specific plan, which are intended to reduce the visual impacts associated with such changes. However, mitigation measure M-V-1 is infeasible and impacts to existing views would remain significant and unavoidable. Short-term construction activities, would contrast with the existing visual character which would be significant (Impact V-3). Implementation of M-V-2 is infeasible. Therefore, short-term construction-related visual impacts would remain significant and unavoidable. The composition of the project viewshed would be adversely affected by physical changes introduced by the project along with projects within the cumulative project area. The changes associated with the cumulative projects within the viewshed would not be compatible with the existing visual character of the area (Impact V-4). While implementation of M-V-1 would reduce the project's contribution to the cumulative impact, this measure is infeasible and cumulative visual impacts would remain significant and unavoidable.</p>
Policy -2.9	Maintaining Rural Character. Consider level of service criteria, in accordance with Policy M-2.1, to determine whether adding lanes to a Mobility Element road would adversely impact the rural character of a community or cause significant environmental impacts. In those instances, consider other options to mitigate LOS where appropriate.	<p>Consistent. West Lilac Road is a Mobility Element road that is designed to accommodate travel from the Project to and from the adjacent public road system and other community planning areas. The project will have two permanent access points directly onto West Lilac Road. The project includes an amendment to the General Plan to change the Mobility Element designation for West Lilac Road from a Light Collector 2.2C to a Light Collector 2.2F from Main Street to Road 3 (Running Creek Road) to ensure</p>

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		that it remains compatible with the character of the area and minimizes impacts on adjacent residences.
Goal LU-3	Diversity of Residential Neighborhoods. A land use plan that accommodated a range of building and neighborhood types suitable for a variety of lifestyles, ages, affordability levels, and design options.	
Policy -3.1	Diversity of Residential Designations and Building Types. Maintain a mixture of residential land use designations and development regulations that accommodate various building types and styles.	Consistent. Lilac Hills Ranch includes a large variety of housing types and residential land use designations. The Specific Plan provides for a variety of single family detached, single-family attached and mixed use development lot sizes, building types and densities. Section III of the Specific Plan illustrates the multitude of residential layouts that could be built along with tables showing general requirements for lot sizes along with required setbacks in various areas.
Policy- 3.2	Mix of Housing Units in Large Projects. Require new large residential developments (generally greater than 200 dwelling units) to integrate a range of housing types and lot and building sizes.	Consistent. See response above. The residential development proposed by the Lilac Hills Ranch Specific Plan provides a range of housing types to implement this policy.
Policy 3.3	Complete Neighborhoods. Require new development sufficiently large to establish a complete neighborhood (typically more than 1,000 dwelling units) to include a neighborhood center within easy walking distance of surrounding residences.	Consistent. Lilac Hills Ranch includes a Town Center complete with commercial and public uses that is within one-half mile of many of the project's residences. Two smaller neighborhood centers are located in the southern half of the project and provide neighborhood serving uses for the southern area of the project, providing necessary commercial services within one- half mile of residences.
Goal LU-4	Inter-jurisdictional Coordination. Coordination with the plans and activities of other agencies and tribal governments that relate to issues such as land use, community character, transportation, energy, other infrastructure, public safety, and resource conservation and management in the incorporated County and the region.	
Policy -4.1	Regional Planning.	Not applicable. The policy establishes the County's intent to coordinate with specified agencies. The project would not impede the County's achievement of its intent.
Policy -4.2	Review of Impacts of Projects in Adjoining Jurisdictions.	Not applicable. The policy establishes the County's intent to coordinate with specified agencies. The project would not impede the County's achievement of its intent.

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Policy -4.3	Relationship of Plans in Adjoining Jurisdictions.	Not applicable. The policy establishes the County's intent to coordinate with specified agencies. The project would not impede the County's achievement of its intent.
Policy-4.4	Development Compatibility with Military Facilities.	Not applicable. The policy establishes the County's intent to coordinate with specified agencies. The project would not impede the County's achievement of its intent.
Policy-4.5	Annexations with Incompatible Land Uses.	Not applicable. The policy establishes the County's intent to coordinate with specified agencies. The project would not impede the County's achievement of its intent.
Policy-4.6	Planning for Adequate Energy Facilities.	Not applicable. The policy establishes the County's intent to coordinate with specified agencies. The project would not impede the County's achievement of its intent.
Policy-4.7	Airport Land Use Compatibility Plans (ALUCP).	Not applicable. The policy establishes the County's intent to coordinate with specified agencies. The project would not impede the County's achievement of its intent.
Goal LU-5	Climate Change and Land Use. A land use plan and associated development techniques and patterns that reduce emissions of local greenhouse gases in accordance with state initiatives, while promoting public health.	
Policy 5.1	Reduction of Vehicle Trips within Communities. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that support multi-modal transportation, including walking, bicycling, and the use of public transit, when appropriate	<p>Consistent. Lilac Hills Ranch is consistent with the Community Development Model in that it locates a mixture of uses in a Town Center, consisting of commercial uses, office uses, a farmers' market, and single- family attached uses. A second node of development is located a short distance away with commercial, school, park, private recreation center uses, a fire station site and single family attached homes. The third node of intensity is located in the Senior Community. The Town Center and Neighborhood Centers are surrounded by single family homes on lots of varying sizes. This forms the Village, along with open space and an extensive trail system. The Town Center and two Neighborhood Centers ensure that services are available to all residents within a ten minute (1/2 mile) walk and will provide job opportunities.</p> <p>The Project is a compact walkable community providing neighborhood serving commercial uses within one-half mile of all residents. (See, Global</p>

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		<p>Response to Comments: Project Consistency with General Plan Policy LU-1.2.)</p> <p>The average trip length for people in this project will be 7.6 to 8.25 miles. (Chen Ryan 2015-TIS) The average trip length throughout the entire community planning area is 8.25 miles. When the project is combined with the community planning area, the average trip length is reduced to 8.17 due to the inclusion of local services in closer proximity than existing.</p> <p>The actual trip distances calculated by CalEEMod vary by land use type. For purposes of the proposed project, the following trip distances were generated by CalEEMod for utilization in computing the project’s GHG emissions:</p> <ul style="list-style-type: none"> • Home-to-work trip length: 16.8 miles • Home-to-shopping trip length: 7.1 miles • Home-to-shopping trip length: 7.9 miles • Commercial-to-commercial trip length: 6.6 miles • Commercial-to-work trip length: 14.7 miles • Commercial-to-non-work trip length: 6.6 miles <p>[See EIR, Appendix O [GHG technical report], and Section 11.0 [Section 4, Project with Design Features GHG Emissions Calculations, 4.0 Mobile Detail, Trip Type Information].) As demonstrated by these data points, particularly the home-to-work trip length, the CalEEMod assumptions are consistent with the distance from the project site to employment centers in the San Diego region.</p> <p>As stated, with the development of the proposed project, trip lengths within the Valley Center Community are projected to be reduced by 0.08 to 0.09 miles. Table 4.12 of the TIS, Appendix “E” to the EIR, provides information on the overall reduction of vehicle miles traveled (VMT). Moreover, an extensive network of trails is provided to further encourage residents to walk and bike throughout the community.</p>

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Policy 5.2	Sustainable Planning and Design. Incorporate into new development sustainable planning and design.	<p>Consistent. Lilac Hills Ranch is designed in accordance with sustainable community principles, such as pedestrian orientation, mixed-use land uses, efficient building design, and recycling of water and waste, preserves the more sensitive wetlands while developing less sensitive upland areas where no significant populations of native species have been located. Conservation of upland habitat offsite in areas conceptually planned as a regional preserve will ensure that the natural environment is preserved in an interconnected preserve system while ensuring that development is done in a sustainable, consolidated manner, minimizing habitat fragmentation. The project is designed to be a compact walkable community.</p> <p>All residential development is located within a short walking distance (1/2 mile, ten minutes) of shopping, offices, schools or parks, allowing residents to walk and bike within the community.</p> <p>Drought tolerant landscaping will be required and use of recycled water and limited use of groundwater will occur in all common areas. Finally, a RF will be located within the project site that would encourage recycling.</p>
Policy- 5.3	Rural Land Preservation. Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations.	<p>Not applicable. Lilac Hills Ranch is requesting a General Plan Amendment approval of which would result in a change in Land Use Designation from Semi-Rural to Village.</p>
Policy 5.4	Planning Support. Undertake planning efforts that promote infill and redevelopment of uses that accommodate walking and biking within communities.	<p>Not applicable.</p>

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Policy 5.5	Projects that Impede Non-Motorized Travel. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented.	Consistent. Lilac Hills Ranch will provide two east-west linkages to the County Master Trails program access to which will be integrated into the extensive public on-site pedestrian and bike system. In addition, the Specific Plan provides for over 16 miles of Community trails which are available for public use. The design of the project encourages the use of bicycles and walking within a compact village and implements this policy.
Goal LU-6	Development-Environmental Balance. A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.	
Policy 6.1	Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.	Consistent. The project will protect 104.1 acres of sensitive biological resources (one-sixth of the entire project site). Approximately 35-acres of sensitive wetland areas will be preserved and maintained in perpetuity along the western boundary of the project and within the development. The few areas of disturbed wetlands will be restored, enhanced and appropriate mitigations provided. Implementation of the project will ensure the conservation of significant resources onsite and the implementation of this policy. See also EIR, Section 2.5, Biology; EIR, Table S-1, Biological Mitigation Measures, M-BIO-2 (Resource Management Plan for riparian and sensitive natural communities); M-BIO-3 (wetland mitigation per County regulations).
Policy 6.2	Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.	Consistent. The most sensitive areas, the wetlands, have largely been preserved and will have conservation easements recorded over them. Lilac Hills Ranch has been designed to cluster land uses in the least sensitive areas of the property into areas with upland vegetation types. Areas in which significant cultural resources have been located would also be located within open space.

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Policy -6.3	Conservation-Oriented Project Design. Support conservation-oriented project design. This can be achieved with mechanisms such as, but not limited to, Specific Plans, lot area averaging, and reductions in lot size with corresponding requirements for preserved open space (Planned Residential Developments). Projects that rely on lot size reductions should incorporate specific design techniques, perimeter lot sizes, or buffers, to achieve compatibility with community character.	Consistent. The Project is consistent with the Community Development Model and is implemented by the Lilac Hills Ranch Specific Plan. The project is designed by creating a compact development footprint in an area with few on-site sensitive resources. Conservation of sensitive resources in a regional interconnected preserve system will be maximized by providing mitigation that contributes significant resources to the draft North County MSCP. The project will protect 104.1 acres of sensitive biological resources (one-sixth of the entire project site). Approximately 35-acres of sensitive wetland areas will be preserved and maintained in perpetuity along the western boundary of the project and within the development. The project also incorporates various design features to reduce visual effects along the project perimeter and to achieve compatibility with the community. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes. Along the west side of the project, the large riparian woodland would be preserved, providing separation from the project and existing homes. In areas adjacent to existing agriculture, a 50 foot wide buffer planted with fruit trees will provide a transition from the project to the existing uses.
Policy -6.4	Sustainable Subdivision Design. Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increased fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and when appropriate, provide public amenities.	Consistent: The project is consistent with LU 6.4 in that the project has been planned to conserve open space and natural resources, protect agricultural operations (Please refer to response to comment C1e-60) As discussed in EIR subchapter 2.4, the project requires the implementation of mitigation measures to ensure both the safety of on-site residents from adjacent agricultural operations, as well preserve the integrity of those off-site operations from on-site land uses. Development in accordance with the Fire Protection Plan will ensure safety for residents. See, Global Response to Comments, Fire and Emergency Services. In addition, the project is designed in accordance with General Plan Policy LU-1.2, which addresses sustainable development practices, low-impact development, reduced impervious footprints, location and agriculture. See Global Response to Comments, Project Consistency with General Plan Policy LU-1.2.

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Policy -6.5	Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.	Consistent. Specific project features that implement this policy are included in the project design. These include the features identified in the Major SWMP, Drainage Study, and HMP and detailed in Appendices U-1, U-2 and U-3, respectively. The Drainage Study, Major SWMP and HMP concluded that the incorporation of the requisite LIDs, BMPs and hydromodification design features including detention basins would reduce impacts associated with excessive erosion or siltation, and flooding, on- or off-site flooding to less than significant. The future use of rainwater capturing and permeable pavers as design elements could provide alternative measures to the use of the proposed detention basins.
Policy-6.6	Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.	Consistent. The most recognizable and sensitive natural feature on the property are the drainages with their mature oak woodlands, almost all of which have been integrated into the preserved open space system of the project. Where disturbed, the mature oak woodlands have been enhanced and restored. In addition, 104.1 acres of sensitive RPO wetlands will be conserved in permanent open space.
Policy -6.7	Open Space Network. Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunity.	Consistent. Lilac Hills Ranch is not located within any proposed regional preserve system. However, the project contains a significant drainage along the western boundary of the property that will be preserved within permanent open space. This area is adjacent to and drains into the proposed preserve envisioned in the Draft North County Multiple Species Conservation Program (NC MSCP). There are no regional wildlife corridors or core areas identified on the project site. Local movement is maintained through preservation of major drainage areas through the property in both north-south and east-west directions. Impacts to upland habitat will be mitigated offsite by preserving land located within the proposed PAMA contributing to the long-term sustainability of upland vegetation types including coastal sage scrub and chaparral. Landscaping within the project will not use invasive species as provided in the conceptual landscape plan and the Specific Plan. In keeping with the project objectives, Lilac Hills Ranch preserves the more sensitive wetlands while developing less sensitive upland areas where no significant populations of native species

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		<p>are located.</p> <p>Conservation of upland habitat offsite in areas conceptually planned as a regional preserve will ensure that the natural environment is preserved in an interconnected preserve system while ensuring that development is done in a sustainable, consolidated manner, minimizing habitat fragmentation. Lilac Hills Ranch will conserve 90-95% of onsite wetlands and restore degraded habitat in accordance with the Lilac Hills Ranch Resource Management Plan. Appropriate buffers are included in the project design.</p>
Policy-6.8	<p>Oversight of Open Space. Require that open space associated with future development that is intended to be preserved in perpetuity either be: 1) Retained in private ownership of the property owner or a third party with a restrictive easement that limits use of the land as appropriate; or Require that open space associated with future development that is intended to be preserved in perpetuity either be: 2) Transferred into public ownership of an agency that manages preserved open space. The owner of the open space will be responsible for the maintenance and any necessary management unless those responsibilities are delegated through an adopted plan or agreement. Restrictive easements shall be dedicated to the County or a public agency (approved by the County) with responsibilities that correspond with the purpose of the open space. When transferred to a third party or public agency, a funding mechanism to support the future maintenance and management of the property should be established to the satisfaction of the County.</p>	<p>Consistent. The open space areas will be set aside in accordance with County requirements. A Resource Management Plan has been prepared that will guide management in perpetuity (See EIR, Section 2.5-Biology and Appendix G to the EIR which includes the Resource Management Plan).</p>
Policy -6.9	<p>Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage</p>	<p>Consistent. The project is consistent with LU 6.9 in that grading in all phases, including off-site improvements would comply with the Landform Grading Guidelines contained in the Specific Plan, which will include the blending and rounding of slopes, roadways, and pads to reflect the existing surrounding</p>

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	and topography in conveying stormwater to the maximum extent practicable.	<p>contours by undulating slopes, replicating the natural terrain. Runoff is directed to existing drainages through appropriate mechanisms as discussed in the EIR, Chapter 3.0 and in Appendix U-1, 2, 3 relating to hydrology and storm water management to the maximum extent practicable. See also response to comment C1e-56.</p> <p>Grading for the project maintains the overall general contour of the property, requiring 2,300 cubic yards of grading per home (which would require a minor grading permit on an individual lot basis). This is consistent with projects of this size. 99.7% of all steep slopes are retained in open space and private roads are used that reduce grading by reducing the design speeds and overall development foot print, and following the contours of the property.</p>
Policy-6.10	Protection from Hazards. Require that development be located and designed to protect property and residents from the risk of natural and man-induced hazards.	Consistent. The wildfire threat will be mitigated to less than significant levels by the incorporation of the project design features identified in the FPP.
Policy -6.11	Protection from Wildfires and unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.	Consistent. The wildfire threat will be mitigated to less than significant levels by the incorporation of the project design features identified in the FPP. The FPP evaluated the level of potential fire hazard affecting or resulting from the proposed project and the methods and measures required to minimize that hazard. The Project design features include: FMZs; the use of ignition resistant building materials; fire and building code guidance for the protection of non-residential structures; the provision of fire apparatus, secondary emergency access roads, and adequate water supply for fire hydrants. In addition, Mitigation measure M- HZ-1 provides alternative measures to achieve the same level of protection from potential wildfires, when the 100 foot FMZ cannot be met.
Policy-6.12	Flooding. Document and annually review areas within floodways and 100 and 200-year floodplains to ensure areas subject to flooding are accurately mapped in accordance with AB 162.	Not applicable.

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Goal LU- 7		
Policy -7.1	Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.	Consistent. The General Plan is intended to reflect an "environmentally sustainable approach to planning that balances the need for adequate infrastructure, housing, and economic vitality, while maintaining and preserving each unique community within the County, agricultural areas, and extensive open space." Furthermore, the General Plan states that "the policies contained within this General Plan were written to be a clear statement of policy but also to allow flexibility when it comes to implementation. Policies cannot be applied independently; rather, implementation of the policies must be balanced with one another and will address details such as how and when the policy is applied and any relevant exceptions. For example, a policy to conserve open space is not a mandate for preservation of 100 percent of the existing undeveloped land in the County. It must be balanced with other polices that allow development and other uses of the land." (General Plan, p. 1-5.) Therefore, policy LU-7.1 should not be interpreted independently or as requiring the preservation of 100 percent of the agricultural land in the County. Rather, the policy should be balanced with other policies in the General Plan that allow for new growth and the establishment of new villages. In balancing this policy with other policies in the General Plan, the County may give more weight to the policies that allow new, well-designed development that complies with policies LU-1.2 Leapfrog Development, LU-3.1 Diversity of Residential Designations and Building Types, LU-3.2 Mix of Housing Units in Large Projects and LU-3.3 Complete Neighborhoods.
Policy-7.2	Parcel Size Reduction as Incentive for Agriculture. Allow for the reduction in lot size for compatible development when tracts of existing historically agricultural land are preserved in conservation easements for continued agricultural use.	Not applicable.

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Goal LU- 8	Aquifers and Groundwater Conservation. Sustainable aquifers and functional groundwater recharge areas.	
Policy 8.1	Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.	Consistent. The County manages anticipated future groundwater demand through its Groundwater Ordinance (County Code section 67.701 to 67.750). The project complies with the Groundwater Ordinance and other laws, including federal, state and local regulations that exist to ensure adequate water supplies are protected. Adherence to these laws and regulations would ensure that the project would not result in a demand for water that exceeds existing entitlements and resources, or necessitates new or expanded entitlements. Therefore, impacts associated with adequate water supplies or entitlements would be less than significant.
Policy-8.2	Groundwater Resources. Require development to identify adequate groundwater resources in groundwater dependent areas, as follows: in areas dependent on currently identified groundwater overdrafted basins, prohibit new development for exacerbating overdraft conditions. Encourage programs to alleviate overdraft conditions in Borrego Valley, in areas without current overdraft groundwater conditions, evaluate new groundwater dependent development to assure a sustainable long-term supply of groundwater is available that will not adversely impact existing groundwater users.	Consistent. With fifty-nine individual properties incorporated into the project, the property includes a number of existing wells. It has been determined through the Preliminary Hydrogeology Study, EIR Appendix P, that the project would comply with the Groundwater Ordinance and would not impact groundwater resources.
Policy -8.3	Groundwater-Dependent Habitat. Discourage development that would significantly draw down the groundwater table to the detriment of groundwater-dependent habitat.	Consistent. With fifty-nine individual properties incorporated into the project, the property includes a number of existing wells. It has been determined through the Preliminary Hydrogeology Study, EIR Appendix P, that the project would comply with the Groundwater Ordinance and would not impact groundwater resources.
Policy-8.4	Program for Borrego Valley Aquifer.	Not applicable.
Goal LU-9	Distinct Villages and Community Cores. Well-defined, well-planned, and well-developed community cores, such as Villages and Town Centers that contribute to a community's identity and character.	
Policy -9.1	Village and Community Core Planning. Encourage the delineation of and development of more detailed planning direction for the character, design, uses, densities and amenities of Village areas, Town Center and other community	Consistent. The Project will be implemented by a Specific Plan that provides detailed planning guidelines for the future development of the project. The Specific Plan includes detailed design guidelines regarding community development, the mix of land uses, lot sizes and architectural styles that will

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	cores in Community Plans to assist in the future planning of residences, infrastructure, businesses, and civic uses.	guide development of all aspects of the project.
Policy -9.2	Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations.	Consistent. The project is designed in accordance with sustainable community principles by consolidating development in less sensitive upland areas where no significant populations of native species have been located, allowing for the preservation of the more sensitive wetlands. In addition, the project has been designed to be consistent with relevant community plan policies by incorporating the design principles set forth in both the Valley Center and Bonsall community plans. The Project providing 104.1 acres of open space for resource preservation and 25.3 acres of recreational open space (public and private parks and recreation etc.). Groves of orchard trees could be integrated throughout the project site and could be located within the HOA- maintained open space, such as manufactured slopes. Approximately 20 acres of common area would be available for agriculture. Along the west side of the project, the large riparian woodland would be preserved, providing separation from the project and existing homes. In areas adjacent to existing off-site agricultural operations, a minimum 50 foot wide buffer planted with orchard trees would provide a transition from the project to the existing uses.
Policy -9.3	Village and Community Core Guidelines and Regulations. Support the development and implementation of design guidelines, Village-specific regulations for roads, parking, and noise, and other planning and regulatory mechanisms that recognize the unique operations and character of Villages, Town Centers, and transportation nodes. Ensure that new development is compatible with the overall scale and character of established neighborhoods.	Consistent. Section III of the Lilac Hills Ranch Specific Plan includes detailed design guidelines regarding community development, the mix of land uses, lot sizes and architectural styles that will guide development of all aspects of the project. These guidelines will ensure that development of each neighborhood is compatible with the overall scale and character of the established neighborhood. In addition, the design guidelines incorporate the design principles set forth in both the Valley Center and Bonsall community plans ensuring that the project will be compatible with the character of the established neighborhood.
Policy-9.4	Infrastructure Serving Villages and Community Cores. Prioritize infrastructure improvements and the provision of public facilities for Villages and community cores as sized for the intensity of development allowed by the Land Use Map.	Consistent. The provision of infrastructure will follow the phasing plan outlined in the Lilac Hills Ranch Specific Plan. This will ensure that adequate infrastructure is available to each phase of development at the appropriate time as required to implement this policy.

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Policy-9.5	Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.	<p>Consistent. Lilac Hills Ranch locates a mixture of uses in a Town Center, consisting of commercial uses, office uses, a farmers’ market, and single-family attached uses. A second node of development is located a short distance away with commercial, school, park, private recreation center uses, a fire station site and single family attached homes. The third node of intensity is located in the Senior Community. The Town Center and Neighborhood Centers are surrounded by single family homes on lots of varying sizes. This forms the Village, along with open space and an extensive trail system. The Town Center and two Neighborhood Centers ensure that services are available to all residents within a ten minute (1/2 mile) walk and will provide job opportunities.</p> <p>An extensive network of trails is provided to further encourage residents to walk and bike throughout the community</p>
Policy-9.6	Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.	<p>Consistent. The Town Center is located at the main intersection of Main Street and Lilac Hills Ranch Road in the north-central portion of the property as called for by this policy. This is the portion of the property that is easily accessible and is where a transit stop may be included in the future if the NCTD bus service is extended to this area. Neighborhood Centers are also located with other civic and commercial uses to enhance viability and ensure that they can be easily reached on foot or bike.</p>
Policy-9.7	Town Center Planning and Design. Plan and guide the development of Town Centers and transportation nodes as the major focal point and activity node for Village areas. Utilize design guidelines to be compatible with the unique character of a community. Roadways, streetscapes, building facades, landscaping, and signage within the town center should be pedestrian oriented. Wherever possible, locate public facilities, such as schools, libraries, community centers, and parks in Town Centers and Villages.	<p>Consistent. The Project proposes a General Plan Amendment that when adopted will establish a Village. The Specific Plan and Design Guidelines will implement the development of the Village. The Village includes a Town Center that will be the focus of the community. Commercial, office, civic and residential uses are included in the Town Center. South of this Town Center are two Neighborhood Centers that provide smaller opportunities for mixed use development, and also include a public park, school and private recreational areas. The Town Center and two Neighborhood Centers ensure that services are available to all residents within a ten minute (1/2 mile) walk and will provide job opportunities. An extensive network of trails is provided to further encourage residents to walk and bike throughout the</p>

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		community. In addition, the Design Guidelines will, among other things, establish transitions from adjacent residential and agricultural uses to the denser uses within the entire Village and will incorporate design principles that will be consistent with the surrounding communities.
Policy -9.8	Village Connectivity and Compatibility with Adjoining Areas. Require new development within Villages to include road networks, pedestrian routes, and amenities that create or maintain connectivity; and site, building, and landscape design that is compatible with surrounding areas.	Consistent. The Lilac Hills Ranch Specific Plan includes a road network, a comprehensive pedestrian network and public amenities together with detailed building and landscaping guidelines for their development that will create connectivity as required by this policy and ensure the creation of a cohesive village that is compatible with the surrounding area.
Policy -9.9	Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.	Consistent. This project proposes to amend the General Plan Regional Land Use Map to re- designate the project site as Village (as shown in Figure 1-1 of the Project's EIR) consistent with the Community Development Model. The approval of the proposed General Plan Amendment would specifically include the Project as an area for future growth. The Lilac Hills Ranch Specific Plan proposes a new Village which allows for a wide variety of housing types which will be provided in an efficient residential development pattern that creates new neighborhoods. The project is adjacent to a major freeway, provides all necessary infrastructure and is consistent with General Plan policies regarding sustainable development.
Policy -9.10	Internal Village Connectivity. Require that new development in Village areas are integrated with existing neighborhoods by providing connected and continuous street, pathway, and recreational open space networks, including pedestrian and bike paths.	Consistent. The Lilac Hills Ranch circulation network includes an interconnected network of private roads that provide multiple internal connections. Lilac Hills Ranch includes four connecting points to existing roads, ensuring that both local and surrounding residents have alternate routes. The project includes numerous trails, community pathways, bike lanes and similar facilities throughout the project site (See Figure 1-8 in the Project's EIR). The project would include two bike lanes on Main Street through the Town Center and a multi-surface trail that connects the Town Center to the Neighborhood Center.
Policy-9.11	Integration of Natural Features in Villages. Require the protection and integration of natural features, such as unique topography or streambeds, into Village projects.	Consistent. The natural drainage system is retained within the design of Lilac Hills Ranch. Several detention basins are incorporated throughout the project to ensure that most stormwater runoff percolates back into the groundwater that underlies the property. The project will also encourage

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		builders to achieve hydrologic invisibility through a combination of methods including architectural features, rain harvesting and use of loosened soil zones to maximize filtration. The most recognizable and sensitive natural features on the property are the drainages with their mature oak woodlands, almost all of which have been integrated into the preserved open space system of the project. Over 75% of the property is already disturbed. Of the 146 acres that is not disturbed, 104.1 acres will be conserved in permanent open space.
Policy-9.12	Achieving Planned Densities in Villages. In villages, encourage future residential development to achieve planned densities through multi-family, mixed use, and small-lot single-family projects that are compatible with the community character.	Consistent. Within the Village proposed for the Lilac Hills Ranch Specific Plan there are planned areas with a mix of uses that will include residential, commercial, office and civic uses accessible by walking or biking. There will be 164 single-family attached homes and 211 mixed-use units. Finally, age restricted housing supported by a senior center will ensure a range of housing types.
Goal LU-10	Function of Semi-Rural and Rural Lands. Semi-Rural and Rural Lands that buffer communities, protect natural resources, foster agriculture, and accommodate unique rural communities.	
Policy -10.1	Function of Semi-Rural and Rural Lands. Semi-Rural and Rural Lands that buffer communities, protect natural resources, foster agriculture, and accommodate unique rural communities.	Not applicable.
Policy-10.2	Development—Environmental Resource Relationship. Require development in Semi- Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.	Not applicable.
Policy -10.3	Development—Environmental Resource Relationship. Require development in Semi- Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.	Not applicable.
Policy-10.4	Development—Environmental Resource Relationship. Require development in Semi- Rural and Rural areas to respect and	Not applicable.

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	conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.	
Goal LU-11	Commercial, Office, and Industrial Development. Commercial, office, and industrial development that is appropriately sited and designed to enhance the unique character of each unincorporated community and to minimize vehicle trip lengths.	
Policy -11.1	Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.	Consistent. The Lilac Hills Ranch Town Center and two Neighborhood Centers include commercial uses which have been designed to provide high connectivity and accessibility from the surrounding residential neighborhoods. As can be seen on the Specific Plan land use map, these areas are connected to the rest of the community by a network of roads and bicycle and pedestrian trails.
Policy-11.2	Compatibility with Community Character. Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.	Consistent. The Lilac Hills Ranch Specific Plan contains detailed design guidelines that will ensure that the commercial uses are located, scaled and designed to be compatible with the surrounding neighborhoods and community. The commercial areas will also contain a “B” Special Area Regulation that requires Site Plan review pursuant to the Valley Center Design Guidelines.
Policy -11.3	Pedestrian-Oriented Commercial Centers. Encourage the development of commercial centers in compact, walkable configurations in Town Centers that locate parking in the rear or on the side of the parcel, use transparent storefronts with active retail street-fronting uses, minimize setbacks, and discourage “strip” commercial development. “Strip” commercial development consists of automobile-oriented commercial development with the buildings set back from the street to accommodate parking between the building and street.	Consistent. The Lilac Hills Ranch Specific Plan includes detailed design guidelines for commercial uses that will result in a compact, walkable configuration in the Town Center. The commercial will be designed as mixed-use and will oriented and close to Main Street. Commercial parking lots are located to the rear of the commercial structures and active retail uses are located facing the streets with zero lot lines. Together these design standards implement this policy.
Policy-11.4	Town Center Intensity and Vitality. Encourage the revitalization of Town Center areas to strength neighborhoods, expand local employment opportunities and establish or enhance a sense of place.	Not applicable. The Project proposes to establish a new village and town center.

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Policy-11.5	Large-Format Retail Stores. Allow large-format retail uses, typically referred to as “big box stores” only where the scale of the use and design is compatible with the surrounding areas. Large format retail typically means retail stores with floor plans that are larger than 65,000 sq. ft.	Not applicable. Large format retail uses are not proposed.
Policy-11.6	Office Development. Locate new office development complexes within Village areas where services are available, in proximity to housing, and along primary vehicular arterials (ideally with transit access) with internal vehicular and pedestrian linkages that integrate the new development into the multi-modal transportation network where feasible.	Consistent. Office uses are permitted in the Town Center and Neighborhood Centers where services will be available, and where 375 residential units will be located. These uses are all a short distance from Main Street and Lilac Hills Ranch Road which are the two main streets within the project. These uses all have immediate access to the internal trail system, sidewalks and the bicycle path system.
Policy-11.7	Office Development Compatibility with Adjoining Uses. Require new office development including office parks, to be compatible to the scale, design, site, layout and circulation patterns of adjacent existing or planned commercial and residential development.	Consistent. The project will be implemented by the Specific Plan that will include Design Guidelines that will ensure compatibility with adjacent uses within the Village.
Policy -11.8	Permitted Secondary Uses. Provide a process where secondary land uses may be permitted when appropriate and compatible with the primary commercial, office and light industrial uses, in order to better serve the daily needs of employees and to reduce the frequency of related automobile trips.	Consistent. The office uses will be located within the Village, which will include commercial, residential and civic uses within close proximity.
Policy -11.9	Development Density and Scale Transitions. Locate transitions of medium-intensity land uses or provide buffers between lower intensity uses, such as low-density residential districts and higher intensity development, such as commercial or industrial uses. Buffering may be accomplished through increased setbacks or other techniques such as grade differentials, walls, and/or landscaping but must be consistent with community design standards.	Consistent. Land uses in Lilac Hills Ranch are well integrated with higher density single-family attached and mixed-use housing located within the Town Center and various single family home densities located elsewhere in the new community. The project has been designed to use the open space areas to buffer and separate the higher density uses of the Town Center from the lower density single family uses in the area and has been discussed in the response to LU-2.8. In addition, a variety of policies in the Specific Plan will be used in future phases to ensure a transition to surrounding semi-rural uses. These include the use of wide lots, use of agricultural buffers to separate homes from adjacent agricultural operations and the

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		allowed use of larger rear yard setbacks along the perimeter of the new community.
Policy -11.10	Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.	Not applicable. No Medium or High Impact uses are proposed or adjacent to the project.
Policy-11.11	Industrial Compatibility with Adjoining Uses. Require industrial land uses with outdoor activities or storage to provide a buffer from adjacent incompatible land uses.	Not applicable.
Goal LU-12	Infrastructure and Services Supporting Development. Adequate and sustainable infrastructure, public facilities, and essential services that meet community needs and are provided concurrent with growth and development.	
Policy -12.1	Concurrency of Infrastructure and Services with Development. Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.	Consistent. The provision of infrastructure will follow the phasing plan outlined in the Lilac Hills Ranch Specific Plan. This will ensure that adequate infrastructure is available to each phase of development at the appropriate time as required to implement this policy. In addition, with the implementation of one of the options identified in the FPP fire services will be provided.
Policy-12.2	Maintenance of Adequate Services. Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved LOS but do not achieve a LOS of D or better.	Consistent. All significant impacts to public facilities required for the project will be mitigated when feasible, and existing levels of public services to existing residents are maintained as required by this policy. Connection to the existing water system will be accomplished as required by the VCMWD. A new recycled water facility will be permitted and constructed to provide treatment of wastewater and reclaimed water to be used for irrigation. Existing West Lilac Road will be constructed as a two lane 2.2C light collector from Old Highway 395 to Main Street (in accordance with the Mobility Element). This segment of West Lilac Road will operate as LOS D at project buildout and at LOS E in the Horizon Year. The project proposes to reduce the Mobility Element classification from 2.2C to the previous classification of 2.2F along the northern project boundary east to Road 3 (Running Creek

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		Road), ensuring that this road will remain in its current location with dedications and improvements as required by the County.
Policy -12.3	Infrastructure and Services Compatibility. Provide public facilities and services that are sensitive to the environment with characteristics of the unincorporated communities. Encourage the collocation of infrastructure facilities, where appropriate.	Consistent. In addition to public services, Lilac Hills Ranch will include a water reclamation facility, and RF. The location of the RF and recycled water facility was chosen to ensure compatibility with Village residents as well as those who live in the surrounding area. See, consistency analysis associated with Policy COS-14.3 for a discussion of the solar commitments of the project. The design of these facilities will follow design guidelines included in the Specific Plan to ensure compatibility with the community and implement this policy.
Policy-12.4	Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Element roads identified in Table M-4, an LOS D or better may not be achieved.	Consistent. The public utility infrastructure required for the Lilac Hills Ranch Specific Plan has been designed and located to minimize both visual and environmental impacts. Stand- alone facilities are located outside of dedicated open space and are separated from residential areas. West Lilac Road will be retained in its current location and is not used for access by individual homes within the project. The Mobility Element designation for West Lilac Road is proposed to be changed from a Light Collector 2.2C to a Light Collector 2.2F from Main Street to Road 3 (Running Creek Road) to ensure that it remains compatible with the character of the area and minimize impacts to adjacent residences.
Goal LU-13	Adequate Water Quality, Supply, and Protection. A balance and regionally integrated water management approach to ensure the long-term viability of San Diego County’s water quality and supply.	
Policy -13.1	Adequacy of Water Supply. Coordinate water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water supply. Ensure that new development includes both indoor and outdoor water conservation measures to reduce demand.	Consistent. Land use planning has been coordinated with VCMWD. Service will be provided as the project is built. Indoor water conservation measures will be incorporated consistent with VCMWD requirements. Outdoor water conservation measures include the use of landscaping appropriate to the climate zone, extensive use of recycled water and other measures described in the Specific Plan and as required by this policy.
Policy-13.2	Commitment of Water Supply. Require new development to identify adequate water resources, in accordance with State law, to support the development prior to approval.	Consistent. Valley Center Municipal Water District has provided a “will-serve” letter indicating that they will provide service to this area subject to the project applicant building all necessary facilities and meeting other conditions. The district has also approved the Water Supply Assessment

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		assuring water supplies are adequate (See EIR, Section 3, wastewater and water supplies).
Goal LU- 14	Adequate Wastewater Facilities. Adequate wastewater disposal	that addresses potential hazards to human health and the environment
Policy -14.1	Wastewater Facility Plans. Coordinate with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and assure consistency with the County's land use plans.	Consistent. A Wastewater Management Plan for Lilac Hills Ranch was prepared by Wilson Engineering, in coordination with VCMWD and several options for wastewater service were analyzed. Attached as Appendix S to the Project EIR. The proposed onsite WRF would be constructed as determined by the District and sized to serve only Lilac Hills Ranch.
Policy-14.2	Wastewater Disposal. Require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands.	Consistent. A Wastewater Management Plan for Lilac Hills Ranch was prepared by Wilson Engineering, in coordination with VCMWD and four options for wastewater service were identified and analyzed (Attached as Appendix S to the Project EIR). Any of these four scenarios could be implemented at the discretion of the VCMWD.
Policy -14.3	Wastewater Treatment Facilities. Require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. Coordinate the planning and design of such facilities with the appropriate agency to be consistent with applicable sewer master plans.	Consistent. Lilac Hills Ranch is located within the boundaries of the VCMWD which provides both potable water and domestic sewer services. The provision of sewer services for the Lilac Hills Ranch does not require annexation into the district. VCMWD will own and operate the WRF. A Wastewater Management Plan for Lilac Hills Ranch was prepared by Wilson Engineering, in coordination with VCMWD and identified several options for wastewater service.
Policy-14.4	Sewer Facilities. Prohibit sewer facilities that would induce unplanned growth. Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map. Sewer systems and services shall not be extended beyond either Village boundaries or extant Urban Limit Lines, whichever is more restrictive, except: <ul style="list-style-type: none"> ■ When necessary for public health, safety, or welfare; ■ When within existing sewer district boundaries; ■ When necessary for a conservation subdivision adjacent to existing sewer facilities; or 	Consistent. Lilac Hills Ranch is located within the boundaries of the VCMWD which provides both potable water and domestic sewer services. The provision of sewer services for the Lilac Hills Ranch does not require annexation into the district. The proposed project includes a General Plan Amendment which when approved will establish a Village land use category for the project and which will add the project to both the Valley Center and Bonsall Community plans as a project served by domestic sewer service. The proposed WRF will be sized to serve the Lilac Hills Ranch community as depicted in the Lilac Hills Ranch Specific Plan. The EIR (subchapter 3.1.7.1.) described several alternatives for treatment of wastewater, both on and offsite as requested by VCMWD. The project

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	<ul style="list-style-type: none"> ■ Where specifically allowed in the community plan. 	<p>applicant would implement one of the options for wastewater treatment as approved by the VCMWD.</p> <p>With respect to the comment related to having sufficient right of way to construct the sewer force main or recycled water lines, a fourth alternative pipeline location has been added to Appendix S of the EIR (Wastewater Management Alternatives Report). This alternative would utilize public road rights-of-way along Covey Lane (upon acceptance of the IODs), West Lilac Road and Circle R Road to reach the LMCWRF. This alternative does not have any new impacts to undisturbed land because the pipeline would be located within existing roadways. This alternative would require the County acceptance of an existing IOD and grant additional right of way. EIR subchapters 1.2.1.7 and 3.1.7.2 have been revised after receipt of public review comments to clarify that additional alternative routes for sewer lines have been considered and analyzed. Locating the pipeline along a public road right of way is consistent with VCMWD Administrative Regulations Sec. 200.4 provides that under normal circumstances, sewer and water lines are to be located in a maintained roadway.</p> <p>With respect to right of way, VCMWD has stated that in order for the project to use three of the four routes additional right-of-way may need to be secured. VCMWD Administrative Regulations Sec. 200.3[d] provides that properties requiring an offsite line extension that do not have adequate easements to extend water lines may petition the VCMWD Board of Directors to initiate proceedings to acquire the easements through eminent domain. Ultimately it is in the discretion of the Board of Director’s to decide whether to initiate proceedings to acquire the easements. California law also grants local public agencies the ability to impose conditions on private development requiring the construction of public improvements located within land not owned by the developer. (See Government Code Section 66462.5) Therefore none</p>

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		<p>of the four alternatives are infeasible because of easement restrictions in that such rights may be legally obtained.</p> <p>In sum, the project would construct new wastewater treatment facilities to serve only the project's needs, not those of other properties, and state law grants public agencies the authority to ensure that proper easements may be obtained.</p>
Policy-14.5	Alternate Sewage Disposal Systems. Support the use of alternative on-site sewage disposal systems when conventional systems are not feasible and in conformance with State guidelines and regulations.	Not applicable. No alternative on-site sewage disposal systems are proposed. The proposed on-site WRF will provide tertiary treatment consistent with applicable regulations. The plant will be owned and operated by the VCMWD.
Goal LU-15	Adequate Wireless Communication Facilities. Wireless telecommunication facilities that utilize state-of-the-art techniques to minimize impacts to communities and the environment.	
Policy -15.1	Telecommunication Facilities Compatibility with Setting. Require that wireless telecommunication facilities be sited and designed to minimize visual impacts, adverse impacts to the natural environment, and are compatible with existing development and community character.	Consistent. Wireless facilities are allowed only in the three areas of the Community with the C34 Use Regulation. All proposed wireless facilities will be required to obtain the permits and go through the review process required in Section 6980 of the Zoning Ordinance.
Policy-15.2	Co-Location of Telecommunication Facilities. Encourage wireless telecommunication service providers to co-locate their facilities whenever appropriate, consistent with the Zoning Ordinance.	Consistent. Wireless facilities are allowed only in the three areas of the Community with the C34 Use Regulation. All proposed wireless facilities will be required to obtain the permits and go through the review process required in Section 6980 of the Zoning Ordinance.
Goal LU-16	Appropriately Sited Waste Management Facilities. Solid waste management facilities that are appropriately located and sited in a manner that minimizes environmental impacts and potential conflicts from incompatible land uses, while facilitating recycling and resource recovery activities.	
Policy -16.1	Location of Waste Management Facilities. Site new solid waste management facilities identified in the San Diego County Integrated Waste Management Plan, in a manner that minimized environmental impacts and prevents groundwater degradation and in accordance with applicable local land use policies.	Not applicable. No solid waste facilities are located in the vicinity of the project.

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Policy-16.2	Integrity of Waste Management Facilities. Avoid encroachment of incompatible land uses upon solid waste facilities in order to minimize or avoid potential conflicts.	Not applicable. No solid waste facilities are located in the vicinity of the project.
Policy -16.3	New Waste Management Facilities. Encourage the establishment of additional recycling and resource recovery facilities in areas with Industrial land use designations or other appropriate areas based on the type of recycling.	Consistent. Lilac Hills Ranch includes a dedicated recycling facility. The purpose of this facility is to allow residents to sell their recyclables to the operator and obtain mulch produced from green waste. This facility is located behind and below the commercial center away from any proposed residences. The facility will be enclosed and designed in accordance with the design guidelines included in the Lilac Hills Ranch Specific Plan.
Goal LU-17	Adequate Education. Quality schools that enhance our communities and mitigate for their impacts.	
Policy -17.1	Planning for Schools. Encourage school districts to consider the population distribution as shown on the Land Use Map when planning for new school facilities.	Not applicable.
Policy-17.2	Compatibility of Schools with adjoining Uses. Encourage school districts to minimize conflicts between schools and adjacent land uses through appropriate siting and adequate mitigation addressing such issues as student drop-off/pick up locations, parking access and security.	Consistent. The project was planned with roads and other infrastructure sized to accommodate a new school on the indicated site. Provision of the school site in a central location within the project ensures that additional school facilities would be available should the appropriate district determine that such facilities were necessary.
Policy-17.3	Priority School Locations. Encourage school districts to locate schools within Village or Rural Village areas wherever possible and site and design them in a manner that provides the maximum opportunity for students to walk or bicycle to school.	Consistent. A school site is provided in Lilac Hills Ranch for construction of a school should the service providing district determine that a new school is necessary.
Policy -17.4	Avoidance of Hazards. Assist school districts with locating school facilities away from fault zones, flood or dam inundation zones and hazardous materials storage areas in conformance with state statues.	Consistent. A school site is proposed as a part of the project. The school site is not located on a fault zone or a flood or dam inundation zone. However, the on-site WRF would be located 0.13 miles or within one-quarter mile of the school site. Although hazardous materials would be used and stored in proximity to the school site, uses of such materials would be required to conform to applicable hazardous materials regulations, including the preparation and implementation of a Hazardous Materials Business Plan (HMBP). Moreover, prior to the siting of a school, the local education agency is required to make a finding that the health risks do not or will not

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		constitute an actual or potential endangerment of public health at the site or that corrective measures will be taken that will result in emissions mitigation to levels that will not constitute endangerment. Therefore based on conformance with applicable state law impacts related to the location of the proposed school site would be less than significant.
Goal LU-18	Adequate Civic Uses. Civic uses that enhance community centers and places.	
Policy -18.1	Compatibility of Civic Uses with Community Character. Locate and design Civic uses and services to assure compatibility with the character of the community and adjoining uses, which pose limited adverse effects. Such uses may include libraries, meeting centers, and small swap meets, farmers markets, or other community gatherings.	Consistent. Civic uses such as community gathering points and a farmers' market are located in the Town Center, consistent with the Community Development Model. Other Civic uses such as the public park in Phase 3 contains agricultural buffers and fencing to ensure compatibility with off-site agricultural uses. The adjacency impacts were analyzed and mitigated to less than significant.
Policy-18.2	Co-Location of Civic Uses. Encourage the co-location of civic uses such as County library facilities, community centers, parks, and schools. To encourage access by all segments of the population, civic uses should be accessible by transit whenever possible.	Consistent. Civic uses such as community gathering points and a farmers' market are located in the Town Center. The school and park are located together and are adjacent to a potential private recreation facility. All such uses are accessible by walking or biking on the extensive network of pedestrian ways.
Policy COS-11.3	Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas.	The project site is not in a visually sensitive area (no unique visual resources on-site and limited views of the project site). Therefore, Policy COS 11.3 would not apply.

ATTACHMENT A

Policy *LU-1.2 Leapfrog Development* defines the term, and specifically notes that development proposals which conform to the Community Development Model are *not* by definition Leapfrog Development. In essence this policy states that new Villages, outside of existing urban designated areas may be proposed and approved as consistent with the General Plan so long as they;

1. Conform to the Community Development Model, and
1. Provide necessary services and facilities, and
2. Are designed to meet the LEED-Neighborhood Development Certification or an equivalent, and
3. Are within established water and sewer service boundaries.

The Lilac Hills Ranch Specific Plan has been designed to meet and achieve all of these criteria. The application of LEED-ND or an equivalent provisions and project compliance with the other bullets in LU 1.2 are discussed extensively in the EIR, EIR Global LU-1.2 Response and the Specific Plan. In summary;

The Project Conforms to the Community Development Model.

The Lilac Hills Ranch Project is a new village whose structure, design and function are based on the Community Development Model. The Project proposes a “Village” Regional Category, surrounded by Semi-Rural Regional Category land uses that transitions to Rural Regional Category. This gradation of land use densities is illustrated at the Project level in the Specific Plan at Figure 8, entitled, “Proposed Community Plan Land Use Designations.” The following illustrates how the Project is designed to meet the Community Development Model described in The General Plan at page 3-20.

Under the Community Development Model, The edge of a “Village” can be defined by a boundary which is designed to differentiate permitted development densities and design standards. The Project’s perimeter is designed to adhere to this model boundary concept. The Project edge contains the following features: ranchette-style lots that are 100 feet wide with grade separations and matured planting buffers, a multi-purpose pathway with low, rustic stone and wood-rail fencing that is equestrian-friendly, a 50-foot wide agricultural buffer planted with two rows of orchard trees (avocado, citrus, olives), and a 104-acre Biological Open Space Preserve. These developed and managed features differentiate the “Village” from the surrounding “Semi-Rural” densities and corresponding design standards. Outside of the “Village,” “Semi-Rural” areas would continue to maintain low-density residential neighborhoods, small-scale agricultural operations, and rural commercial businesses.

The Project is designed under the Community Development Model to contain the densest neighborhoods and a broad range of commercial and civic uses supported by a dense network of local roads containing bicycle lanes and walkways linking the neighborhoods with parks, schools, and public areas. The highest intensities (commercial, mixed-use and attached residential) are to be located within the central portion of a Project (Town Center) with the lower-intensity residential uses (single-family detached) around the perimeter.

The Project contains a Village that is anchored by a 20-acre Town Center that consists of an integrated mixed use core that is pedestrian-oriented and includes higher-density attached residential, retail commercial, and professional office uses, as well as private and public facilities, such as a park, a civic center, a country inn, and a recycling facility, that serve the entire community. The composition includes 270 mixed-use homes, such as attached units, live/work lofts and row homes, zoned for a minimum of 1,000 square feet, with the retail, commercial, and professional office spaces both at the ground level and free standing up to three stories high.

The residential-oriented Neighborhoods will radiate out from the Town Center to the Project perimeter with the largest, ranchette-styled lots feathering the edges. The composition includes 1,371 single family detached homes, zoned for a minimum of 2,800 square feet, one and two stories high. There are two Neighborhood Centers (highly abbreviated forms of the Town Center) planned southeast of the Town Center. The closer one clusters 105 attached homes with commercial and retail uses on 4.3 acres, and the further one is consistent with the model concept of graduating lesser intense uses away from its core, supporting the commercial uses.

The local road network is densest at the Town Center. The Project trail network consists of 16 miles of community trails, feeder trails and ranch multi-use trails, connected at key points to county regional trails. The trail network will be designed for pedestrian and bicycle uses, with bike lanes and community trails placed alongside the local road network. Equestrian trails and a staging area will be placed nearer the Project edges, and there will be a parking area for visitors who wish to access the Project trail network. This trail network threads the higher intensity urban uses at the Town Center to the lower intensity residential-oriented uses in the Neighborhoods and weaves the “Village” as a whole to the still lesser intensity rural uses in the surrounding “Semi-Rural” and “Rural Areas.”

The Project will provide all necessary services and facilities

The Project will provide all of the necessary facilities and services required to meet the needs of the Project. Lilac Hills Ranch is located within the County Water Authority, Valley Center Municipal Water District (VCMWD), Valley Center School District, Bonsall School District and the Deer Springs Fire Protection District (DSFPD). As detailed in EIR Chapter 1, the project includes parks and recreational facilities, an opportunity for an on-site school, an internal private road system, storm drain facilities, underground utility lines, water lines, and an on-site water reclamation facility with distribution system, detention basins and wet

weather storage ponds. The Project includes a looped potable water system and a water reclamation facility that would provide service from the VCMWD. The “Lilac Hills Ranch Fire Protection Plan,” prepared by FIREWISE 2000, Inc., described how the DSFPD will provide fire services to the Project and the Capabilities Assessment Report by Dudek and Hunt, dated April 16, 2014, demonstrates that the District has the capacity to provide fire protection services. In addition, the project includes four options for fire service. All options would allow fire service to be provided to the project in conformance with the requirement of the General Plan (see subchapter 2.7).

The Project is designed to meet the LEED-ND Certification or equivalent program

In addition to the Project being in conformance with the NGBS program, attached as the Specific Plan Appendix “G” and “H”, the Project was also designed in a manner that is equivalent or corresponding in performance or outcome with the LEED®-ND Certification program. In order to make this determination, the following method was established by which to compare the Project against the principles of LEED®-ND. First, 18 fundamental development practices (“Green Development Practices”) were identified from the various categories of credits that could be received under the LEED®-ND Certification model. These green Development Practices were chosen because they are the key tenements of LEED®-ND and recognized smart growth principals. The Project was then evaluated under each of the Green Development Practices as well as against the intent provisions of the corresponding relevant credit categories under LEED®-ND. Subparagraph (a) below describes each of the three topic categories of LEED®-ND, the principles it promotes, and how the Project complies. Subparagraph (b) below outlines each of the Green Development Practices used to design the Project, describes how the practices correlate with the principles of the relevant credit categories of the LEED®-ND program, and how the Project complies.

a. The project is designed to be equivalent to LEED®-ND in that:

1) **Smart Location and Linkage:** For purposes of this evaluation, some of the relevant underlying objectives for this topic area include: reducing vehicle miles traveled, encouraging daily physical activity associated with walking and bicycling, locating within a water and wastewater service area, conserving natural resources, preserving water quality, natural hydrology, habitat and wetlands, protecting prime and unique soils on farmland from development, and enhancing natural hydrological systems. The Project’s location is within existing water and sewer service district boundaries; it protects and restores habitat for sensitive species, wetlands, and natural drainages, and long-term management is ensured through implementation of a resource management plan; it would promote on-going agriculture land uses on-site; is not in a flood plain; contains 16 plus miles of walkable and bikeable trails; and complies with the Resource Protection Ordinance (RPO) by avoiding 99.7 percent of the RPO defined steep slopes.

2) Neighborhood Pattern and Design: For purposes of this evaluation, some of the relevant underlying objectives for this topic area include: promoting transportation efficiency, promoting walking, encouraging physical activity, promoting internal connectivity and to the community at large, clustering diverse land uses, promoting diversity of housing opportunities, improving physical and mental health, promoting local food production, and reducing urban heat. The Project's neighborhood pattern and design creates walkable streets, compact development, mixed-use neighborhood centers, and mixed-income diverse communities; implements traffic calming; provides for a mass transit bus stop and includes a Transit Demand Management program; provides close access to civic and public spaces and to recreational facilities; promotes local food production; has tree-lined streets, parks, and trails; and a neighborhood school that is walkable and bikeable by students because of traffic calming measures.

3) Green Infrastructure and Building: For purposes of this evaluation, some of the relevant underlying objectives for this topic area include: reducing effects on natural resources, improving water quality, and reducing heat islands. The Project's buildings will exceed the State's Building Code efficiency standards (2008 Title 24) by thirty percent; construction activity will meet all air and water pollution prevention regulatory requirements; landscaping will be drought tolerant and consist of native and regionally appropriate species; stormwater management plans will reduce pollution; the project will install 2,000 kilowatts (kW) of on-site solar/photovoltaic systems, which are estimated to produce 3,400,000 kW hours of electricity, or approximately 22 percent of the project's total electricity needs at build-out (see EIR GHG Section); waste disposal will be reduced by 20 percent through the construction of an on-site recycling facility; potable water consumption will be reduced by 20 percent; and light pollution reduction measures will protect night skies; project-related construction activities shall use a minimum of Tier III U.S. EPA/CARB-certified construction equipment for the majority of construction equipment used, during the entire construction period; The project will install high-efficiency public street and area lighting to achieve an overall minimum 15 percent lighting energy reduction; The project will install Energy Star appliances (including clothes washers, dish washers, fans, and refrigerators) in 95 percent of the single-family, mixed-use residential, and senior community residential uses; Project design shall include the installation of Smart Meters; All fireplaces installed in residential uses must be natural gas or equivalent non-wood burning fireplaces; The project requires that only electric-powered landscaping equipment be used on property managed by the homeowners' association (HOA); and lastly, in addition to the Specific Plan policies, performance measures, and project design features, the project's GHG emissions also would be reduced as a result of several existing statewide regulations: Pavley I and II (the latter of which also is sometimes referred to as LEV III or ACC), the LCFS, the RPS, and the Tire Pressure Program.

b. The following information (as found in EIR and related Appendixes) provides support that the Project has been designed to meet an equivalent of LEED®ND Certification by

incorporating the following 18 Green Development Practices: Building Site Selection, Compact and Efficient Development Footprints, Mixed-use Development, Innovative Zoning and Design, Conservation of Wildlife Habitat, Soil Conservation, Storm Water Management, Natural Filtering and Drainage, Water Efficient and Native Palette Landscaping, Operation and Maintenance Plans for Project Plans and Facilities, Recycling and Innovating Wastewater Technology, Pedestrian and Bike Paths Connecting the Community Amenities, Topographic Preservation, Floodplain Avoidance, Sustainable Location, Sustainable Building, Integrated Transportation Planning and Dark Sky Protection. The following provides a description of each of the foregoing Green Development Practices” of the Project that support its design as an equivalent to LEED®ND Certification as well as the equivalent principles of LEED®ND Certification described in the “Intent” provisions of the LEED®ND that it also meets. (Reference Guide “LEED v4 for Neighborhood Development,” updated July 1, 2014, USGBC.

1. Sustainable Location.

- a. The project is located within existing water and sewer district boundaries, namely the County Water Authority and the Valley Center Municipal Water District.
- b. Although the project would add traffic to the area, the project will reduce trip length and vehicle distances traveled as a result of locating services in the vicinity of residential uses. The project incorporates principles of smart location as required by the County General Plan, which requires new villages to be located within existing water and sewer districts and near existing infrastructure and facilities. In addition, State and Local planning policies (for example, SB-375 and AB-32) encourage locating Projects near major transportation corridors, in part to reduce commuting distances and carbon footprints by lowering vehicle miles travelled (“VMT’s”). The project entrance from West lilac Road is approximately 1.6 to 1.8 miles from the I-15 on and off-ramps, and as shown in Table 4.12 of the Traffic Impact Study (Appendix E), would reduce trip lengths within the Valley Center community by 0.08 miles, assuming the construction of Road 3, and 0.09 miles without the construction of Road 3. The proposed Project is projected to have an average vehicular trip length of 7.6 miles, which is over a half-mile lower than the rest of the Valley Center community, both with and without the construction of Road 3.
- c. The Project would encourage daily physical activity associated with walking and biking. The project also locates neighborhood services within short walking and biking distances as follows:
 1. The project village core will reserve a future site for a mass transit stop, which is located within a short walk or bike ride from all points within the community.

2. A 16-plus mile landscaped community path and trail network supports pedestrians, bicyclists, and equestrians. Trails are crisscrossed throughout the project encouraging their use from all points. The trail system will tie into the planned County trail system at the north and south ends of the Project. Streets are designed to promote traffic calming through the use of narrow roads, curvatures, roundabouts, landscaping, and parallel parking. The proposed paths are placed parallel to the streets to reduce vehicle speeds, promote pedestrian connections and increase roadway safety.
- d. The Project is designed so that all homes within the project will be located within one-half mile distance of at least seven neighborhood assets or “diverse uses” which are located in the Town Center and neighborhood centers. Among the LEED[®]ND[®]-defined “diverse uses” proposed are the following: general store/market, farmer’s market, bank, coffee shop, bakery, drug store, senior care center, gym, recreational center, school, civic offices, public park, and commercial office. Project zoning would allow “diverse uses” within one-half mile of the project’s geographic center on account of the dense, mixed-uses permitted in the Town Center, the Neighborhood Centers, and the location of the Senior Center and the Group Care Facility.

Therefore the project **Sustainable Location** practice is equivalent to the **Smart Location** principle of LEED[®]ND (SLL Prerequisite 1), to locate projects within existing water and sewer service district boundaries, to encourage reducing vehicle trips and vehicle distance traveled, to improve health by encouraging daily physical activity associated with walking and bicycling, as well as locating “neighborhood assets” or “diverse uses” within ½ mile walking and biking distance of project residents.

2. Compact and Efficient Development Footprint.

The Project densities under the County’s standards, ranging from 24 du/acre to 2.9 du/acre, result in a compact, pedestrian-oriented planning and design. Project densities are illustrated in the Specific Plan in Table 3, Land Use Summary by Phase. The project also complies with the Community Development Model as explained previously under section 1, which is the County’s model for compact development. The Project also includes an extensive and thoroughly integrated, 16 plus mile Trail Network, including community pedestrian and bike paths, linking together the project components, including the Town Center, the Neighborhood Centers, all the Neighborhoods, the school site, the 13.5 acre central park, and the dozen smaller parks and green spaces located throughout the Project. This promotes the project’s walkability and livability. The trails include a staging area in the Town Center, and three trail connections at the north and south ends of the Project to trails defined in the County Master Trail Plan. See EIR, Figure 1-4a

(Lotting Study) and Figure 1-8 (Trails Plan). Project parks and trails are designed to be wholly integrated with the dedicated 104.1 acre Biological Open Space. The EIR, Figure 1-9 (Open Space and Parks) illustrates this for example, in showing adjacency of the Biological Open Space to four parks, including the 13.5 acre central park, and to the school site and adjoining recreational and play fields areas. Certain trails, towards the Project perimeters connect to the County Master Trail Plan and will also allow equestrian usage.

The foregoing Compact and Efficient Development Footprint Practice is equivalent to the LEED®ND Compact Development principle (NPD Prerequisite 2), to conserve land and promote livability, walkability, transportation efficiency and reduce vehicle distance traveled the LEED®ND Walkable Streets principle (NPD Prerequisite 1), to promote walking by providing safe, appealing and comfortable street environments that support public health by encouraging daily physical activity and the LEED®ND Bicycle Facility principle (SLL Credit 4), to promote bicycling and transportation efficiency and reduce vehicle distance traveled, as well as to improve public health by encouraging utilitarian and daily physical activity.

3. Mixed-Use Development.

The Project's Town Center, consisting of 21.4 acres, and the northern Neighborhood Center, 4.8 acres, provide for mixed-use development as shown in EIR, Project Lotting Study, Figure 1-4a. These areas will be zoned to allow an urban core of mixed use, clustered development, including 375 higher-density, up-to-three-story, attached residential units, including live/work and row homes, some with minimums of 1,000 square feet, along with specialty retail, community serving commercial, professional offices, a town green, a civic center, a country inn, and a central recycling facility, where a trail staging area leads to 16 plus miles of trails. At the southern portion of the Project there will be senior housing. The inclusion of smaller, denser homes in the core areas, a senior care facility, and surrounding residential neighborhoods provide a variety of housing types.

The foregoing Mixed-Use Development practice is equivalent to the LEED®ND Mixed Use Neighborhood Center principle (NPD Credit 3), to reduce automobile dependence, encourage daily walking, biking, and transit use, and support car-free living by providing access to diverse land uses, and the LEED®ND Mixed Income Diverse Communities principle (NPD Credit 4), to promote socially equitable and engaging neighborhoods by enabling residents from a wide range of economic levels, household sizes, and age groups to live in a community.

4. Innovative Zoning and Design.

- a. **Variation in Design and Clustering.** The Project was designed in accordance with the Community Development Model establishing a new "Village" Regional Category that is surrounded by Semi-Rural Regional Category lands, which

transitions to Rural Regional Category areas. (See Specific Plan, Figure 8.) The project has been designed with the highest intensities (commercial, mixed-use and attached residential) within the central portion of the project (Town Center) and the lower-intensity residential uses around the perimeter of the site (single-family detached residential uses.) The Town Center includes high-density residential development, commercial and professional offices uses, various private facilities, multiple private parks, and community trails. Compact residential neighborhoods surround the Town Center towards the Project perimeter and support several small parks and community trails. There are also two Neighborhood Centers (highly abbreviated forms of the Town Center) planned southeast of the Town Center. The road network leads to the Town Center and Neighborhood Centers and there are over sixteen miles of multi-use community trails providing a pedestrian lineage to every part of the community, which also connects to the County regional trail system. The Project is compact enough to encourage residents to walk to amenities and service, as all residences would be within half ($\frac{1}{2}$) a mile, and less than 10-minute walk from the Town Center or from one of the two Neighborhood Centers.

A snapshot of the compact, village model is seen in the EIR, Project Lotting Study at Figure 1-4a. The Project design also illustrates how residential areas are attractively interspersed among and defined by predominant swaths of open space, parks, and an extensive community path network thus preserving the natural and scenic qualities of the site, which further encourage walking and biking and further reduce auto dependence.

- b. Local Design Criteria** The County Zoning Ordinance allows for a variety of innovative techniques to address local development criteria and standards. The Specific Plan text includes detailed development design criteria and standards for both subdivision design and for architectural design. All development will require Site Plan approval, pursuant to the "D" Special Area Designator, for implementation to ensure compliance with the Design Guidelines and developments standards included respectively in the Specific Plan's Section III, Design Guidelines, and in Section III, Development Standards and Regulations. These guidelines address the design elements that contribute to Project planning concepts for pedestrian-oriented residential and commercial/mixed use design. Guidelines are provided for architectural styles, facade elements, garage location and design, and landscape themes. Conceptual site plans and architecture for the residential and commercial/mixed use areas of the project are illustrated at the end of Section III of the Specific Plan. . The development of the single family detached areas of the project is regulated by Figures 98 and 99, which identify 17 different lot configurations. The Site Plan required for all detached single family development requires that each lot must show a specific lot configuration from the table coupled with one of 14 single family architectural configurations. This results

in a permutation of numerous combinations of lot sizes and architectural styles ensuring that the compact form of development has a wide range and diversity of designs.

- c. **Traffic Calming Design.** Pedestrian safety is essential to encouraging a pedestrian-oriented community, and a community where children can safely walk to school. Thus the Project includes multiple approaches to traffic calming throughout the Project. Traffic calming features include roadway design (such as roundabouts, one-way streets and slightly curved streets), road features (such as bulb-outs and on-street parking) and landscaping such as, landscaping areas for trees to be planted close to the curb, to cause automobile drivers to reduce their travel speeds without having to resort to less effective measures (such as speed bumps). The Project includes one public road, West Lilac Road that is designated as part of the County maintained road system. Furthering pedestrian safety, the Project will dedicate and construct a portion of West Lilac Road with a multi-purpose pathway to be built within a 12-foot section of the road right of way and includes an 8-foot Decomposed Granite (DG) pathway and landscaping per the guidelines and standards set forth in the Specific Plan. (Specific Plan, p. 1-20, Figure 1-8)

The foregoing **Innovative Zoning and Design** practice is equivalent to the LEED®ND **Walkable Streets** principle (NPD Credit 1), to promote transportation efficiency and reduce vehicle distance traveled and to improve public health by providing safe, appealing, and comfortable street environments that encourage daily physical activity and avoid pedestrian injuries, the LEED®ND **Community Outreach and Local Input** principle (NPD Credit 12), to encourage responsiveness to community needs by involving the people through the HOA who live or work in the community in project design and planning and in decisions about how the project should be improved or changed over time, and the **Neighborhood Schools** principle (NPD Credit 15), to promote community interaction and engagement through traffic calming and thereby improve students' health by encouraging walking and bicycling to school.

5. Conservation of Wildlife Habitat.

- a. **Conservation by Design.** The project includes the preservation of 104.1 acres of open space that includes native habitat to support a variety of wildlife species. See EIR, Ch. 2.5, Biology Resources Report, Section 8.0 and Table 10 for a summary of impacts and mitigation measures. Mitigation measures will restore, enhance, and maintain open space subject to a Resource Management Plan, funded through an endowment or community facilities district, will enhance and create wetlands, under the jurisdiction of local, state, and federal resource agencies, and will include a Revegetation Plan, with numeric success criteria, and

subject to local, state, and federal review and approval prior to issuance of wetland and the first and all subsequent grading permits. The wildlife habitat to remain in the 104.1 acres Biological Open Space on-site will be subject to an open space easement and maintained according to the guidelines contained in the Conceptual Resource Management Plan. See Table 1 and Section 4.0 of the Conceptual Resource Management Plan. Measures employed to establish and promote wildlife habitat include the preservation of 104.1 acres of biological open space for wildlife use, the on-site creation of 6.0 acres of wetland habitat for wildlife use, and the enhancement of 12 acres of existing disturbed riparian habitat to native riparian habitat for wildlife use. See EIR, Ch. 2.5 Biological Resources Report, Section 8.0 and Table 10. The biological open space being preserved on the project site conserves the local important wildlife corridors. See Figures 14a and 14b of the EIR, Ch. 2.5 Biology Resource Report.

- b. Environmentally Sensitive Areas Restored, Mitigated or Avoided.** The Project's 104.1 acre Biological Open Space plan assures the permanent conservation of wetlands and associated riparian upland habitats, the restoration of degraded wetland habitat, and the provision of opportunities for wetland enhancement, in accordance with a prior-approved and funded Resource Management Plan (for example the County's MSCP) that meets wetland conservation and mitigation criteria required by local, state, and federal natural resource agencies. For example, the County RPO limits impacts to wetlands, wetland buffers, and sensitive habitat lands and requires a wetland buffer where development is adjacent to wetland areas. According to the EIR Biological Resource Report, current wetland buffers, as contained within the designated limits of the proposed biological open space areas are a minimum of 50 feet wide for the preserved wetlands, with some wetland buffer widths exceeding 100 feet for limited distances. The Project, in total, will mitigate for all impacts to wetlands and associated riparian and upland areas, onsite and offsite, through the following mitigation: coast live oak woodland (preserve 3.3 acres on-site; purchase 1.2 acres off-site); coastal sage scrub (preserve 2.9 acres on-site; purchase 39.4 acres off-site); coastal/valley freshwater marsh (preserve 0.5 acre on-site; create 0.3 acre off-site); southern coast live oak riparian woodland (preserve 22.8 acres on-site; create/purchase 4.8 acres off-site); southern mixed chaparral (preserve 27.1 acres on-site; purchase 26.9 acres off-site); southern willow riparian woodland (preserve 4.2 acres on-site; create/purchase 1.5 acres off-site); southern willow scrub (preserve 5.8 acres on-site; create/purchase 1.8 acres off-site); mule fat scrub (create/purchase 0.3 acre off-site), open water/freshwater wetland (create/purchase 1.5 acres off-site); and disturbed wetland (preserve 0.3 acre on-site; create/purchase 0.3 acre off-site). In addition, the Project will create 6.0 acres of wetland and enhance 12.0 acres of existing disturbed wetland resources on-site to help offset a portion of the creation/purchase of wetland habitat mitigation off-site. Conceptual Resource Management Plans have been

prepared that proscribes the protection and maintenance of wetland areas and associated riparian and upland habitats being preserved on the site. See EIR, Ch. 2.5, Biological Resource Report, Attachments 15 (Wetlands) and 16 (Biological Open Space). These plans require, among other measures, the removal of invasive species and fencing and signage to prevent site disturbance and degradation. As stated, the final Resource Management Plan must be reviewed and approved by local, state and federal resource agencies and must meet all sensitive habitat and wetland regulatory standards including no net loss of habitat functions and values. The 104.1 acre Biological Open Space will require a permanent conservation easement and Revegetation Plan for impacts to wetlands. In addition, while the project uses avoidance as the foremost site design concept to minimize impacts to wetlands, where unavoidable impacts may occur, the Project is required to obtain the following permits for project-related impacts. These permits ensure no net loss of habitat functions and values and protect wetland from exposure to pollutants, hydro-modification, vegetation clearing, and the introduction of invasive species, and ensure that the feasibility of alternatives will have been considered:

- 4(d) Habitat Loss Permit issued by the County, U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife. (See EIR, Habitat Loss Permit application and Habitat Loss Permit Exhibits)
- Section 404 Permit by the U.S. Army Corps of Engineers.
- 1603 Streambed Alteration Agreement from the California Department of Fish and Wildlife.
- NPDES General Permit for Stormwater Discharges (State Water Resources Control Board) and NPDES Municipal Stormwater Permit Compliance (County and Regional Water Quality Control Board).
- Section 401 Water Quality Certification or waiver from the Regional Water Quality Control Board.

The foregoing **Conservation of Wildlife Habitat** practice is equivalent to the LEED®ND **Imperiled Species and Ecological Communities (SLL Prerequisite 2)** and the **Wetland and Water Conservation (SLL Prerequisite 3)** principles, to promote open space and habitat conservation, preserve and enhance water quality and natural hydrologic systems, and protect habitat and biodiversity through conservation of wetlands and water bodies.

6. Soil Conservation.

- a. Soil Disturbance and Erosion During Grading.** The Project must comply with major grading provisions of the San Diego County Grading Ordinance and with the Regional Water Quality Board Order R9-2007-0001, as implemented through the County Standard Urban Stormwater Mitigation Plan for Land Development and Public Improvement (SUSMP) which will require a broad range of construction best management practices to minimize soil disturbance and erosion during

construction, further described in the County Stormwater Ordinance/Stormwater Standards Manual, and will include practices such as staking the limits of clearance and grading prior to construction, fencing or flagging limits of no disturbance, covering and protecting stockpiles of soil, minimizing soil compaction using materials capable of distributing equipment weight, stabilizing disturbed areas before grading, and amending soils with organic material and mulch.

- b. Soil Disturbance and Erosion Minimization During Construction.** The Project construction activities are scheduled per the Community Phasing Plan to minimize the length of time soils are exposed. The total disturbance area on the site would be 504 acres but less than 50 acres would be disturbed at any given time under the worse-case scenario. The Project Stormwater Plan must comply with the Regional Water Quality Board Order R9-2007-0001, as implemented through the County Standard Urban Stormwater Mitigation Plan for Land Development and Public Improvement (SUSMP) will require a broad range of construction best management practices to minimize soil disturbance and erosion during construction, further described in the County Stormwater Ordinance/Stormwater Standards Manual.

The foregoing Soil Conservation practice is equivalent to the LEED®ND Construction Activity Pollution Prevention principle (GIB Prerequisite 4), to reduce pollution from construction activities by controlling soil erosion, waterway sedimentation and airborne dust.

7. Storm Water Management, Natural Filtering and Drainage.

Project stormwater is managed through the use of low-impact development techniques to preserve natural drainages and minimize concentrated hydrological flows. As for preservation, the Stormwater Plan does not include disturbance of natural drainages and all flows would be directed on-site, grass-lined detention basins, as described in the project Drainage Plan, for settling and filtration prior to discharge off-site through both natural and man-made drainages. The Drainage Plan includes measures such as planting shallow drainage slopes to prevent erosion and siltation. The Project Drainage Plan must meet applicable local, state and federal standards, be approved by the Department of Public Works, and maintained by either the Public Works Flood Control Division or the HOA. Natural drainages within the project site are further protected by the Resource Management Plan, to protect 104 acres of biological open space, including natural drainages throughout the site, as detailed in EIR S-1, Mitigation Measures M-BIO-2. To minimize concentrated hydrological flows, the project General Use and Performance Standards as described in the Specific Plan allows the use of permeable road pavers, that meet private road and Consolidated Fire Code requirements, throughout the private road system within the project area. In conjunction with the reduced detention basins, bio-retention area and other BMP facilities, pavers add another component to the storm

water runoff treatment that further enhances the runoff water quality leaving the project site. The Specific Plan's Infrastructure/Public Facilities and Services Plan allows for cisterns and roof collection systems for the storing and use of rain water on single family homes. The Project trail network will include permeable materials such as decomposed granite. Project area parking lots will include interior tree planting areas. The Project would also incorporate long-term water quality controls pursuant to the County Stormwater Ordinance, Stormwater Standards Manual, and related National Pollutant Discharge Elimination System Municipal Permit requirements. Short-term erosion and sedimentation impacts would be addressed through conformance with the NPDES Construction Permit and County Stormwater Ordinance/Stormwater Standards Manual which include developing and implementing an authorized SWPP for proposed construction, including erosion and sedimentation BMPs.

The foregoing Stormwater Management, Natural Filtering and Drainage practice is equivalent to the LEED®ND Stormwater Management principle (GIB Credit 8), and Minimized Site Disturbance in Design principle (GIB Credit 7) to reduce runoff volume and improve water quality by replicating the natural hydrology and water balance of the site, based on historical conditions and undeveloped ecosystems in the region, and the LEED®ND Reduced Parking Footprint principle (NPD Credit 5), to minimize the environmental harms associated with parking facilities, including automobile dependence, land consumption, and rainwater runoff.

8. Water Efficient and Native Palette Landscaping.

The Project Landscape Plan which is incorporated into the Specific Plan is designed to limit water and energy use while preserving and enhancing the environment. The Landscape Plan conserves water through the use of native and drought resistant species and integrates existing field agriculture, orchards, riparian corridors, and native oaks into the project design. Oaks and Sycamores will accent channel crossings and drainages. All three public parkways will be planted with regionally appropriate native trees and shrubs such as Olives, Sycamores, Oaks, Madrone, Currant, Toyon, as well as Apricot, Lemon, Orange, Guava, and Avocado. Medians will be landscaped in accordance with County Water Conservation and Landscape Design Manual guidelines including drought tolerant and native plant materials where appropriate. Community recreational areas will use groves, drought tolerant and naturalizing plant material to transition to natural open space areas. Native vegetation will be emphasized, supplemented by compatible, non-invasive ornamental plant materials. Street trees will be planted at close intervals to assure overlapping foliage along West Lilac Road. Trees will be protected by planting wells and retaining walls. The Landscape Plan also encourages turning tree trimmings into mulch. The community Recycling Facility will accept residential and community compost waste. To limit water and energy usage, all of the reclaimed water from the Water Reclamation Facility

treated to Title 22 Standards will irrigate on-site parks, street parkways, private residential lots, private and public open space, agricultural land in both common areas and in Biological Open Spaces, manufactured slopes and the school site, or as allowed by the Valley Center Municipal Water District and other regulatory agencies, thus preserving and protecting the environment. Irrigation systems will be designed in accordance with the Irrigation Association's *Turf and Landscape Best Management Practices* consistent with the applicable requirements of the Water District. All landscape plans will be submitted for County review and approval prior to the start of construction. Such plans shall comply with the County Water Conservation Landscaping Ordinance, the Water Efficient Landscape Design Manual, the Specific Plan Design Guidelines, the County Grading Ordinance, the Off Street Parking Design Manual and the Valley Center MWD policy Article 190.7 regarding Conservation and Local Supply Use Requirements.

The foregoing Water Efficient and Native Palette Landscaping practice would be equivalent to the LEED®ND Minimized Site Disturbance in Design principle (GIB Credit 7) and Water-Efficient Landscaping principle, (GIB Credit 4) to reduce outdoor water consumption.

9. Operation and Maintenance Plans for Project Plans and Facilities Project Wide.

Conceptual Resource Management Plans have been prepared setting forth guidelines for the operation and maintenance of preserved environmental resources both on and off site. (EIR, Ch. 2.5, Biological Resources Report, Attachments 15 (Wetlands), 16 (Biological Open Space) Attachment 17 (Off-site Habitat Mitigation). These plans must be reviewed and approved by local, state, and federal resource agencies before being finalized. A Revegetation Plan with numeric success criteria and subject to local, state, and federal review and approval is also required. Prior to Final Map an HOA Operations and Maintenance Manual will be prepared and adopted by the HOA. The manual will provide guidelines and standards for the common open space management activities. In addition, the onsite stormwater system, including the detention basins, will be owned and managed by the HOA. Prior to Final Map a Stormwater Management and Operations Manual, approved by the RWQCB, will be prepared and adopted by the HOA. The manual will provide guidelines and standards for the operations and management activities for the storm drain system. Included with the documentation will be contact information so that the HOA and the County Department of Public Works can effectively coordinate issues and concerns regarding the operation of the system. The Recycling Facility licenses and permits will require operation and maintenance plans, which must comply with 16 performance standards, and with all local, state, and federal environmental, health and safety laws, as applicable. The Wastewater Treatment Facility MUP will require operation and maintenance plans. All wastewater systems will be owned and managed by the Valley Center MWD which is responsible to ensure the system complies with 16 particular performance standards, and with all other local, state, and federal environmental, health and safety laws, as applicable.

The foregoing Operation and Maintenance Plans for Project Plans and Facilities Project Wide practice would be equivalent to the LEED®ND Long-Term conservation Management of Habitat or Wetlands Principle (SLL Credit 9) to create and commit to implementing a long term management plan for native habitats and water conservation areas, and create guaranteed funding sources.

10. Recycling and Innovating Wastewater Technology.

A Major Use Permit is being processed concurrently with the Specific Plan for construction of a Water Reclamation Facility (WRF) located on a 2.4-acre site in the southwestern portion of the site. Depending on which option is implemented by the Project, wastewater generated by the Community may be treated at the proposed on-site WRF, which would accommodate up to 356,510 gallons per day of wastewater from the development or by the other options identified in the EIR. Recycled water will be subject to Valley Center Municipal Water District policy on reclaimed water uses (Article 190.7 Conservation and Local Supply Use Requirements section (c)). Recycled water distribution pipelines may be installed within the Community roadways to deliver the recycled water to the targeted on-site areas. The reclaim wastewater generated by the project will be used for community open space irrigation. Also planned within the site, in the Town Center is a Recycling Facility (RF) to be located in the Town Center at a trail head staging area. (Specific Plan, Figure 1-4a) The purpose of this facility is to provide and encourage recycling among project residents in addition to the weekly collection of waste. The RF would be available for use by project residents, as well as those residing in the surrounding area. (Specific Plan, Section I)

Therefore the foregoing Recycling and Innovating Wastewater Technology practice is equivalent to the LEED®ND Wastewater Management principle (GIB Credit 14) to reduce pollution from wastewater and encourage water reuse, and the LEED®ND Solid Waste Management Infrastructure principle (GIB Credit 16), to reduce the volume of waste deposited in landfills by including a recycling or reuse station.

11. Pedestrian and Bike Paths Connecting the Community Amenities.

The project includes an extensive and thoroughly integrated, 16 plus mile Trail Network, including community pedestrian and bike paths, linking together the major project components, including the Town Center and Neighborhood Centers, Neighborhoods, the school, and the and 13.5 acre central park. The trails include a staging area in the Town Center, and three trail connections at the north and south ends of the project to trails defined in the County Master Trail Plan. See EIR, Figure 1-4a (Lotting Study) and Figure 1-8 (Trails Plan) showing the integration of the project as whole with the Trail Network. Also, project parks and trails are designed not to disturb the dedicated 104.1 acre Biological Open Space. Certain trails, towards the project perimeters, linking to the County Master Trail Plan will also allow equestrian usage.

Therefore the foregoing Pedestrian and Bike Paths Connecting the Community Amenities practice is equivalent to the LEED®ND Access to Civic and Public Space (NPD Credit 9) to improve physical and mental health and social capital by providing a variety of open spaces close to work and home and LEED®ND Compact Development

(NPD Prerequisite 2) to promote livability, walkability, to reduce public health risks by encouraging daily physical activity associated with walking and bicycling.

12. Topography Preservation.

The County of San Diego has adopted the Resource Protection Ordinance (RPO), which regulates the development of steep slopes. All 608-acres of the Project have been designed so that 99.7% of all grading will occur outside of the RPO defined steep slope areas. Less than 1.6 acres of RPO-defined steep slopes would be disturbed by the project, which complies with the RPO. The project is designed to minimize slope disturbance through preservation and alignment of project forms to the natural topography. Construction activities must conform to the project Grading Plan Development Standards governing contour grading, manufactured slopes and material import/export balance. For example, the project will not import or export any soil. The project site grading plan complies with the San Diego County Grading Ordinance, the Hillside Development Policy (1-73) and complies with the 10 percent steep slope encroachment limit allowed under Resource Protection Ordinance as only 0.8 percent (1.6 acres) encroachment of steep slopes is proposed. Further, the Specific Plan's Landform Grading Guidelines, the techniques for blending and rounding slopes, roadways and building pads to reflect the natural contours will minimize long-term erosion effects.

This Topography Preservation practice is equivalent to the LEED®ND Steep Slope Protection principle (SLL Credit 6), to minimize erosion, protect habitat, and reduce stress on natural water systems by preserving steep slopes in a natural, vegetated state.

13. Agricultural Land Conservation.

The project would support continued agricultural operations as follows: The project would permanently preserve 43.8 acres of agriculture off-site based on the County's Guidelines for the Determination of Significance for Agriculture or purchase agricultural mitigation credits at a 1:1 ratio through the County's PACE (Purchase of Agricultural Conservation Easement) program. The site is not located within a Williamson Act Contract or an Agricultural Preserve. Approximately 23.8 acres of active agriculture would remain on-site within the biological open space and 18.3 acres of orchards will be planted within the project agricultural buffers. An additional 20 acres of common area open space could include community gardens and agriculture. Other compatible agricultural uses would be allowed by the Specific Plan, such as farmers' markets, community gardens and vineyards.

Therefore this Agricultural Land Conservation practice also incorporates the equivalent principle as the LEED®ND Agricultural Land Conservation principle (SLL Prerequisite 4), to preserve irreplaceable agricultural resources by protecting prime and unique farmland from development, and as the LEED®ND Local Food Production principle (NPD Credit 12) to promote the environmental and economic benefits of community-based food production and improve nutrition through better access to fresh produce.

14. Floodplain Avoidance.

The project is not located in a flood plain and therefore would meet the equivalent principle as the LEED®ND Floodplain Avoidance principle, to protect life and property, promote open space and habitat conservation, and enhance water quality and natural hydrologic systems.

15. Building Site Selection.

The project conducted an initial inventory of the natural resources (EIR, Ch. 2.5 Biological Resources Report, and Tables 1-2) across the site to create a development plan that would maximize avoidance of natural resources. This is reflected in the Open Space and Recreation Plan, and to varying other extents other resource-attentive plans, such as the Drainage Plan, the Landscape Concept Plan, and the Water and Wastewater Plan. These plans are assured proper implementation, through several county, state, and federal government agency approvals and oversight mechanisms, to protect project site natural resource areas both during construction and in perpetuity. Two plans in particular, both Conceptual Resource Management Plans (Attachments 15 and 16 have been prepared that provide the guidelines for the protection and maintenance of natural resources and areas being preserved. (EIR, Ch. 2.5, Biological Resources Report, Attachments 15 (Wetlands) and 16 (Biological Open Space) Three top priority resources to preserve include Coast Live Oak Woodland, Riparian Woodlands (southern coast live oak riparian woodland, southern willow riparian woodland) and Riparian Scrubs (southern willow scrub, mule fat scrub). See EIR, Ch. 2.5, Sec. 1.4 Biology Resources Report. Project streets, buildings, homes, facilities, and all built features are sighted to avoid and thus conserve natural resources, natural drainages and several high priority vegetation communities.

The Project's Building Site Selection Green Building Practice is equivalent to the LEED®ND intent of Minimize Site Disturbance (GIB Credit 7) by preserving existing noninvasive trees, native plants, and pervious surfaces.

16. Sustainable Building.

The project includes the following performance measures related to energy use: Lilac Hills Ranch homes and buildings will be designed, constructed and built to exceed 2008 Title 24 Energy Standards by 30%, and the project will install 2,000 kilowatts (kW) of on-site solar/photovoltaic systems, which are estimated to produce 3,400,000 kW hours of electricity, or approximately 22 percent of the project's total electricity needs at build-out. In order to achieve this total photovoltaic energy production volume, the project shall produce or cause to be produced renewable electricity by one of the following methods to be determined by the applicant: (1) installation of the equivalent of one photovoltaic (i.e., solar) power system no smaller than 2 kW on 500 single-family homes, and a photovoltaic power system(s) no smaller than 1,000 kW on 90,000 square feet of non-residential roof area; or (2) the installation of the equivalent

of one photovoltaic (i.e., solar) power system no smaller than 2 kW on 1,000 single-family homes. The actual capacity and/or conversion efficiency of the photovoltaic panels may alter the actual number of roofs or non-residential roof space requirements to meet the annual 3,400,000 kW-h requirement at project build out.

All buildings would have dual pipe irrigation systems to conserve fresh water resources. The project would also plant shade along streets, trails, in parks, in parking lots, in the commercial centers and in civic and public spaces, which would negate the formation of urban heat islands and reduce energy demand during the hottest weather.

Therefore the project Sustainable Building practice would be equivalent to the LEED®ND Certified Green Building principle (GIB Prerequisite 1), to encourage the design, construction, and retrofit of buildings using green building practices, the LEED®ND Building Energy Efficiency principle (GIB Credit 2), to encourage the design and construction of energy-efficient buildings that reduce air, water, and land pollution and environmental damage from energy production and consumption, the LEED®ND Solar Orientation principle (GIB Credit 2), to encourage energy efficiency by creating optimum conditions for the use of passive and active solar strategies, and the LEED®ND Tree-Lined Streets principle (NPD Credit 12) to, encourage walking and bicycling and discourage speeding, and to reduce urban heat island effects, improve air quality, increase evapotranspiration, and reduce cooling loads in buildings

17. Integrated Transportation Planning.

The project site is less than a half-mile from I-15, with access to regional destinations, and approximately a mile of frontage along West Lilac Road (a Mobility Element roadway), maximizing efficient community access within Valley Center and Bonsall. The village core will reserve a future mass transit stop, which is located within a short walk or bike ride from all points within the community and would include an interim transit service to transport residents to the nearest transit stop until the NCTD establishes a transit route to the Project. A 16-plus mile community path and trail network supports pedestrians, bicyclists, and equestrians and is connected to the planned County trail system at the north and south ends of the Project. Streets are designed to promote traffic calming through the use of narrow roads, curvatures, roundabouts, landscaping, and parallel parking. The proposed paths are placed parallel to the streets to reduce vehicle speeds, promote pedestrian access and increase roadway safety. Finally, the Project will implement a Transportation Demand Management Plan and private interim-transit program until regional transit plans are coordinated. The Specific Plan also requires planning and integration of transit facilities within the project to meet the standards of the North County Transit District which are described in the project's Transportation Demand Management program: will coordinate with the NCTD as to the future sighting of transit stops/stations within the project site. As the project is built-out, the NCTD may adjust routes and services to meet the needs of the growing community. The project would allocate a site for public transportation within the Town Center. The applicants will continue to coordinate with NCTD and MTS regarding potential transit options for the project site.

Therefore this Integrated Transportation Planning practice would be equivalent to the LEED®ND Transit Facility principle (NPD Credit 7) to encourage transit use and reduce driving by providing safe, convenient, and comfortable transit waiting areas, and LEED®ND Transportation Demand Management principle (NPD Credit 8) to reduce energy consumption, pollution from motor vehicles and adverse public health effects by encouraging multimodal travel.

18. Dark Sky Protection.

The project is 3,700 feet beyond the Zone A radius for Palomar Observatory. The project is however, designed to comply with the safety standards of the County Light Pollution Code. Street lighting will include downward directed lighting, shielded lighting, low voltage decorative lighting, and lighting lower than what would typically be found on an urban street. See Specific Plan, Section III.D. The project Lighting Fixture Schedule illustrates sensitive and rural-themed lighting designs.

This Dark Sky Protection practice is equivalent to the LEED®ND Light Pollution Reduction principle (GIB Credit 17) to increase night sky access, improve nighttime visibility, and reduce the consequences of development for wildlife and people.