

Attachment C – General Plan Consistency Table

Attachment Page 4

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>General Plan Guiding Principles.</p>	<p>The General Plan maps, goals and policies, and implementation programs are based on a set of ten interrelated principles that provide guidance for accommodating future growth while retaining or enhancing the County's rural character, its economy, its environmental resources, and its unique communities. Guiding Principles guide the formulation of growth and development plans, environmental conservation, provision of infrastructure and services, and protection from environmental and man-induced hazards.</p> <p>As stated in above, the General Plan Guiding Principles, Goals, and Policies must be taken as a whole using a balanced approach. Therefore, when the proposed project is considered within the context of all of the Guiding Principles, the project would further the objectives of Guiding Principles 1, 2, 4, 5, 7, and 9.</p> <p>Guiding Principle 1 states that the County should "support a reasonable share of projected regional population growth." Although the General Plan accounted for a reasonable share of projected growth during the General Plan Update, the project would construct additional housing that would contribute to the housing need within the region, including single-family detached, single-family attached, mixed use, senior housing and an assisted living group/care facility.</p> <p>Guiding Principle 2 promotes health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development. The project would locate new growth near existing and planned infrastructure within the Valley Center Municipal Water District and along West Lilac Road, a 2.2C Light Collector Mobility Element Road, within close proximity to I-15. The project would provide services for the proposed development, including 90,000 square feet of commercial uses, a school, parks, and trails. The project would also be compact with the highest intensity of residential and commercial uses within the town and neighborhood centers surrounded by lower density single-family residential uses.</p> <p>Guiding Principal 4 states that the County should "promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance." The project would</p>

Attachment Page 5

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
	<p>comply with the intent of this guiding principle by preserving biological resources pursuant to the Resource Protection Ordinance (RPO), by complying with CEQA, and by mitigating impacts to biological resources within the Pre-Approved Mitigation Area (PAMA) of the draft Multiple Species Conservation Program (MSCP).</p> <p>The project would also comply with the intent of Guiding Principal 5, which ensures “that development accounts for physical constraints and the natural hazards of the land.” The project would comply with this principle by preserving steep slopes within the project site in accordance with the RPO and reducing natural hazards through the provision of fuel modification on-site adjacent to the project boundary and surrounding open space areas and through the implementation of other mitigation measures that address impacts to habitat and wetlands.</p> <p>The project would accommodate drainages through the site and would not impact any Federal Emergency Management Agency or County mapped floodplain areas.</p> <p>The project would also comply with the intent of Guiding Principle 6, which states the County should “provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.” The project would implement this principle by providing new access routes for the proposed and existing residents, as well as providing bikeways, pathways and trails within ½ mile of proposed services (commercial, parks, and a school). Although the site is not located within an area served by public transportation, the project would provide a location within the Town Center that would be available for a transit stop if service were provided to the area in the future.</p> <p>The project would also comply with the intent of Guiding Principle 7, which states that the County should “maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.” As demonstrated in the Land Use Policy LU-1.2 analysis, the project would meet the intent of Guiding Principle 7 by providing services (commercial) and civic uses (parks and school) within ½ mile of the proposed residences within the community, and by implementing project design measures that would result in a less than significant impact to greenhouse gas emissions, including a condition that</p>

Attachment Page 6

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
	<p>future construction within the site exceeds 2013 Title 24 Energy Efficiency Standards by 5 percent.</p> <p>In addition, the project would comply with the intent of Guiding Principle 9, which states that the County “minimize public costs of infrastructure and services and correlate their timing with new development.” The project would include the construction of both on and off-site improvements to roadways and other infrastructure, such as sewer. The improvements to the infrastructure and services would be provided by the applicant and not by the public. In addition, the timing of the improvements would be correlated with the phasing of the project in accordance with CEQA and County standards.</p> <p>While the project is largely consistent with the set of ten Guiding Principles, decisions related to land use are complex and, as noted above, decision makers must consider and balance the entire set of Guiding Principles, Goals, and Policies that guide decisions. Guiding Principle 8, states that agriculture should be preserved as an integral component of the region’s economy, character and open space network. It is important to note that a policy or principle of this nature should not be considered a mandate for complete preservation of all of the existing agricultural lands in the County. First, the existing Semi-Rural Regional Category and Semi-Rural 4 (SR-4) and Semi-Rural 10 (SR-10) Land Use Designations allow various uses other than agriculture including lower-density residential neighborhoods, recreation areas, and related commercial uses that support rural communities. It is not the intent of the General Plan to prohibit different (non-agricultural) uses on Semi-Rural lands that are currently used for agriculture or restrict their use to agriculture only.</p> <p>Second, although the project would convert approximately 384 acres of existing agricultural lands to non-agricultural uses, the project would not conflict with the Guiding Principle or adjacent agriculture because agricultural would remain a vital part of the region’s economy, character and open space network. Approximately 20.3 acres of common area would be available for agriculture activities within the project site, and impacts to 43.8 acres of agricultural land would be mitigated through the purchase of credits through the County’s off-site mitigation banking program or by independently securing permanent agricultural conservation easements. The open space easements would preserve the land for agricultural conservation</p>

Attachment Page 7

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
	<p>purposes in perpetuity. The project site would also be surrounded by semi-rural and rural lands intended for agricultural operations, which would be protected through on-site agricultural buffers, including fencing and restrictions on the placement of structures. Aerial application of pesticides, dust generation, and noise from agricultural equipment would be prohibited in the agricultural buffers. The buffers would be adequate to ensure that off-site impacts to agriculture are less than significant.</p> <p>There are also a number of other reasons why the project complies with Guiding Principle 8, including: (1) The site is not located within a Williamson Act Contract or an Agricultural Preserve. (2) 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. (3) 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). Therefore, the proposed project would not conflict with Guiding Principle 8 because agricultural (including agriculture adjacent to the project) would remain a vital part of the region's economy, character and open space network.</p> <p>Furthermore, if Guiding Principle 8 was applied in a vacuum to require the preservation of all agriculture on site, the result would be to prevent the County from balancing Guiding Principles 1, 2, 4, 5, 7, and 9, which the project would further, with Guiding Principle 8. Although this interpretation would fully implement Guiding Principle 8, the remaining principles would not be implemented by the project. As explained previously, the General Plan Guiding Principles, Goals, and Policies cannot be applied independently, but must be balanced with one another. In balancing these Guiding Principles, the County may give more weight to Guiding Principles 1, 2, 4, 5, 7 and 9 than to Guiding Principle 8.</p>
<p>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.</p>	<p>The proposed project would comply with the Community Development Model as explained in detail under LU-1.2, including the boundaries of the Regional Categories.</p>

Attachment Page 8

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Policy LU-1.1 Assigning Land Use Designations. 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.</p>	<p>The General Plan Land Use Framework defines a Community Development Model that uses three regional categories- Village, Semi-Rural, and Rural Lands to broadly reflect the differing character of County lands that range from communities with substantial populations to predominantly undeveloped backcountry areas.</p> <p>The proposed project would adopt new regional categories as a result of the General Plan Amendment and Land Use Map amendment in conformance with the Community Development Model. The project would be consistent because it proposes a "Village" Regional Category that is surrounded by the "Semi-Rural" Regional Category, which transitions to the "Rural" Regional Category. The General Plan defines the Community Development Model as a central core, referred to as a "Village" or, in very rural communities, a "Rural Village," in which the highest intensities of development are surrounded by areas of lesser intensity including "Semi-Rural" and "Rural Lands."</p>
<p>Policy LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. <i>[See applicable community plan for possible relevant policies.]</i></p>	<p style="text-align: center;">"Community Development Model"</p> <p>The proposed project is designed to be consistent with the Community Development Model because it proposes a "Village" Regional Category that is surrounded by the "Semi-Rural" Regional Category, which transitions to the "Rural" Regional Category. The General Plan defines the Community Development Model as a central core, referred to as a "Village" or, in very rural communities, a "Rural Village" in which the highest intensities of development are surrounded by areas of lesser intensity including "Semi-Rural" and "Rural Lands." The edge of a "Village" or "Rural Village" can be defined by a boundary that can be used to differentiate permitted development densities and design standards. The "Village" would contain the densest neighborhoods and a broad range of commercial and civic uses that are supported by a dense network of local roads containing bicycle lanes and walkways linking the neighborhoods with parks, schools, and civic uses. Outside of the "Village," "Semi-Rural" areas would contain low-density residential neighborhoods, small-scale agricultural operations, and rural commercial businesses. In turn, these would be surrounded by "Rural Lands" characterized by very low density residential areas that contain open space, habitat, recreation, agriculture, and other uses associated with rural</p>

Attachment Page 9

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
	<p>areas.</p> <p>The Community Development Model is implemented by three regional categories—Village, Semi-Rural, and Rural Lands—that broadly reflect the different character and land use development goals of the County's developed areas, the lower-density residential and agricultural areas, and the very low-density or undeveloped rural lands (See the Figure at the bottom of page 2-8 in the General Plan). The Community Development Model directs the highest intensities and greatest mix of uses to Village areas, while directing lower-intensity uses, such as estate-style residential lots and agricultural operations, to Semi-Rural areas. The Semi-Rural category may effectively serve as an edge to the Village, as well as a transition to the lowest-density category, Rural Lands.</p> <p>The project has been designed with the highest intensities (commercial, mixed-use and attached residential) within the central portion of the project (Town Center), with the lower-intensity residential uses (single-family detached).around the perimeter of the site.</p> <p style="text-align: center;">"Provides Necessary Services and Facilities"</p> <p>The proposed project would provide all necessary services and facilities, including water, sewer, parks, schools and fire service. The Valley Center Municipal Water District has provided service availability forms for both water and sewer that state that services to the project are reasonably expected to be available within the next five years. In addition, the project includes four potential options for fire service. All four options would provide adequate fire service to the project within the 5-minute travel time requirement of the General Plan. Furthermore, the project would also include other necessary services, including private and public parks, a site for a K-8 school, and 90,000 square feet reserved for commercial uses.</p> <p style="text-align: center;">"LEED-Neighborhood Development Certification or an Equivalent"</p> <p>For a complete description of the project's compliance with the LEED-ND certification component of Policy LU 1.2, please see Section D, General Plan Conformance, of the Lilac Hills Ranch staff report.</p>

Attachment Page 10

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Policy LU-1.3 – Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.</p>	<p>The project is surrounded by Semi-Rural land use designations, not rural lands as described by this policy. Additionally, the change in land use designation from the existing Semi-Rural lands category to Village will establish a community consistent with the Community Development Model, which is characterized by the highest intensity uses surrounded by gradually decreasing intensities and densities toward the perimeter of the project. Furthermore, the project would not impact any rural lands as defined by the "Rural" Regional Category.</p>
<p>Goal LU-2 Maintenance of the County's Rural Character. Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.</p>	<p>The proposed project would be designated as a "Village" under the General Plan and would conform to the Community Development Model. In addition, the project site is not subject to the "Rural" Regional Category. . The project would provide open space, parks, trails and other common areas that will reinforce its rural village identity. The project would provide new commercial uses and park land that would enhance the existing services in the Valley Center community while maintaining and preserving 104.1 acres of biological open space. Approximately 20.3 acres of common area would be available for agriculture activities within the project site, and 43.8 acres of agricultural lands would be acquired off-site and placed within permanent agricultural conservation easements. The project is designed in accordance with the Community Development Model which will provide the most intense uses in the center of the project, with the outer rings of development "feathering" out to integrate within the existing community character. In addition, a 50-foot vegetation buffer along the perimeter of the project enhances the transition from Village to surrounding rural land uses.</p>
<p>LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.</p>	<p>The general character of the surrounding area is that of rolling hills which have been historically used for citrus and avocado groves, estate residences, and open space. Varying types of homes exist in the project area ranging from small lot townhomes to farm homes on large parcels. Single-family residential homes are located on parcels ranging in size from less than 5,000 square feet to 40 acres. The project proposes to amend the General Plan Regional Land Use Map to re-designate the entire project site as a Village that is consistent with the Community</p>

Attachment Page 11

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
	<p>Development Model, and provides a mix of residential homes that are similar to the existing mix of homes found in the surrounding area. Land use densities will be assigned based upon the Village designation. In addition the project proposes to modify the text of the Valley Center Community Plan and the Bonsall Community Plan by adding Lilac Hills Ranch as an additional Village.</p> <p>The project has been designed to be consistent with relevant community plan policies by incorporating the design principles set forth in both in both of the 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. Additionally, in the project's Specific Plan Chapter 3 design guidelines are established that will create transitions from low-density residential and agricultural uses to the denser uses within the Village.</p> <p>The project features the most intense uses, single-family attached units, in the center of the development and away from the neighboring land uses. Project development along West Lilac Road, east of the western entrance, would include a 50-foot buffer along the north side of the project in order to better implement the necessary transition between the project site and existing land uses to the north. The wider spacing between these homes combined with the landscaping and multi-use trail on the south side of West Lilac Road provide a gradual transition from the project to existing nearby homes and users of West Lilac Road. The project also incorporates various design features to reduce visual effects along the project perimeter. These include the use of wider lots and 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 trees will provide a transition from the project to the existing uses.</p>

Attachment Page 12

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Policy LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.</p>	<p>While the project site currently has the Semi-Rural Regional Category designation and the project was not anticipated by the Valley Center Community Plan, the project is located approximately one-quarter mile east of Interstate 15, a major regional transportation corridor. Additionally, there are many approved Specific Plans in the adjacent 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.</p>
<p>Policy LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.</p>	<p>The project would provide open space, parks, trails and other common areas that will reinforce its rural village identity. The project will provide a 50-foot vegetation buffer along the perimeter of the project (along West Lilac Road) which will provide a transition between the existing rural homes to the north and east, and the higher densities of the project. 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 trees will provide a transition from the project to the existing uses. Additionally, 50-foot agricultural buffers planted with tree crops will be implemented where residential uses in the project would abut existing, adjacent orchards and other agricultural uses in order to create a transition between the two uses along the western and southern perimeter of the project site as agricultural mitigation (see M-AG-2).</p>
<p>Policy LU-2.7 Commercial Viability. Ensure that new commercial centers maintain or enhance the viability of existing commercial areas.</p>	<p>There are no commercial uses within the immediate vicinity of Lilac Hills Ranch. The project will provide 90,000 square feet of commercial space which can incorporate a variety of diverse retail opportunities. The commercial uses within the project are designed to serve the needs of the residents and immediately surrounding areas and will enhance the commercial viability of the Valley Center region by diversifying the type of retail in the area.</p>

Attachment Page 13

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Policy LU-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.</p>	<p>An EIR was prepared for the Project which includes appropriate mitigation measures whenever feasible for impacts resulting from the Project. In particular, the following has been identified: the implementation of mitigation measures M-AQ-2 through M-AQ-5, would reduce impacts related to dust to less than significant.</p> <p>Mitigation measures (M-N-11) and (M-N-12) would reduce temporary 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 Lane and future Lilac Hills Ranch Road, impacting existing off-site Noise Sensitive Land Uses (Impact M-N-3). No feasible mitigation measures exist, and therefore, these off-site impacts are significant and unavoidable direct and cumulative impacts of the project. Other noise impacts (Impacts M-N-4 through M-N-8, and M-N-9 and M-N-10) would be reduced to less than significant by mitigation measures M-N-3 through 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 M-N-13). Impacts associated with rock crushing activities would be mitigated with the incorporation of M-N-10.</p> <p>The project would change the composition of the visual environment 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 M-V-1 and M-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 M-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</p>

Attachment Page 14

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
	<p>character of the area (Impact M-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>
<p>Policy LU-2.9 Maintaining Rural Character. Consider level of service criteria, in accordance with Policy M-2.1, to determine whether adding lanes to a Mobility Element road would adversely impact the rural character of a community or cause significant environmental impacts. In those instances, consider other options to mitigate LOS where appropriate.</p>	<p>West Lilac Road is a Mobility Element road that will accommodate travel from the project to the adjacent public road system and other community planning areas. The project will have two 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 which would reduce the improved width and capacity of the roadway. However, if the roadway segment is downgraded to 2.2F it would not be able to accommodate the anticipated traffic under buildout of the General Plan and therefore would need to be added to Table M-4 in the Mobility Element as a roadway accepted at a LOS of E/F. Staff recommends that the existing 2.2C classification be retained, which would not require the roadway to be added to Table M-4.</p> <p>The project also results in the need to upgrade the classifications of two segments of Old Highway 395 under the buildout scenario (E. Dulin Rd. to West Lilac Road and West Lilac Road to the I-15 southbound ramps). Similar segments of Old Highway 395 were already accepted at LOS E/F operations as part of the General Plan Update. The rationale for accepting these additional segments of Old Highway 395 is based on an arterial speed study that demonstrated that the roadways would operate an acceptable LOS based on the speed of traffic, not just based on the volume to capacity ratio.</p> <p>Additionally, the project would add traffic to a segment of Old Highway 395 from E. Dulin Road to West Lilac Road that was previously accepted at LOS E/F as part of the General Plan Update. This roadway segment would be reaccepted at LOS E/F operations with the additional traffic generated by the project. As explained previously, rationale has been prepared as part of the General Plan Amendment explaining why this segments should remain at LOS E/F.</p>

Attachment Page 15

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Goal LU-3 Diversity of Residential Neighborhoods. A land use plan that accommodates a range of building and neighborhood types suitable for a variety of lifestyles, ages, affordability levels, and design options.</p>	<p>The proposed project includes a range of building types suitable for a variety of lifestyles, including single-family detached, attached, mixed-use and senior housing.</p>
<p>Policy LU-3.1 Diversity of Residential Designations and Building Types. Maintain a mixture of residential land use designations and development regulations that accommodate various building types and styles.</p>	<p>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, building types and densities. Section III of the Specific Plan illustrates the multitude of residential layouts that could be built along with the general requirements for lot sizes setbacks in each area.</p>
<p>Policy LU-3.2 Mix of Housing Units in Large Projects. Require new large residential developments (generally greater than 200 dwelling units) to integrate a range of housing types and lot and building sizes. [See applicable community plan for possible relevant policies.]</p>	<p>The Lilac Hills Ranch Specific Plan provides a range of housing types, including single-family detached, attached, mixed-use and senior housing.</p>
<p>Policy LU-3.3 Complete Neighborhoods. Require new development sufficiently large to establish a complete neighborhood (typically more than 1,000 dwelling units) to include a neighborhood center within easy walking distance of surrounding residences. [See applicable community plan for possible relevant policies.]</p>	<p>Lilac Hills Ranch includes a Town Center complete with commercial and public uses that is within one-half mile of most 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 additional commercial services within one-half mile of residences.</p>
<p>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 unincorporated County and the region.</p>	<p>The County has coordinated with other jurisdictions throughout the process including tribal governments, CALTRANS and all applicable service providers.</p>

Attachment Page 16

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>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.</p>	<p>The project has been designed to locate services in close proximity to residential uses in order to reduce vehicle miles traveled and related greenhouse gases and to encourage walking and bicycling.</p>
<p>Policy LU-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>	<p>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 design 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 some job opportunities. An extensive network of trails is provided to further encourage residents to walk and bike throughout the community.</p> <p>Additionally, the project proposes 1,746 dwelling units which will increase the demand within the region for public transportation. While bus service is not currently proposed for the project site, the County and NCTD will continue to work together to meet new demand for service.</p>
<p>Policy LU-5.2 Sustainable Planning and Design. Incorporate into new development sustainable planning and design.</p>	<p>Lilac Hills Ranch is designed in accordance with sustainable community principles, such as emphasizing pedestrian and bicycle infrastructure and use, mixed land uses, energy and water efficient building and landscaping design, and recycling of water and waste. 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 rather than drive their cars. Homes will be equipped with energy and water saving devices including low-flow fixtures and solar systems. Drought tolerant landscaping will be required. Recycled water will be used extensively, and groundwater will be used on a limited basis in all common areas. Finally, a recycling facility (RF) will be located within the project</p>

Attachment Page 17

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
	<p>site that would encourage recycling.</p> <p>Additionally the project is sensitive to natural resources and preserves the most sensitive wetlands while developing less sensitive upland areas where no significant populations of native species have been located. Conservation of upland habitat in offsite areas as a regional preserve will ensure that nearby natural resources are preserved in an interconnected system which minimizes habitat fragmentation.</p>
<p>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.</p>	<p>The proposed project is a mixed-use pedestrian oriented community with extensive areas for parks, trails, agriculture, and open space. It preserves 95 percent of the RPO wetlands in open space easements and disturbs less than 1.6 acres of RPO steep slopes. Major riparian woodlands located on the site will be placed into open space easements and roadway crossings of these sensitive habitats have been minimized to one location.</p>
<p>Policy LU-6.1 Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.</p>	<p>The project will protect 104.1 acres of sensitive biological resources (approximately 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 and enhanced, and appropriate mitigation will be provided. Mitigation for impacts to upland habitats will be located in areas that contribute significant resources to an integrated preserve system. Implementation of the project will ensure the conservation of the significant sensitive resources onsite in accordance with 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).</p>
<p>Policy LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.</p>	<p>The most sensitive areas, the wetlands, have largely been preserved and will be protected with conservation easements. Lilac Hills Ranch has been designed to cluster land uses in the least sensitive areas of the property, those areas with upland vegetation types. Areas in which significant cultural resources have been located will be designated as open space.</p>

Attachment Page 18

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Policy LU-6.4 Sustainable Subdivision Design. Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities. [See applicable community plan for possible relevant policies.]</p>	<p>This policy relates to Conservation Subdivisions, which are required within the SR-10, and RL-20 through RL-80 Land Use Designations. The proposed project would change the existing Semi-Rural SR-4 and SR-10 Land Use Designations to Village Residential VR-2.9 and Village-Core Mixed Use C-5. Therefore, this policy does not apply to the project.</p>
<p>Policy LU-6.5 Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development (LID) 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.</p>	<p>Specific project features that implement this policy are included in the project design. These include the features identified and described in the Major SWMP, Drainage Study, and HMP as detailed in FEIR 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 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.</p>
<p>Policy LU-6.6 Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.</p>	<p>The most recognizable and sensitive natural features on the project site are the drainage courses and adjacent mature oak woodlands, which have been integrated into the preserved open space system of the project. The project includes a minimum 50-foot wetland buffer for the protection of on-site wetlands which have been previously degraded by agricultural activities, but buffers of up to 500-feet protect the higher quality wetlands along the southwest boundary; permanent fencing/walls where lots are adjacent to open space at trail heads, and at staging areas; signage every 200 feet on trails along or in open space prohibiting access to sensitive areas; and 100-foot limited building zones around open space areas to reduce edge effects. Additionally, due to previous development and agricultural use, over 75% of the property was previously disturbed. Of the 146 acres that are not disturbed, 104.1 acres will be conserved in permanent open space.</p>

Attachment Page 19

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Policy LU-6.7 Open Space Network. Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunity.</p>	<p>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 as 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 wildlife 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 providing land located within the proposed Pre Approved Mitigation Area (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 and will primarily include drought resistant native species as discussed in the conceptual landscaping plan and Specific Plan. In keeping with the project objectives of a consolidated development footprint, Lilac Hills Ranch preserves the more sensitive wetlands while developing less sensitive upland areas where no significant populations of native species are located. Conservation of upland habitat offsite in areas planned as a regional preserve will ensure that the natural environment is preserved in an interconnected system while minimizing habitat fragmentation. Lilac Hills Ranch will conserve 90-95% of onsite wetlands in accordance with the Lilac Hills Ranch Resource Management Plan. Appropriate buffers are included in the project design.</p>

Attachment Page 20

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Policy LU-6.8 Oversight of Open Space. Require that open space associated with future development that is intended to be preserved in perpetuity either be: 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 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>The Biological Open Space Preserve consists of 104.1 acres and includes environmentally sensitive habitats and buffer areas (including existing agriculture) that preserve wildlife corridors and linkages. This open space will be set aside in accordance with County requirements. A Resource Management Plan has been prepared that will guide management of the biological open space in perpetuity, and a conservation easement on the land will be dedicated to the County. (See EIR, Section 2.5-Biology and Appendix G to the EIR which includes the Resource Management Plan). The Lilac Hills Ranch Home Owners Association will own, manage, and maintain additional open space including manufactured and landscaped slopes, and recreational open space (trails, parks, etc.) within the community boundaries.</p>
<p>Policy LU-6.9 Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.</p>	<p>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 contours by undulating slopes and replicating the natural terrain. Grading will be balanced across the site. The Specific Plan text includes a number of single-family development templates that step down the hillsides. Runoff is directed to existing drainages through appropriate mechanisms as discussed in the EIR, Section 3 and in Appendix U-1, 2, and 3 of the EIR relating to hydrology and stormwater management.</p>
<p>Policy LU-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.</p>	<p>The most severe hazardous threat to the project area is wildfire. Portions of the site are mapped as very high fire hazard zones severity zones by CALFire. As discussed in the project Final Environmental Impact Report in Chapter 2.7, the wildfire threat will be mitigated to less than significant levels by the incorporation of the project design features identified in the Fire Protection Plan (FPP) which was approved by CALFire and the Deer Springs Fire Protection District.</p>

Attachment Page 21

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Policy LU-6.11 Protection from Wildfires and unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.</p>	<p>The project proposes to construct 1,746 dwelling units within an area, portions of which have been mapped as very high Fire Hazard Severity Zones. A Fire Protection Plan (FPP) was prepared and was approved by the service provider. As described in the FEIR, 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 resulting from implementation of the proposed project and described methods and measures to minimize that hazard. The Project design features include: Fuel Modification Zones (FMZ); 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. Therefore, because the project mitigates the wildfire risk, it is consistent with this policy.</p>
<p>Policy LU-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.</p>	<p>The project is not located within a floodway or 100 or 200 year floodplain.</p>
<p>Goal LU-7 Agricultural Conservation. A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character.</p>	<p>While Goal LU-7 states that agricultural land use should be preserved as an integral component of the County's rural character, it is important to note that a policy or principle of this nature should not be considered a mandate for complete preservation of all of the existing agricultural lands in the County. Although the project would convert approximately 384 acres of existing agricultural lands to non-agricultural uses, the project would not conflict with the Goal because agriculture would remain a vital part of the region's economy, character and open space network. Approximately 20.3 acres of common area would be available for agriculture activities within the project site, and 43.8 acres of agricultural lands would be acquired off-site and placed within permanent agricultural conservation easements. The open space easements would preserve the land for agricultural conservation purposes in perpetuity. The project site would also be surrounded by semi-rural and rural lands intended for agricultural operations, which would be</p>

Attachment Page 22

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
	<p>protected through on-site agricultural buffers, including fencing and restrictions on the placement of structures. The agricultural buffers would include restrictions on aerial pesticide application, dust generation, and noise from agricultural equipment. The buffers would be adequate to ensure that off-site impacts to agriculture are less than significant.</p>
<p>Policy LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.</p>	<p>The General Plan designated the project site as Semi-Rural Lands pursuant to General Plan Land Use Policy LU-7.1. The project proposes to amend the General Plan Semi Rural Lands land use designation to create a new Village.</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.” As explained above in the introduction to the General Plan Consistency Table, policy LU-7.1 is not intended to prohibit the establishment of new villages on agricultural land that support continued agricultural uses.</p> <p>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.” Therefore, policy LU-7.1 should not be applied independently and should be balanced with other policies in the General Plan that allow for new growth and the establishment of new villages. In balancing the policy with other policies in the General Plan, the County may give more weight to the policies that allow well-designed new growth, such as policies 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, than to policy LU-7.1. Nonetheless, Lilac Hills Ranch would provide new growth and development while preserving some agriculture on-site within the biological open space and preserving some agriculture off-site through the preservation of 43.8 acres of significant agricultural resources and would support continued agricultural uses by allowing farmers markets and community gardens.</p>

Attachment Page 23

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
<p>Policy LU-7.2 Parcel Size Reduction as Incentive for Agriculture. Allow for reductions in lot size for compatible development when tracts of existing historically agricultural land are preserved in conservation easements for continued agricultural use.</p>	<p>This policy was intended to promote Lot Area Averaging and Conservation Subdivisions that preserve agricultural resources and still reach the maximum unit count within the site. The policy was also intended to reduce impacts on off-site agricultural operations through the on-site preservation of agricultural resources that buffer the off-site uses. This policy does not apply to the project because the project is not utilizing Lot Area Averaging or designed as a Conservation Subdivision.</p>
<p>Policy LU-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 cores in Community Plans to assist in the future planning of residences, infrastructure, businesses, and civic uses.</p>	<p>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 the development standards and regulations regarding community development, the mix of permitted land uses, and lot sizes and architectural styles that will guide development of all aspects of the project. The Specific Plan also describes the sizes and placement of community amenities including parks, trails, public services and infrastructure. Additionally, the Specific Plan describes the design features that will be implemented in order to achieve efficient use of transportation, energy, and water as described in the project description.</p>
<p>Policy LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations.</p>	<p>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 and allowing for the preservation of the most 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 will provide a 50-foot vegetation buffer along the West Lilac Road corridor which will result in a transition among density and the neighboring rural land uses. Additionally, the Project is 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 would be integrated throughout the project site and would be located within the HOA-maintained open space, such as manufactured slopes. A total of 20.3 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 agriculture, a 50-</p>

Attachment Page 24

Attachment C – General Plan Consistency

General Plan Goal/Policy	Explanation of Project Conformance
	foot wide buffer planted with trees will provide a transition from the project to the existing uses.
<p>Policy LU-9.3 Village and Community Core Guidelines and Regulations. Support the development and implementation of design guidelines, Village-specific regulations for roads, parking, and noise, and other planning and regulatory mechanisms that recognize the unique operations and character of Villages, Town Centers, and transportation nodes. Ensure that new development is compatible with the overall scale and character of established neighborhoods.</p>	<p>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 over time is compatible with those previously developed. In addition, the design guidelines incorporate the design principles set forth in both Valley Center and Bonsall Community Plans ensuring that the project will be compatible with the character of the established neighborhoods.</p>
<p>Policy LU-9.4 Infrastructure Serving Villages and Community Cores. Prioritize infrastructure improvements and the provision of public facilities for Villages and community cores as sized for the intensity of development allowed by the Land Use Map.</p>	<p>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.</p>
<p>Policy LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.</p>	<p>The Lilac Hills Ranch Project provides a mixture of uses in a Town Center, consisting of commercial uses; office uses, a farmers' market, and attached single-family units. 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 design 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 1/2 mile. An extensive network of trails is provided to further encourage residents to walk and bike throughout the community.</p>