

3.1.6 Land Use and Planning

This land use analysis for the Proposed Project describes the relevant land use policy and regulatory framework applicable to the Project, identifies guidelines for determination of significance, evaluates potential environmental impacts related to the Project's consistency with applicable County land use policies, goals and regulations, evaluates cumulative impacts and (as required) discusses feasible mitigation measures identified in Chapter 2.0 subchapters. The CEQA guidelines of significance used in this section require the EIR to consider whether a proposed project conflicts with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact. Under CEQA, a conflict or inconsistency with an applicable plan is not by itself considered a significant environmental impact. Instead, the inconsistency must result in a significant physical impact for there to be a significant impact under CEQA. In addition to the land use consistency analysis in this section, each chapter of the EIR contains a discussion of the Project's potential physical impacts related to consistency with applicable regulations, including General Plan goals and policies, relevant to the environmental issue area.

3.1.6.1 Existing Conditions

For information regarding the existing physical setting, the reader is referred to the discussion of Subchapter 1.4, *Environmental Setting*, of this EIR, as well as Figure 1-3, *Area Land Uses*.

Although the existing condition, or "baseline" for environmental review, is usually set as the date that the NOP is released for circulation; CEQA allows for an adjustment where that baseline would be misleading or without informational value as to a project's true impacts. Harmony Grove Village (of which the Project is proposing to expand the southern extent, see Figure 1-3) has already received all of its discretionary approvals and is currently undergoing development with 742 homes, recreational, and small commercial uses. (HGV's approved entitlements assumed full build out by 2008). The site has been rough graded, and approximately half of the site has been finish-graded. The construction of homes is under way, the Water Reclamation Facility that will serve HGV has been constructed, major infrastructure has been installed and homes have been available for sale since May 2015. Because the development is so far along, the presence of that project is included as a baseline environmental condition (an existing condition) in this EIR. As further described below, if the presence of the HGV project as developed was not included in the existing condition, the baseline would be misleading or without informational value and would not best define the Harmony Grove Valley which has undergone a rapid change to its environmental conditions.

If the existing setting reflected the existing condition on the date of NOP issuance (August 2015), it would have been outdated immediately after NOP issuance and an unnecessarily artificial image of the existing condition would have been used as the basis for Project effects. For instance, using the NOP baseline would have resulted in the Project being analyzed against a setting of large expanses of graded and raw soil, partial development, and vegetation at installation size or of young age. This would result in a large-scale highly disturbed existing condition of the valley floor which was identified as visually significant and unmitigable (for the construction period and first few years following installation) in the certified HGV EIR against which visual and community character effects of the buildout condition of the Proposed

Project would be minimized. This EIR assumes full build out of HGV prior to opening day of the Proposed Project, which allows incorporation of full traffic loading onto area streets, providing the most accurate and most conservative (most impactful) assessment of traffic and traffic-reliant technical issues, such as noise, air quality and GHG, when combined with Project effects. Additionally this EIR assumes that HGV elements associated with residential, commercial and utility uses on both sides of Harmony Grove Road are fully built out with regard to the visual analysis. The analysis does not assume that the Equestrian Ranch is built. At this time, no construction associated with implementation of that facility, or the associated multi-purpose trail that HGV is conditioned to install on the west side of Country Club Drive south of the intersection with Harmony Grove Road, has occurred. Therefore, it was deemed inappropriate to interpret the Equestrian Ranch as “built.”

The assumption that HGV will be present when HGV South construction begins provides a more conservative analysis in which impacts associated with the Proposed Project are given full weight. Analysis assuming that the existing conditions with their highly disturbed context would continue would minimize HGV South effects and lower associated impacts under CEQA. This approach is considered the most analytically conservative and to be of most informational value. It does not tie analyses to a point in time which has already changed since the NOP issuance (cf. Figure 2.1-3i and Figure 2.1-4a) and takes into consideration the already-approved development under construction. Thus the existing physical environmental conditions would have been misleading and without informational value and would not provide a reasonable baseline.

Regulatory Setting

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

San Diego Forward

The Regional Comprehensive Plan (RCP) was adopted by SANDAG in 2004 and served as a blueprint for the region’s future growth and development. In 2011, SANDAG adopted the 2050 Regional Transportation Plan (RTP) which also included a Sustainable Communities Strategy as required by SB 375. Both documents served as advisory documents to local agencies in the San Diego region and for handling local issues of regional significance.

On October 9, 2015, SANDAG adopted “San Diego Forward” a Regional Plan that merged its RCP with the 2050 RTP and the Sustainable Communities Strategy (Regional Plan). The Regional Plan now serves as the blueprint for how the San Diego region will grow and how SANDAG will invest in transportation infrastructure to provide more choices, strengthen the economy, promote a healthy environment, and support thriving communities. The Regional Plan sets forth the following six general objectives:

- Habitat and Open Space Preservation
 - Focus growth in areas that are already urbanized allowing the region to set aside and restore more open space in our less developed areas.
 - Protect and restore the region’s urban canyons, coastlines, beaches and water resources.
- Regional Economic Prosperity
 - Invest in transportation projects that provide access for all communities to a variety of jobs with competitive wages.
 - Build infrastructure that makes the movement of freight in the region’s communities more efficient and environmentally friendly.
- Environmental Stewardship
 - Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency and sustainable living.
 - Support energy programs that promote sustainability.
- Mobility Choices
 - Provide safe, secure, healthy, affordable and convenient travel choices between the places where people live, work and play.
 - Take advantage of new technologies to make the transportation system more efficient and accessible.
- Partnerships/Collaboration
 - Collaborate with Native American tribes, Mexico, military bases, neighboring counties, infrastructure providers, the private sector and local communities to design a transportation system that connects to the megaregion and national network, works for everyone, and fosters a high quality of life for all.
 - As we plan for our region, recognize the vital economic, environmental, cultural and community linkages between the San Diego region and Baja California.

- Healthy and Complete Communities
 - Create great places for everyone to live, work and play.
 - Connect communities through a variety of transportation choices that promote healthy lifestyles, including walking and biking.
 - Increase the supply and variety of housing types affordable for people of all ages and income levels in areas with frequent transit service and with access to a variety of services.

At the core of the Regional Plan is a Sustainable Communities Strategy that charts a course towards lowering GHG emissions and includes the following five building blocks:

- *A land use pattern* that accommodates our region's future employment and housing needs, and protects sensitive habitats, cultural resources, and resource areas.
- *A transportation network* of public transit, Managed Lanes and highways, local streets, bikeways, and walkways, built and maintained with reasonably expected funding.
- *Managing demands* on our transportation system (also known as Transportation Demand Management, or TDM) in ways that reduce or eliminate traffic congestion during peak
- *Managing our transportation system* (also known as Transportation System Management, or TSM) through measures that maximize the overall efficiency of the transportation network.
- *Innovative pricing policies* and other measures designed to reduce the number of miles people travel in their vehicles, as well as traffic congestion during peak periods of demand.

The Regional Plan includes the following set of principles to guide the development of the region's future transportation network:

- The SANDAG investment plan will be built with financial resources that are reasonably expected to be available between now and 2050.
- A more efficient transportation network will be achieved through two key strategies: effectively managing the overall system (TSM) and effectively managing demands on the system (TDM) with innovative technologies being integrated into both. The result will be maximized efficiency in the transportation network, which ultimately can lower GHG emissions.
- Managing parts of the network, such as adding Managed Lanes and transit only lanes on freeways, which encourage people to carpool and use public transit to bypass bottlenecks.

- The road toward a more sustainable San Diego region should include vehicles that use cleaner, alternative sources of energy with SANDAG playing an important role in promoting this transition.

County of San Diego General Plan

The General Plan was comprehensively updated and adopted on August 3, 2011. The General Plan Land Use Element provides maps, goals, and policies and serves as the regulatory document guiding land use, conservation, and development in the unincorporated County. This element provides a framework to accommodate future development within the County in an efficient and sustainable manner that is compatible with the character of unincorporated communities and the protection of valuable and sensitive natural resources (County 2011a).

A major component guiding the physical planning of the County is the Community Development Model (CDM). The CDM is implemented by three regional categories—Village, Semi-Rural, and Rural Lands—that broadly reflect the different character and land use development goals for the County’s developed areas, its lower-density residential and agricultural areas, and its very low density or undeveloped rural lands. The CDM 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, which represents large open space areas where only limited development may occur. The intent of the CDM is to guide new development into more compact development as a means to reduce associated impacts. Generally, locating housing closer to retail, services, schools, and job centers can reduce the size of required infrastructure improvements and number and length of automobile trips, while increasing the efficiency of delivering police, fire, and other public services including community enhancing amenities. This model of development likewise allows an increase in the amount of open space, natural habitat, and agriculture that can be preserved.

The Land Use Element describes Regional Land Use Categories and Land Use Designations that are applied to lands within the County’s land use jurisdiction. Regional Categories provide a framework for the regional distribution of uses that serves as the foundation for the Land Use Map designations, goals, policies, and regulations that guide future development. The existing regional land use category for the Project site, as identified in the Land Use Element, is Semi-Rural. The Land Use Element defines the Semi-Rural category as areas of the County that are appropriate for lower density residential neighborhoods, recreation areas, agricultural operations, and related commercial uses that support rural communities.

Where the Regional Categories represent a broad framework for the form and organization of development, the Land Use Designations are property specific and identify the type and intensity of land uses that are allowed. The Land Use Designations are defined by the land use type and the maximum allowable residential density or nonresidential building intensity. The designations are applied throughout the County, as shown on community and subregional area land use maps, as contained in an appendix to the General Plan. The Project site is located within the Elfin Forest and Harmony Grove Planning Area of the larger San Dieguito Community Planning Area (CPA). The existing land use designations for the Project site, as shown on the San Dieguito CPA Land Use Map, are Semi-Rural Residential (SR-0.5) and Rural Lands (RL-20). The Project

site is almost entirely (approximately 110.5 acres) designated Semi-Rural Residential (SR-0.5) except for the northernmost portion (approximately 0.5 acre), which is designated Rural Lands (RL-20).

The Land Use Element also includes a Community Services and Infrastructure section addressing water supply, wastewater collection and treatment, solid waste management, schools, libraries, and telecommunication services.

The Mobility Element of the General Plan describes the multi-modal transportation network within the unincorporated areas, including motor vehicle, public transportation, bicycle, pedestrian, rail, and air transportation facilities. The element states the goals and policies that address the safe and efficient operation, maintenance, and management of the transportation network, and identifies major existing and planned road network components in the County. These road network components are shown on maps and matrices in the Mobility Element Network Appendix. In the vicinity of the Project site, the following roads and their corresponding classifications are identified: Harmony Grove Road (Light Collector), Harmony Grove Village Parkway (formerly Lariat Drive; Community Collector) and Citracado Parkway (Major Road).

The Conservation and Open Space (COS) Element addresses four topics (Open Space, Conservation, Scenic Highway, and Energy) and describes the natural resources within the County and goals and policies to preserve them. This element provides direction for future growth and development in the County with respect to the conservation, management, and utilization of natural (biological, water, agricultural, paleontological, mineral, and visual [including scenic highways and dark skies]) and cultural resources; protection and preservation of open space; and provision of park and recreation resources. The closest scenic highway to the Project site is the segment of Elfin Forest Road/Harmony Grove Road between the San Marcos city limits and the Escondido city limits, which is located, at its closest point, approximately 350 feet north of the Project site. One other designated Scenic Highway in the general Project area includes the segment of Via Rancho Parkway between Del Dios Highway and SR-78, which is located approximately 0.7 mile east of the Project site and has no views to the site due to intervening topography. The COS Element also addresses air quality, climate change, and energy, and the associated generation of criteria pollutants and GHG emissions. Finally, the element contains goals and policies related to parks and recreation and uses residential densities to determine the spacing of parks based on population (i.e., 10 acres of local parks and 15 acres of regional parks for every 1,000 persons in the unincorporated County). Projects are required to provide in lieu fees and/or dedicate land to parks, passive recreation open space areas, and trails in accordance with the County PLDO.

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

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

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

As noted above, the General Plan currently shows the Project site designations as Semi-Rural Residential (SR-0.5) and Rural Lands (RL-20). The SR-0.5 designation allows for one DU per 0.5, 1, or 2 gross acres, and the RL-20 designation allows for one DU per 20 gross acres. The General Plan policies adopted for protection of environmental resources or values are discussed under Project analysis of Guideline 1 in Section 3.1.6.2 below.

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

In general, community plans have been adopted as integral parts of the General Plan to provide the framework for addressing the issues and concerns unique to each community that are not reflected in the broader policies of the General Plan. Each community/subregional plan in San Diego County identifies specific community character attributes and outlines goals and policies intended to preserve those attributes. Community Plans must be consistent with the General Plan but can provide additional guidance that reflects the unique nature of each of the unincorporated area's communities. The General Plan has clearly delineated the relationship between the General Plan and the County's community plans. Community plans must be internally consistent with the General Plan's Goals and Policies and cannot be used to undermine the policies of the General Plan. This means that community plans must be read and interpreted in the context of the goals and policies set forth in the General Plan (General Plan Policy LU-2.2).

The Elfin Forest and Harmony Grove portion of the San Dieguito Community Plan (Community Plan) augments the 2011 General Plan and contains goals and policies specific to the San Dieguito CPA, specifically within the Elfin Forest and Harmony Grove Planning Area. The Community Plan covers the planning areas of Elfin Forest and Harmony Grove, which total approximately 6,793 acres in size. The entire Project site is located within the Harmony Grove

community. Land Use goals for the Harmony Grove community include “preservation of the rural small town feeling,” open access community design that unifies multiple developments into “one neighborhood,” and continued preservation and dedication of natural and cultural resources and open space. The Land Use Element encourages environmentally sensitive, responsible equestrian uses; preservation of a rural visual environment and visually significant resources; continued agricultural uses; and buffers between urban areas and rural residential uses. Goals of the Circulation and Mobility Element include providing safe roads for vehicle, pedestrian, bicycle and equestrian use, and adequately identified emergency response service providers. The COS Element outlines goals and policies for resource conservation and management, parks and recreation, and community open space planning. Other elements include the Safety Element, which discusses hazards/risk avoidance and mitigation, emergency preparedness and response and law enforcement; the Noise Element; and the Harmony Grove Specific Plan Area Element, which pertains to HGV project.

Community Plan policies adopted for protection of environmental resources or values are discussed under Project analysis for Guideline 1 in Section 3.1.6.2 below.

County of San Diego Board of Supervisors Policies

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

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

Policy I-18. “Right-of-Way Dedication and Public Improvement Requirements in Connection With Major and Minor Use Permits,” requires that when a project is granted a use permit, it shall provide public improvements, facilities, and the lands, easements and right-of-way necessary to assure that the special use would not be materially detrimental to the public health, safety or welfare, or the property or improvements in the vicinity and zone in which the subject property is located. Similar to Policy I-17, the policy emphasizes improvements related to roads, drainage, sewage, and fire protection.

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

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

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

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

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

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

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

County of San Diego Zoning Ordinance

The County ZO (effective December 19, 1978, as amended) identifies the permitted uses of the Project site, consistent with the land use designations of the General Plan. The Project site is almost completely zoned A70 (Limited Agriculture), although the very southwest portion of the site is zoned RR (Rural Residential).

County of San Diego Resource Protection Ordinance

The County regulates natural and cultural resources via the RPO, which provides development controls for unique topography, ecosystems and natural characteristics within the County deemed to be fragile, irreplaceable, and vital to the general welfare of the County’s residents. Resources addressed by the RPO include wetlands, wetland buffers, floodplains, steep slopes (lands having a natural gradient of 25 percent or greater and a minimum rise of 50 vertical feet, unless said land has been substantially disturbed by previous legal grading), sensitive habitat lands, and prehistoric and historic sites. The site does not contain any RPO wetlands, although Escondido Creek just north of the Project site is a RPO resource. In addition, the one cultural site within the Project site is not considered significant under the RPO.

RPO Sensitive Habitat Lands are located in the southern portion of the Project site where southern mixed chaparral communities support an estimated 20,000 wart-stemmed ceanothus individuals. Also present in this area are summer holly (20 to 30 individuals), San Diego sagewort (4 individuals), and ashy spike-moss (4 concentrations). These areas are “unique” in that they support rare plant species and they are considered sensitive by CDFW.

The majority of the Project site and associated off-site roadway/utility improvements along Country Club Drive are not located within a mapped 500- or 100-year floodplain area as depicted on the associated FEMA FIRM panel (FEMA 2012a and 2012b), a County Floodplain Map, or a County Alluvial Plain Map (see also Section 3.1.5 of this EIR and EIR Appendices M-1 and M-4). The northernmost portion of the site, including a small portion of the WTWRF facilities, as well as adjacent portions of the proposed off-site roadway/utility improvements along Country Club Drive and the related crossing of Escondido Creek, are within one of the following mapped FEMA floodplain categories: (1) Zone AE, which includes 100-year floodplain areas where base flood elevations have been determined; (2) portions of the Escondido Creek floodway¹ that are within the AE Zone; and (3) “other flood areas” also designated as Zone X and defined by FEMA to include areas within the 500-year floodplain, areas within the 100-year floodplain with average depths of less than 1 foot or a drainage area of less than 1 square mile, and areas protected from the 100-year flood by levees. These areas within mapped floodplains are considered RPO resources.

There are approximately 44.3 acres of slopes on the property which meet or exceed 25 percent slope, and 26.5 acres that meet the definition of steep slopes under the County’s RPO. This means that approximately 24 percent of Project site is subject to analysis under the RPO. RPO-protected steep slopes are primarily located in the northeast hills of the Project site, on the central primary slope rising above the valley floor, and in the southern third of the Project where terrain is overall higher and more rugged (refer to Figure 2.1-11b in Subchapter 2.1).

County of San Diego Park Land Dedication Ordinance

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

Natural Community Conservation Planning Program

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

The Project site is not within an adopted MSCP Subarea Plan, but it is within the Draft North County MSCP area. Projects or activities approved or initiated before completion of the North County MSCP are subject to the Interim Review Process described in Exhibit B of the Planning

¹ Generally defined as the channel of a river or stream and the adjacent portions of the floodplain that are reasonably required to efficiently carry and discharge the associated 100-year flood flow.

Agreement for the Planning and Preparation of the North and East County Multiple Species Conservation Program, entered into by and among the County of San Diego, the CDFW, and the USFWS (“Wildlife Agencies Planning Agreement” County et al. 2008). Therefore, the Project will require compliance with the Habitat Loss Permit (HLP) Ordinance and County and Wildlife Agencies Planning Agreement.

Development projects that are initiated before completion of this Plan are analyzed to determine consistency with the preliminary conservation objectives of Section 5 of the Wildlife Agencies Planning Agreement. The preliminary conservation objectives intended to be achieved through the Plan are to:

- Provide for the protection of species, natural communities, and ecosystems on a landscape level;
- Preserve the diversity of plant and animal communities throughout the Planning Areas;
- Protect threatened, endangered, or other special status plant and animal species, and minimize and mitigate the take or loss of proposed Covered Species;
- Identify and designate biologically sensitive habitat areas;
- Preserve habitat and contribute to the recovery of Covered Species;
- Reduce the need to list additional species;
- Set forth species-specific goals and objectives; and
- Set forth specific habitat-based goals and objectives expressed in terms of amount, quality, and connectivity of habitat.

Refer to Subchapter 2.3 and Appendix E to this EIR for additional information on NCCP implementation through the HLP Ordinance and Draft MSCP compliance.

County of San Diego Subdivision Ordinance

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

County of San Diego Light Pollution Code

The LPC is a County regulatory ordinance that restricts the use of outdoor lighting that emits undesirable light rays into the night sky that would have a detrimental effect on astronomical research. Although the primary intent of the code is to curb lighting that may affect astronomical research at the Mount Palomar and Mount Laguna observatories, it also contains language to minimize spill light into the dark night sky and adjacent neighborhoods. The LPC defines two zones in the unincorporated portion of San Diego County. Zone A consists of areas within a

15-mile radius of Mount Laguna and Mount Palomar. Zone B pertains to all remaining areas that are not defined as Zone A. The Project site falls within Zone B of the ordinance, which is defined as all areas within the territorial limits of the unincorporated portion of San Diego County that are not within a 15-mile radius of the Palomar Observatory or the Mount Laguna Observatory.

Congestion Management Program Update

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

3.1.6.2 Analysis of Project Effects and Determination as to Significance

Goals, Policies and Objectives of Applicable Land Use Plans

Guideline for the Determination of Significance

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

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

Guideline Source

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

Analysis

San Diego Forward

The Project provides a variety of housing types, densities and levels of affordability, as well as compact building footprints to minimize land consumption and maximize energy efficiency. The Project locates higher density and mixed-use development where infrastructure can be provided efficiently and close to existing infrastructure, such as along SR-78 and west of I-15. This area is surrounded by 10 incorporated cities (refer to Figure 1-1), that contain over one million existing residents (approximately one-third of the region) and are home to an estimated 500,000 jobs (2010 U.S. Census). Two transit centers—"Nordahl Road" and "Escondido Transit Center"—are also located nearby. The Project requires less roadway infrastructure because of its location. It would provide residential opportunities near major commercial and employment centers, potentially reducing travel by automobile. The Project would locate a range of housing types within 0.5 mile (10-minute walk) from the commercial and civic core of the existing HGV

Village, and would connect by trail HGV commercial area with the Project's residential areas, park and commercial uses. This would contribute to ability to pursue a healthy lifestyle promoted by the Regional Plan, through allowing for walking and biking. The project also would support introduction of housing across a span of all ages and income levels. The Project would cluster development in portions of the site that would allow a block of 34.8 acres (approximately 31 percent of the site) to be protected within a BOS easement. This would allow for preservation of a large area of permanent open space that would be managed through implementation of a resource management plan to protect biological resources in perpetuity. The Project also would enhance water resources through enhancements to Escondido Creek (removal of an at-grade crossing and installation of a bridge, allowing for free flow of creek waters, and revegetation with non-invasives).

Therefore, the Project would not be in conflict with the objectives of San Diego Forward. Potential impacts associated with regional plans or policies would thus be **less than significant**. The Project could be included in the next update of both the Sustainable Communities Strategy and the RTP documents as contained in San Diego Forward.

County of San Diego General Plan

In addition to the land use consistency analysis contained in this section, each topical analysis in this EIR contains a discussion of the Project's potential physical impacts related to consistency with applicable regulations, including General Plan goals and policies, relevant to the environmental issue area.

Aesthetics. This section is divided into three separate issues, as presented below. Refer to Subchapter 2.1, Aesthetics, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design and an identified mitigation measure.

Scenic Vistas and Scenic Resources. To preserve scenic vistas and scenic resources, the Proposed Project must be consistent with General Plan goals and policies from the Land Use, Mobility, and COS Elements. The relevant policies are LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, LU-6.9, LU-10.1, LU-10.2, M-2.3, COS-11.1, COS-11.2, COS-11.3, COS-11.6, and COS-11.7 (refer to the County General Plan [County 2011a] for the text of these policies). Consistent with analysis provided in Subchapter 2.1 of this EIR (which provides focused discussion on potential visual effects relative to scenic vistas and scenic corridors), the Project complies with these policies by proposing clustered development in the least environmentally sensitive areas (to the extent possible) and away from natural areas with intact sensitive resources. In addition, the Project complies with these policies by proposing a conservation-oriented design, conserving a large area of open space that connects to adjacent open space and natural resources, providing open space on steep slopes to protect natural topography and to minimize and mitigate visual impacts from roads and vistas. The Project site would also be encumbered with a D1 (design review) special area designator that requires review for consistency and conformance with the Project Specific Plan Project Visual Impact Assessment (VIA). Adherence to these policies would reduce potential obstruction, interruption, or detraction of scenic vistas and resources from Project implementation.

Visual Character or Quality. To maintain the visual character and quality, the Proposed Project must be consistent with General Plan goals and policies from the Land Use, Mobility, and Housing Elements. The relevant policies are LU-1.4, LU-2.3, LU-2.5, LU-4.1, LU-4.3, LU-11.2, LU-12.4, M-10.6, and H-2.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project complies with these policies by implementing a Specific Plan (and associated design guidelines within the Specific Plan) to reflect and maintain the community character of the area consistent with HGV as an expansion of the existing Village. Proposed densities would be compatible with HGV and would provide a transition from the Village Center to existing surrounding residential and semi-rural and rural uses. Greenbelts in the form of large open space areas and landscaping would be provided to define the community and reduce visual effects along the site perimeter. Adherence to these policies would reduce impacts associated with visual character or quality from Project implementation.

Light or Glare. To maintain dark skies, the Proposed Project must be consistent with General Plan goals and policies from the COS Element. The relevant policies are COS-13.1 and COS-13.3 (refer to the County General Plan [County 2011a] for the text of these policies). The Proposed Project includes lighting elements to both accent community focal elements and to provide safety. As described in Section 1.2.2.6, *Lighting*, and Table 1-2 of this EIR, the Project would implement design features to minimize impacts from light and glare. Overall, Project lights would be low level, timed, directed downward and screened to minimize Project impacts on the dark sky and minimize spillover onto adjacent properties. Lighting for the Proposed Project is designed to use the least amount of lighting possible, be energy efficient, and still be in compliance with State and local regulations for safety, and to adhere to the County LPC and dark skies policies. In addition, the Project would implement a lighting plan that regulates the Project's outdoor lighting for preservation of the dark skies that are consistent with the rural character of the community and dark skies policies. Substantial glare is generally not anticipated from residential units, as large expanses of glass are not proposed for the Project. Windows often would be located below shielding architectural elements and exterior lighting design would include the use of glare louvers, ensuring that glare and spillage into the sky or onto adjacent property are restricted to levels permitted by ordinance. Potential glare associated with use of photovoltaic panels and possible use of tempered glass on potential fire-resistive walls would be less than significant, as analyzed in Subchapter 2.1. Adherence to these policies would reduce impacts associated with light and glare from Project implementation.

Conclusion. As indicated above, the Proposed Project is compliant with General Plan goals and policies applicable to the Project. Accordingly, impacts associated with the goals and policies of the County General Plan related to aesthetics would be **less than significant**.

Agricultural Resources. This section is divided into three separate issues, as presented below. Refer to Section 3.2.1, Agriculture, for additional information regarding agriculture.

Direct Conversion of Agricultural Resources. To reduce impacts due to the direct conversion of agricultural resources, the Proposed Project must be consistent with policies from the Land Use and COS Elements. The only relevant policy is LU-6.4 (refer to the County General Plan [County 2011a] for the text of this policy), which requires (among other things) protection of agricultural operations for residential subdivision projects. There are no existing agricultural operations on, or adjacent to, the Project site, and as discussed in Section 3.2.1, the site does not

contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Only Farmland of Local Importance (approximately 20 acres and assigned a “low” rating for water availability) and “Other” (approximately 91 acres) categories are present. As described in Subchapter 3.2, Farmland of Local Importance is land that meets characteristics of prime and statewide farmland, with the exception of irrigation. “Other” includes timber, brush, wetlands, and/or riparian habitats not suitable for cattle grazing, vacant and non-agricultural land surrounded by development, etc.

Based on available soil types and the low water rating, the site was not considered agriculturally significant and direct agricultural impacts related to the conversion of Farmland of Local Importance are identified as less than significant. The Project therefore, would be consistent with this policy relative to agricultural resources.

Land Use Conflicts. As described above, there are no existing agricultural operations on, or adjacent to, the Project site. Although not agriculture per se, environmental considerations regarding potential nuisance effects associated with large-animal keeping by nearby neighbors are addressed in Table 1-2 and Section 3.2.1 of this EIR. No land use conflicts with agricultural impacts would occur.

Indirect Conversion of Agricultural Resources. As described above, there are no existing agricultural operations on, or adjacent to, the Project site. Therefore, the Project would not result in indirect conversion of agricultural resources. No impacts would occur.

Conclusion. No significant impacts to agricultural resources would occur as a result of Project implementation. Accordingly, impacts associated with the goals and policies of the County General Plan related to agricultural resources would be **less than significant**.

Air Quality. This section is divided into five separate issues, as presented below. Refer to Section 3.1.12, *Air Quality*, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design.

Air Quality Plans. The General Plan does not include policies related specifically to air quality plans. Therefore, no impact would occur. In addition, as discussed in Subchapter 2.6, the Project would not result in a significant air quality impact with regard to construction- or operational-related emissions of ozone precursors or criteria air pollutants. Located in proximity to job centers in Escondido and San Marcos, as well as two transportation hubs, the Project also has the ability to provide residents with opportunities to minimize vehicular travel, supporting reductions in vehicle miles traveled.

Air Quality Violations. To maintain air quality, the Proposed Project must be consistent with General Plan goals and policies from the COS Element. The relevant policies are COS-14.1, COS-14.2, COS-15.1, COS-15.4, COS-16.2, and COS-16.3 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would not generate significant levels of air pollutants, and no air quality violations are projected. The Project is consistent with the County’s CDM whereby compact development is concentrated at the core and lower densities and open space are in outlying areas. The Project would provide a human-scaled, pedestrian-oriented environment with multi-modal connections (trails connecting to County multi-purpose

trails as well as to the HGV Village Center) to encourage use of transportation modes other than the automobile. Buildings would include sustainable design features and would meet or exceed 2016 Title 24 standards to reduce impacts to air quality. Adherence to these policies would reduce impacts associated with air quality from Project implementation.

Non-attainment Criteria Pollutants. The General Plan policies associated with non-attainment criteria pollutants are the same as those listed above under *Air Quality Violations*. Adherence to the above policies would reduce impacts associated with air quality from Project implementation.

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

Objectionable Odors. The General Plan does not include policies related specifically to odors. No impacts would occur.

Conclusion. As indicated above, the Proposed Project is compliant with applicable General Plan goals and policies applicable to the Project. Accordingly, impacts associated with the goals and policies of the County General Plan related to air quality would be **less than significant**.

Biological Resources. This section is divided into six separate issues, as presented below. Refer to Subchapter 2.3, Biological Resources, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design and identified mitigation measures.

Special Status Species. To minimize impacts to special status species, the Proposed Project must be consistent with goals and policies from the COS and Land Use Elements. Relevant policies are COS-1.3, COS-1.6, COS-1.8, COS-1.9, COS-1.10, COS-2.1, COS-2.2, LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, and LU-10.2 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by clustering development in portions of the site that are the most highly disturbed and/or have the lowest acreage of valuable contiguous habitat (to the extent possible). This would allow for preservation of a large area of permanent open space that would be managed through implementation of a resource management plan to protect biological resources in perpetuity. Specifically, a block of 34.8 acres (approximately 31 percent of the site) would be protected within a BOS easement. The BOS on site would primarily consist of granitic southern mixed chaparral; with a large populations of wart-stemmed ceanothus. Other habitat, such as coast live oak woodland, is also included. In addition, the Project would mitigate for impacts to sensitive species and their habitats through on- and off-site preservation. Adherence to these policies would reduce impacts associated with special status species from Project implementation.

Riparian Habitat and Other Sensitive Natural Communities. The General Plan policies associated with sensitive natural communities are discussed above under *Special Status Species*. One additional policy, COS-3.1 also applies to the Project, which requires development to preserve wetland areas and riparian and upland buffers (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with this policy by providing a minimum 100-foot buffer from the Escondido Creek riparian canopy as well as an

additional limited building zone between any Project development and the edge of the wetland buffer. Impacts to riparian and sensitive upland buffer habitat would be mitigated in accordance with County and Wildlife Agency requirements as specified in Section 2.3.5 of this EIR. Adherence to this policy and the above policies would reduce impacts associated with sensitive natural communities from Project implementation.

Federally Protected Wetlands. To avoid impacts to federally protected wetlands, the Proposed Project must be consistent with goals and policies from the COS Element. Relevant policies are COS-3.1 and COS-3.2 (refer to the County General Plan [County 2011a] for the text of these policies). Project compliance with COS-3.1 is discussed above under *Riparian Habitat and Other Sensitive Natural Communities*. Impacts to federally protected wetlands would occur, but would be mitigated to ensure no net loss of wetlands would occur in accordance with County and Wildlife Agency requirements. Adherence to these policies would reduce impacts associated with federally protected wetlands from Project implementation.

Wildlife Movement Corridors and Nursery Sites. To address potential impacts to wildlife movement corridors and nursery sites, the Proposed Project must be consistent with goals and policies from the COS and Land Use Elements. The relevant policies are COS-1.1, COS-1.2, COS-1.3, LU-6.1, and LU-6.7 (refer to the County General Plan [County 2011a] for the text of these policies). Project development has been consolidated to reduce edge effects and concentrated in the portions of the site with the lowest, relative biological value. The Project would provide large areas of permanent open space contiguous with portions of the Escondido Creek Open Space to the north; DDHP to the south; and undeveloped lands, residential properties, and lands constrained by steep slopes and rugged terrain to the east and west. Adherence to these policies would reduce impacts associated with wildlife movement corridors and nursery sites from Project implementation.

Local Policies and Ordinances. There are no General Plan goals or policies related to conflicts with local policies and ordinances. No impacts would occur.

Habitat Conservation Plans and Natural Community Conservation Plans. There are no General Plan goals or policies related to conflicts with habitat conservation plans and natural community conservation plans. No impacts would occur.

Conclusion. As indicated above, the Proposed Project is compliant with applicable General Plan goals and policies. Accordingly, **impacts associated with the goals and policies of the County General Plan related to biological resources would be less than significant.**

Cultural Resources. This section is divided into four separate issues, as presented below. Refer to Subchapter 2.4, Cultural Resources and Tribal Cultural Resources, and Section 3.1.7, Paleontological Resources, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design and identified cultural resource mitigation measures.

Historical Resources. To address impacts to historical resources, the Proposed Project must be consistent with General Plan goals and policies from the COS Element. The relevant policy is COS-8.1 (refer to the County General Plan [County 2011a] for the text of this policy), which

encourages adaptive re-use of historic structures, sites or objects. No standing structures or sites are located on site or within areas potentially affected by off-site Project elements. The sole historic-period element (remnants of a residence and associated uses) was evaluated and determined to not be significant (i.e., not to be an historic resource) under CEQA or RPO.

Archaeological Resources. In order to minimize or avoid impacts to archaeological resources, the Proposed Project must be consistent with General Plan goals and policies from the COS Element. The relevant policies are COS-7.1, COS-7.2, COS-7.3, and COS-7.4 (refer to the County General Plan [County 2011a] for the text of these policies). Based on prior on-site reconnaissance, and a Project records search review and cultural survey, no known prehistoric archaeological resources occur on site. Mitigation is identified in the event that resources are discovered during Project construction. Additionally, the County has initiated consultation with local tribes, pursuant to CA Senate Bill 18 and CA Assembly Bill 52,² and consultation is ongoing. The reader is referred to Subchapter 2.4 of this EIR. Adherence to these policies would reduce impacts associated with archaeological resources from Project implementation.

Paleontological Resources. To address impacts to paleontological resources, the Proposed Project must be consistent with General Plan policy COS-9.1 from the COS Element (refer to the County General Plan [County 2011a] for the text of this policy). Policy COS-9.1 does not apply to the Proposed Project because on-site surficial and underlying deposits (i.e., historic fill Quaternary-age topsoil, alluvium and colluviums, and Cretaceous-age granitic rocks) exhibit low or no potential for the occurrence of significant paleontological resources, and the Project site is not within an area requiring paleontological monitoring on the San Diego County Paleontological Resources Potential and Sensitivity Map (County 2009f).

Human Remains. To address impacts to human remains, the Proposed Project must be consistent with General Plan policy COS-7.5 from the COS Element (refer to the County General Plan [County 2011a] for the text of this policy). Based on a record search review and cultural survey conducted for the Project, human remains are not expected on site. Regardless, impacts related to unanticipated discovery of human remains would be avoided with mitigation that includes a grading monitoring program in accordance with California state law requirements if such a discovery occurs in consultation with local tribal representatives. Adherence to this policy would reduce impacts associated with discovery of human remains from Project implementation.

Conclusion. As indicated above, the Proposed Project is compliant with applicable General Plan goals and policies. Accordingly, impacts associated with the goals and policies of the County General Plan related to cultural resources would be **less than significant**.

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

Hazards and Hazardous Materials. This section addresses nine separate issues, divided into five categories, as presented below. Refer to Section 3.1.4, *Hazards and Hazardous Materials*, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design.

² Local Native American tribes were noticed of EIR preparation during the NOP process, with one response received from the San Luis Rey Band of Mission Indians. AB 52 outreach was initiated on October 1, 2015.

Hazardous Materials. The General Plan does not include policies related specifically to transport, use, and disposal of hazardous materials, accidental release of hazardous materials, hazards to schools or existing hazardous materials sites. No impacts would occur.

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

Emergency Response and Evacuation Plans. To address hazards associated with emergency response and evacuation plans, the Proposed Project must be consistent with policies from the Mobility and Safety Elements. The relevant policies are M-1.2, M-3.3, M-4.3, S-1.3 and S-6.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by implementing roadway improvements to Country Club Drive to provide added capacity to accommodate emergency vehicles and improved accessibility across Escondido Creek, providing multiple access points to the Project from Country Club Drive, and establishing adequate fuel modification zones. The closest fire station (at HGV) would provide emergency response within less than three minutes of road time. Please also see more detailed discussion in Section 3.1.4 of this EIR. Adherence to these policies would reduce impacts associated with emergency response and evacuation plans from Project implementation.

Wildland Fires. To avoid hazard impacts associated with wildland fires, the Proposed Project must be consistent with policies from the Land Use and Safety Elements. The relevant policies are LU-6.11, LU-11.2, S-3.1, S-3.2, S-3.3, S-3.4, S-3.6, S-4.1 and S-6.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by implementing an approved fire protection plan (FPP, Appendix L to this EIR), incorporating adequate fuel modification zones (including expanded zones as appropriate, c.f. Section 3.1.4 of this EIR), and implementing roadway improvements to Country Club Drive to facilitate improved emergency vehicle movement and response times. The closest fire station (at HGV) would provide fire response within three minutes of road time. Additional detailed discussion is provided in Section 3.1.4 of this EIR, with important design considerations detailed in that section, and included on Table 1-2 and in Chapter 7.0 of this document. Adherence to these policies would reduce impacts associated with wildland fires from Project implementation.

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

Conclusion. As indicated above, the Proposed Project is compliant with applicable General Plan goals and policies. Accordingly, impacts associated with the goals and policies of the County General Plan related to hazards and hazardous materials would be **less than significant**.

Hydrology and Water Quality. This section is divided into nine separate issues, as presented below. Refer to Section 3.1.5, Hydrology and Water Quality, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design.

Water Quality Standards and Requirements. To address conformance with water quality standards and requirements, the Proposed Project must be consistent with policies from the Land Use and COS Elements. The relevant policies are LU-6.5, LU-6.9, LU-14.1, LU-14.2, LU-14.3, LU-14.4, COS-4.2, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.5 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by implementing low impact development (LID) features (e.g., detention/hydromodification vaults, bioswales, permeable pavers), avoiding development on ridgelines, constructing the Project in accordance with underlying existing topographic variation (i.e., not resulting in meaningful changes to water flow patterns in terms of destination or volume [please refer to Section 3.1.5 of this EIR]), providing drainage improvements that includes erosion protection, providing treatment for wastewater generated by the Project in accordance with required standards, and installing drought tolerant landscaping. Adherence to these policies would reduce impacts associated with water quality standards and requirements from Project implementation.

Groundwater Supplies and Recharge. To avoid impacts related to groundwater supplies and recharge, the Proposed Project must be consistent with policies from the Land Use and COS Elements. The relevant policies are LU-13.1, LU-13.2, COS-4.1, COS-4.2, COS-4.3, COS-4.4, and COS-5.2 (refer to the County General Plan [County 2011a] for the text of these policies). Domestic water supplies for the Proposed Project would be obtained from the Rincon del Diablo Municipal Water District (Rincon MWD), with no groundwater use proposed for domestic or other purposes. The Project would comply with the cited policies by coordinating with the Rincon MWD to ensure availability of water services for residents, incorporating water conservation features (e.g., use of reclaimed water for irrigation), installing drought tolerant landscaping, and implementing LID features (e.g., detention/hydromodification vaults, bioswales, permeable pavers). Adherence to these policies would reduce impacts associated with groundwater supplies and recharge from Project implementation.

Erosion or Siltation. To address impacts associated with erosion and siltation, the Proposed Project must be consistent with policies from the Land Use and COS Elements. The relevant policies are LU-6.5, LU-6.9, and COS-5.3 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by implementing LID features (e.g., bioswales, permeable pavers), incorporating the dominant physical characteristics of the site, using natural topography to convey stormwater, and providing drainage improvements that includes erosion protection. Adherence to these policies would reduce impacts associated with erosion or siltation from Project implementation.

Flooding. To address flooding impacts, the Proposed Project must be consistent with policies from the Land Use and Safety Elements. The relevant policies are LU-6.5, LU-6.10, S-9.2, S-10.2, S-10.3, S-10.4, and S-10.6 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by implementing LID features (including use of permeable surfaces and features), avoiding development within mapped floodplains, improving the Escondido Creek crossing on Country Club Drive to eliminate existing roadway flooding hazards, and providing drainage improvements to avoid potential flooding. Adherence to these policies would reduce impacts associated with flooding from Project implementation.

Exceed Capacity of Stormwater Systems. To address stormwater system capacity impacts, the Proposed Project must be consistent with policies from the Land Use, COS, and Safety Elements. The relevant policies are LU-6.5, LU-6.9, COS-4.3, COS-5.2, S-9.2, S-10.2, S-10.3, S-10.4, S-10.5, and S-10.6 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by implementing LID features (e.g., detention vaults and bioswales), maintaining overall existing drainage patterns, avoiding habitable development within mapped floodplains, improving the Escondido Creek crossing on Country Club Drive to eliminate existing roadway flooding hazards, and providing drainage improvements to accommodate Project runoff. Adherence to these policies would reduce impacts associated with stormwater capacity from Project implementation.

Housing within a 100-year Flood Hazard Area. To avoid impacts related to housing within floodplains, the Proposed Project must be consistent with policies from the COS and Safety Elements. The relevant policies are COS-5.1, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, and S-10.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by avoiding habitable development within mapped floodplains, improving the Escondido Creek crossing on Country Club Drive to eliminate existing roadway flooding hazards, and mitigating for impacts due to development within the floodplain fringe. Adherence to these policies would reduce impacts associated with housing within floodplains from Project implementation.

Impeding or Redirecting Flood Flows. To address impacts related to impeding or redirecting flood flows, the Proposed Project must be consistent with policies from the COS and Safety Elements. The relevant policies are COS-5.1, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, and S-10.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by avoiding habitable development within mapped floodplains, improving the Escondido Creek crossing on Country Club Drive to eliminate existing roadway flooding hazards, and mitigating for impacts due to development within the floodplain fringe. Adherence to these policies would reduce impacts associated with impeding or redirecting flood flows from Project implementation.

Dam Inundation and Flood Hazards. To address impacts related to dam inundation and flood hazards, the Proposed Project must be consistent with policies from the COS and Safety Elements. The relevant policies are COS-5.1, S-9.1, S-9.2, S-9.3, and S-10.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by avoiding habitable development within mapped floodplains and improving the Escondido Creek crossing on Country Club Drive to eliminate existing roadway flooding hazards. No impacts associated with dam inundation would occur because the Project site is not located within a dam inundation area. Adherence to these policies would reduce impacts associated with flood hazards from Project implementation.

Seiche, Tsunami and Mudflow Hazards. To avoid hazards related to seiche, tsunami, and mudflows, the Proposed Project must be consistent with policies from the COS and Safety Elements. The relevant policies are COS-5.1, S-8.1, S-8.2, and S-9.3 (refer to the County General Plan [County 2011] for the text of these policies). The Project would comply with these policies by avoiding habitable development within mapped floodplains and engineering Project development in accordance with required regulatory standards to ensure slope stability.

According to the Project geotechnical study (Geocon 2015a), there is no evidence of previous landslides, and the potential for landslides within the Project site is low. Adherence to these policies would reduce impacts associated with seiche, tsunami, and mudflow hazards from Project implementation.

Conclusion. As indicated above, the Proposed Project is compliant with applicable General Plan goals and policies. Accordingly, impacts associated with the goals and policies of the County General Plan related to hydrology and water quality would be **less than significant**.

Land Use and Planning. This section addresses two separate issues, as presented below. The issue of physical division of an established community is separately addressed under the heading “Community Character,” below.

Land Use Policies and Regulations Conformance. To support and integrate with an established community, the Proposed Project must be consistent with policies from the Land Use, Mobility, and Housing Elements. The relevant policies are LU-1.4, LU-2.3, LU-2.4, LU-2.5, LU-6.9, LU-9.2, LU-11.2, LU-12.4, M-10.6, and H-2.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies because it would be an expansion of an existing Village and would provide connections to the adjoining HGV. Proposed densities would be compatible with HGV (see detailed discussion about proposed densities and land use designations below) and also would provide a transition from the on-site residential uses to transition into existing lower-density portions of Harmony Grove Valley. Greenbelts in the form of large open space areas and buffers would be provided to further integrate the project into the surrounding rural and semi-rural uses. Overall topography would be retained by the Project’s implementation of the Grading Policies set forth in the HGV South Specific Plan that encourage the placement of pads in conformance with the underlying topography, as it varies in elevation rather than a single large flat pad. This results in incorporating, rather than altering, the dominant physical characteristics of the site and retaining drainage patterns to the north and west to convey stormwater to the maximum extent practicable. In general, areas with more protected steep slopes and other environmental constraints were set into biological open space or HOA open space with lower density designations. The Center House, with its commercial and civic uses, would incorporate design guidelines contained in the Specific Plan that would include architectural styles and treatments to reinforce a rural style reflective of a repurposed agricultural use. Proposed residential development also would incorporate design guidelines contained in the Specific Plan that are characterized by design treatments and architectural styles to reflect surrounding communities and agricultural elements. On-street parking would be provided, but streetscapes would include rural style elements and landscape treatments.

The Project is consistent with the County’s CDM, whereby compact development is concentrated in and around a core area and transitions out into lower density development and open space. The Project’s most intense uses are located within 0.5 mile of the adjacent HGV Village Center where HGV’s highest densities are also located. HGV South would provide a transition from the Village portion of the site and the existing surrounding community by maintaining the perimeter of the site within the existing Semi-Rural regional category. This land surrounds the HGV South’s Village area along the southwestern, southern, and eastern property boundaries. Lower intensity single-family uses (typically with larger lot sizes) are planned in this area in addition to the designated open space areas being located in this vicinity. These

designated open space areas reduce visual effects (less than significant) along the Project's perimeter, provide views to natural areas, and contribute to an open environment. In addition, approximately 34.8 acres (31 percent) of the Project site would be placed within a single BOS easement.

As previously stated, the existing General Plan Land Use Designation is Semi-Rural Residential (SR-0.5) for nearly the entire site (approximately 110.5-acres) and Rural Lands (RL-20) for a small portion (approximately 0.5-acre) located at the northerly portion of the site. The Semi-Rural Residential (SR-0.5) portion would allow a density of two dwelling units per acre to one dwelling unit per 2 acres depending on the slope of the site, while the Rural Lands (RL-20) portion requires a minimum of 20 acres per dwelling unit. Without taking into consideration the site's topographical and other constraints, under the existing land use designations, there is a maximum yield of approximately 220 residences that would be allowed on the approximately 111-acre site.

The Project, therefore, proposes density that is not consistent with adopted General Plan land use designations. The Project proposes a GPA (specifically addressed under the heading *Amendment to the General Plan*, below) to extend the HGV Regional Land Use Category of "Village" to include the Proposed Project's boundaries.

The Village category supports the highest intensity and range of land uses, and is intended for compact development patterns where residential uses are located within walking distance of commercial services, employment centers, and civic uses. This results in the preservation of swaths of open space (thus preserving the natural and scenic qualities of the site); and encourages walking and biking, which further reduces auto dependence. The Project would be compact enough to encourage residents to walk to amenities and service, as no resident would be over 0.5 mile, or more than a 10-minute walk, from HGV's Town Center or from the commercial and civic uses of the Project. The use of a variety of lot and building designs reinforce an efficient, clustered, pedestrian-orientation.

The GPA would redesignate the majority of the site to Village Regional Category and change land use designations from Semi-rural Residential 0.5 to Village Residential (VR) 10.9 and Neighborhood Commercial for the central commercial/civic use area. Approximately 58 acres (more than half of the property) would remain in Semi-rural Residential 0.5 land use designation, as addressed in the Project Specific Plan. If approved, a combination of SR-0.5 and VR-10.9 within the development footprint would allow for a range of densities from 2 dwelling units per gross acre to up to 10.9 dwelling units per gross acre, depending on the slope of the site. The Project proposes a maximum density of approximately 8.4 dwelling units. The proposed density is also consistent with the adopted density for the Village Center (Planning Area 1) of the adjacent HGV Specific Plan, which contains 519 dwelling units on 60 residential acres (or approximately 8.7 dwelling units per acre).

Policy LU-1.1 states that land use designations on the Land Use Map are to be assigned in accordance with the CDM and boundaries established by the Regional Categories Map. This does not prevent future amendments to the Regional Land Use Map; rather the Regional Categories Map and the Land Use Maps are graphic representations of the Land Use Framework and the related goals and policies of the General Plan. The Land Use Maps must be interpreted in

conjunction with the language of the General Plan's Goals and Policies which expressly provide authority to make future amendments as may be determined appropriate by the County Board of Supervisors (County General Plan 2011:3-18). HGV South would expand HGV pursuant to the requirements set forth in General Plan Policy LU-1.4 as discussed below, and would further implement the CDM by concentrating the highest densities of uses closest to HGV while decreasing intensities adjacent to existing larger lot residential development and nearby open space areas.

Policy LU-1.4 permits new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the criteria described in the Policy are met. These criteria include: contiguity with an existing or planned Village, compatibility with environmental conditions and constraints, accommodation of the General Plan road network, public facilities and services support expansion, and consistency with community character. Extensive analysis of these points is provided in the 2017 HGV South Specific Plan, circulated with this EIR. Salient points are summarized below.

Contiguity with an Existing or Planned Village – The Project site lies physically adjacent or contiguous to HGV. HGV is an existing Village, approved in 2007 as a master planned community that was designed in accordance with the CDM. Its highest densities of uses are concentrated within the “Village Center,” with densities progressively decreasing as development moves further away from the village center. HGV South would expand the HGV Village by locating its highest intensities of development contiguous to the Village Center or approximately 2,100 feet (less than 0.5 mile) south of the adjacent HGV Village Center, where HGV's highest densities are located. A County public park which is part of HGV is also adjacent (less than 300 feet) from the HGV South site and designated under the Village Regional Category. The park will provide an additional community gathering place for both HGV South and HGV that further serves to unify and provide a focal point for both sites.

Compatibility with Environmental Conditions and Constraints – The Project site's topography is characterized by a broad, relatively gentle valley bottom in the northern and central portions of the site adjacent to HGV, and moderately steep slopes to the south and northeast. An east-west trending bench extends across the roughly center point on the Project site, separating the existing parcels visually into north and south halves. Prominent hilltops and ridgelines are located south and southwest of the site and are associated with the higher hills located in the DDHP and EFRR, respectively. In particular, slopes exceeding 50 percent slope are primarily situated in the southern third of the site (identified for permanent set-aside).

The proposed development is concentrated mainly in areas of the site that have been previously disturbed. All habitable Project improvements are designed to avoid the existing 100-year floodplain. The site topography naturally rises and falls, and the grading has been designed to reflect this pattern. The Project would comply with the RPO steep slopes criteria through a waiver for encroachment into insignificant slopes, an exception for access roads, and strict compliance with remaining lot encroachment percentages of less than 10 percent; each of which follows RPO criteria. These elements are addressed in detail under the “County of San Diego Resource Protection Ordinance, *Steep Slopes*,” discussion, below in this section, with additional detail on insignificant steep slopes provided in Subchapter 2.1. The Project has been designed to preserve a large block (34.8 acres, or 31 percent of the Project) of contiguous open space,

including southern mixed chaparral with narrow endemic species, a small patch of coast live oak woodland, and (non-RPO) jurisdictional drainages. The Project would maintain existing drainage patterns to the extent feasible, create an opportunity to re-establish a drainage feature that was largely eliminated from the site due to early agricultural activities, and maintain significant visual resources.

HGV South would contribute to or participate in implementation of a new bridge being constructed over Escondido Creek which will lift the current roadway out of the water, allowing the creek to return to a more natural state. It would enhance the wetland areas and provide better quality habitat for fish and birds. The bridge would also create a safer wildlife crossing for species traveling east-west along the creek as they could pass under the bridge and not cross vehicular traffic.

Accommodation of the General Plan Road Network – Primary access to HGV South is provided by two Mobility Element roads north of the Harmony Grove Road and Country Club Drive intersection (Country Club Drive continues south from that intersection along the Project's western boundary). The Proposed Project would reconfigure the intersection to enhance safety and access for pedestrians, bicyclists and equestrian riders through provision of multi-purpose trail south of the intersection through the bridge, pathway from Harmony Grove Road to the southern Project entry, and inclusion of three lanes south of the intersection (consistent with the existing configuration from the north). South of the intersection, the roadway would transition to three lanes. The roadway network proposed by HGV South would improve multi-modal circulation and implement the County's Community Trails Master Plan.

HGV South would not result in any significant direct impacts to County roadways within the General Plan road network. Cumulative impacts would be addressed either through the TIF or by other mitigation measures.

Public Facilities and Services Support Expansion – Compliance with General Plan Policies, County ordinances, and mitigation measures identified through the environmental review process and Project approval process would ensure that public facilities and services needed to support the Project would not result in a reduction of services to other County residents. HGV South would be required to provide the infrastructure and facilities needed to provide services to the Project either directly or through the payment of fees. Detail is provided in Chapter 1.0, as well as Sections 3.1.9, *Public Services* and 3.1.11, *Utilities and Service Systems* of this EIR. Service Providers are required to provide "will-serve" letters indicating that they can provide service to HGV South prior to the recordation of final maps and the issuance of any building permits for the Project. Community Facility Availability Forms have been received from service providers indicating that service will be available (see Appendix O).

Consistency with the Scale and Orderly and Contiguous Growth of HGV – HGV implements the CDM by concentrating the highest densities within a "Village Center" and decreasing the density progressively as development moves further away from the Village Center and into the surrounding community. The proximity of the Project's densest residential neighborhoods to HGV and its Village Center, illustrates the contiguous nature of these areas and how they are part of the same compact, walkable village. Residents would be encouraged to walk to amenities and services that are within 0.5 mile (approximately 2,100 feet), and less than a 10-minute walk

from both the HGV Village Center and HGV South's commercial/community center (the Center House). This design allows for the benefits of compact development which include increasing the amount of land that can be preserved contiguous to existing open space areas, decreasing the need for additional infrastructure, and enhancing the walkability of the communities. Surrounding the Village Residential designation along the western, southern, and eastern perimeter, the remaining 58 acres of HGV South is designated Semi-Rural Residential with a density of 0.5 dwelling unit per acre. Up to 30 dwelling units are proposed within this Semi-Rural Residential area in addition to open space. The Project's highest densities would be located in the northern and central portions of the site to avoid impacting the combined sensitive habitats and steep slopes located in the southern part of the site. This establishes a development pattern that is less dense around the perimeter.

The Project would enhance connections to HGV by encouraging pedestrian activity along an improved Country Club Drive through landscaping, shade trees, and interpretive signage; as well as contributing to or implementing the development of a bridge over Escondido Creek to replace the existing substandard "Arizona" crossing.

Consistency with Community Character – The Project is proposing to expand HGV, in a manner that is consistent with the community character of HGV and the surrounding areas. In approving HGV, the County determined that it was compatible with the existing character of the community and the more intense uses of the surrounding jurisdictions (HGV Specific Plan, Rick Engineering et al. 2007: 124).

If approved, HGV South would become part of the same compact, walkable community; connected by an integrated network of multi-use trails and pathways. HGV South features the most intense uses within 0.5 mile of the adjacent HGV Village Center where HGV's highest densities are also located. The Project has been designed to provide a wider range of housing options that are not only compatible with the housing options of HGV but also enhance the viability of the commercial uses located in the adjacent Village Center. Both HGV and HGV South, when combined, would create a range of housing opportunities supporting an economically vibrant community.

Lower intensity single-family uses (typically with larger lot sizes) would be located along the site perimeter in addition to designated open space (with an approximately 35-acre permanent set-aside of BOS in the southern portion of the Project). These designated open space areas would reduce visual effects along the Project's perimeter, provide views to natural areas, and contribute to an open environment. HGV South would provide a transition from the existing surrounding community by maintaining these perimeter areas within the existing Semi-Rural regional category.

The design principles outlined in the Specific Plan would ensure that the community character would be upheld. In particular, the Project's Design Guidelines are intended to ensure overall cohesiveness between HGV South and HGV. The Project includes a system of interconnected trails and pathways that encourage pedestrian and bicycle activity and establish important links to HGV as noted above, but also DDHP and EFRR. HGV South proposes to utilize consistent street trees, similar planting materials, lighting, signage, walls, fences, and architecture to provide a continuous link between HGV and the Project, strengthening the concept that the two

communities constitute one unified village. The architectural design is rural in inspiration and the Project's architectural guidelines identify elements to reduce the apparent size, bulk, and scale of proposed buildings. The smaller lot single-family development would replicate the character and design of the existing development. Multi-family housing types would be designed to appear as detached single-family homes or re-purposed rustic/agricultural buildings. Parking would be located internal to the development.

Adherence to these policies would reduce impacts associated with physical division of an established community from Project implementation, and support integration into the existing Village.

Conflicts with HCPs or NCCPs. The General Plan does not include policies related specifically to conflicts with HCPs or NCCPs. No impacts would occur.

Conclusion. As indicated above, the Proposed Project is compliant with applicable General Plan goals and policies. Accordingly, impacts associated with the goals and policies of the County General Plan related to land use would be **less than significant**.

Mineral Resources. While the General Plan contains policies related to mineral resources in the COS Element, these policies focus on retention of lands currently used for mining and/or identified as MRZ-2 (or those properties with a substantial likelihood of containing mineral resources), and located in areas appropriate for mining (e.g., not within proximity to existing or planned residential uses due to potential mining-associated noise, air quality, and traffic impacts). As described in Appendix R and in Subchapter 3.2 of this EIR, the Project site is not located in an area that contains MRZ-2 designated lands, nor is it located within 1,300 feet of such lands. Therefore, the Proposed Project would not result in the loss of availability of locally important mineral resource(s). In addition, the Project site is adjacent to existing and proposed residential areas, which would be incompatible with future extraction of mineral resources. Accordingly, impacts associated with the goals and policies of the County General Plan related to minerals extraction would be **less than significant**.

Noise. This section is divided into five separate issues, as presented below. Refer to Subchapter 2.5, Noise, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design and identified mitigation measures.

Excessive Noise Levels. To address impacts related to excessive noise levels, the Proposed Project must be consistent with policies from the Land Use, Mobility, and Noise Elements. The relevant policies are LU-2.8, M-2.4, N-1.4, N-2.1, N-2.2, N-4.1, and N-4.2 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by implementing mitigation measures to reduce significant noise impacts to below a level of significance, including construction of noise barriers (sound walls associated with two residences adjacent to Country Club Drive) and noise shielding (potential placement of some sound-generating equipment within structures). The reader is referred to Subchapter 2.5 of this EIR for detail. Adherence to these policies would reduce impacts associated with excessive noise levels from Project implementation.

Excessive Groundborne Vibration. To avoid impacts related to excessive groundborne vibration, the Proposed Project must be consistent with policies from the Noise Element. The relevant policies are N-6.3 and N-6.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies through compliance with the County Noise Ordinance. Adherence to these policies would reduce impacts associated with excessive groundborne vibration from Project implementation.

Permanent Increase in Ambient Noise Levels. To avoid impacts associated with permanent increases in ambient noise levels, the Proposed Project must be consistent with policies from the Land Use, Mobility, and Noise Elements. The relevant policies are LU-2.8, M-2.4, N-4.1, N-4.2, and N-5.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by implementing mitigation measures to reduce significant noise impacts to below a level of significance (including construction of noise barriers and noise shielding) and locating uses where truck access might be required (the Center House, or the potential WTWRF) away from the densest residential uses as a matter of Project design. Adherence to these policies and the related mitigation measures and design features would reduce impacts associated with potential permanent increases in ambient noise levels from Project implementation.

Temporary Increase in Ambient Noise Levels. To avoid impacts associated with temporary increases in ambient noise levels, the Proposed Project must be consistent with policies from the Noise Element. The relevant policies are N-6.3 and N-6.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies through compliance with the County Noise Ordinance. Adherence to these policies via compliance with the Noise Ordinance would reduce impacts associated with temporary increases in ambient noise levels from Project implementation.

Excessive Noise Exposure from a Public or Private Airport. The Project is not located near any airports or in the vicinity of aircraft flight patterns. No impacts would occur.

Conclusion. As indicated above, the Proposed Project is consistent with applicable General Plan goals and policies. Accordingly, impacts associated with the goals and policies of the County General Plan related to noise would be **less than significant**.

Population and Housing. The Housing Element includes six goals and related policies; however, only some of these policies are relevant to private developments. The relevant policies to an individual project are H-1.3, H-1.6, H-1.7, H-1.8, H-2.1, and H-2.2 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by providing opportunities for small-lot single-family and multi-family building types in a Village, and a range of housing types, lot sizes and building sizes; implementing development that would not degrade the character of surrounding development, provision of uses that would include amenities and common open space areas; and coordinating with the local fire agency to improve fire protection for multi-story construction. Impacts associated with the goals and policies of the County General Plan related to Housing would be **less than significant** through Project design.

Public Services. This section is divided into four separate issues, as presented below. Refer to Section 3.1.9, Public Services, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design.

Fire Protection Services. To address impacts to fire protection services, the Proposed Project must be consistent with policies from the Land Use and Safety Elements. The relevant policies are LU-1.4, LU-6.4, LU-6.11, LU-12.3, LU-12.4, S-3.4, S-6.1, S-6.2, S-6.3, S-6.4, and S-6.5 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by providing adequate fuel modification zones, coordinating with the Rincon MWD to ensure adequate fire flows are provided, paying applicable fair share fees for public services, and coordinating with the appropriate Fire Authority to ensure fire protection services are available to serve the Project, as specified in Chapter 1.0 of this EIR on the Permit matrix. In addition, the Project would be located less than 1.3 miles from a new fire station being constructed in conjunction with HGV. Based on the Facility Availability Form provided in Appendix O to this EIR, the closest fire station (at HGV) would provide response within fewer than three minutes of road time. Adherence to these policies would reduce impacts associated with fire protection services from Project implementation.

Police Protection Services. To address impacts to police protection services, the Proposed Project must be consistent with policies from the Land Use Element. The relevant policies are LU-1.4, LU-12.3, and LU-12.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Law Enforcement Services information provided to the Project by the San Marcos Command states that physical facilities are adequate and that no new staff would be required to serve the Project. Compliance with LU-1.4 is discussed above. Lack of need for new facilities and adherence to these policies would reduce impacts associated with police protection services from Project implementation.

School Services. To address impacts to school services, the Proposed Project must be consistent with policies from the Land Use Element. The relevant policies are LU-1.4, LU-9.7, LU-12.3, and LU-12.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by paying applicable development impact fees for school services and coordinating with applicable school districts to procure an agreement between the Applicant and the affected school districts in accordance with the School Facilities Mitigation Ordinance (7966). Adherence to these policies would reduce impacts associated with school services from Project implementation.

Other Public Services. To address impacts to other public services, the Proposed Project must be consistent with policies from the Land Use Element. The relevant policies are LU-1.4, LU-9.4, LU-9.7, LU-12.3, LU-12.4, LU-18.1, and LU-18.2 (refer to the County General Plan [County 2011a] for the text of these policies). These policies address provision of infrastructure and public facilities, as well as civic uses consistent with intensity of development and community character. The majority of these policies address accessibility and availability of facilities, but context sensitive elements are also addressed. LU-1.4 is addressed in some detail above. The Project would be consistent with these policies by including a centrally located community center (the Center House) easily accessible by road and trail, that that incorporates architecture and local features. Project infrastructure would be provided timely with development, with roads

and utilities installed prior to vertical construction. Will serve letters will be required. The Project would be conditioned pay and applicable development impact fees would be assessed and paid by the Applicant to fund the Project's fair-share contribution towards schools and fire protection services. Adherence to these policies would reduce impacts associated with other public services from Project implementation.

Conclusion. As indicated above, the Proposed Project is compliant with the applicable General Plan goals and policies. Accordingly, impacts associated with the goals and policies of the County General Plan related to public services would be **less than significant**.

Recreation. This section is divided into two separate issues, as presented below. Refer to Section 3.1.10, Recreation, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design.

Deterioration of Parks and Recreational Facilities. To address impacts related to deterioration of parks and recreational facilities, the Proposed Project must be consistent with policies from the Land Use, Mobility, Housing, and COS Elements. The relevant policies are LU-12.1, LU-12.2, M-12.1, M-12.2, M-12.4, M-12.8, M-12.10, H-2.2, COS-21.1, COS-21.2, COS-22.1, COS-23.1, COS-24.1, and COS-24.2 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by provision of public and private parks serving as gathering places, a community center, open space, and a pathway/trail system throughout the development that connects to the Del Dios Highlands Trail. These facilities are shown on Figures 1-17, 1-20a, 1-20c, and 3.1.10-1; and described in Section 3.1.10 of this EIR. The Project would also comply with the County's PLDO by providing in lieu fees for additional acreage not provided on site. Adherence to these policies would reduce impacts associated with deterioration of parks and recreational facilities from Project implementation.

Construction of New Recreational Facilities. To avoid impacts associated with construction of new recreational facilities, the Proposed Project must be consistent with policies from the Land Use, Mobility, Housing, and COS Elements. The relevant policies are LU-6.4, LU-9.7, LU-18.2, M-12.9, M-12.10, H-2.2, COS-21.2, COS-21.3, COS-21.5, COS-21.4, and COS-23.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by providing a variety of recreational activities on site, a centrally located community center co-located with a park and trails within appropriate areas throughout the development that connect to public trails (including multi-use facilities with potential bike use) off site and through proposed preserve area, as appropriate. The proposed parks and community center would incorporate design guidelines of the Specific Plan to reflect the surrounding character of the area. No existing recreational facilities would be impacted in order to construct Project amenities and use of the on-site facilities would not require additional road capacity beyond what is proposed as part of Project upgrades through design or traffic mitigation proposed in Subchapter 2.2 of this EIR. Adherence to these policies would reduce impacts associated with construction of new recreational facilities from Project implementation.

Conclusion. As indicated above and discussed in detail in Section 3.1.10 of this EIR, the Proposed Project is compliant with applicable General Plan goals and policies through Project design and payment of in lieu fees per the PLDO. Accordingly, impacts associated with the goals and policies of the County General Plan related to recreation would be **less than significant**.

Transportation/Traffic. This section is divided into six separate issues, as presented below. Refer to Subchapter 2.2 Transportation/Traffic, for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design and identified mitigation measures.

Unincorporated County Traffic and LOS Standards. To address impacts related to County traffic and LOS standards, the Proposed Project must be consistent with policies from the Land Use and Mobility Elements. The relevant policies are LU-5.1, LU-12.2, M-1.1, M-1.2, M-2.1, M-2.3, M-3.1, M-3.2, M-3.3, M-4.2, and M-9.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by providing a development that accommodates multi-modal transportation options (automobiles, walking, bicycling, and horse) and an interconnected local roadway network, implementing traffic mitigation to road segments and intersections as described in Section 2.2.6 of Subchapter 2.2 to reduce impacts to below a level of significance, implementing roadway improvements, and providing three access points to the Project from Country Club Drive. The Project would also contribute to or implement a bridge crossing of Escondido Creek by Country Club Drive to eliminate existing roadway flooding and to provide for improved wildlife movement. Proposed roadways and trails have been designed to meet County standards to accommodate facility users. Adherence to these policies would reduce impacts associated with County traffic and LOS standards from Project implementation.

Adjacent Cities' Traffic and LOS Standards. To avoid impacts associated with traffic and LOS standards of adjacent cities, the Proposed Project must be consistent with policies from the Land Use and Mobility Elements. The relevant policies are LU-4.3 and M-4.6 (refer to the County General Plan [County 2011a] for the text of these policies). Proposed projects from the cities of San Marcos and Escondido, as well as the County were used to identify potential direct and cumulative impacts on area roadways. Potentially significant impacts were identified on County and City of Escondido segments and intersections. The Project would be consistent with these policies in that the Project traffic analysis evaluated potential traffic impacts using both the County and City of Escondido methodology and significance thresholds. Although mitigation of traffic impacts are in the City of Escondido, which is outside the jurisdiction and control of the County, the Project considered traffic impacts on neighboring jurisdictions and identified mitigation measures that would mitigate impacts to City roadway segments and intersections as specified in Subchapter 2.2. Coordination with the City of Escondido is ongoing. Although the City is expected to approve the proposed mitigation, because the improvements remain within the purview of another public agency, and because the County cannot guarantee that the City would ultimately require implementation of those mitigation measures, the impact to City road segment and intersections is currently conservatively assessed as significant and unmitigated in Subchapter 2.2 relative to traffic and transportation impacts. Relative to Land Use plan conformity, however, the Project would meet the M-4.6 goal of coordination “to the extent practical.”

Road Safety. To avoid impacts related to road safety, the Proposed Project must be consistent with policies from the Land Use and Mobility Elements. The relevant policies are LU-2.8, LU-6.10, M-4.3, M-4.4, M-4.5, and M-9.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by designing proposed roadways to meet County standards to avoid traffic safety hazards and accommodate

emergency vehicle access, providing roadway improvements to Country Club Drive, and incorporating design guidelines of the Project Specific Plan to include rural elements along Project roadways and trails. Adherence to these policies would reduce impacts associated with road safety from Project implementation.

Emergency Access. To avoid impacts related to emergency access, the Proposed Project must be consistent with policies from the Land Use, Mobility, and Safety Elements. The relevant policies are LU-2.8, LU-6.10, LU-12.2, M-1.2, M-4.4, S-3.5, and S-14.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by implementing a fire protection plan (Appendix L to this EIR), implementing traffic mitigation to reduce impacts to below a level of significance, implementing roadway improvements to improve emergency vehicle access south of Escondido Creek, and providing three access points to the Project off Country Club Drive and an interconnected roadway network as addressed in Subchapter 2.2 and Section 3.1.4 of this EIR. Adherence to these policies would reduce impacts associated with emergency access from Project implementation.

Parking Capacity. To address impacts associated with parking capacity, the Proposed Project must be consistent with policies from the Mobility Element. The relevant policies are M-10.1, M-10.2, M-10.3, and M-10.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by providing vehicular parking that meets or exceeds County standards, and provision of access to trail staging areas. Parking areas would not restrict pedestrian circulation patterns. Adherence to these policies would reduce impacts associated with parking capacity from Project implementation.

Alternative Transportation. To avoid impacts related to alternative transportation, the Proposed Project must be consistent with policies from the Land Use and Mobility Elements. The relevant policies are LU-5.1, LU-5.5, LU-9.8, M-3.1, M-3.2, M-4.3, M-11.1, M-11.2, M-11.3, M-11.4, and M-11.7 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by accommodating multi-modal transportation options (automobiles, walking, bicycling, and horse) and an interconnected local roadway and multi-use trails network. Proposed roadways, bike routes, and trails have been designed to meet County standards to accommodate facility users. Additionally, design guidelines of the proposed Specific Plan would be incorporated into Project roadways and trails to include rural elements along these facilities. Adherence to these policies would reduce impacts associated with alternative transportation from Project implementation.

Conclusion. Impacts associated with the goals and policies of the County General Plan related to transportation/traffic within County jurisdiction would be **less than significant**. Impacts associated with the ability of the County to implement mitigation within City jurisdiction are addressed in Subchapter 2.2 of this EIR. County goals and policies as they relate to use of City of Escondido thresholds for impact assessment, as well as ongoing coordination regarding implementation of mitigation proposed within City jurisdiction has, and will continue, to occur. As a result, impacts associated with the goals and policies of the County General Plan related to transportation/traffic within City of Escondido jurisdiction are identified as **less than significant**.

Utilities and Service Systems. This section is divided into seven separate issues, as presented below. Refer to Section 3.1.11, Utilities and Service Systems, for additional information

regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design.

Wastewater Treatment Requirements. To address compliance with wastewater treatment requirements, the Proposed Project must be consistent with policies from the Land Use Element. The relevant policies are LU-9.4, LU-12.1, LU-12.2, LU-14.1, LU-14.2, LU-14-3, and LU-14.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by providing infrastructure improvements to serve the Project and treatment for wastewater generated by the Project in accordance with required standards. In particular, HGV South would be consistent with LU-14.4 upon its designation as a Village which allows it to provide sewer services by one of the options identified in its Sewer Master Plan by amending the General Plan Regional Land Use Map to re-designate the portion of the site served by the Project sewer as “Village” pursuant to Policy LU-1.4 (expansion of existing HGV Village. Adherence to these policies would reduce impacts associated with wastewater treatment requirements from Project implementation.

New Water or Wastewater Treatment Facilities. To avoid impacts related to new water or wastewater treatment facilities, the Proposed Project must be consistent with policies from the Land Use and Housing Elements. The relevant policies are LU-1.4, LU-4.3, and H-1.3 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by providing a development (Village extension) contiguous with HGV and provision of wastewater services without reducing services for other County residents. The sewer system has been planned and sized to serve HGV South for the densities depicted by the Specific Plan. A Sewer Master Plan was prepared for HGV South in which several options for providing wastewater service to the Project were identified and analyzed. There are three wastewater treatment system scenarios that could be used to serve the Project, the largest of which is addressed as part of the Proposed Project (please see Chapter 4.0, *Alternatives*, for discussion of smaller design scenarios). Adherence to these policies would reduce impacts associated with new water or wastewater treatment facilities from Project implementation.

Sufficient Stormwater Drainage Facilities. To avoid impacts related to sufficient stormwater drainage facilities, the Proposed Project must be consistent with policies from the Land Use and COS Elements. The relevant policies are LU-6.5, LU-6.9, and COS-4.3 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would comply with these policies by incorporating LID features into the Project and avoiding alteration of ridgelines and significant steep slopes to preserve major topographic site features and maintain overall drainage patterns. Adherence to these policies would reduce impacts associated with stormwater drainage facilities from Project implementation.

Adequate Water Supplies. To address impacts associated with adequate water supplies, the Proposed Project must be consistent with policies from the Land Use and COS Elements. The relevant policies are LU-13.1, LU-13.2, COS-4.1, COS-4.2, COS-4.3, COS-5.2, and COS-5.5 (refer to the County General Plan [County 2011a] for the text of this policy). The Project would comply with these policies by incorporating water conservation measures (use of reclaimed water), drought tolerant landscaping, on-site infiltration areas (detention/hydromodification vaults with park areas above them, and other pervious areas), and potential water use restrictions as discussed in Section 3.1.11 as necessary to address focused drought events. The project also

must obtain a PFAF from the Rincon MWD (included in Appendix O). Adherence to these policies would reduce impacts associated with water supplies from Project implementation.

Adequate Wastewater Facilities. To address impacts related to adequate wastewater facilities, the Proposed Project must be consistent with one policy from the Land Use Element, LU-4.3 (refer to the County General Plan [County 2011a] for the text of this policy). The Project would comply with this policy in that other projects in the vicinity within other jurisdictions (i.e., Escondido and San Marcos) were considered in the cumulative analysis conducted for the Proposed Project. The neighboring cities will be provided opportunities to comment on the Project through the environmental review process. Adherence to this policy would reduce impacts associated with adequate wastewater facilities from Project implementation.

Sufficient Landfill Capacity. To avoid impacts associated with sufficient landfill capacity, the Proposed Project must be consistent with policies from the Land Use and COS Elements. The relevant policies are LU-12.1, LU-12.2, COS-17.1, COS-17.2, COS-17.4, and COS-17.6 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies through compliance with construction and demolition waste recycling requirements, provision of community gardens where composting will be encouraged, and provision of space for recycling containers within the development. Adherence to these policies would reduce impacts associated with sufficient landfill capacity from Project implementation.

Energy. To address impacts related to energy, the Proposed Project must apply policies from the COS Element. The relevant policies are COS-14.7, COS-15.1, and COS-15.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by including provision of 100 percent of Project electricity needs through photovoltaic systems and/or enrollment in a renewables program, incorporation of energy efficiency features into Project facilities of this EIR relevant to electrical design features, and meeting or exceeding 2016 Title 24 standards, as described on Table 1-2. Adherence to this policy would reduce impacts associated with energy from Project implementation.

Conclusion. As indicated above, the Proposed Project is compliant with applicable General Plan goals and policies. Accordingly, impacts associated with the goals and policies of the County General Plan related to utilities and service systems would be **less than significant**.

Global Greenhouse Gases. This section is divided into two separate issues, as presented below. Refer to Section 3.1.3, Greenhouse Gas Emissions, of this EIR for additional information regarding Proposed Project compliance with the General Plan as indicated through technical analysis of the Proposed Project design.

Compliance with AB 32. To address compliance with AB 32, the Proposed Project must be consistent with policies from the COS Element. The relevant policies are COS-14-1, COS-14.3, COS-15.1, COS-15.4, COS-17.2, COS-17.6, and COS-19.1 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies including provision of a minimum of 100 percent of Project electricity needs through photovoltaic systems and/or enrollment in a renewables program, incorporating sustainability and efficiency design features into the Project as described on Table 1-2 of this EIR relevant to

electrical design features, use of only gas fireplaces in residences, encouraging recycling by provision of space for recycled containers within the village, and incorporating features to minimize water use. HGV South is a model of compact development which expands the existing HGV Village core to become part of the same compact, walkable community that would be connected by an integrated network of multi-use trails and pathways, continuing those that were part of the HGV Specific Plan. The Project features the most intense uses within less than 0.5 mile of the adjacent HGV Village Center where HGV's highest densities are also located. The residents of these neighborhoods would be encouraged to walk to the amenities and services available at the HGV Village Center and the commercial/civic zone of HGV South, located within a 10-minute walk of each other by interconnected trails and pathways. Adherence to these policies would reduce impacts associated with AB 32 compliance from Project implementation.

Potential Effects of Global Climate Change on the Proposed Project. To address potential effects of global climate change, the Proposed Project must apply policies from the COS Element. The relevant policies are also COS-15.1, COS-15.7, and COS-20.4 (refer to the County General Plan [County 2011a] for the text of these policies). The Project would be consistent with these policies by providing opportunities to utilize solar power and incorporating sustainability and efficiency design features into the Project as described above, and encouraging recycling by provision of space for recycled containers within the village. Adherence to these policies would reduce impacts associated with global climate change from Project implementation.

Conclusion. As indicated above, the Proposed Project is compliant with applicable General Plan goals and policies. Accordingly, based on Project design, impacts associated with the goals and policies of the County General Plan related to global climate change would be **less than significant**.

Amendment to the General Plan. A General Plan Amendment is required to achieve the densities which would support the expansion of the Village. The proposed General Plan Amendment includes amending the General Plan Regional Category and Land Use Designation(s) through redesignating a portion of the HGV South site from a Semi Rural Regional Category to a Village Regional Category, and changing a portion of the site from the Semi-Rural residential designation of 2 dwelling units per acre (SR-0.5) to a Village Residential designation of 10.9 dwelling units per acre (VR-10.9).

As the General Plan Amendment is incorporated into this Project and would occur as part of Project approval during Board of Supervisors consideration of the Project, the inconsistency with the current General Plan designation would be cured as part of Project approval, and modification to the General Plan would not result in a significant impact to plan conformance. No land use conformity impact would occur relative to implementation of the General Plan Amendment.

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

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

Community Character. Policies applicable to the Project include LU-1.5.2, LU-1.6.1, LU-1.6.2, LU-1.7.1, LU-1.8.1, LU-1.9.1, LU-1.9.3, LU-1.9.7, LU-1.19.8, and LU-1.11.1 (refer to the Community Plan [County 2011b] for the text of these policies). The Project would be consistent with these policies by proposing a GPA as part of Project design to be included within the Village Boundary to allow for various lot sizes governed by a Specific Plan, providing an integrated system of multi-use trails and pathway that connect neighborhoods with the Center House and the Village Center at HGV, incorporating design guidelines contained in the Project Specific Plan that reinforce country themes, avoiding impacts to mature oak trees to the extent feasible, proposing a clustered residential development that would preserve large areas of on-site open space, mitigating a portion of the Project's impacts within the proposed on-site BOS and completing careful review for potential to mitigate with necessary off-site habitat within the Community Plan area, as possible, and informing potential home owners of the proximity to equestrian and other surrounding uses. In addition to public outreach in general, the Project would be subject to review by the San Dieguito Community Planning Group, which will provide a recommendation to the County.

Community Growth Policy. Policies applicable to the Project include LU-2.1.4 and LU-2.2.2 (refer to the Community Plan [County 2011b] for the text of these policies). The Project would be consistent with these policies by proposing a clustered residential development in accordance with the CDM that would preserve large areas of on-site open space and provide a transition from the Project, feathering into the existing surrounding community. Greenbelts in the form of large open space areas and buffers would be provided. The Project would implement a Specific Plan (and associated design guidelines within the Specific Plan) to reflect and maintain the community character of the area and consistent with HGV and to further reinforce the Project as an expansion of the existing village. Additionally, the Project would include pathways and a multi-use trail. The reader is also referred to the discussion of the "Amendment to the Community Plan" below.

Community Conservation and Protection. Policies applicable to the Project include LU-3.1.1, LU-3.2.1, LU-3.2.2, LU-3.2.3, and LU-3.2.4 (refer to the Community Plan [County 2011b] for the text of these policies). The Project would be consistent with these policies by maintaining a buffer from Escondido Creek consistent with RPO policies (see discussion in Subchapter 2.3) to preserve the riparian corridor and improving the road crossing over the creek, prohibiting off-road motorized vehicles within the proposed on-site open space areas, mitigating for Project impacts through a combination of on-site preservation and off-site preservation at approved mitigation banks, proposing a clustered residential development that would preserve large areas of on-site open space that connects to adjacent open space areas that function as wildlife corridors, and dedication of open space easement.

Areas of Change: Development Infill and Intensification. The Community Plan does not include associated policies for Harmony Grove. No impacts would occur.

Community Facilities. Goals applicable to the Project include LU-5.2 and LU-5.3 (refer to the Community Plan [County 2011b] for the text of these policies). The Project would be consistent with these goals in that the Project would not impact the Fellowship Hall of the Harmony Grove Spiritualist Association or the Elfin Forest/Harmony Grove Fire Station. The Project would

provide public parks, as well as limited commercial retail uses to serve the community and provide central gathering spaces.

Other Topics/Issues. Policies applicable to the Project include LU-6.1.1 and LU-6.1.2 (refer to the Community Plan [County 2011b] for the text of these policies). The Project would be consistent with these policies by including limited commercial retail uses within the community center intended to serve the local community and incorporating design guidelines contained in the Specific Plan to govern signage and lighting.

Conclusion. Accordingly, impacts associated with the goals and policies of the Land Use Element of the Community Plan would be **less than significant** through Project design.

Circulation and Mobility. The Circulation and Mobility Element is divided into 10 issues, as presented below, and contains goals and policies relative to these issues. Refer to Subchapter 2.2 for additional information.

Integrated Mobility and Access. The Community Plan does not include associated policies for Harmony Grove. No impacts would occur.

Local Road Network. Policies applicable to the Project include CM-2.3.1 and CM-2.3.2 (refer to the Community Plan [County 2011b] for the text of these policies). The Project would be consistent with these policies by designing internal residential streets with sharrows as appropriate and generally curvilinear alignments. Concerns over equestrian uses along the road would be addressed through HGV South implementation of multi-use trail segments along public Country Club Drive, with the Project addressing the critical junction of Country Club Drive with Harmony Grove Road, as well as the crossing of Escondido Creek as part of the Project. Truck traffic would be limited to local deliveries at the Center House and WTWRP.

Fire Access/Egress Routes. Policies applicable to the Project include CM-3.1.1 and CM-3.2.2 (refer to the Community Plan [County 2011b] for the text of these policies). The Project would be consistent with these policies by naming internal roadways and installing appropriate street signage to facilitate navigation within the community for emergency vehicles. The Project would also implement roadway improvements along Country Club Drive to improve vehicle access south of Escondido Creek.

Local Transit. The Community Plan does not include associated policies for Harmony Grove. No impacts would occur.

Pedestrian. Policy CM-5.1.1 is applicable to the Project (refer to the Community Plan [County 2011b] for the text of this policy). Consistent with this policy, the Project would include an integrated public and private pathway/trail system that links residential neighborhoods with the HGV Village Core and on- and off-site open space areas and trails.

Bicycle and Trails. Policy CM-6.2.1 is applicable to the Project (refer to the Community Plan [County 2011b] for the text of this policy). The Project would comply with this policy by implementing roadway improvements on Country Club Drive to provide an improved crossing over Escondido Creek for bicyclists and pedestrians (as well as automobiles).

Aviation. The Community Plan does not include associated policies for Harmony Grove. No impacts would occur.

Trip Reductions. Policies applicable to the Project include CM-8.1.1 and CM-8.1.2 (refer to the Community Plan [County 2011b] for the text of these policies). The Project would be consistent with these policies by designing internal residential streets with two lanes and sharrows and generally curvilinear alignments. Project intersections would be stop-controlled. Policy CM-8.1.2 specifically encourages a shuttle system between the business park to the northeast (within Escondido) and the HGV Center. The Project would provide residential homes within close proximity to the business park which would enhance the potential viability of a shuttle system. The Project would not be inconsistent with these policies.

Parking. The Community Plan does not include associated policies for Harmony Grove. No impacts would occur.

Infrastructure and Utilities. Policy CM-10.1.1 is applicable to the Project (refer to the Community Plan [County 2011b] for the text of this policy). Consistent with this policy, the Project Specific Plan includes a landscape palette that emphasizes native, drought tolerant, and fire resistant plantings.

Conclusion. Accordingly, impacts associated with the goals and policies of the Circulation and Mobility Element of the Community Plan would be **less than significant** through Project design.

Conservation and Open Space Element. The COS Element is divided into three issues, as presented below, and contains goals and policies relative to these issues.

Resource Conservation and Management. Policies applicable to the Project include COS-1.1.1, COS-1.1.2, COS-1.1.3, COS-1.2.1, COS-1.3.1, COS-1.3.2, COS-1.6.1, and COS-1.7.1 (refer to the Community Plan [County 2011b] for the text of these policies). The Project would be consistent with these policies by including community gardens and allowing a farmer's market as an allowable use, use of reclaimed (recycled) water for general HOA irrigation and rain barrels for community gardens, and proposing a clustered residential development and preserving large areas of on-site open space that contains steeper topography and landforms that connects to adjacent open space areas. An adequate buffer from Escondido Creek would be maintained and the road crossing over the creek would be improved with a bridge. Additionally, the Project would incorporate features to encourage alternative energy use such as provision of 100 percent of the Project electricity needs through renewable resources (see Table 1-2 and Section 3.1.1) and providing an electrical vehicle charging area consistent with 2017 CALGreen requirements at the Center House for use by both Project residents and community neighbors.

Parks and Recreation. Policy COS-2.1.1 is applicable to the Project (refer to the Community Plan [County 2011b] for the text of this policy). Consistent with this policy, the Project would provide 13 parks, totaling approximately 4.1 acres, which connect to a system of multi-use trails. Paved areas and lighting would be minimized within parks to include only that necessary for safety during hours of operation.

Community Open Space Plan. Policies applicable to the Project include COS-3.1.1, COS-3.2.1, COS-3.2.2, COS-3.2.3, and COS-3.2.4 (refer to the Community Plan [County 2011b] for the text

of these policies). The Project would be consistent with these policies by proposing a clustered residential development and preserving large areas of on-site open space that contains steep slopes, ridgelines, and sensitive biological resources; implementing mitigation in accordance with County and Resource Agency requirements for impacts to biological resources; and maintaining adequate buffers from wetlands.

Conclusion. Based on Project design and mitigation measures specifically designed to address biological impacts (discussed above and in Subchapter 2.3), impacts associated with the goals and policies of the COS Element of the Community Plan would be **less than significant**.

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

Hazards/Risk Avoidance and Mitigation. Policy S-1.1.1 is applicable to the Project (refer to the Community Plan [County 2011b] for the text of this policy). The Project would comply with this policy by implementing roadway improvements along Country Drive, and potentially contributing to or implementing construction of a bridge over Escondido Creek to improve access and eliminate flood hazard conditions associated with the existing at-grade crossing.

Emergency Preparedness and Response. The Community Plan does not include associated policies for Harmony Grove. No impacts would occur.

Other Topics – Law Enforcement. The Community Plan does not include associated policies for Harmony Grove. No impacts would occur.

Conclusion. Accordingly, impacts associated with the goals and policies of the Safety Element of the Community Plan would be **less than significant** through Project design.

Noise Element. The Noise Element is divided into three issues, including Noise Sources, Noise Standards and Mitigation, and Other Topics/Issues. The Noise Element, however, does not contain any policies that are applicable to the Project. Accordingly, **no impacts** associated with the goals and policies of the Noise Element of the Community Plan would occur.

Amendments to the Community Plan. As indicated previously in this section, community plans provide additional guidance that reflects the unique nature of each unincorporated community, but the General Plan has clearly delineated the relationship between the General Plan and the County's community plans. Community plans must be internally consistent with the General Plan's goals and policies and cannot be used to undermine the policies of the General Plan (General Plan LU-2.2). This means that community plans must be read and interpreted in the context of the goals and policies set forth in the General Plan. (This policy in particular should be used for guidance when addressing this Project's consistency with goals and policies of the Community Plan.)

HGV South proposes to amend the Community Plan to add the Project as an independent but compatible component of the HGV Specific Plan Area, amend Figures 1 and 3 of the Community Plan to adjust the Village Boundary Line, and revise related portions of the Community Plan.

Amendments to the Harmony Grove Village Specific Plan Area Section (Chapter 6) – This section of the Community Plan contains general goals and policies that pertain to HGV development to the north. HGV South would expand HGV Village pursuant to the requirements set forth in General Plan Policy LU-1.4, and would further implement the Community Development Model by concentrating the highest densities of uses closest to HGV while decreasing intensities adjacent to semi-rural land uses and nearby open space areas. The Project proposes to modify the text of Chapter 6 of the Community Plan to add the Project as an independent but compatible component of the HGV Specific Plan Area. The Project proposes to amend the Community Plan to insert text that will describe the Project and its relationship with HGV as an independently approved Specific Plan. Although the distribution, location, and uses of land within the Project would be controlled by its Specific Plan, the Project's design features and design guidelines would be compatible with similar provisions found in HGV's Specific Plan. Also, the Project would generally follow as appropriate the "concepts for land use" described in the Community Plan for HGV. Some additional policies would be added to Chapter 6 of the Community Plan to explain further its connection with HGV. Accordingly, **no impacts** associated with the goals and policies of the HGV Specific Plan Area Element of the Community Plan would occur.

Amend the Village Boundary Line – HGV South would amend Figures 1 and 3 of the Community Plan to incorporate HGV South within the Village Boundary. Although the Community Plan currently identifies the existing "Harmony Grove Village Boundary" as the only area in which development should be directed, the General Plan allows for the expansion of an existing village under the circumstances outlined in Policy LU- 1.4 (see primary discussion under *Land Use and Planning*, "Physical of an Established Community," above). Since community plans cannot be interpreted in a manner that would undermine the policies of the General Plan or limit the discretion of the Board of Supervisors to take those actions contemplated by General Plan policies, the current placement of the Village Boundary does not preclude amending the current Village Boundary to include HGV South. Specific to this Project, the Community Plan can be revised in a manner consistent with adopted General Plan policies that allow for new growth and village expansion under specific identified circumstances.

Revise Related Language in the Community Plan for Consistency – The Project proposes to amend Community Plan Policy LU-2.2.1 in order to achieve consistency with the modified Village boundary and General Plan policies. This amendment would not undermine the underlying intent of the Community Plan in that LU-2.2.1 was originally enacted to preserve the rural residential and equestrian character of Harmony Grove while still accommodating growth (see Goal LU-2.2). Rather, the amended language would clarify any ambiguities or potential conflicts between General Plan Policies related to accommodating future growth and the Community Plan. The new revised policy would require adherence to the CDM and the community character policies of the Community Plan; but would not freeze any future land use decisions or undermine General Plan Policies that are related to accommodating future growth, such as General Plan Policy LU-1.4.

HGV South is not proposing an urban, clustered or suburban designed development; rather HGV South is proposing to expand the existing HGV Village pursuant to the requirements set forth in General Plan Policy LU-1.4. This Policy permits new Village Regional Category designated land uses only when contiguous with an existing or planned Village, all of the criteria described in the

Policy are met, and the CDM is implemented. Therefore, development under this General Plan Policy is consistent with the intent expressed within the Community Plan with respect to the growth boundary and Community Plan Policy LU-2.2.1. Compliance with General Plan Policy LU-1.4 prevents pockets of clustered urban or suburban development from occurring by ensuring that development be located contiguous to an existing village, thereby preserving the communities' surrounding semi-rural and open space land. The Project's designated open space would reduce visual effects along the Project's perimeter, provide views to natural areas, and contributes open space areas ensuring that the surrounding Harmony Grove community is maintained.

County Board of Supervisors Policies

As stated above, there are nine Board of Supervisors Policies applicable to the Proposed Project. Regarding Policy I-17, the Project would provide the public improvements, facilities, and the lands, easements and rights-of-way necessary to make the property suitable for the proposed zoning reclassification. The Proposed Project would provide infrastructure to handle the sewage generated by the new development through construction of a stand-alone WTWRF (see also potential treatment alternatives in Chapter 4.0 of this EIR). A SWMP would identify drainage improvements to ensure that the Proposed Project would be suitable for the increased development. Fuel modification zones would be implemented to assure proactive and effective fire protection. In addition, numerous improvements to roadways and intersections would be implemented. Therefore, the Proposed Project would be consistent with Policy I-17.

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

The Proposed Project would be expected to comply with Policy I-36, as the Project site would be required to be annexed through a LAFCO action into an existing Sanitation District for sewer service, as appropriate and as noted in the Permits matrix in Chapter 1.0 of this EIR. Construction and operation of improvements have been considered in this EIR, and the facilities would be built and operational prior to occupancy so that compliance with Policy I-36 will be assured. In order to implement the Project, annexation into an existing Sanitation District would be required to be completed consistent with Policy I-36. If the Project is not annexed into a Sanitation District, the Project could not be implemented and no impacts would occur.

The County sent notices to all property owners within 300 feet of the Project site when the Project application was received, and notices will be sent again prior to each public hearing. The San Dieguito Community Planning Group also receives notification of each Tentative Map resubmittal and prior to hearings. In addition, pursuant to the State CEQA Guidelines, an NOP was distributed on August 27, 2015, and a 30-day public review period was initiated in which public agencies and private citizens commented on the Proposed Project (Appendix A). Therefore, the Project would be consistent with Policy I-49.

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

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

The Proposed Project contains development near hillsides. In accordance with Policy I-73, the Proposed Project would be planned and designed to minimize the permanent impact upon site resources including existing natural terrain, established vegetation, and portions of a site which have significant public or multiple-use value. The Proposed Project would not impact dominant landforms or topographic features in the immediate vicinity, such as Mount Whitney to the west-northwest, or other closer prominent ridgelines or hills to the south; all of which are beyond the Project boundaries. There are approximately 26.5 acres of RPO steep slopes on the property. Excluding slope addressed under exception or waiver, the Proposed Project would permanently encroach upon a total of approximately 0.88 acre of RPO steep slopes, which is less than one percent of the site overall. Therefore, the Proposed Project would be consistent with Policy I-73.

As previously stated, the Proposed Project would provide infrastructure to handle the sewage generated by the new development. Full construction of a WTWRF would be subject to all appropriate plans, ordinances, statutes, and regulations in the adopted population forecasts of the County General Plan, County General Plan's Land Use Element, County ZO, CEQA and County EIR Guidelines, and RWQCB rules and regulations. The WTWRF would follow the specific design criteria and standards developed by the County. The Project would meet the RWQCB's requirement for approximately 90 days of recycled water storage through the construction of wet weather storage. Through this EIR, the WTWRF would be reviewed and in compliance with CEQA and County EIR Guidelines. Therefore, the Proposed Project would be consistent with Policy I-78.

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

County of San Diego Zoning Ordinance

The Project site is almost completely zoned A70 (Limited Agriculture), with a minimum lot size of 0.5 acre. A small sliver of land at the northern end of the property, adjacent to Escondido Creek, is also designated A70, but has a minimum lot size of 8 acres. The A70 zone is primarily meant to create and preserve areas for agriculture. The very southwest portion of the site is zoned RR (Rural Residential) with a minimum lot size is 0.5 acre. The Rural Residential zone is intended to create and enhance residential areas where agricultural use, compatible with a

dominant permanent residential use, is desired. While residential development is an allowable use within the A70 and RR zones, the proposed clustered development design would not be consistent with these existing zone use regulations.

In order for the Project to be found consistent with the County ZO, the Project would include a Rezone, which would rezone the entire site as Specific Plan Area (SPA; S88). The S88 use regulations are intended to accommodate SPAs and can create an unlimited variety of land uses in conformance with the General Plan. Uses established pursuant to an applicable Specific Plan shall be subject to the conditions and restrictions set forth in that Specific Plan. Approval of the GPA and Rezone would remedy current inconsistencies between the current and proposed use regulations, and land use impacts associated with the County ZO would be **less than significant**.

County of San Diego Resource Protection Ordinance

Applicable policies of the RPO include those that address wetlands, wetland buffers, sensitive habitat lands, floodplains, and steep slopes. No significant prehistoric or historic sites are located within the Project site.

Wetlands. Off-site impacts would occur to 0.72 acre RPO wetlands at the Country Club Drive low-water crossing over Escondido Creek. The anticipated improvements would include construction of a new bridge that would span the flood limits of the Creek and allow for safe passage for the existing residents and future residents of the Project that rely on Country Club Drive. The bridge span represents the least environmentally damaging alternative to crossing the Creek and impacts to wetland would be unavoidable. The bridge span would provide a superior condition to that which currently exists. The improvements would be restricted to only those necessary to provide a safe crossing and enhance the biological and hydrological functions and services of the reach. Limited temporary impacts would be related to the access of equipment and staging during bridge construction. Permanent impacts would be limited to bridge abutments, footings and bank stabilization. The impacts would be unavoidable but necessary to remove the existing substandard low-water crossing, construct the new span bridge, stabilize the channel embankment, and restore the riverine hydrology of the reach. Therefore, this RPO impact is allowed, and with mitigation as described in Subchapter 2.3 the Project would comply with the RPO wetland avoidance provisions.

Wetland Buffers. The Proposed Project would provide minimum 100-foot buffers around wetlands on and in the immediate vicinity of the site. Temporary encroachment into the buffer around Escondido Creek is required during construction for the anticipated removal of the existing low-water crossing, construction of the new span bridge, stabilization of the channel embankment, and restoration of riparian habitat and riverine hydrology within temporary impact areas. Construction activities within the buffer would be limited to the existing disturbed and developed areas in and around Country Club Drive. Temporary impacts within buffer areas would be restored to pre-project or superior conditions, subject to fuel modification requirements. Therefore, the Proposed Project would comply with the RPO wetland buffer provisions.

Sensitive Habitat Lands. Sensitive Habitat Lands in the Project area include lands supporting the core on-site population of wart-stemmed ceanothus in the southern portion of the site (an

estimated 20,000 wart-stemmed ceanothus individuals). Also present in this area are summer holly (20 to 30 individuals), San Diego sagewort (four individuals), and ashy spike-moss (four small concentrations). This area is “unique” in that it supports rare plant species considered sensitive by CDFW.

The Project would preserve approximately 35 acres of the approximately 111-acre site that contains contiguous, high quality and intact habitat, including the southern mixed chaparral occupied by the major population of wart-stemmed ceanothus individuals in permanent BOS. This habitat is contiguous with the DDHP and would expand the existing regional core area. The Project would preserve the large majority of this species, including the major population of ceanothus, as well as the noted summer holly, San Diego sagewort, and ashy spike-moss. Therefore, the Proposed Project would comply with the RPO provisions with respect to sensitive habitat lands.

Floodplains. The northernmost portion of the site, as well as adjacent portions of the proposed off-site roadway/utility improvements along Country Club Drive and the related crossing of Escondido Creek, are within mapped floodplains are considered RPO floodways. However, no habitable structures would be constructed within these mapped floodplains. A potential WTWRF site would be constructed within mapped floodplains, but it would be elevated above the 100-year flood level and would not redirect or impede flood flows (PDC 2017b, 2015). Therefore, the Proposed Project would comply with the RPO floodway provisions.

Steep Slopes. There are approximately 44.3 acres of slopes on the property which meet or exceed 25 percent slope, and 26.5 acres that meet the preliminary definition of RPO steep slopes based on 25 percent slope and at least 50 feet of vertical rise. This means that approximately 24 percent of Project site is subject to analysis under the RPO. The areas in question include slopes located in the small northeast hills of the Project site, on the central slope where Project elevation begin rising above the valley floor, and in the southern third of the Project, where terrain is overall higher and more rugged.

The reason these slopes are considered for protection by the County is because, separate and distinct from engineering issues related to slope which are addressed in building and safety codes, RPO steep slopes can be important components of an area’s visual character. As such, steep slopes that provide important components to a particular view are provided protection. Steep slopes that do not provide critical view elements may receive a waiver under County standards (i.e., the need to protect these visually unimportant slopes may be “waived”) by following a specified analytical process identified in RPO Section 86.604(e)(3). This is discussed in detail in Subchapter 2.1 of this EIR relative to visibility and visual effect; including important existing condition baseline visual information, and potential Project-related changes to that existing condition. Other incursions into steep slopes are excluded if they meet specified exceptions within the ordinance, or are allowed if they fall within specified percentages of lot encroachment.

Of the approximately 7.7 acres of RPO steep slopes that would be impacted by the Project, the majority is either excepted (approximately 2.2 acres) or subject to waiver approximately (4.7). As indicated, analysis specifically related to visibility of slopes and assessment of some limited encroachment as occurring on insignificant slopes is detailed in Subchapter 2.1 of this EIR. Less

than 1 acre overall (0.88 acre) of protected RPO steep slope area would be permanently encroached upon, and that encroachment would fall within the allowable 10 percent per lot. The remainder of this discussion details the analysis.

Access Exception. Section 86.604(e)(2)(bb)(ii) of the County RPO provides that local private roads and driveways that are necessary for primary or secondary access to the portion of the site to be developed on lands of less than 25 percent slope are allowed provided that no less environmentally damaging alternative exists. As described in the section, the initial determination of approval is made by the Director of PDS. The Board of Supervisors will make a final decision during evaluation of this Project. The following information provides analysis relevant to this decision. The reader is referred to EIR Figure 2.1-11d, for depiction of the location of areas proposed for the roadway exception.

Access Exception in Southern Portion of the Site – The private roadway exemption applies to Private Drives B and E, where the Project would abut the northern-most boundary of the DDHP and BOS.³ The roadway would be adjacent to Lots 159, 162 and 163 near Private Drive B and Lots 92 and 96 along Private Drive E. The Project would grade into slope to create roadbed. Approximately half of the area encroached upon would be temporary as, following creation of the road(s), the area disturbed during construction but not necessary for final roadway would be revegetated and returned to open space.

The following text addresses the footprint proposed for the Project and why it is considered necessary (i.e., no less damaging alternative is available).

Development of the Project, including the location of the various lots and the roadways required to access the site, has been proposed such that no less damaging alternative is available. The Project has been designed to create a compact and efficient development footprint that would cluster development in a manner to result in the preservation of a large swath of open space in the southern portion of the Project site that contains high quality biological resources while providing development that is scaled to complement development within HGV, which is located contiguous to the Project site, and of which the Project would constitute a Village extension. As a result of clustering development within certain areas of the project, approximately 35 acres of continuous pristine BOS would be retained in the southern portions of the site, adjacent to DDHP. The Project design is also intended to minimize visual impacts from off-site views by placement of Project development below the iconic ridgeline surrounding the valley and clustering development on the site to decrease the development footprint to make the most efficient use of non-protected RPO steep slope areas. In addition, those open areas would allow for the improvement to on-site drainage control (and ultimate improvements over current runoff patterns into Escondido Creek). The Project design would provide a more natural drainage plan on the Project and provide for visual open space between residential uses. This would allow for greater conformity with existing community character than would result if the Project footprint were to utilize only non-steep slope land without regard to these design considerations. The site's proposed intensity also would implement the principles of sustainable development by allowing for a diversity of uses contiguous to HGV that would encourage walkable communities,

³ Private Drives C and D are not addressed in this discussion. They are part of the on-site slopes proposed for Waiver under the RPO; see discussion in Subchapter 2.1 of this EIR.

increased efficiencies of public facilities, and provide opportunities for the Project to contribute to the funding of needed services that can serve the Project, HGV and the surrounding community. Thus, the Project's compact design is consistent with General Plan policies and the RPO, resulting in the most efficient use of environmentally sensitive lands rather than standard design that would need to develop every square foot of non-steep slope land.

The provision of visual open space and preference for lessened encroachment into steep slopes are considered for the same reasons (consistency with community character). Accordingly, the relative visual "weight" of the effect of development versus retention of untouched slope was evaluated. The value of additional on-site open space area is weighted more heavily in this evaluation because it would reduce visual impacts to off-site viewers from the north. Where the Project-modified slopes *might* be visible, the encroachment would be required for the construction period only, and would be remediated; i.e., contoured to appear natural and revegetated with native species, and retained as part of the Project permanent open space. The revegetated slopes would blend into the undisturbed slopes above them. Upon recommendation of approval of this encroachment by the Director of PDS, and based upon the rationale provided, these encroachments qualify for the exception, and no significant impact is identified. The ultimate decision to approve the exception request will be part of the discretionary action of the Board of Supervisors.

Access Exception in Northeastern Portion of the Site – For the same reasons described above, the access exemption under Section 86.604(e)(2)(bb)(ii), also applies to the area in the northeastern portion of the Project where a small stand-alone hillock is located, the slopes of which largely contain disturbed Diegan coastal sage scrub (see Figure 2.1-11d). In this area, Lots 1 and 2 would be aligned along the base and top of the hillock, along private drives J and K, respectively. Final encroachments fall within the 10 percent allowable percent of permanent encroachment for each lot (see discussion under Encroachment into RPO-protected Steep Slopes, below).

In order for the access road and driveways to conform to County design standards and to prepare adequate engineered pads both at the top and base of this hillock (and largely out of steep slope areas), grading is required across the slope that joins lots 1 and 2, resulting in a short-term visual impact. This would occur during the site construction period, and would be part of the visual impacts associated with the construction period (see analysis in Section 2.1). These intervening slopes would be fully remediated, however, and would appear "natural" following contour grading and revegetation. These slopes would be retained as part of the Project permanent landscaped open space. Upon recommendation of approval of this encroachment by the Director of PDS, and based upon the rationale provided, these encroachments qualify for the exception, and no significant impact is identified. The ultimate decision to approve the exception request will be part of the discretionary action of the Board of Supervisors.

RPO Steep Slope Waiver. A waiver from the restrictions of the RPO steep slopes and easement requirements (County Code Title 8, Division 6, Chapter 6) may be granted if the following four findings can be made (RPO Section 86.604[e][2][cc][3]):

- aa. The slope is an insignificant visual feature and isolated from other landforms, or surrounding properties have been developed on steep slopes such that this project would be considered "infill"; and

- bb. The property is zoned for 0.5 acre lots or smaller at the time the application was made, or a concurrent Rezone has been filed; and
- cc. The greater encroachment is consistent with the goals and objectives of the applicable community plan; and
- dd. Site Plan review is required to ensure consistency of design with these regulations.

Three areas in the south-central portion of the site are proposed for waiver of the easement requirements. The visual elements of the criteria (aa; visual significance, isolation, etc.) are detailed in Section 2.1 of this EIR. Land use conformity criteria (aa relative to infill, bb, cc and dd) are addressed below.

- **Criterion aa.** As stated, analysis regarding insignificant visual features isolated from other landforms is addressed in Subchapter 2.1. Finding aa also provides an option to find that the surrounding properties have been developed on steep slopes such that this project would be considered “infill.” This is considered less of a visual issue and more a land use planning issue specific to the RPO. As a result, it is discussed here.

In the case of the Project, although many of the homes in the immediate vicinity are located near the valley floor, many are also sited on RPO steep slope sides as well as on ridgelines and hilltops, including the home currently being built adjacent to the Project’s eastern boundary. A review of RPO steep slope locations against existing homes visible on Google Earth south of Harmony Grove Road shows that approximately 35 percent of the currently existing homes are sited within steep slope areas.⁴ As shown on Figure 3.1.6-1, these homes are located to the northeast, southwest and west of the Project (there is no building due south of the Project due to the DDHP boundary, which is immediately adjacent to the Project.)

To the north of Harmony Grove Road, the pattern continues. A number of existing homes along the western valley slopes also have been developed on steep slopes. In addition, although it is not yet fully present, HGV is building out. As shown on Figure 2.4-7, *Steep Slope Encroachment Map*, of that project’s EIR; the 3,000,000 cubic yards of cut and 3,000,000 cubic yards of fill approved for that project have resulted in encroachment into RPO steep slopes. A number of that project’s compounds, hillside farmhouses, and grove country house or farmhouses west of Country Club Drive, and village housing (hillside cottages) east of Country Club Drive, will encroach into RPO steep slopes; as has that project’s water reclamation facility, located at the very visible intersection of Harmony Grove Road and Country Club Drive.

For purposes of this Finding, the proposed HGV South development can indeed be seen as an infill project, which would also—and separately—provide an important consideration of this waiver.

⁴ This number does not include the non-conforming residential uses associated with the Harmony Grove Spiritualist Association, which is planning to rebuild structures destroyed in the 2014 Cocos Fire.

- **Criteria bb and dd.** The project is currently designated as SR (0.5) which fulfills criterion bb, and would be assigned a “D1” designator, which requires site plan review to ensure design consistency with the Project Specific Plan and Visual Impact Assessment (criterion dd).
- **Criterion cc.** Relative to criterion cc, the encroachments into these two areas would be consistent with the Community Plan. The following text is excerpted from the analysis contained within Appendix C, the Steep Slope Waiver.

As noted above, HGV South is located within the Harmony Grove Community of the San Dieguito Community Plan. An important goal of the Plan is to preserve the rural residential lifestyle while accommodating growth. The Harmony Grove Community is designed consistent with the CDM whereby the most intense development is located within the Village and is generally, but not necessarily uniformly, surrounded by decreasing residential densities. HGV South is contiguous to HGV and is a logical extension of this Village. The Project would preserve open space and natural habitat, thereby contributing to the retention of the existing setting and lifestyle of the adjacent Harmony Grove community.

The Harmony Grove Community “strongly supports conservation and protection of native species” (Community Plan 2011:20). The design concept for HGV South allows this to occur by focusing development within the least constrained areas of the site and making the most efficient use of the land. This compact and efficient development pattern reduces the building footprint and preserves the largest block possible of contiguous open space where sensitive biological resources are located. Although this development pattern would require some encroachment into insignificant RPO steep slopes, it is much more efficient than pushing development farther into the southern portion of the site in an effort to strictly remain on non-RPO steep slope land. If the Project design fully avoided all RPO-defined steep slopes, the BOS preserves could be much more fragmented, with substantially increased edge effects and more impacts to rare plants and sensitive species.

The grading plan has been designed to closely follow the underlying existing topography, thereby retaining the existing overall shape of the landform and reflecting the topographic features of the terrain, including focused rise and fall in the northern and central portions of the site. Where no development is proposed, of course, the existing natural terrain would remain. The steepest on-site slopes and connections to the steep and rugged off-site slopes in the southeast and southernmost portions of the Project would be preserved. These lead to and merge seamlessly with the memorable and unique peaks that form the southern edge of the Harmony Grove Valley.

The retention of BOS complies with Community Plan guidance regarding greater encroachment into steep slopes. As described in Subchapter 2.1, the Project would avoid impacts into the primary and locally known hill formations called out in the Community Plan as critical to the setting of the community. Similarly, the Community Plan voices concern over development on ridgelines (2011:19). The Project would keep all development below the iconic ridgeline formations that rim the valley. No ridgelines (formed by connecting the highest peaks along a ridge) are located on site, and therefore

no ridgelines would be impacted. The Project would preserve a large swath of native habitat in the south-central and southern portion of the Project as BOS. Preservation of this habitat would contribute to continued health of abutting habitat in the DDHP. This is consistent with the goal to preserve ridgelines in their native habitat (Community Plan 2011:44).

The most notable slopes of the Project would be retained in open space. Views to the steep slopes leading to the intact promontory just southeast of the central portion of the Project, and to the intact hills in the southern portion, would be retained. This is consistent with the goal to retain “unspoiled views to the intact hills” (Community Plan 2011:30). These undisturbed areas would continue to merge seamlessly into protected slopes in DDHP with nearby notable peaks reaching 960, 1,000, 1,080 and 1,200 feet amsl; and the slightly more distant peak at 1,320 feet amsl.

The Project would not contribute to any ongoing degradation of views toward the Lady of the Valley, called out as “threatened by urban sprawl” in the Community Plan (2011:30). The Project is located southerly of the peaks making up this formation, which are north of Harmony Grove Road and on the western side of the valley. The “Lady” is visible from portions of the Project site. Off-site views taking in both the Project and those peaks require the viewer to be at a distance. Viewers south of the Project would look over the Project to the notable higher peaks that form the “Lady,” encompassing all the intervening development in Harmony Grove Valley, as well as Eden Valley and points well to the north. Viewers from the north would be closer to the “Lady” but would be looking westerly to see her. Views toward the Project would then be lateral, and the Project would appear as a smaller development in the distance without relationship to the Lady of the Valley. Implementation of the Project would not impact the importance, form, or visibility of this important community landmark.

It should also be noted that the Community Plan references the General Plan Goal COS-12 regarding the preservation of ridgelines (Community Plan 2011:30). The General Plan indicates that undeveloped ridgelines and steep hillsides should be protected through the application of semi-rural or rural designations on these areas. HGV South has maintained the SR-0.5 designation within the southern portion of the site where the most significant and steep on-site slopes would be preserved within permanent open space.

To protect community character, the Project has been designed to appear much less dense than the number of dwelling units would suggest. Approximately half of the proposed homes are planned for single-family residences. The remaining residences would be located within structures built to accommodate multiple dwellings, yet still appear like single-family homes or repurposed agricultural/rural structures. The site layout promotes a feeling of openness with substantial internal open space features such as a remnant drainage that would be restored to a naturalized state, wide landscaped areas between buildings, and an assortment of park and recreation areas including community gardens. Together, natural open space, common area landscaping, and recreational areas are important framework elements and represent approximately 75 acres or 68 percent of the entire Project area.

Based on the steep slope analysis provided in Appendix C and Subchapter 2.1 of this EIR, combined with the infill analysis noted above, and the remainder of the land use consistency discussion, a waiver from the RPO steep slope easement restrictions is considered appropriate and consistent with RPO. As a result, **no significant impact** would result from permanent development encroachment into these slopes.

The remainder of this discussion addresses Project-proposed encroachment into steep slopes that are not removed from protection due to exception or waiver.

Encroachment into RPO-protected Steep Slopes. Ten lots (1, 2, 96, 116, 138, 142, 145, 158, 169, and 170) contain steep slopes that are not exempted or subject to waiver under the RPO. The RPO allows encroachment into RPO-protected steep slopes on a lot by lot basis. Where lots contain 75 percent or less steep slope, up to 10 percent permanent encroachment per lot is permitted.

Table 3.1.6-1, *Steep Slope Analysis by Lot*, identifies all Project lots that encroach permanently into on-site RPO-protected steep slopes. Excluding the areas either waived or excepted as described above, a total of approximately 38,060 square feet, or 0.88 acre of permanent encroachment would occur to protected on-site slopes. This totals less than one percent of the site overall. The lot by lot breakdown of these impacts includes a total of 10 lots (1, 2, 96, 116, 138, 142, 145, 158, 169, and 170). These range from the smallest encroachment of 0.15 percent of Lot 169 to the largest encroachment of 9.98 percent of Lot 2. Each of these encroachments is within the 10 percent allowable by lot. **No significant impact** would occur.

The purpose of the County RPO is to protect and preserve features, resources, and habitats unique to San Diego County. As discussed above, the Proposed Project is in conformance with the purpose and guidelines set forth in the RPO with regard to wetlands, wetland buffers, sensitive habitat lands, floodways, and steep slopes. Therefore, impacts associated with the RPO would be **less than significant**.

County of San Diego Park Land Dedication Ordinance

The Proposed Project would include the development of parks and other recreational facilities on site. Specifically, the Project would include multiple park areas and multi-use trails. A total of 13 parks (approximately 4.1 acres) are planned to be developed in HGV South (refer to Figures 1-6a and 3.1.10-1, *Proposed Public and Private Park Locations*, as well as to conceptual layouts/ landscaping plans presented in Figure 1-20c). Seven public parks (totaling approximately 1.86 acres) and six private parks (totaling approximately 2.23 acres) would be provided. Because private park acreage totals are calculated at 50 percent for purposes of PLDO satisfaction, the 2.23 acres of private parks would satisfy 1.12 acres of the required acreage. Combined with the public parks, 2.98 acres of the PLDO-required acres of park would be provided on site. The remaining requirement for PLDO compliance would be satisfied through the payment of in lieu fees. Refer to Section 3.1.10 for more discussion on impacts to parks. Impacts associated with the PLDO would be **less than significant**.

Natural Community Conservation Planning Program

The Project site is located within the North County Subarea of the MSCP, for which the County is currently processing a Subarea Plan. Since this regional planning document is not yet approved, NCCP compliance would be required for upland impacts. Therefore, pursuant to Rule 4(d) of the federal ESA, impacts to coastal sage scrub are limited to 5 percent of the total acreage occurring within the County, and require an HLP pursuant to Habitat Loss Ordinance 8365. The Proposed Project would directly impact approximately 10.4 acres of the Diegan coastal sage scrub outside of adopted MSCP areas. The loss of these acres would not be in excess of the 5 percent habitat loss threshold, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines. While the Proposed Project would remove coastal sage scrub habitat, impacts would be mitigated in accordance with Section 4.3 of the NCCP Guidelines. Development projects that are initiated before completion of this Plan are analyzed to determine consistency with the preliminary conservation objectives of Section 5 of the Wildlife Agencies Planning Agreement. The Project would provide for the protection of species, natural communities, and ecosystems; preserve the diversity of plant and animal communities throughout the surrounding areas; provide for the protection of threatened, endangered, or other special status plant and animal species, minimize and mitigate the take or loss of proposed Covered Species; identify and designate biologically sensitive habitat areas; preserve habitat and contribute to the recovery of Covered Species; help to reduce the need to list additional species; set forth species-specific goals and objectives; and set forth specific habitat-based goals and objectives expressed in terms of amount, quality, and connectivity of habitat.

Project implementation would not preclude or prevent finalizing and adoption of a subregional NCCP. Conserving habitat blocks within and maintaining unobstructed access between the DDHP, EFRR, and Escondido Creek corridor are key targets for the Draft North County MSCP Subarea Plan. The Project would contribute BOS to the existing habitat block preserved in DDHP and EFRR and would not have a substantial adverse impact on Escondido Creek or access to the Creek corridor.

The Project site is outside of the adopted MSCP but is within the boundary of the Draft North County Subarea Plan. The Project would not preclude the implementation of the Draft Subarea Plan and is consistent with Section 5 of the Wildlife Agencies Planning Agreement. Accordingly, Project impacts related to the NCCP would be **less than significant**.

County of San Diego Subdivision Ordinance

The Proposed Project is subject to the provisions and standards contained in Section 81.401 – Design of Subdivision, which includes 14 design regulations associated with lot size, orientation and configuration. Where waivers are requested, Subdivision Ordinance Section 81.401(o) states that if the Board approves a specific plan that provides subdivision design requirements contrary to the requirements in subsections (b), (d), (e), (h) or (i), the provisions of the approved specific plan shall govern. The Specific Plan explains why the proposed deviations are preferable to complying with the Subdivision Ordinance. Each of these waivers would be considered by the decision-maker and, upon approval of the Tentative Map, the Proposed Project is determined to be in general conformance with the development standards within the County Subdivision

Ordinance. The Proposed Project would comply with each of these design regulations upon Project approval.

The Proposed Project does not require modifications to the Subdivision Ordinance regulations. Impacts would be **less than significant**.

County of San Diego Light Pollution Code

Project-proposed lighting would include lights similar to or lesser in intensity than other developed areas in the County. Consistent with the rustic character of the Project site and surrounding area, street lighting would be minimal. Project lighting would include safety and accent lighting at Project entries, road intersections, the Center House, and the WTWRF consistent with the LPC. Although Project lighting would be expected to produce light levels brighter than currently exists on the Project site, all lighting would adhere to the County's Dark Sky Ordinance and ZO. Lighting design would include the use of full cut off light fixtures and glare louvers, ensuring that light rays are projected downward and that glare and spillage into the sky or onto adjacent property are limited.

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

Congestion Management Program Update

As noted previously, the CMP requires an Enhanced CEQA Review for all large projects that are expected to generate more than 2,400 ADT or more than 200 peak hour trips. The Proposed Project is projected to generate 4,500 ADT and a total of 360 and 450 peak hour trips during the a.m. and p.m. peak hours, respectively. In conformance with this program, an enhanced CEQA review was completed for the Proposed Project (as incorporated into this EIR). Refer to Subchapter 2.2 for additional details on potential impacts. Therefore, **associated impacts would be less than significant**.

Community Character

Guideline for the Determination of Significance

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

2. Conflict with the established community character, as defined by the Community Plan.

Guideline Source

The community character guideline is based on Appendix G of the CEQA Guidelines and County staff guidance. The guideline is intended to maintain and enhance the character, structure and dynamics of established communities in the Project vicinity.

Analysis

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

Determination of a proposed project’s effect on existing community character is derived from evaluating and comparing the introduced development to the existing community character of the area. If the proposed land uses conflict with the nature and character of the existing setting of the community, a significant impact would be anticipated.

The Elfin Forest and Harmony Grove Community Plan describes the character of the Harmony Grove community as a primarily single-family rural residential community on estate lots sprawling over hillsides, along with agricultural uses and residential livestock keeping. Community values include open space, quiet, dark nighttime skies, and low traffic. The Community Plan identifies HGV as a rural village with a small commercial town center that should serve the local community and provide public gathering places. The Community Plan also recognizes that portions of Harmony Grove immediately adjoin urban areas of Escondido and San Marcos.

The Proposed Project would provide the same residential density as HGV in the same topographical and visual setting. The Project has been designed to be consistent with the County’s General Plan policies and the CDM, whereby compact development is concentrated in and around a core area and then feathers out into lower density development and open space. Development would be clustered in the central and northern portions of the site, which would result in the preservation of a large area of open space in the southern portion of the property. A total of approximately 35 acres (approximately 31 percent) of the site would be protected within a BOS easement that is contiguous with designated open space within the DDHP. In addition to the BOS, the Project would provide other green space, including naturalized open space (i.e., areas which may be graded during construction but revegetated upon completion of construction), park areas, landscaped areas, common area open space, and multi-use trails that would, in combination, with the BOS, total approximately 75 acres or 68 percent of the site. These open space green areas, particularly the BOS, would provide a transition buffer between the proposed development footprint and surrounding open space and existing development.

Lots would be graded to reflect the natural topography of the site, where feasible and as projected in the cross sections shown in Figure 2.1-10 in Subchapter 2.1. Roadways and an integrated network of multi-use trails and pathways would conform to the natural topography, and incorporate curvilinear elements. Surface drainage features also have been designed to appear natural, and where they would be located in subsurface vaults are proposed to have landscaped park uses above them. Existing drainage patterns generally would be maintained and a remnant drainage would be restored to a naturalized state. Paving and hardscape areas would

be minimized to the extent possible to allow the landscape to retain more of its natural hydrological function.

The Project would include features and amenities to create a sense of community reflective of the existing character. Clustering of the residences would contribute to connections between residents, as well as emphasizing the undeveloped nature of the steeper hills to the south, which would also foster a sense of “place.” To support a feeling of “belonging,” the Project would include a central park with the Center House that would provide recreational opportunities for residents and also accommodate a coffeehouse or café that is open to the public. As feasible, an existing remnant fireplace chimney that is a local visual feature could be repaired and relocated within the park, establishing another focal point to tie in to the local character and values.

Proposed architecture would be compatible with the adjacent HGV Specific Plan, which identified a Western Farmhouse/Cottage architectural theme. The theme for the Proposed Project is based on the Western Farm Village architecture tradition. This style is consistent with the rural character and history of the Project area, incorporating small-scale commercial and visually referencing agribusiness/industrial structures. This theme includes Western Farmhouse/Cottage as well as other farm building references such as granary, barn and mill and supports a rural, utilitarian style that reflects both historical and current uses of the site and surrounding area; specifically the agricultural and equestrian traditions of the surrounding community.

The conceptual landscape plan developed for the Proposed Project has been designed to incorporate existing natural landforms and local conditions. The landscape design concept reflects the natural setting in and around the site, and references steep hillsides with rock outcroppings to the east and south, as well as the dense riparian corridor that edges the northern Project boundary. Informal arrangements of plant materials would be combined with more formal landscapes near residential areas to define a more rural landscape effect. Several distinct landscape zones would be incorporated into the Project that reflect on-site conditions; these include Valley, Hillsides, Riparian, Transitional, BOS, Special Use Area, and Wastewater Treatment Area (see Figures 1-20a and 1-20b). Architectural and landscaping guidelines contained in the Specific Plan and depicted in Chapter 1.0 of this EIR provide general design criteria.

While the Project site is located in the semi-rural Elfin Forest and Harmony Grove portion of the San Dieguito CPA, this portion of the CPA is located in close proximity to a major freeway (I-15), a major highway (SR-78), and two major city jurisdictions (Escondido and San Marcos). The areas along the I-15 and SR-78 corridors contain more intense uses by design and have been planned for large-scale residential and commercial/industrial uses. The Project site is surrounded on all sides by a series of hills and canyons except to the immediate northwest, which consists of the broader portion of the Harmony Grove Valley (of which the Project site is part of the southern extent, see Figure 1-5). The Project is located contiguous with the HGV project. That project started home sales in May 2015. HGV is constructing 742 homes; and recreational and equestrian uses; as well as small commercial/retail/office uses within a pedestrian-oriented Village Core. The Project would complement and support the HGV Village Core through expanding the mix of housing opportunities and providing limited commercial/civic uses that are compatible with the existing and planned contiguous HGV. Residents are encouraged to walk to amenities and services as all residences would be within 0.5 mile and less than a 10-minute walk

from the Project's commercial and community center or the HGV Village Core. Project design elements, such as lighting, signage, walls, fences, and architecture, are intended to be as consistent as possible with those of HGV while referencing the character of the surrounding area. Taken together with HGV, the Proposed Project would be part of the developed area along the western side of I-15 and southern side of SR-78.

In sum, although the character of the site would change from existing conditions to single- and multi-family residential uses interspersed with open space, Project development would be generally consistent with the relative scale of development planned in the area. The Proposed Project would be compatible with existing and planned surrounding uses, as well as surrounding topographic features. For instance, some proposed residential types would include a common driveway and courtyard, which mimics the compound formations on HGV. Height and architectural projections on other residential buildings would reference the steep and pointed peaks around the valley. Community character compatibility, therefore, would result from the diversity of elements that would be consistent throughout the Project site based on conformance with the Project Specific Plan, as well as neighboring development (particularly nearby residential portions of the abutting HGV project) that will include a similar residential development pattern. Additionally, preservation of the highest on-site existing topographic forms in the southern portion of the Project site, retention of sight lines to surrounding mountains and ridgelines, and revegetation with native and/or locally compatible plants would further reinforce the existing character.

Given that the Proposed Project would preserve large contiguous open space areas, incorporate design elements that are compatible with the surrounding areas, and include development patterns similar to neighboring developing land, **less than significant** impacts to community character are identified.

Division of an Established Community

Guideline for the Determination of Significance

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

3. Physically divide an established community.

Guideline Source

The division of an established community guideline is based on Appendix G of the CEQA Guidelines and County staff guidance. The guideline is intended to maintain and enhance the character, structure and dynamics of established communities in the Project vicinity.

Analysis

The Project would not result in division of an established community. For such a division to occur, Project elements would need to separate existing residents from currently available facilities/community services. This can occur, for instance, where a highway is installed between residences and schools, shopping or churches.

In this instance, the Project site is located in a semi-rural area that is currently undergoing development associated with the HGV project. The Project site itself is undeveloped and surrounded by hillsides and mountains on three sides with some interspersed residences and an institutional facility (the Harmony Grove Spiritualist Association) within 0.25 mile. The Project would be placed against an existing road, and into currently undeveloped land. No access would be blocked. To the contrary, Country Club Drive would be improved to accommodate non-vehicular users (Project path along the east side of the street), and the Escondido Creek crossing would be upgraded to accommodate/avoid 100-year flood events (which can currently close access to existing residents). The very few homes located between Country Club Drive and the City of Escondido boundary east of that road would attain upgraded access through the Project property on paved and standard roads, which is not currently the case.

No public services (schools, post office, churches, retail, or government offices) would be blocked for any existing residents by Project implementation.

The Project would be an expansion of HGV and has been designed to integrate with, connect to, and be compatible with the adjoining HGV community. The Project would include roadway improvements to Country Club Drive that would improve access across Escondido Creek to provide a multi-modal connection between the Project and HGV for automobiles, pedestrians, bicyclists, and horse riders. The Center House and a number of public parks would be located near the Project entry close to commercial and community facilities within HGV, including those directly across the street at the HGV Equestrian Ranch. The Project would complement and support the HGV Village Core through expanding the mix of housing opportunities and providing limited commercial/civic uses that are compatible with the existing and planned contiguous HGV. Project design elements, such as lighting, signage, walls, fences, and architecture, are intended to be as consistent as possible with those of HGV.

The Project would not construct new major roadways and no pathways or travel routes would be eliminated. The planned public facilities proposed by the Project (parks and trails) may provide a point of cohesion and a place for surrounding residents to gather. All major water and sewer lines would be located underground and within existing/proposed roadways, while other utilities (gas and electric, etc.) would tie in to existing off-site facilities and be located underground within the Project site. Based on the described conditions, **no impacts** would occur related to physical division of a community.

3.1.6.3 Cumulative Impact Analysis

Cumulative land use and planning impacts may occur when project-specific impacts evaluated in an EIR are combined with the effects of other projects which, when examined individually, may not be considered to be significant. All of the projects depicted on Figure 1-23 in Chapter 1.0 of this EIR were included in review of the potential for significant cumulative land use impacts. As noted in Table 1-3, six projects (four in the unincorporated County and two in the City of San Marcos), in addition to the Proposed Project, include GPAs. The inclusion of all projects from Figure 1-23 and Table 1-3 in the following analysis was based on the location of these projects in the general site vicinity and the possibility that these projects, in combination with the Proposed Project, would conflict with their respective land use plans and policies. Particular attention was paid to those other projects that include GPAs that may, in combination with the Proposed

Project, contribute to increased land use density not envisioned in the general or community plans.

Completion of these various residential projects is anticipated to increase the intensity of development in the area, which may alter the overall community character and land use compatibility of the area over the long-term. A total of approximately 15,494 residences would be constructed by the Proposed Project and the other related projects listed in Table 1-3. Approval of the seven GPA projects, involving a total of 2,432 DUs (16 percent of the total cumulative residential units), would potentially result in a significant cumulative impact to the existing land use densities and character of the region. For the Proposed Project and cumulative projects, including the GPA projects, to be approved, each one must be found consistent with the goals and policies of the County General Plan and any applicable community plans. Accordingly, cumulative impacts associated with land use and planning would **be less than significant**.

3.1.6.4 Significance of Impacts

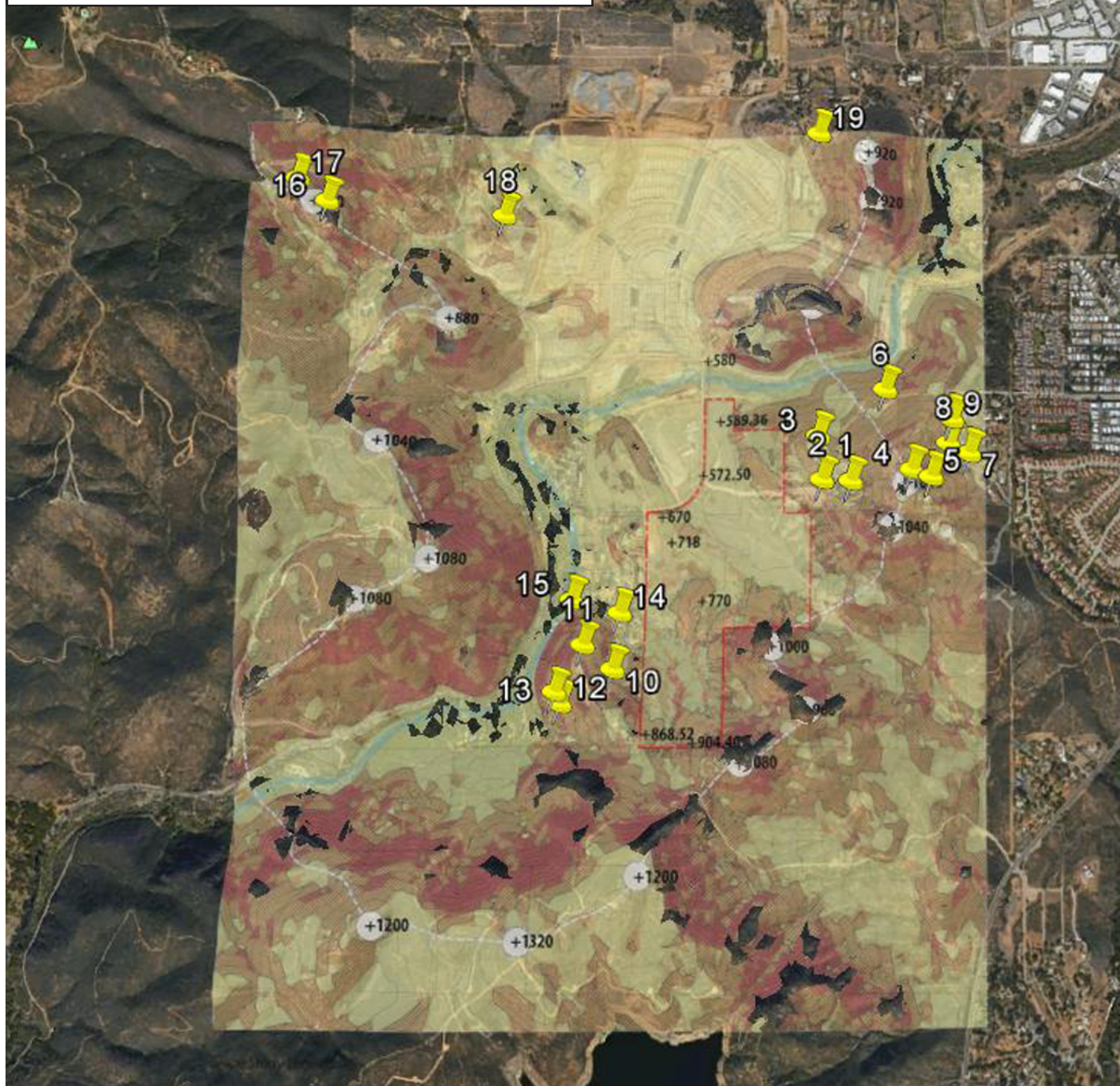
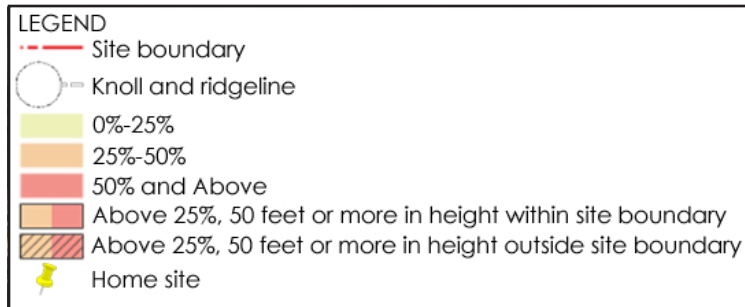
Based on the analysis provided above, the Proposed Project would have less than significant impacts related to land use and planning.

3.1.6.5 Conclusion

Based on the Project design features and above analysis, the Proposed Project would have less than significant Project-specific or cumulative impacts related to land use and planning.

**Table 3.1.6-1
STEEP SLOPE ANALYSIS BY LOT**

Lot Number	Lot Area (sf)	Encroachment (sf)	Encroachment Percentage (%)	Waiver Requested?
1	205,194	19,926	9.71%	NO
2	147,794	14,754	9.98%	NO
96	8,729	710	8.13%	NO
115	10,037	1,630	16.24%	YES
116	10104	333	3.30%	NO
117	5,413	1,481	27.36%	YES
118	6,579	6,547	99.51%	YES
119	9,802	6,198	63.23%	YES
120	11,647	1,662	14.27%	YES
138	6,252	151	2.42%	NO
139	3,908	1,345	34.42%	YES
141	11,025	1,111	10.08%	YES
142	7,218	487	6.75%	NO
145	17,586	980	5.57%	NO
146	5,471	2,081	38.04%	YES
147	3,522	3,523	100.03%	YES
148	8,944	2,015	22.53%	YES
149	14,031	1,460	10.41%	YES
150	4,938	4,851	98.24%	YES
151	3,897	3,897	100.00%	YES
152	16,030	7,099	44.29%	YES
153	11,403	11,129	97.60%	YES
154	5,966	5,966	100.00%	YES
155	3,526	3,502	99.32%	YES
156	8,945	8,945	100.00%	YES
157	11,544	6,213	53.82%	YES
158	5,348	149	2.79%	NO
160	6,550	2,625	40.08%	YES
161	3,533	3,533	100.00%	YES
162	3,577	3,577	100.00%	YES
163	5,731	5,731	100.00%	YES
164	5,566	5,566	100.00%	YES
165	6,241	6,241	100.00%	YES
166	26,009	15,489	59.55%	YES
167	24,198	24,198	100.00%	YES
168	29,502	9,121	30.92%	YES
169	42,661	65	0.15%	NO
170	23,257	655	2.82%	NO
TOTAL	741,678	194,946 (4.48 acres)		



Source: PDC 2016

Residences in Steep Slope Areas

HARMONY GROVE VILLAGE SOUTH

Figure 3.1.6-1