

## **Attachment B – Analysis Area Summary Reports**

## I. Introduction

On August 3, 2011 (1), the Board of Supervisors (Board) adopted the General Plan Update. On January 11, 2012 (4), the Board directed staff to evaluate 56 separate property requests for land use designation changes that were raised during public testimony of the General Plan Update and not adopted as part of the update. These requests are known as “Property Specific Requests” (PSRs).

To evaluate the requests, Analysis Areas consisting of a single PSR or multiple PSRs with the same or similar land use designation changes were defined to establish a context for evaluation. In some cases, surrounding properties were included and evaluated within the Analysis Areas. The Board held additional Workshops in the summer of 2012 to receive staff analysis and provide direction for the General Plan Amendment. The Board directed staff to analyze 47 PSRs. Four PSR Analysis Areas were grouped and processed under a separate General Plan Amendment approved by the Board on June 18, 2014 (3). Two PSRs were later withdrawn by the property owners. In 2014, staff began the current PSR evaluation and released the Notice of Preparation (NOP) for the Subsequent Environmental Impact Report (SEIR) in December, 2015.

Early in this process, property owners within the former Champagne Gardens Specific Plan Area contacted the County to correct conflicts with the expired Champagne Gardens Specific Plan (Champagne Gardens) and the current Specific Plan Area General Plan land use designations and zoning on almost all of the properties. This area is included in this GPA and Rezone and map options are provided for consideration.

The GPA and Rezone includes proposed changes to General Plan land use designations for 41 PSRs, additional Analysis Area properties, and Champagne Gardens within 23 Analysis Areas. The Project also includes zoning changes when necessary for consistency, a proposed revision to Valley Center Community Plan Residential Policy 8, and changes to the Mobility Element of the General Plan. The proposed changes cover approximately 882 parcels over 9,336 acres.

Proposed Project Maps – The Proposed Project Maps include the land use designations directed by the Board for analysis, in most cases. The Proposed Project Maps are the highest density/intensity options and represent an increase of 1,826 potential units above the unit capacity established by 2011 General Plan.

Alternative Maps - Based on site and policy analyses, Alternative Maps are provided for most Analysis Areas, and represent an increase of 662 potential units above the unit capacity established by the 2011 General Plan.

## II. Methodology

Each Analysis Area was studied with a combination of using Geographic Information Systems data, additional analysis tools and information sources, site visits, conducting outreach with Community Planning and Sponsor Groups (CPG/CGS), property owners, service districts/agencies, and other stakeholders. The summaries and exhibits that follow summarize the staff recommendations for each Analysis Area. Additional analysis is included in the Analysis Area Policy Analysis Reports, which were prepared during the public outreach and development of alternatives for the Draft Subsequent Environmental Impact Report.

The proposed land use changes for each PSR Analysis Area as directed by the Board for analysis in 2012 (in most cases) and the proposed land use changes for the area of the former Champagne Gardens Specific Plan area are reflected in the Proposed Project Maps within this report and the

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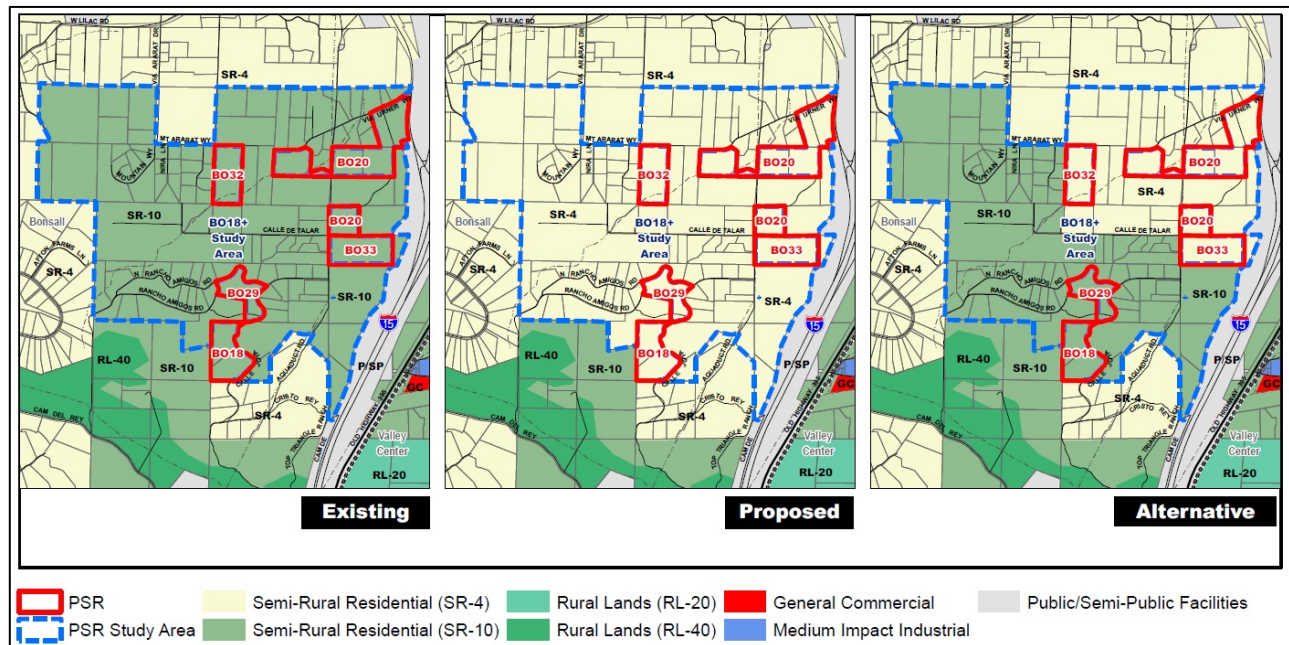
Subsequent Environmental Impact Report (SEIR). The Proposed Project Maps are the highest density/intensity options and represent an increase of 1,826 potential units above the unit capacity established by the 2011 General Plan. The California Environmental Quality Act (CEQA) requires that the SEIR analyze a reasonable range of alternatives that would reduce environmental impacts. Alternative Maps were prepared for most Analysis Areas and provide another option for decision-makers, which address land use and environmental issues considered during the analysis and outreach for the project.

Provided below is an overview of each Analysis Area and brief staff recommendation rationale. Following the overviews, Analysis Area Summary Reports are provided in this Attachment B, which include additional information and constraint maps. The Analysis Area Policy Analysis Reports in Attachment D provide more in-depth policy and site analysis. General Plan Conformance Findings are provided in Attachment C, including a report for each Analysis Area, covering the applicable policies of the General Plan and the applicable community plan.

### III. Overview of Analysis Area

1. **BO18+ Analysis Area (Bonsall)**: The BO18+ Analysis Area covers 120 parcels, approximately 921 acres, and includes five PSRs in the northern portion of the Bonsall Community Planning Area (CPA).

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-10	SR-4	SR-4 only in northeastern portion
Potential Dwelling Units	129	196 Estimated increase: 67	165 Estimated increase: 36
CPG/CSG Recommendation	●		
Staff Recommendation			●
Planning Commission Recommendation		●	



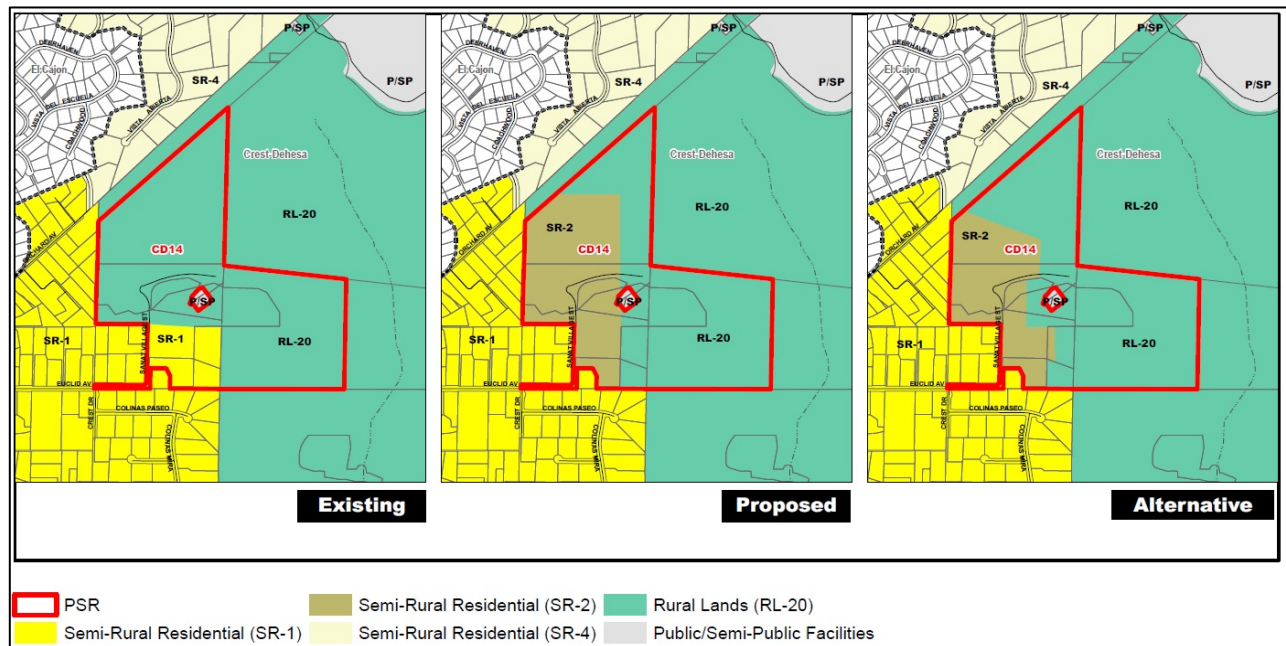
General Plan Policy and Constraints Analysis - The Proposed Project Map was found to be inconsistent with General Plan Policies LU-6.11 and S-1.1 that require land use mapping to minimize exposure to hazards, particularly fire hazards. The Proposed Project Map was also found to be inconsistent with Policy LU-1.1 which requires development to be consistent with the Community Development Model, including consideration of proximity to existing infrastructure and services. The southern and western portions of the Analysis Area contain steep slopes with habitat constraints, multiple dead-end roads, and roads not built to fire access standards. Some of these existing substandard access roads have steep drop-offs on one side making it infeasible to bring into compliance in certain areas. The northeastern portion of the Analysis Area is the only portion adjacent to a public road, has multiple roads currently built to fire access standards, is one quarter mile from an I-15 on-ramp, and has very little steep slope or habitat constraints. The Alternative Map studied a reduced area of Semi-Rural 4 in this northeastern portion. No General Plan inconsistencies have been identified with this Alternative Map, which only applies a higher density designation in the less constrained areas of the Analysis Area.

Planning and Development Services (PDS) Recommendation – Staff recommends the Alternative Map.

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- CD14 Analysis Area (Crest/Dehesa/Harbison Canyon/Granite Hills):** The CD14 Analysis Area covers 10 parcels, approximately 101 acres, and includes one PSR in the western portion of Crest/Dehesa/Harbison Canyon/Granite Hills CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-1/RL-20	SR-2/RL-20	SR-2(less)/RL-20
Potential Dwelling Units	10	17 Estimated increase: 7	14 Estimated increase: 4
CPG/CSG Recommendation			●
Staff Recommendation			●
Planning Commission Recommendation			●



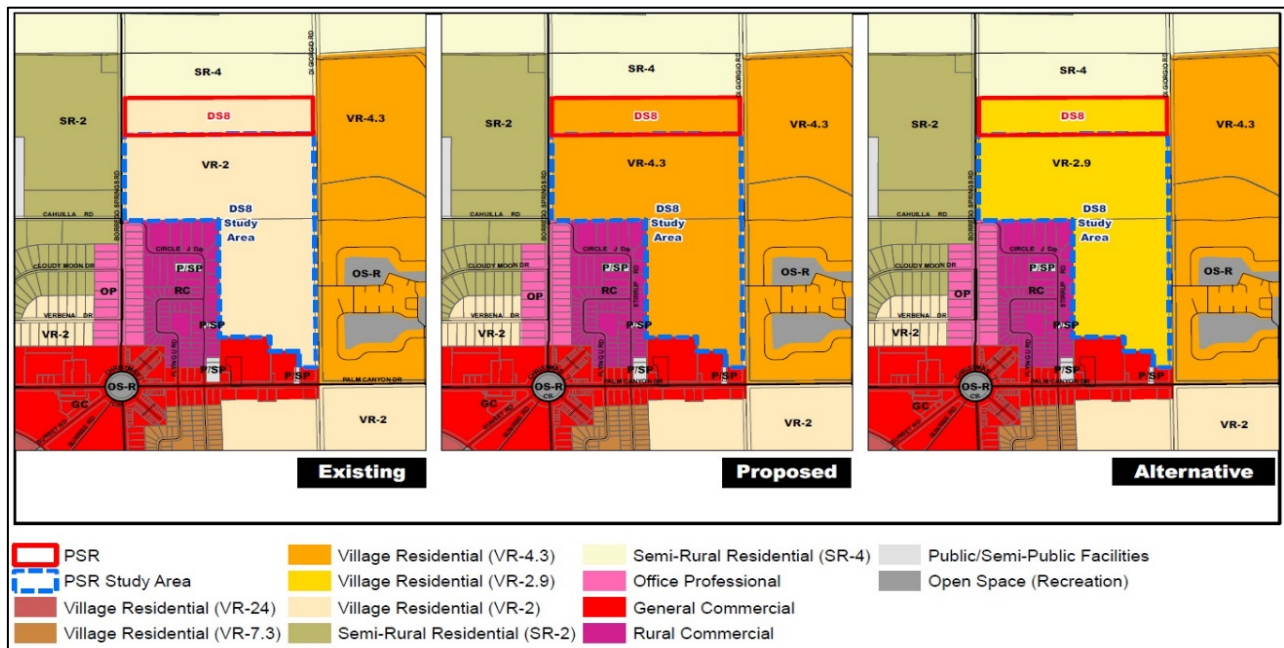
**General Plan Policy and Constraints Analysis** – Staff concluded the Proposed Project Map was not consistent with General Plan Policy LU-1.9, which addresses feasibility of reaching the General Plan density potential. The site has an existing special zoning designator, which limits grading and septic placement. It is in the adopted Pre-Approved Mitigation Area (PAMA) of the South County Multiple Species Conservation Program which will require consolidating development in the southwest corner to maximize open space and wildlife corridors. Meeting fire access requirements for the Proposed Project Map would be difficult and also would necessitate consolidating homes in the southwest corner of the site, depending on easement options for secondary access. The Alternative Map reduces the area of SR-2 in more constrained portions of the site, including part of a ridgeline and a drainage area, and further consolidates the SR-2 closer to the existing built out neighborhood to the west; thus demonstrating a higher level of consistency with policies that address sensitive habitat areas and ridgelines.

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PDS Recommendation – Staff recommends the Alternative Map. Upon consideration of these constraints, and with the absence of sewer service and limitations on septic placement options, the estimated 14-lot Alternative Map provides greater assurance of feasibility.

3. **DS8 Analysis Area (Borrego Springs):** The DS8 Analysis Area covers 3 parcels, approximately 169 acres, and includes one PSR in the central portion of the Borrego Springs CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	VR-2	VR-4.3	VR-2.9
Potential Dwelling Units	337	726 Estimated increase: 389	489 Estimated increase: 152
CPG/CSG Recommendation	●		
Staff Recommendation	●		
Planning Commission Recommendation	●		



General Plan Policy and Constraints Analysis – Analysis concluded the Proposed Project Map and Alternative were inconsistent with General Plan goals and policies. The DS8 Proposed Project Map would constitute a density increase of 389 units, in an area with water supply constraints. Both the Proposed Project Map and Alternative Map were found to be inconsistent with six applicable policies of the General Plan. The most significant issue facing development in the Borrego Valley is the implications of the Sustainable Groundwater Management Act (SGMA) and upcoming Groundwater Sustainability Plan (GSP), which will require reductions in water use in the Valley, bringing into question the ability of the Borrego Water District (BWD) to service the density potential. Both the current Community Plan and the community-specific mapping objectives of the General Plan Update recognized the existing supply of vacant lots and existing



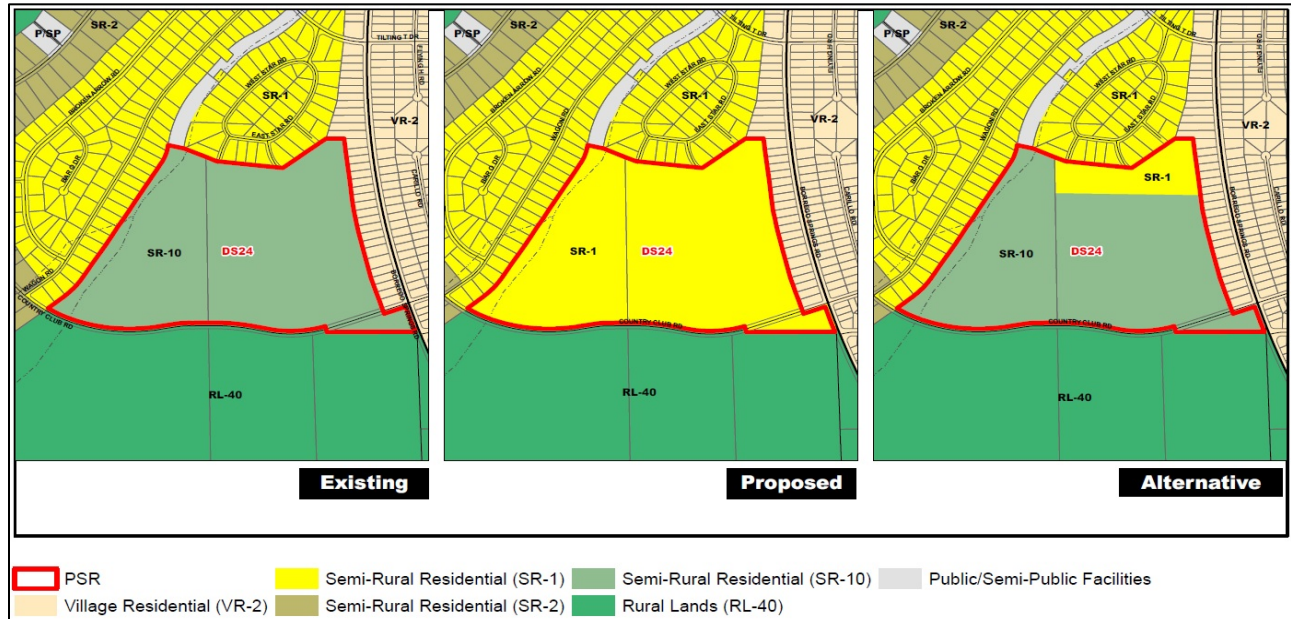
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unbuilt density in the CPA. According to the General Plan Update Groundwater Study, there are approximately 3,700 vacant lots within the Borrego Valley. It is estimated that over 10,000 additional dwelling units (DUs) are possible when adding legally buildable vacant lots to the additional subdivision/multi-family potential in the current General Plan. From the hazards and feasibility perspective, the Analysis Area is mostly within a fan terminus alluvial wash, which is a particularly hazardous area of the floodplain that can concentrate flows during flash floods and carries restrictive requirements that will limit feasibility.

PDS Recommendation – Staff recommends retaining the Existing General Plan Land Use designation.

4. **DS24 Analysis Area (Borrego Springs):** The DS24 Analysis Area covers two parcels, approximately 169 acres, and includes one PSR in the western portion of the Borrego Springs CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-10	SR-1	SR-10/SR-1
Potential Dwelling Units	16	169 Estimated increase: 153	34 Estimated increase: 18
CPG/CSG Recommendation	●		
Staff Recommendation	●		
Planning Commission Recommendation			●



General Plan Policy and Constraints Analysis - The Proposed Project Map was found to be inconsistent with seven policies of the General Plan and three policies of the Community Plan. These inconsistencies would also carry forward for the Alternative Map, with the exception of two of the General Plan policies. The issues of groundwater sustainability, unbuilt available density in the CPA, and flood hazards would also apply to

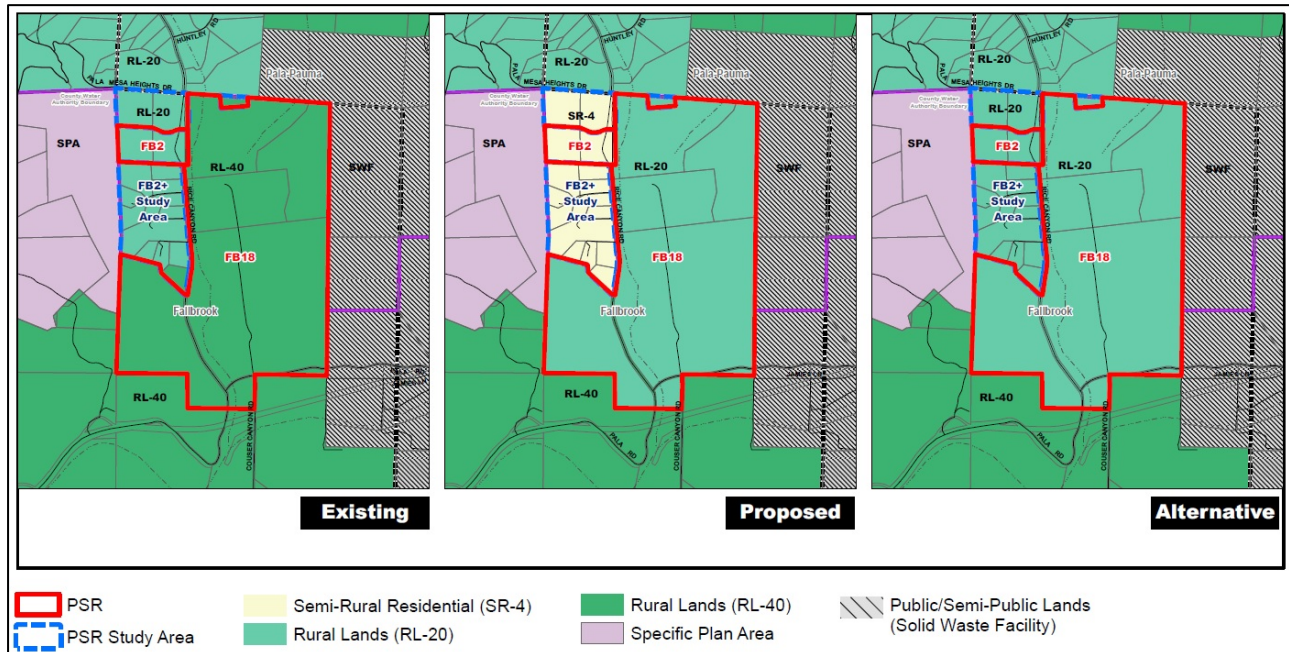
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DS24. In addition, DS24 contains one of the densest concentrations of ocotillos in the Valley. The high quality native desert habitat has the potential to host several sensitive species. The Community Plan calls for directing new development toward previously cleared sites. It is estimated that over 10,000 additional DUs are possible when adding legally buildable vacant lots to the additional subdivision/ potential in the current General Plan. The site has topographical and landscape features that are a key component of a scenic view shed seen from the main southern community entry point, Borrego Springs Road, and the main western entry point, Montezuma Valley Road, which is a County Scenic Highway. The nearby areas of SR-1, SR-2, and VR-2 designations are already parcelized to those densities, and though the lots are currently adjacent to public roads and water lines, the majority of these nearby lots are vacant.

PDS Recommendation – Staff recommends retaining the Existing General Plan Land Use designation.

5. **FB2+ Analysis Area (Fallbrook):** The FB2+ Analysis Area covers 23 parcels, approximately 491 acres, and includes two PSRs (under the same ownership) in the eastern portion of the Fallbrook CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	RL-20/RL-40	SR-4/RL-20	All RL-20
Potential Dwelling Units	26	42 Estimated increase: 16	37 Estimated increase: 11
CPG/CSG Recommendation	All SR-10 (option not directed for analysis)		
Staff Recommendation			●
Planning Commission Recommendation		●	





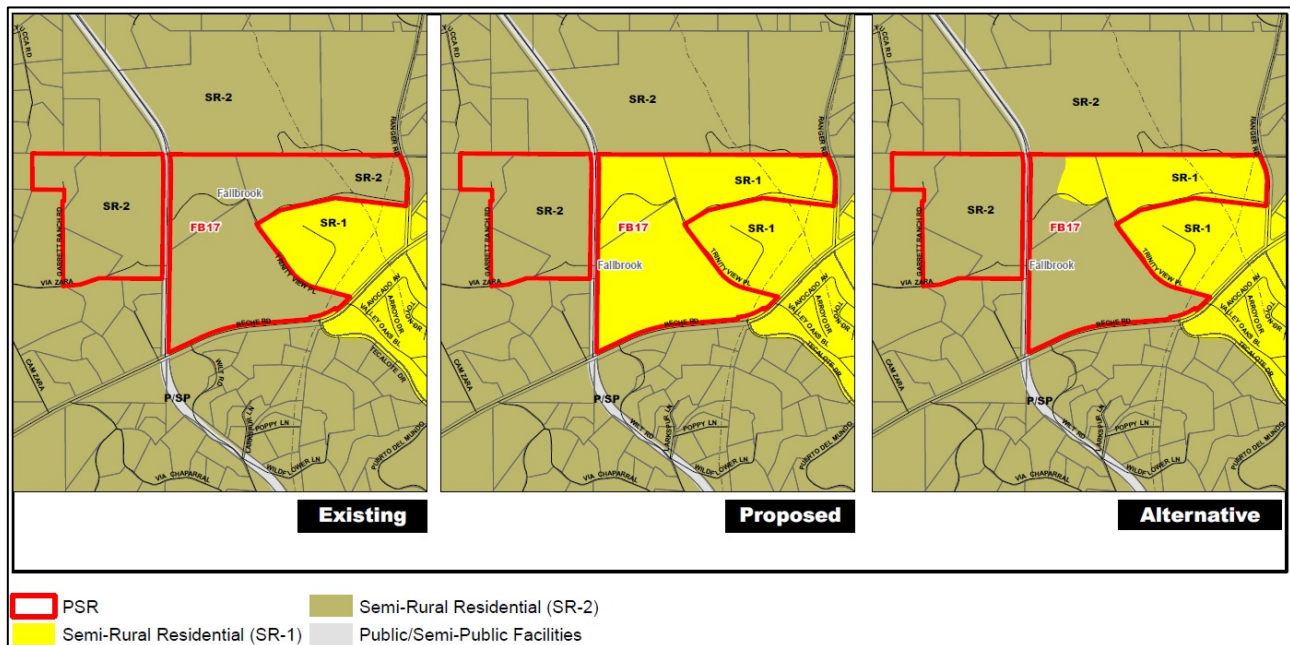
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General Plan Policy and Constraints Analysis - The Proposed Project Map was found to be inconsistent with six policies of the General Plan. No inconsistencies were found for the Alternative Map. The inconsistent component of the Proposed Map is the SR-4 designation proposed for the western portion of the site that is a hillside slope with coastal sage scrub. It makes up an important link in a wildlife corridor, as it is adjacent to over 1,000 acres of native habitat to the north and west, with the majority of this adjacent acreage in preserve. The SR-4 would be dissimilar to the current mapping pattern of the area; the current pattern includes Rural Lands, some of which have Williamson Act contracts. The Analysis Area is separated from higher density areas of Specific Plans near the I-15/SR-76 interchange by a mountainous area of habitat preserves and agricultural preserves.

PDS Recommendation – Staff recommends the Alternative Map.

6. **FB17 Analysis Area (Fallbrook):** The FB17 Analysis Area covers 6 parcels, approximately 107 acres, and includes one PSR in the eastern portion of the Fallbrook CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-2	SR-1/SR-2	SR-1[less]/SR-2
Potential Dwelling Units	49	82 Estimated increase: 33	64 Estimated increase: 15
CPG/CSG Recommendation	●		
Staff Recommendation			●
Planning Commission Recommendation	●		



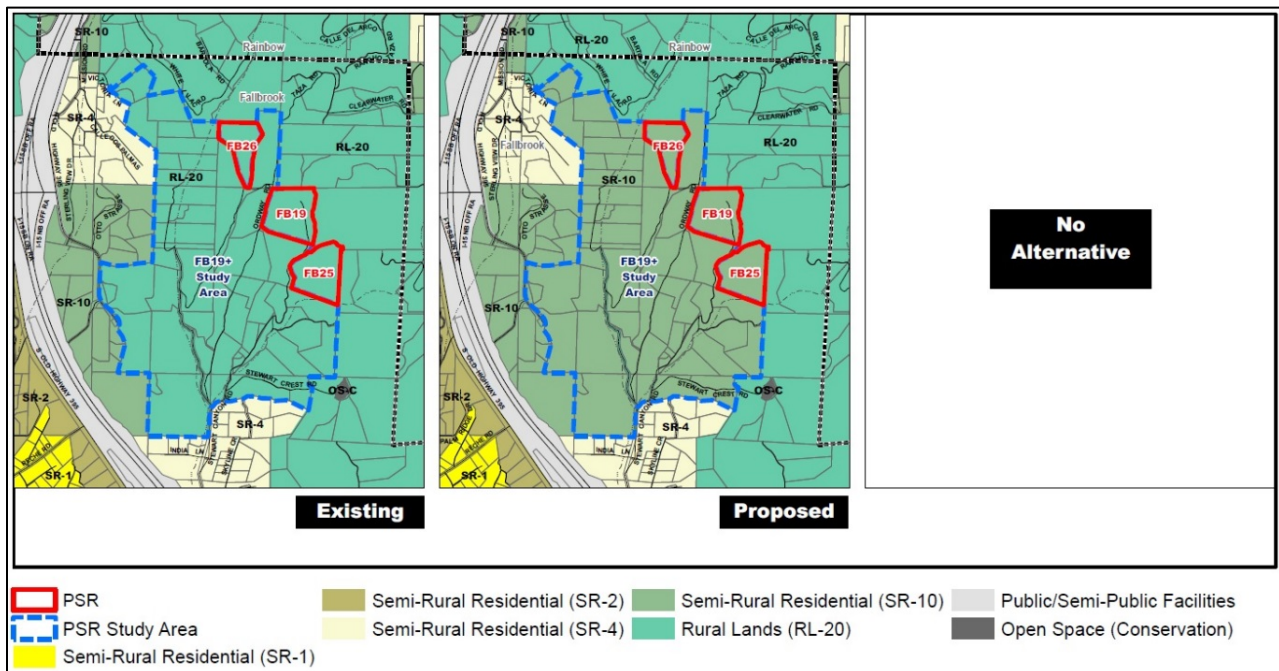
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General Plan Policy and Constraints Analysis - The Proposed Project Map presents inconsistency issues with four policies of the General Plan mainly related to feasibility and land use mapping relative to sensitive habitats and agricultural preservation. The central portion of FB17 contains areas of wetlands along the public road frontage and crossing across the site. Outside of the wetlands are some areas of steep slopes and coastal sage scrub. Because the site is not within a sewer service area, existing infrastructure will present challenges in achieving the density potential. Research on agriculture within the unincorporated County has shown densities SR-1 and higher are more likely to impact agriculture. The Alternative Map would consolidate the change to SR-1 in approximately 27 acres located in the less constrained eastern leg of the Analysis Area, with better access options. This Alternative Map was found to be consistent with all of the applicable General Plan policies.

PDS Recommendation – Staff recommends the Alternative Map.

7. **FB19+ Analysis Area (Fallbrook)**: The FB19+ Analysis Area covers 61 parcels, approximately 579 acres, and includes three PSRs in the northeastern portion the Fallbrook CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	RL-20	SR-10	None
Potential Dwelling Units	61	62 Estimated increase: 1	N/A
CPG/CSG Recommendation		●	
Staff Recommendation		●	
Planning Commission Recommendation		●	



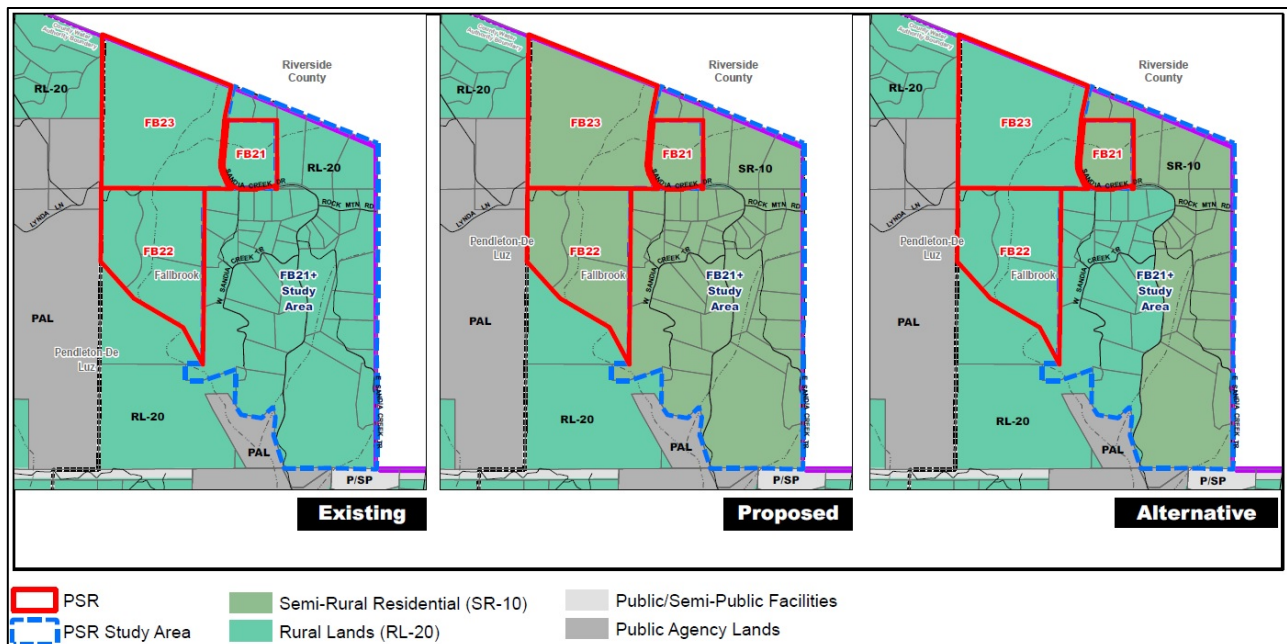
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General Plan Policy and Constraints Analysis - The Proposed Project Map was not found to be inconsistent with General Plan Policies. It constitutes a negligible change for the large area covered. The proposed SR-10 designation allows the same density (1 unit per 20 acres) as the existing RL-20 in the areas of 25% and greater slope. Most of the area consists of steep slopes. A slope model was used for slope-dependent density calculations in relation to the existing parcel sizes. Estimates show only one of the existing parcels would potentially be able to subdivide into two lots under SR-10. With the 1-unit difference between the Existing and Proposed Project Map, there would not be anticipated impacts to the character of the area. There are existing areas of SR-4 and SR-10 adjacent to the west and south, and another large area of SR-10 nearby to the east, and a change would be consistent with the surrounding uses.

PDS Recommendation - Staff recommends the Proposed Project Map. There would be one additional unit given the current lot configurations.

8. **FB21+ Analysis Area (Fallbrook):** The FB21+ Analysis Area covers 51 parcels, approximately 679 acres, and includes three PSRs at the northern edge of the Fallbrook CPA, adjacent to Riverside County.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	RL-20	SR-10	SR-10/RL-20
Potential Dwelling Units	61	68 Estimated increase: 7	63 Estimated increase: 2
CPG/CSG Recommendation		●	
Staff Recommendation	●		
Planning Commission Recommendation			●



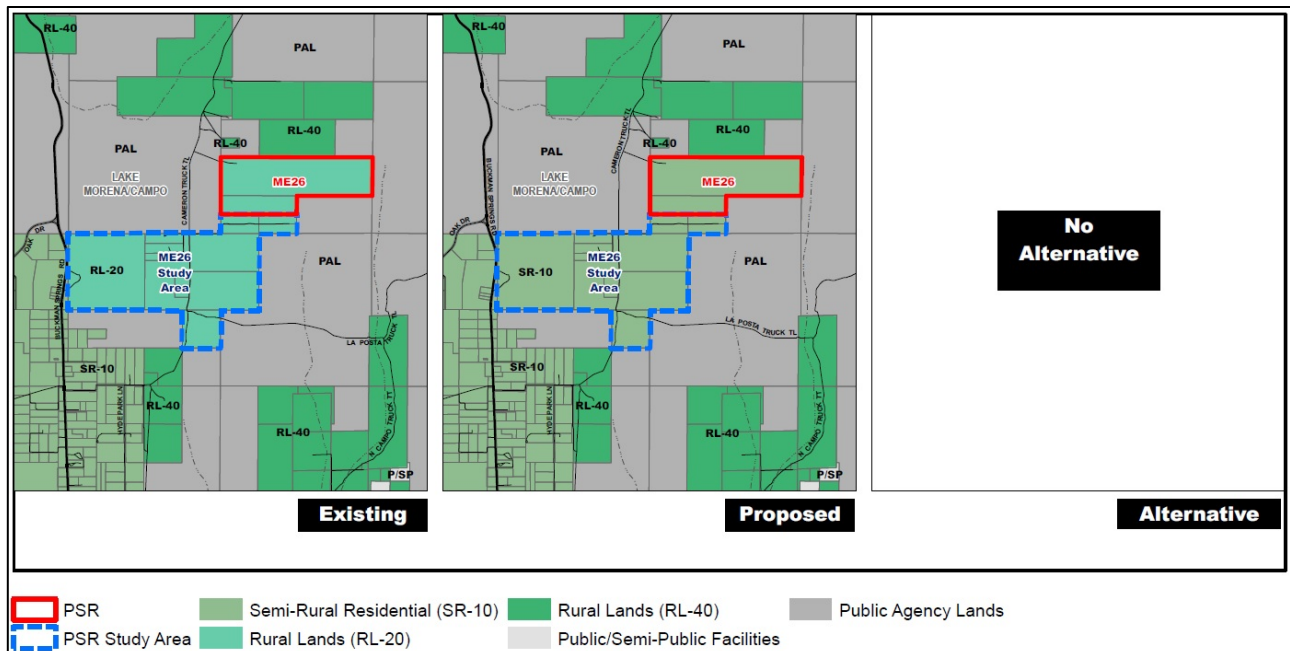
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General Plan Policy and Constraints Analysis - The Proposed Project Map has been found to be inconsistent with 11 General Plan policies. The Analysis Area is highly constrained by Sandia Creek (Santa Margarita River tributary), tributary wetlands, steep slopes, and native upland habitats, with the most constrained portions being the western PSRs in the Analysis Area. When considering these constraints and the 10% Resource Protection Ordinance (RPO) slope encroachment allowance, there is limited potential development area. Public roads are not available in the Analysis Area, and the main private access road through the middle of the Analysis Area (Sandia Creek Drive) contains sharp curves and steep roadside drop offs. One of the community-specific planning rationales for Fallbrook during the General Plan Update was to maintain Rural Lands designations in the environmentally sensitive areas near the Santa Margarita River. All private lands north of the river in the CPA (and east of the river where it curves north) have Rural Lands designations.

PDS Recommendation – Staff recommends retaining the Existing General Plan land use designation.

9. **ME26 Analysis Area (Campo/Lake Morena):** The ME26 Analysis Area covers 15 parcels, approximately 678 acres, and includes one PSR located east of the Lake Morena Rural Village.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	RL20	SR-10	None
Potential Dwelling Units	33	59 Estimated increase: 26	N/A Estimated increase: N/A
CPG/CSG Recommendation		●	
Staff Recommendation		●	
Planning Commission Recommendation		●	





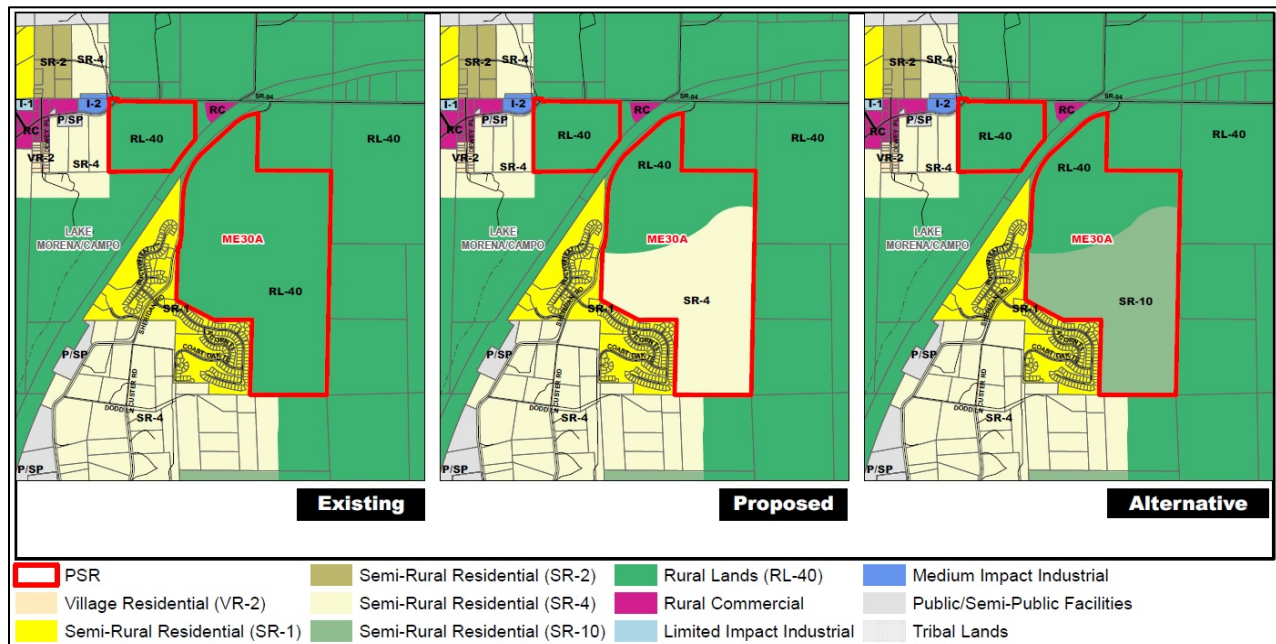
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General Plan Policy and Constraints Analysis – The Proposed Project Map did not present any inconsistencies with the Goals and Policies of the General Plan. During the General Plan Update, application of Semi-Rural densities in Campo/Lake Morena outside the Villages generally followed pre-existing parcelization and development patterns. However, the Analysis Area is a half mile from the Village boundary and shares some similarities with other areas designated as SR-10 in close proximity to the Village, including a mix of larger and smaller parcels. Eight of the 15 parcels in the Analysis Area are less than 11 acres. The area is groundwater-dependent, but the SR-10 density of the Proposed Project Map would not conflict with the Groundwater Ordinance. The Groundwater Ordinance and precipitation map would require a minimum lot size of 5 acres for this area. The Conservation Subdivision requirement would still be applicable, requiring avoidance of 75 percent of resources, under the proposed SR-10, and the application of this density would be consistent with the Community Development Model, given the location within the community.

PDS Recommendation – Staff recommends approval of the Proposed Project Map.

10. **ME30A Analysis Area (Campo/Lake Morena):** The ME30A Analysis Area includes one PSR parcel, approximately 262 acres, located southwest of the Cameron Corners Rural Village.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	RL40	SR-4/RL-40	SR-10/RL-40
Potential Dwelling Units	6	35 Estimated increase: 29	16 Estimated increase: 10
CPG/CSG Recommendation		●	
Staff Recommendation			●
Planning Commission Recommendation		●	





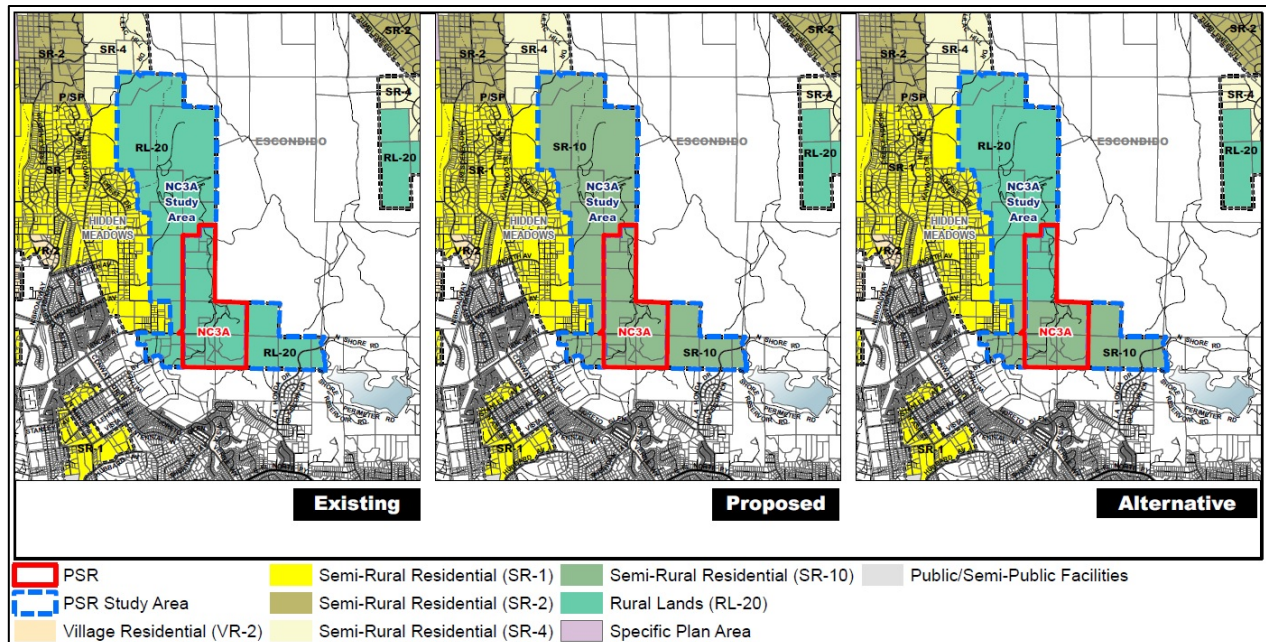
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General Plan Policy and Constraints Analysis - The Proposed Project Map would present inconsistencies with General Plan policies addressing feasibility and mapping patterns. Application of Semi-Rural densities in the community generally followed pre-existing parcelization and development patterns. The practice considered the limited infrastructure and services in the community. Though ME30A is adjacent to an area of SR-1 and SR-4 designations (within the Campo Rural Village boundary), the site consists of one 262-acre parcel, which under the Community Development Model should remain a lower density Semi-Rural designation. The site is groundwater-dependent and within a precipitation zone that would entail a Groundwater Ordinance minimum lot size of 8 acres, thus rendering the proposed SR-4 density (for the southern portion) infeasible. The Alternative Map would instead place SR-10 in the southern portion, maintaining the Conservation Subdivision requirement and consistency with Groundwater Ordinance minimum lot size restrictions, while also addressing the adjacency to two Village boundaries.

PDS Recommendation – Staff recommends the Alternative Map.

11. **NC3A (North County Metro – Hidden Meadows)**: The NC3A Analysis Area covers 48 parcels, approximately 1,015 acres, and includes one PSR located west of the City of Escondido within the North County Metro – Hidden Meadows CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	RL20	SR-10	SR-10/RL-20
Potential Dwelling Units	66	77 Estimated increase: 11	69 Estimated increase: 3
CPG/CSG Recommendation		●	
Staff Recommendation		●	
Planning Commission Recommendation		●	



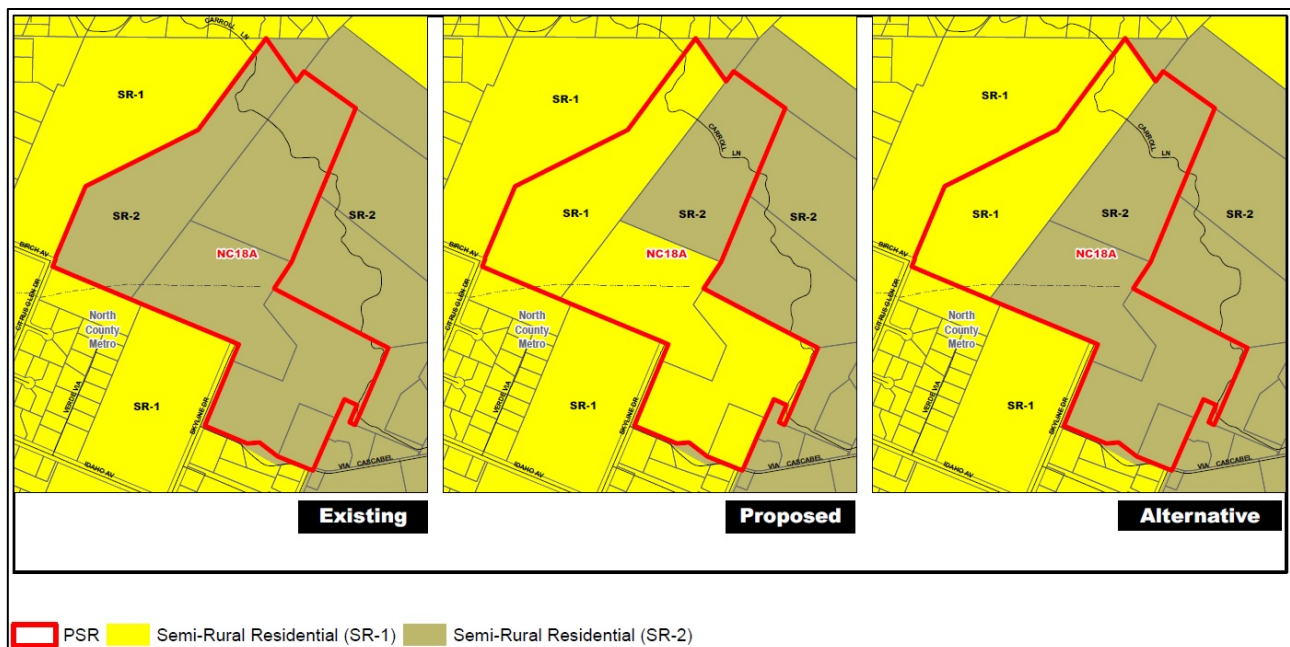
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General Plan Policy and Constraints Analysis – There were no inconsistencies found with the Proposed Project Map. NC3A is a large Analysis Area proposed to be changed from RL-20 to SR-10 with a small estimated increase in density potential, due to the existing parcel sizes and the steep slope areas. The proposed SR-10 designation allows the same density (1 unit per 20 acres) as the existing RL-20 in the areas of 25% and greater slope. The Analysis Area is in a slope-constrained area on the outer edge of the Hidden Meadows CPA (part of the North County Metro Subregion), adjacent to the Daley Ranch Preserve within the City of Escondido jurisdiction. There are areas outside of steep slopes for placement of housing footprints for the additional potential dwelling units. Given the proximity to the infrastructure and services in Escondido and adjacent substantially higher densities in Hidden Meadows, the proposed SR-10 designation would be consistent with the Community Development Model.

PDS Recommendation – Staff recommends the Proposed Project Map.

12. **NC18A Analysis Area (North County Metro – unrepresented portion):** The NC18A Analysis Area covers 5 parcels, approximately 93 acres, and includes one PSR located in a County island within the Sphere of Influence for the City of Escondido.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-2	SR-1/SR-2	SR-1 [less]/SR-2
Potential Dwelling Units	43	77 Estimated increase: 34	57 Estimated increase: 14
CPG/CSG Recommendation	N/A		
Staff Recommendation			●
Planning Commission Recommendation	●		



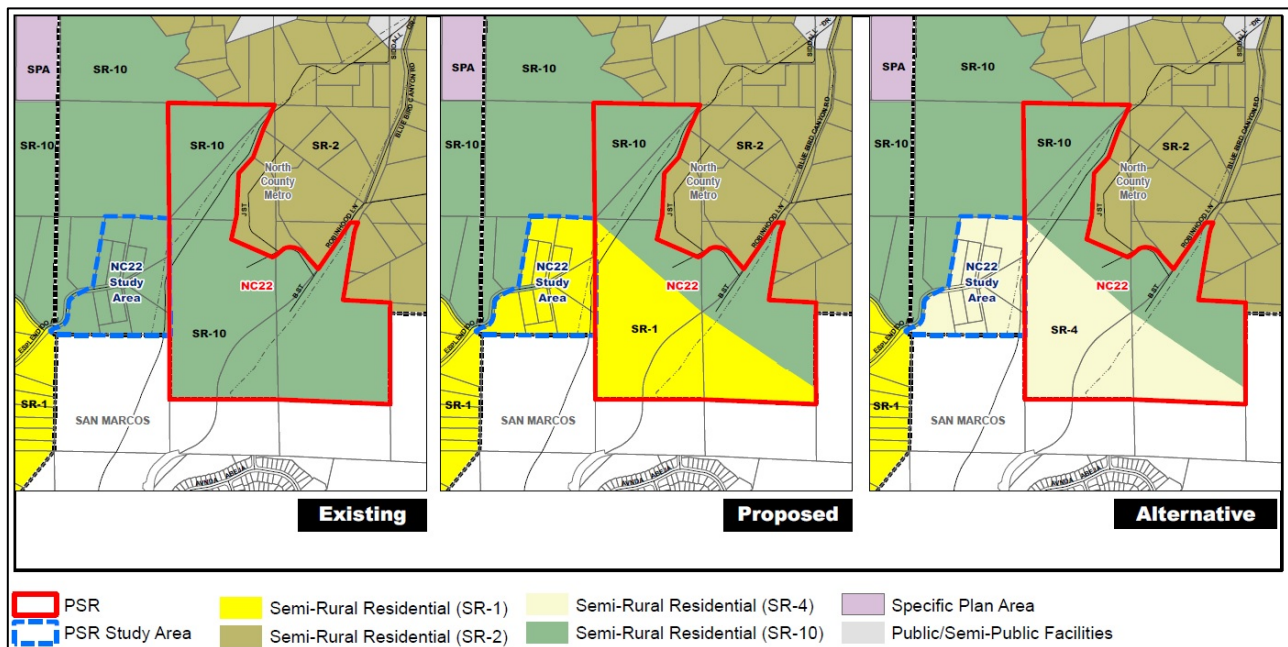
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General Plan Policy and Constraints Analysis – The Proposed Project Map was found to have two General Plan inconsistencies. It is within an area that retains an agricultural focus and community character, though the area transitions to a more suburban character just to the west. Inconsistencies for the Proposed Project Map are related to land use mapping to support continued agricultural operations and in connection to community character issues that were identified. PDS's analysis shows when large areas of predominant agricultural operations move into the SR-1 and higher densities, there is the potential for impact to and loss of agriculture. The NC18A Analysis Area is located in a County island within the Sphere of Influence for Escondido, just east of the City's jurisdiction. Another issue identified for this area during the 2012 PSR workshop process was the impact to emergency response travel time. Current models show only the western edge of the Analysis Area is estimated to be within the 5-minute travel time standard required for SR-1 (verification required at the subdivision application stage). This western portion also has a more limited agricultural footprint than the rest of the area and is in close proximity to the more suburban community character to the west. The Alternative Map would limit the SR-1 to the western portion and was found to be in conformance with the General Plan.

PDS Recommendation – Staff recommends the Alternative Map in recognition of the existing constraints and agriculture on this property.

13. NC22 Analysis Area (North County Metro – Twin Oaks): The NC22 Analysis Area covers 17 parcels, approximately 154 acres, and includes one PSR located in the southern portion of the Twin Oaks CPA, adjacent to the City of San Marcos.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-10	SR-1/SR-10	SR-4/SR-10
Potential Dwelling Units	21	73 Estimated increase: 52	28 Estimated increase: 7
CPG/CSG Recommendation:	●		
Staff Recommendation	●		
Planning Commission Recommendation	●		



General Plan Policy and Constraints Analysis – General Plan inconsistencies were found with the Proposed Project Map and Alternative Map related to feasibility and lower densities for areas with sensitive habitats. Currently, development is limited to parcels in the western portion of the Analysis Area. The Analysis Area is within Draft NCMSCP PAMA and is part of an undeveloped native habitat corridor that spans over 1,200 acres in this area. The PSR parcels, which cover 126 acres of the 154 acre Analysis Area, contain a riparian wetland corridor (in the headwaters of Agua Hedionda Creek) including a pond, surrounded by hillsides of coastal sage scrub. Development up to the Proposed Project Map is likely not feasible due to requirements for wetland buffers, Resource Protection Ordinance (RPO) steep slope easements, fire clearing around structures, and restrictive limitations on septic and access roads over steep slopes and wetlands/wetland buffers. There is more assurance of feasibility under the Alternative Map; however, that option would still present inconsistency with General Plan Policies LU-6.2 and LU-2.4, due to the issues with removing the Conservation Subdivision requirement (applies to SR-10 and lower) in such a critical habitat area. There is an application with the City of San Marcos for Annexation of this property.

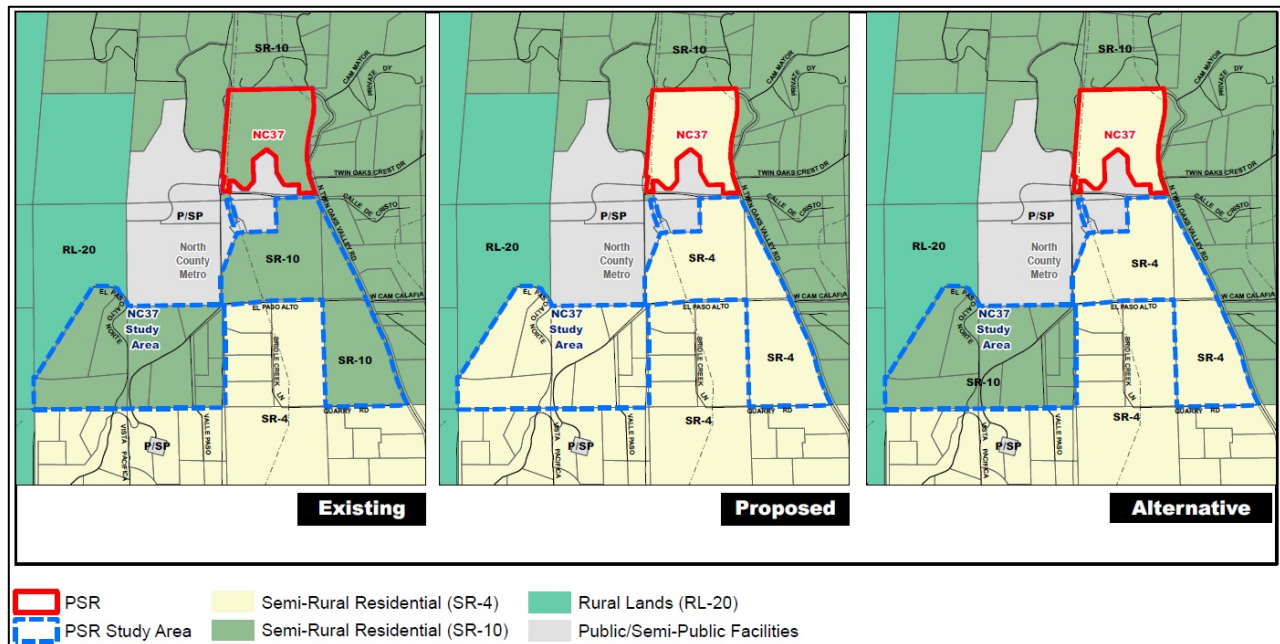
PDS Recommendation – Staff recommends retaining the existing General Plan land use designation.



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14. **NC37 Analysis Area (North County Metro – Twin Oaks):** The NC37 Analysis Area covers 15 parcels, approximately 158 acres, and includes one PSR located in the northwestern portion of the Twin Oaks CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR10	SR-4	SR-4/SR-10
Potential Dwelling Units	19	31 Estimated increase: 12	31 Estimated increase: 12
CPG/CSG Recommendation			●
Staff Recommendation			●
Planning Commission Recommendation			●



**General Plan Policy and Constraints Analysis** – The Proposed Project Map analysis found inconsistencies with the application of Semi-Rural 4 in the western portion of the Analysis Area. NC37 provides a contrast between areas of substantial existing development footprint in the eastern portion, close to Twin Oaks Valley Road, a County-maintained Mobility Element Road, and the western leg of the Analysis Area, transitioning to the more constrained San Marcos Mountains area of limited access and infrastructure. Maintaining the SR-10 in the western portion under the Alternative Map also maintains a mapping pattern of very low-density designations in the more mountainous areas of Twin Oaks. There is not a difference in the density calculation of the Proposed Project Map and Alternative Maps because the western portion (to remain SR-10 in the Alternative) would not have additional subdivision potential under either the SR-10 or SR-4 designations. However, if ownership were consolidated in the western portion, a reconfigured subdivision over that area could yield one or two additional lots under SR-4.

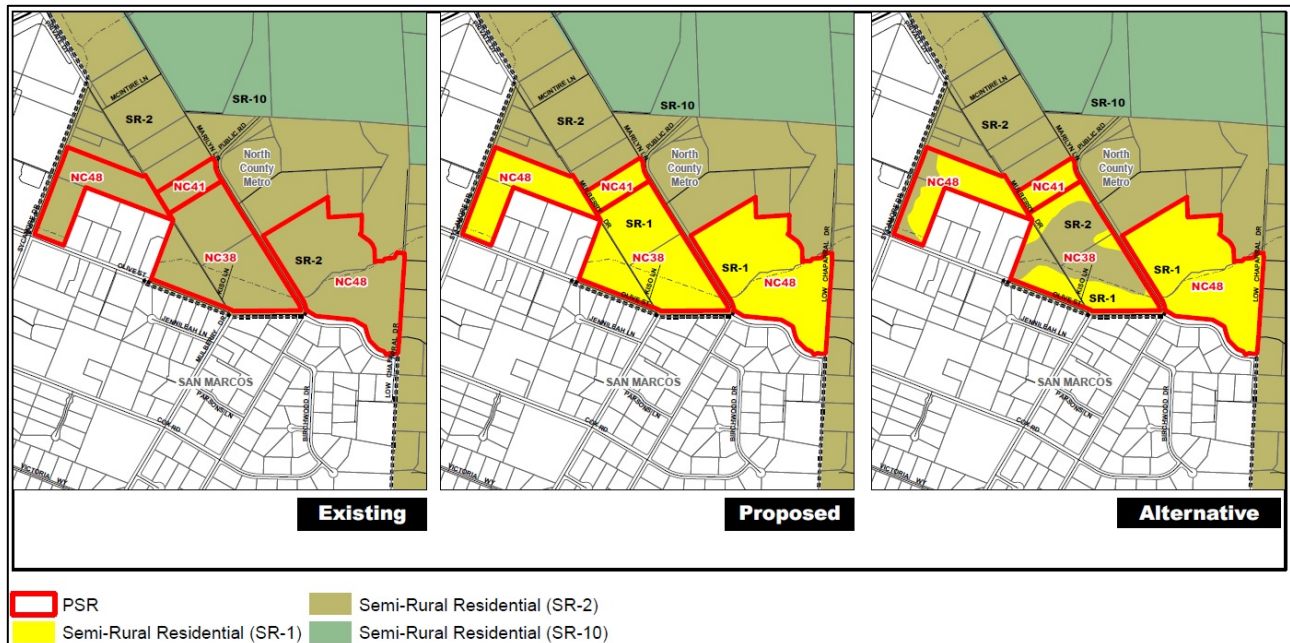
**PDS Recommendation** – Staff recommends the Alternative Map.



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15. **NC38+ Analysis Area (North County Metro – Twin Oaks):** The NC38+ Analysis Area covers 8 parcels, approximately 77 acres, and includes three PSRs located in the southeastern portion of the Twin Oaks CPA, adjacent to the City of San Marcos.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-2	SR-1	SR-1/SR-2
Potential Dwelling Units	37	75 Estimated increase: 38	64 Estimated increase: 27
CPG/CSG Recommendation	●		
Staff Recommendation			●
Planning Commission Recommendation		●	



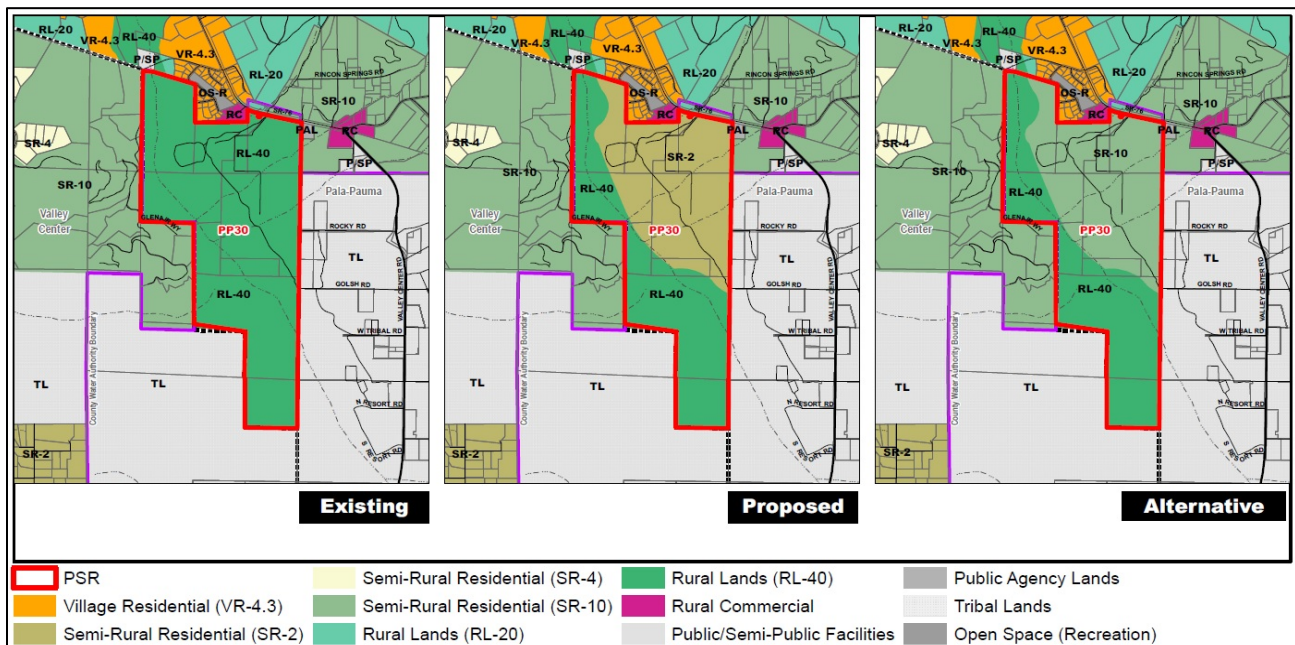
General Plan Policy and Constraints Analysis – Staff found inconsistencies with the Proposed Project Map. The NC38+ Analysis Area contains a low level of habitat and slope constraints in comparison to other North County Analysis Areas; however, it is part of a productive agricultural area. Research conducted shows that large agricultural areas converted to SR-1 or higher densities results in impacts and potentially loss of agriculture. In addition to issues with the applicable agricultural preservation policy, multiple General Plan policies address steering development away from floodplains/floodways, which also pose feasibility issues for the reaching the density potential associated with the Proposed Project Map. This Analysis Area contains a FEMA designated floodplain/floodway, and also contains prime agricultural soils.

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PDS Recommendation – Staff recommends the Alternative Map, which would maintain the SR-2 in the floodplain.

16. **PP30 Analysis Area (Pala/Pauma):** The PP30 Analysis Area covers 11 parcels, approximately 518 acres, and includes one PSR located in the eastern portion of Pala Pauma, south of the Pauma Rural Village and west of the Rincon Reservation.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	RL-40	SR-2/RL-40	SR-10/RL-40
Potential Dwelling Units	12	134 Estimated increase: 122	31 Estimated increase: 19
CPG/CSG Recommendation			●
Staff Recommendation			●
Planning Commission Recommendation			●



General Plan Policy and Constraints Analysis - The Proposed Project Map was found to have inconsistencies with General Plan Policies. The PP30 Analysis Area has a high level of constraints. The San Luis Rey River runs through the southern and western portions. Although its floodplain area would remain RL-40 in both the Proposed Project Map and Alternative Map options, Yuima Creek and Potrero Creek come in from the northeast through the area proposed for SR-2 to connect to the river. The locations of these creek areas constrain access to the southern portion of the SR-2 designation in the Proposed Project Map. In addition to the creek corridors and riparian vegetation, the SR-2 proposed area contains areas of coastal sage scrub and oak woodlands. The site is groundwater dependent, with a Groundwater Ordinance imposed 5-acre minimum lot size, rendering the SR-2 density infeasible. The site is within a basin required to complete

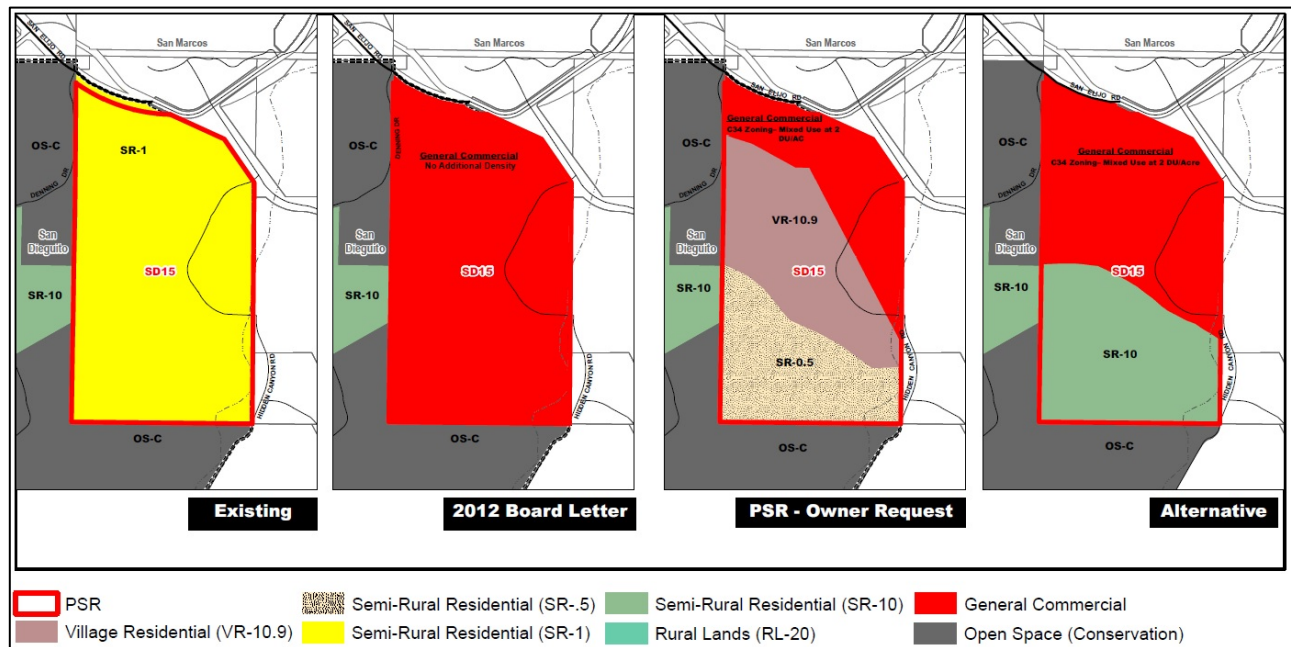
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a Groundwater Sustainability Plan for the Sustainable Groundwater Management Act. The Analysis Area is adjacent to the Pauma Rural Village. The Alternative Map provides additional density (SR-10) in the previously disturbed northeastern portion, which would maintain the Conservation Subdivision requirement to avoid 75 percent of resources as outlined in the Subdivision Ordinance.

PDS Recommendation – Staff recommends the Alternative Map.

17. **SD15 Analysis Area (San Dieguito):** The SD15 Analysis Area includes one PSR parcel, approximately 69 acres, and is located west of Elfin Forest.

	Existing General Plan	2012 Board Letter Map	Proposed Project Map	Alternative Map
Land Use Designation	SR-1	GC (no additional density)	GC/VR-10.9/SR-0.5	GC/SR-10
Potential Dwelling Units	61	61	362 Estimated increase: 301	80 Estimated increase: 19
CPG/CSG Recommendation	●			
Staff Recommendation			●	
Planning Commission Recommendation			●	



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General Plan Policy and Constraints Analysis – The Proposed Project Map was found to be consistent with General Plan Policies. The SD15 Analysis Area is located within a 550-acre County island just west of the Elfin Forest community. The Board direction was to analyze a land use designation change to General Commercial with no additional density (limited to a mixed use residential density consistent with the current SR-1). The owner did not attend the summer 2012 PSR workshop hearings, and based on testimony and correspondence prior to that point, it was apparent that a miscommunication with staff had occurred. After consultation, the owner's request was submitted and analyzed in the SEIR as the current Proposed Project Map. The option referred to in the 2012 Board Letter (Board direction for analysis) is still available for consideration as an additional alternative.

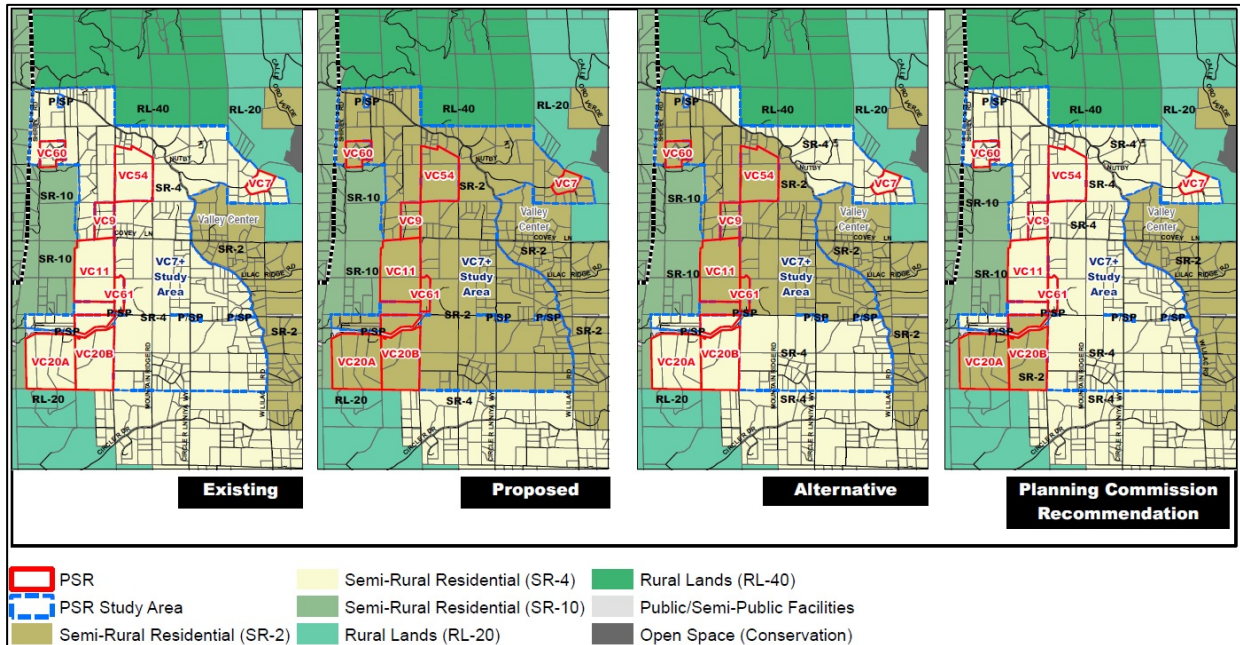
The Proposed Project Map includes VR-10.9 in the central portion. The General Commercial area proposed for the northern 19.3 acres would include a mixed use residential density of 2 units per acre. These higher density/intensity uses could be supported by the infrastructure available to the site, including the adjacent 4-lane San Elijo Road (includes sidewalks and bike lanes), sewer and water service available. The Analysis Area is adjacent to the City of San Marcos with an estimated jobs total of over 34,000, and is only a half mile east of Carlsbad with an estimated jobs total of over 67,000. Public elementary and middle schools, along with a grocery store, are found a half mile away within the San Elijo Hills development, connected by sidewalk and bike lane. Though the site is near high density development in San Marcos on the north, adjacent on the southwest, south, and southeast are open space preserves. The site is within the Draft NCMSCP PAMA with sensitive habitats and wildlife corridor connections, particularly in the southern portion. As such, it is anticipated the southern portion of the site would require open space preservation. General Plan Policy LU-1.8 allows transfer of density within a project site that has multiple designations when approved by a Major Use Permit or Specific Plan. With the flexible building type to allow multi-family residential, it is anticipated that the full density could be achieved in the VR-10.9/GC portion, with open space in the southern portion.

PDS Recommendation – Staff recommends the Proposed Project Map.

18. **VC7+ Analysis Area (Valley Center):** The VC7+ Analysis Area covers 233 parcels, approximately 1,465 acres, and includes eight PSRs located in the Valley Center CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-4	SR-2	SR-2/SR-4
Potential Dwelling Units	366	619 Estimated increase: 253	507 Estimated increase: 141
CPG/CSG Recommendation	●		
Staff Recommendation			●
Planning Commission Recommendation - only VC20A & VC20B change to SR-2			





General Plan Policy and Constraints Analysis – The Proposed Project Map was found to be inconsistent with two General Plan policies. The VC7+ Analysis Area exhibits an agricultural character mixed with relatively low existing densities of residential uses. Public road access is limited to West Lilac Road on the north, but there are additional segments of private roads built to fire access standards. This area has high levels of agriculture. The Alternative Map reduces the area of change, in consideration of agricultural preservation, the Community Development Model (see General Plan Guiding Principle 2) location in the outer ring of Semi-Rural, and environmental constraints. The northern portion that would remain SR-4 in the Alternative is mostly in the Draft NCMSCP PAMA and includes steep slopes descending to the Keys Creek riparian corridor at the northern edge of the Analysis Area. The southern portion that would also remain SR-4 in the Alternative contains steep slopes and is bisected by another creek corridor. The Valley Center Community Plan seeks preservation of these types of riparian and steep slope areas. The Alternative Map is consistent with the Community Development Model, and takes into account areas of extensive steep slope and biological constraints.

For this Analysis Area, the Planning Commission recommended an Alternative that is not covered in the SEIR or other analysis documents for the Project. The Planning Commission recommended limiting the SR-2 change to the VC20A and VC20B PSR properties in the southwest corner of the Analysis Area. If the Board provides direction to staff at the first hearing to prepare final documents based on this Planning Commission recommended Alternative, revisions (mostly additions) would be required for the SEIR and General Plan Conformance Findings.

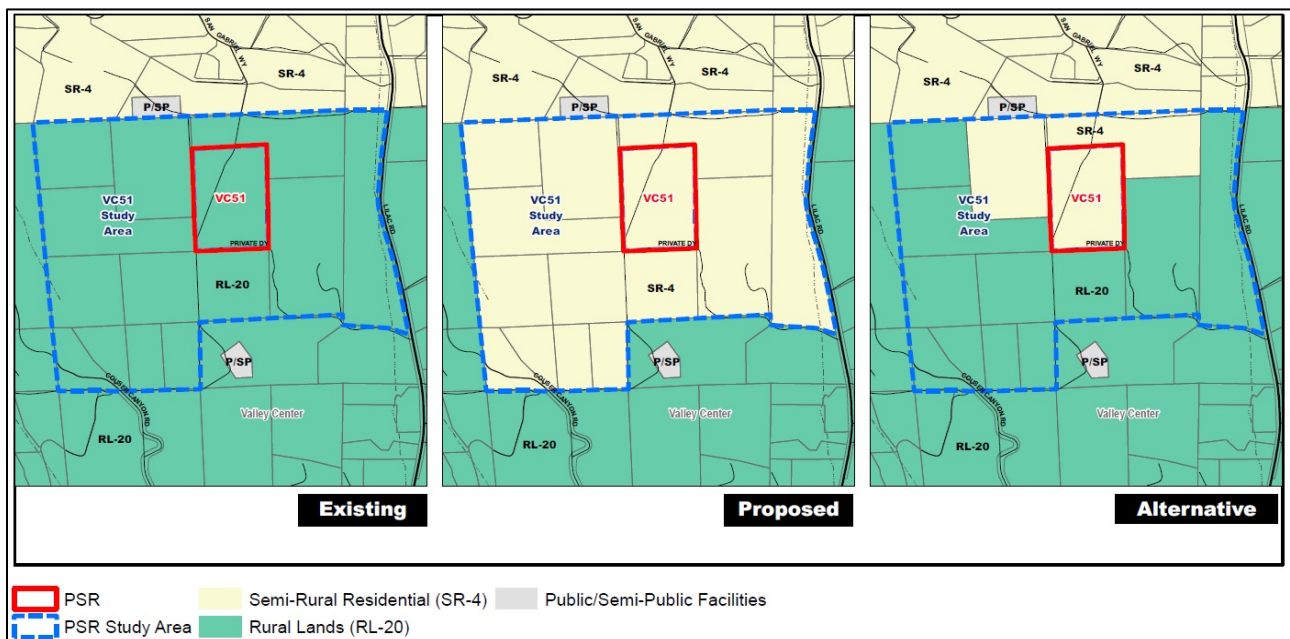
PDS Recommendation – Staff recommends the Alternative Map currently covered in the SEIR and General Plan Conformance Findings, where the most constrained areas remain under the Existing General Plan designation of SR-4.



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19. **VC51 Analysis Area (Valley Center):** The VC51 Analysis Area covers 14 parcels, approximately 166 acres, and includes one PSR located in the northwestern portion of the Valley Center CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	RL-20	SR-4	SR-4/RL-20
Potential Dwelling Units	14	27 Estimated increase: 13	17 Estimated increase: 3
CPG/CSG Recommendation	●		
Staff Recommendation			●
Planning Commission Recommendation			●



**General Plan Policy and Constraints Analysis** – The Proposed Project Map was found to be inconsistent with two General Plan Policies. The VC51 Analysis Area includes a mix of agricultural and residential uses. There is an approximately 800 acre area of SR-4 adjacent to the north, which separates the Analysis Area from the edge of the community. Therefore, VC51 would not be considered part of a “greenbelt” of very low density at the edge of the community. This adjacent area of SR-4 contains a mix of larger (with subdivision potential under SR-4) and smaller parcels, with many of the larger parcels adjacent to the northern portion of the VC51 Analysis Area. This adjacent area of SR-4 also has a similar level of habitat constraints to the northern portion of VC51, with large portions previously cleared/graded for agricultural and residential uses. The Alternative limits the SR-4 change to the north-central portion, while maintaining RL-20 in more constrained areas on the eastern and western ends, and within the more access-constrained southern end. Five of the parcels in the Analysis Area are under Williamson Act contracts for preservation of agricultural uses and would not be able to subdivide (regardless of the GP designation) until completion of a non-renewal

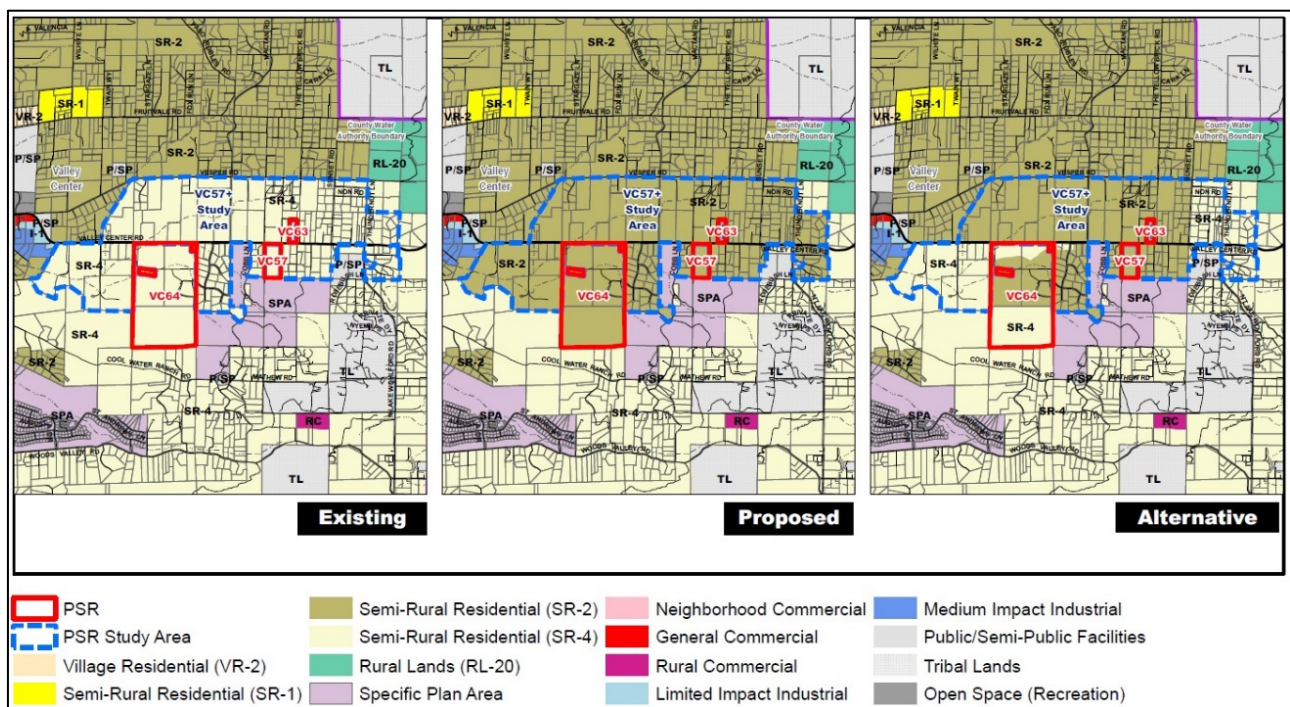
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process for the associated contract, which typically takes 10 years. The Alternative of SR-4 and RL20 is consistent with the Community Development Model and provides greater assurance of feasibility.

PDS Recommendation – Staff recommends the Alternative Map.

20. **VC57+ Analysis Area (Valley Center):** The VC57+ Analysis Area covers 217 parcels, approximately 1,337 acres, and includes three PSRs located in the Valley Center CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-4	SR-2	SR-2/SR-4
Potential Dwelling Units	374	605 Estimated increase: 231	524 Estimated increase: 150
CPG/CSG Recommendation	●		
Staff Recommendation			●
Planning Commission Recommendation			●



General Plan Policy and Constraints Analysis – The Proposed Project Map presented an inconsistency with one General Plan policy. The VC57+ Analysis Area includes extensive agricultural uses, in addition to residential uses. Research shows that an SR-2 designation can support continued agriculture, and that SR-1 or higher density can impact continued agriculture. The Analysis Area is adjacent to the northern Village boundary on the west, has a network of public roads (two east-west, two north-south) to support additional subdivision potential, and has more limited habitat and slope constraints. The biggest constraint is the

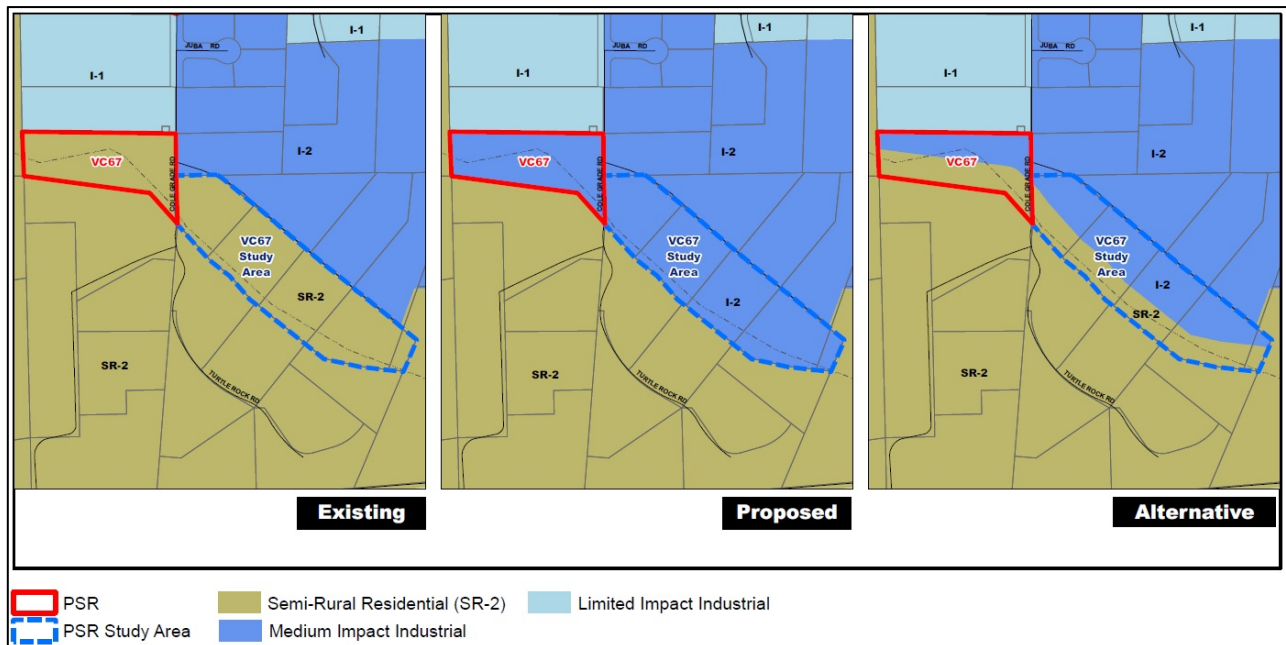
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presence of a FEMA and County mapped floodplain (which includes areas of estimated wetlands) in the western end, mostly south of Valley Center Road, which runs east-west through the middle of the Analysis Area. The areas to remain SR-4 in the Alternative Map include the area of the FEMA floodplain south of Valley Center Road, an area of steep slopes in the far southern end, and the far eastern end, which contains areas of habitat constraints and would provide an appropriate lower density Community Development Model transition area to buffer from areas of Rural Lands and open space further east.

PDS Recommendation – Staff recommends the Alternative Map.

21. **VC67 Analysis Area (Valley Center):** The VC67 Analysis Area covers 6 parcels, approximately 13 acres, and includes one PSR located in the Valley Center CPA.

	Existing General Plan	Proposed Project Map	Alternative Map
Land Use Designation	SR-2	I-2	I-2/SR-2
Potential Dwelling Units	N/A	N/A	N/A
CPG/CSG Recommendation		●	
Staff Recommendation	●		
Planning Commission Recommendation	●		



General Plan Policy and Constraints Analysis – The Proposed Project and Alternative Maps were found to be inconsistent with the General Plan Policy for designations within a floodway. Within the VC67 Analysis Area, the PSR and almost all of the Analysis Area are within in the County-mapped floodway. Residential uses would not be allowed within the mapped floodway. However, the existing SR-2 facilitates agricultural uses similar to other General Plan designations in the Semi-Rural and Rural Lands categories. Policy S-

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10.1 of the General Plan is consistent with RPO restrictions on floodways, and limits uses in floodways to agricultural, recreational, and other such low intensity uses. This area was specifically addressed during the General Plan Update, with the addition of issue and policy language in the Valley Center Community Plan, calling for the area to be re-designated as industrial if revised FEMA mapping is completed to show the area is outside the floodway. No revised FEMA or County floodplain/floodway mapping has been initiated since the General Plan Update. Increasing the allowed intensity of development within a floodway (whether FEMA or County) or otherwise relaxing regulations in these areas can affect the County's National Flood Insurance Program rating, and subsequently affect flood insurance rates in the County. Law enforcement vehicle impound storage can be allowed under a current Site Plan in place on the PSR property, which includes a "No Rise" certification, based on an existing approved evacuation plan for vehicles on the property.

PDS Recommendation - Staff recommends retaining the Existing General Plan designation and zoning. The property owner has not initiated a process to revise the FEMA or County mapped floodplain in this area. Prior to allowing any Industrial designation within a mapped floodway, the mandatory policies prohibiting this (including S-10.1 noted above) in the General Plan would need to be amended.

### **Champagne Gardens Analysis Areas**

The Champagne Gardens Specific Plan (Champagne Gardens) was adopted by the Board in 1999 to allow for visitor serving commercial uses in the areas on either side of Champagne Boulevard, just north and west of the Welk Resort. Champagne Gardens is split between the Community Planning Areas (CPAs) of Bonsall, Valley Center, and Hidden Meadows. After implementing actions were not initiated within the eight-year window set in the Specific Plan, the previously issued Specific Plan entitlements expired in 2007.

The Specific Plan Area land use designation and zoning were carried forward in the 2011 General Plan Update for most of the parcels. Land use options are very limited in the S88 (Specific Plan Area) zone with no adopted Specific Plan. Upon review, the options for this property were limited as part of a General Plan Clean-Up, so the two Analysis Areas (Eastern and Western) were included within this project. Staff conducted analysis and outreach with the owners, stakeholders, and the three associated Community Planning/Sponsor Groups (CPG/CSGs) throughout 2015, to develop the land use map options and associated zoning options for consideration in the current GPA / REZ. Associated with the Champagne Gardens outreach process, a proposed revision to Valley Center Community Plan Residential Policy 8 has also been added to the project, as referenced in the Project Description section of the Board Letter. The policy addresses minimum lot sizes for projects proposing clustering of units. The revision would change the minimum lot size allowed in the SR-2 designation, from one acre to on-half acre, and change the minimum lot size allowed in the SR-4 designation from two acres to one acre. The policy (and proposed revisions) would not automatically apply these minimum lot sizes in SR-2 and SR-4 designations, but would restrict clustered projects from proposing lot sizes lower than the minimums. The stipulations in the policy for allowing the noted minimum lot sizes are not proposed to change.

One of those stipulations is the requirement for sewer service. The properties in Eastern Champagne Gardens are proposed for SR-2 in the Proposed Project Map (except Subarea 2, proposed for SR-4) and for SR-4 in the Alternative Map. These properties are within the sewer service area of the Valley Center Municipal Water District, and proximate to an existing sewer line under the properties. Due to wetland, floodplain, habitat, and slope constraints on portions of the properties, a clustered site design is anticipated to reach the density potential associated with either designation, so that homes could be placed in the areas of limited constraints. Additional lot size flexibility would provide a greater level of assurance of density feasibility, while not affecting the allowed density associated with the designation adopted. This required a revision to the Valley Center Community Plan Policy 8, to allow for additional clustering in SR-2 and SR-4 designations when sewer service is present. The

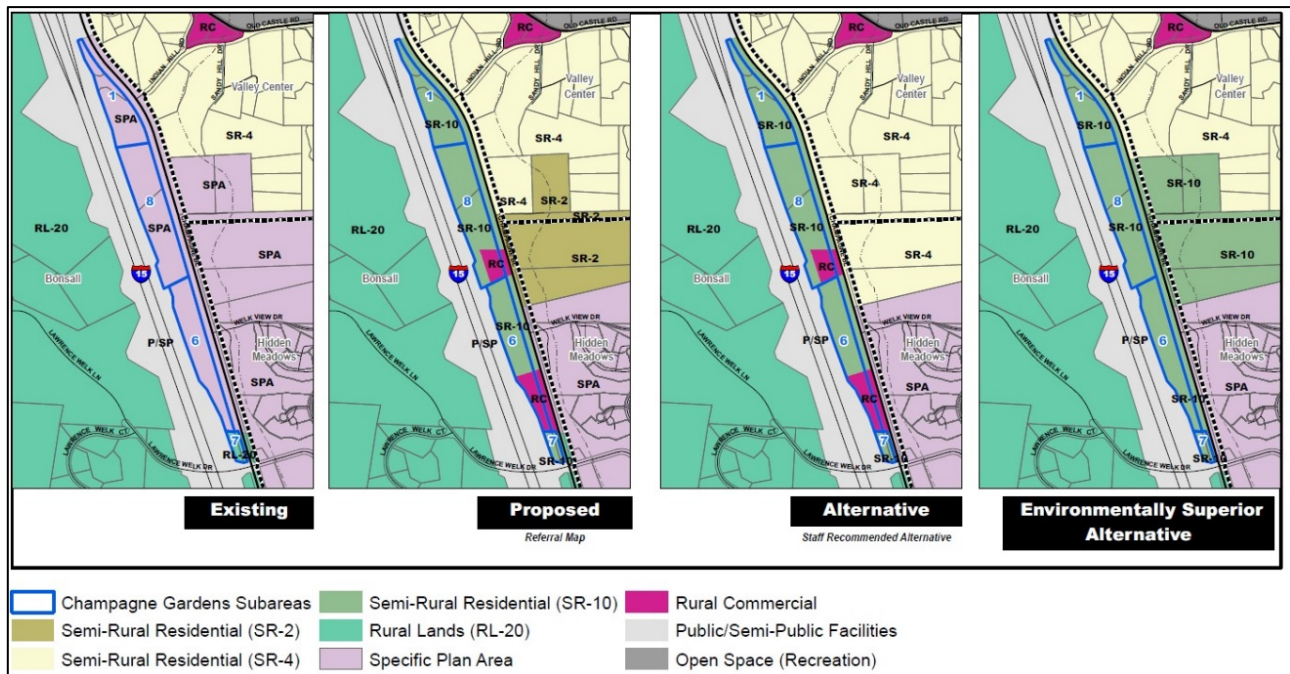


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scope of the revision is very limited, as there is only one other parcel in the CPA with subdivision potential that is either SR-2 or SR-4 and within the sewer service area. Each Champagne Gardens Analysis Area is discussed below.

**22. Western Champagne Gardens (WCG) Analysis Area (Bonsall):** The WCG Analysis Area covers 8 parcels, approximately 44 acres, and is located along the eastern edge of the Bonsall CPA.

	Existing General Plan	Proposed Project Map	Alternative Map	Environmentally Superior Map
Land Use Designation	SPA/RL-20	SR-10/RC	SR-10/RC	(All SR-10)
Potential Dwelling Units	1	8 Estimated increase: 7	8 Estimated increase: 7	7 Estimated increase: 6
Bonsall CSG Recommendation			●	
Staff Recommendation			●	
Planning Commission Recommendation			●	



General Plan Policy and Constraints Analysis – The Proposed Project Map and the Alternative Map are the same for this Analysis Area, and were found to be consistent with the General Plan Goals and Policies.



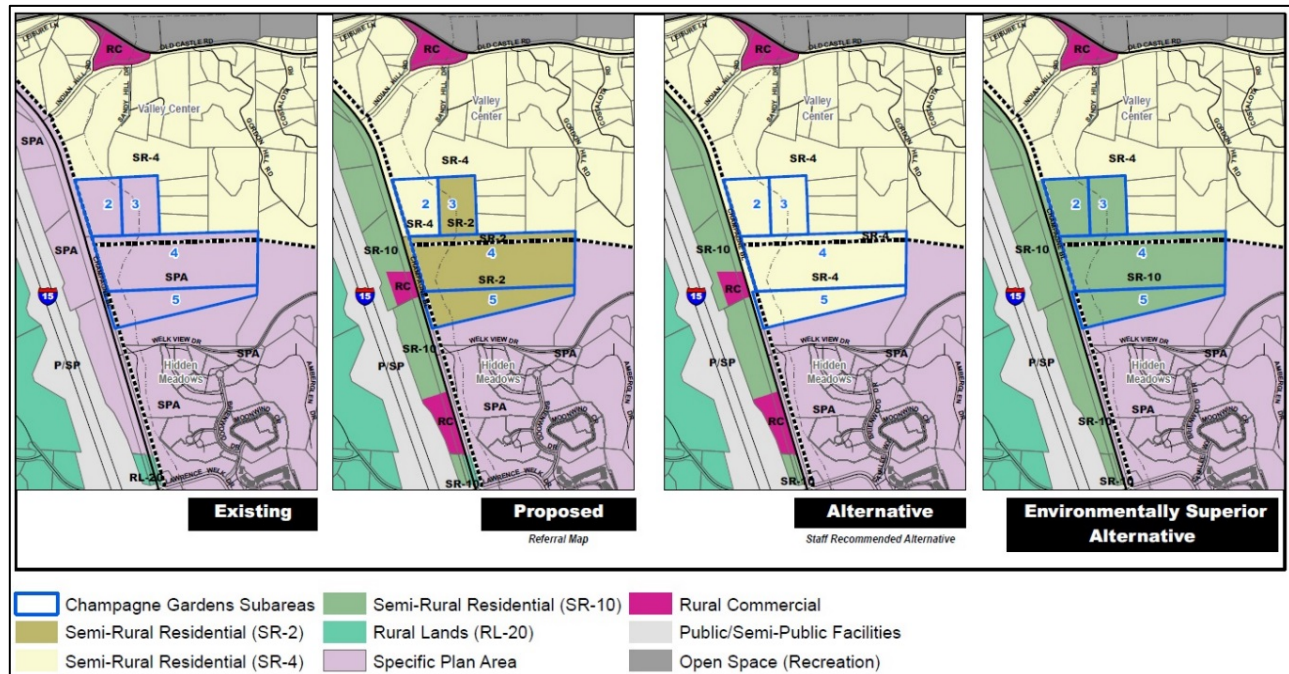
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Western Champagne Gardens (WCG) is situated between the I-15 corridor and Champagne Boulevard, it contains a fairly high level of constraints, and is mostly in the draft North County Multiple Species Conservation Program Pre-Approved Mitigation Area, because of the prevalence of coastal sage scrub and the potential to serve as a “ladder” of California gnatcatcher habitat along I-15. Lower residential densities are consistent with many other properties in such close proximity to the I-15 in this area, due to air quality and noise impacts of such close proximity to the freeway. Two small areas (2.5 acres and 3.5 acres) of Rural Commercial, with C42 Visitor Serving Commercial zoning, are proposed in areas where there is previous clearing and/or mostly non-native grassland vegetation, and where existing commercial uses are near. The Proposed Project Map for Champagne Gardens areas has also been referenced as the Referral Map, and the Proposed/Referral Map is the same as the Alternative Map (previously referenced as the Preliminary Staff Recommendation Map here), as the outreach process led to some consensus on proposals, considering constraints. There is also an Environmentally Superior Map, which would apply SR-10 through all areas of Champagne Gardens.

PDS Recommendation – Staff recommends the Proposed Project Map.

23. **Eastern Champagne Gardens (ECG) Analysis Area (Valley Center and North County Metro – Hidden Meadows)**: The ECG Analysis Area covers 6 parcels, approximately 71 acres, and is located in the Valley Center and North County Metro – Hidden Meadows CPAs.

	Existing General Plan	Proposed Project Map	Alternative Map	Environmentally Superior Map
Land Use Designation	SPA	SR-2/SR-4	SR-4	(All SR-10)
Potential Dwelling Units	0	24 Estimated increase: 24	12 Estimated increase: 12	5 Estimated increase: 5
Hidden Meadows CSG Recommendation:		●		
Valley Center CPG Recommendation			●	
Staff Recommendation			●	
Planning Commission Recommendation		●		



General Plan Policy and Constraints Analysis – The Proposed Project Map was found to have inconsistencies with some of the General Plan Policies. Eastern Champagne Gardens (ECG) is split between the CPAs of Valley Center and Hidden Meadows (part of the North County Metro Subregion). The southernmost property of ECG contains the existing Deer Park Winery and the Residential/Commercial zone provides the best option for consistency with their existing operations, in addition to being consistent with each of the General Plan land use designation options. ECG contains areas of coastal sage scrub on hillsides, but also contains an area of oak woodlands on Subarea 4, and a riparian corridor through each of the properties, which includes a FEMA floodway/floodplain and areas of estimated wetlands. Though it has a high level of constraints, ECG has an existing sewer line under the properties. This provides an opportunity for clustering to avoid constraints and the proposed Valley Center Community Plan Policy Revision was added to the project as a result of the ECG outreach process, addressing clustering capabilities in sewer service areas of Valley Center. The Alternative Map addresses policies related to feasibility, floodplains, mapping in areas of sensitive habitats, and demonstrates a greater level of mapping consistency with the adjacent area of SR-4 to the north.

PDS Recommendation – Staff recommends the Alternative Map.