

Attachment C – General Plan Conformance Findings



BO18+ General Plan and Community Plan Conformance

The BO18+ Analysis Area covers 120 parcels over approximately 921 acres in the northeastern portion of Bonsall Community Planning Area (CPA). The Analysis Area is adjacent to Old Highway 395 and the I-15 corridor, ½ mile south of West Lilac Road on the northern end and ½ mile north of Camino Del Rey on the southern end. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the entire Analysis Area would change from SR-10 to SR-4, which would be estimated to increase overall dwelling unit (DU) potential by 67 (total potential of 196 DU). An Alternative Map is also available for consideration, which would only change the northeastern portion (approximately 345 acres) to SR-4, resulting in an estimated DU increase of 36 (total potential of 165 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

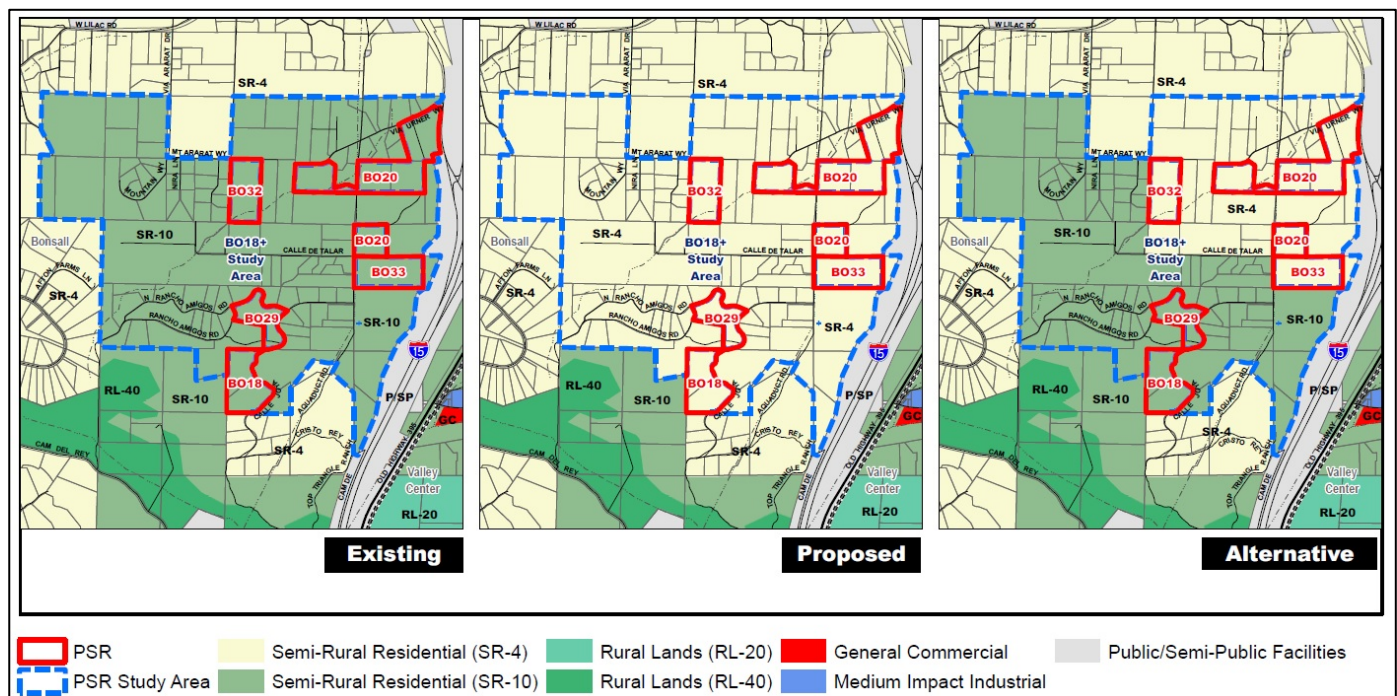


Figure 1: BO18+ Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for



the Proposed Project map, a discussion of applicable Bonsall Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 8 miles from the geographic center of Vista and 13 miles from the geographic center of Carlsbad, with an estimated 33,290 jobs and 67,713 jobs respectively; therefore, the proposed SR-4 would not be out of line with the distance to substantial job centers. Fire service is available from the Deer Springs Fire Protection District, with the 5-10 minute estimated travel time for most of the Analysis Area being consistent with the proposed SR-4 designation (per General Plan standards). Water service is available from the Rainbow Municipal Water District with 98 of the 120 parcels having current water service or access to an on-site or adjacent water line. There is no sewer service available.

*The Analysis Area is currently within the Semi-Rural Regional Category, which covers most of the Bonsall Community Planning Area (CPA). Surrounding to the north and west are SR-4 designated lands. The northeastern portion of the Analysis Area shares many similarities with the area of SR-4 to the north, including a mix of smaller and larger parcels, several agricultural uses, generally good access options, and limited habitat and slope constraints. The only current public road in the Analysis Area is Old Highway 395, adjacent to the northeastern portion, but there are also multiple private roads in the northeastern portion that are built to fire access standards. The southern and western portions of the Analysis Area are more constrained by steep slopes, sensitive habitats, roads that are not built to fire access standards and dead end roads. Habitat and slope constraints would pose challenges to improving certain roads (or providing new access) to meet fire access standards. Given the road access limitations and habitat and slope constraints of the southern and western portions of the Analysis Area and location of the Analysis Area (near the outer edge of the CPA), increasing density in those portions would not be in line with the CDM and the **Proposed Project Map has been found to be inconsistent with Policy LU-1.1.***

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that



provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the BO18+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

As discussed above, the Analysis Area is adjacent to SR-4 lands to the north and west. There is also a small area of SR-4 adjacent to the south. Most of the adjacent land to the south is SR-10, though the Moosa Creek floodplain is designated RL-40. To the east is the I-15 freeway and the Bonsall CPA extends approximately ½ mile east of the freeway, with mostly SR-10 in that area. Existing parcel sizes played a major role in the mapping of Semi-Rural areas during the General Plan Update. Though there are several large parcels of more than 10 acres remaining in the Analysis Area, approximately half of the Analysis Area parcels are four acres or less. Given these considerations, the Proposed Project Map has been found to be consistent with Policy LU-1.3.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the BO18+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is not adjacent to another jurisdiction and the closest adjacent jurisdiction is the City of Oceanside, approximately 4 miles away. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with BO18+.



LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-4 designation applies a 1 unit per 4 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below. A legal lot of at least eight acres would be required, in order to subdivide in the SR-4 designation; however, if there is steep slope on the property, more acreage would be required to be able to subdivide. The northeastern portion of the Analysis Area has multiple roads built to fire access standards, a fairly high level of existing land disturbance (from mostly agricultural and residential uses), limited habitat constraints, and limited slope constraints. Though effective mitigation of significant agricultural resources will be critical for subdivision applications, there is reasonable assurance of reaching the density potential in the northeastern portion.

The southern and western portions would present more feasibility challenges, due to the limited existing road access (built to fire access standards), the steep slopes, and habitat constraints. One of the two lots associated with the BO18 PSR property in the southern portion (one of multiple PSRs in the Analysis Area; '+' in the ID refers to multiple PSRs) currently has a Williamson Act contract for preservation of agricultural uses, which prohibits further subdivision of that lot until the Williamson Act contract is removed (typically a 10-year non-renewal process). The second existing lot of the BO18 PSR does not have additional subdivision potential under the proposed SR-4. Most of the parcels in the western portion are accessed via dead end roads or have no current access at all. The maximum dead end road length that would be applied in the Analysis Area is 1,320 feet (based on a proposed 2-acre minimum zoning lot size, allowing some clustering flexibility); however, the Fire Marshal would have discretion in considering the applicable density of a subdivision proposal. Based on Resource Protection Ordinance (RPO) limitations, almost of the properties in the Analysis Area would be allowed 10% development encroachment into steep slopes (% allowed encroachment based on percentage of lot in steep slopes). This would limit development potential in the southern and western portions; however, the majority of these portions would only be allowed a density of 1 unit per 8 acres (areas of 25% to < 50% slope). Given the current parcel sizes, slope, and slope-dependent proposed SR-4, most potential subdivisions under SR-4 in the southern and western portions would be two-lot splits, which would of course have more limited development infrastructure and service requirements. Considering these factors, the Proposed Project map does not present a clear inconsistency with Policy LU-1.9, and a consistency finding can be made.



Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The BO18+ Analysis Area contains extensive agricultural operations, which is also the case for a 1,000-acre area of SR-4 adjacent to the north; however, the adjacent SR-4 area includes more access options currently built to fire protection standards. Parcel sizes range from less than 0.5 acre to 480 acres within a one mile radius, with a wide range of parcel sizes, including several of less than five acres and several of more than ten acres. The proposed change would not require changing the Semi-Rural Regional Category, which is appropriate in this area, given the level of agricultural resources, environmental constraints, and existing infrastructure. Much of the southern and western portions contain extensive steep slope, habitat constraints, and limited road infrastructure built to the 24' paved width fire protection standard. The northeastern portion contains a better existing access network (including the only area of public road access) and less slope and habitat constraints, thus reducing potential community character issues with an SR-4 proposal in that area. An alternative Map has been developed and analyzed, which would only change the northeastern portion to SR-4, while leaving the rest at SR-10. While this alternative would demonstrate a higher level of consistency with LU-2.3, the Proposed Project Map would be consistent due to the nearby areas of SR-4 with similar constraints.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

Goals of the Bonsall Community Plan that are most applicable to the proposal discuss retaining agriculture, equestrian uses, estate residential development, and low density buffers on the edges of the community. As discussed in the review of LU-7.1 below, research shows the proposed SR-4 designation can support continued agricultural operations. If the SR-4 were to be approved in the Analysis Area, an area of SR-10 would still remain further east on the edge of the Bonsall CPA. Estate lot development is generally considered parcel sizes of two acres and larger, which would be consistent with the proposal. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-2.4.



LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a “greenbelt” per the General Plan definition, because it is not located within a very low-density area (Rural Lands). In addition, no change in the Regional Category is required for the proposal. Therefore, the Proposed Project Map for BO18+ is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

Of the total 921 acres in the Analysis Area, GIS estimates show approximately 73 acres of sensitive habitats. Much of the coastal sage scrub and southern mixed chaparral are found on the hillsides of the southern and western portions. There is a narrow riparian corridor that runs northwest to southeast. 110 acres in the southern portion is in a Pre-Approved Mitigation Area (PAMA) in the draft North County MSCP, signifying an area of high biological value and typically serving as a wildlife corridor, where preservation will be encouraged. Though providing sufficient road infrastructure could be challenging in the southern and western portions, it is anticipated that the potential density of the Proposed Project Map could be achieved in most or all portions of the Analysis Area, while avoiding sensitive habitats (given the minimal additional density potential in the southern and western portions with the slope-dependent proposed SR-4). The northeastern portion of the Analysis Area contains a higher level of existing development footprint and lower extent of sensitive habitats than found in the southern and western portions. An Alternative Map has been developed and analyzed, which would only change the northeastern portion to SR-4, while leaving the rest at SR-10. The Proposed Project Map for BO18+ is consistent with LU-6.2 as the proposed SR-4 density is low enough in consideration of the extent of native vegetation and other resources, to conclude that the most environmentally sensitive areas could be avoided in future development.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

*There are no floodplains, dam inundation zones, or fault hazard zones in the Analysis Area. Approximately 100 acres in the southern hillsides of the Analysis Area is within a Very High Fire Hazard Severity Zone (FHSZ). The rest of the area is within a Moderate FHSZ, due to the extensive areas of irrigated agriculture. Access improvements would be required throughout the Analysis Area in order to accommodate further subdivisions, but it is estimated that most of the area could meet the General Plan travel time standard of 10 minutes upon provision of access roads to fire protection standards. Existing access (and feasibility of improvements) is most sufficient in the northeastern portion, which is the only portion that would be changed in the alternative map mentioned above. Improving access in the southern and western portions of the Analysis Area (near Rancho Amigos Road in the south and the western portion of Calle de Tallar in the west) will be challenging given the extent of steep slopes, some very steep roadside drop-offs, and coastal sage scrub in these areas. Areas adjacent to the southern end of the Analysis Area have limited fire clearing due to the steep slopes and sensitive vegetation on hillsides above the Moosa Creek corridor. Most of the parcels with additional density potential (associated with the proposal) in the western portion of the Analysis Area are currently accessed via dead end roads or have no access at all. In their comments, the Deer Springs Fire Protection District (DSFPD) noted the problematic road network in portions of the Analysis Area. **As a result of these issues, the proposed***



density increase to SR-4 within the southern and western portions of the Analysis Area results in a conclusion of inconsistency with LU-6.11 for the Proposed Project Map.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for BO18+: The Analysis Area contains several current agricultural operations, including citrus, avocados, and vineyards. Almost half of the Analysis Area contains soils which meet the criteria for Farmland of Statewide Importance. The proposed SR-4 designation would not be anticipated to conflict with continued agricultural operations, due to the reasons noted above for consideration of an SR-2 threshold used for this policy. Therefore, the Proposed Project Map for BO18+ has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.



This policy is not applicable to the BO18+ proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent. Water service is available from the Rainbow Municipal Water District

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the BO18+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the BO18+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the BO18+ proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Town Center Centers. The Proposed Project map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The proposal would not change the current Semi-Rural Regional Category. Therefore, it has not been determined to pose inconsistencies with this Policy.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.



This policy is not applicable to the BO18+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the BO18+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area. The closest industrial area (on Nelson Way in Valley Center) is separated from the Analysis Area by the I-15 freeway.

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The entire Analysis Area is located within MRZ-3 designated lands and the proposed SR-4 designation is not a density low enough to allow for potential future mining operations. However, the number of existing homes spread throughout the Analysis Area and adjacent areas would preclude mining operations, due to the lack of adequate area that is not in close proximity to homes. Therefore, the Proposed Project Map for BO18+ has been found to be consistent with Policy COS-10.2.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are some steep hillsides within the Analysis Area, particularly in the southern and western portions.



COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The western portion of the Analysis Area is approximately 1.5 miles from the Bonsall-East Village and would remain within the Semi-Rural Regional Category under the proposed change. The Analysis Area is approximately 2.5 miles from the nearest transit stop and park-and-ride facility, both in the area of the SR-76/I-15 interchange. There is a Class II bike lane along Old Highway 395 on the eastern edge of the Analysis Area and a bike lane is planned (in the Mobility Element) along West Lilac Road, which would eventually provide bike lane access to the Bonsall Villages. In consideration of the SR-4 density in relation to the distance to the Village and the I-15 corridor located adjacent to the eastern portion of the Analysis Area, a consistency finding can be made for the BO18+ Proposed Project Map.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The BO18+ Analysis Area is not within a Village, is not within a sewer service area, and public road access is limited to the northeast portion. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains or fault hazard zones in the Analysis Area. A dam inundation zone touches the southwest corner of the Analysis Area, but the parcels it encroaches into would not have additional subdivision potential under Proposed or Alternative Maps. Approximately 100 acres in the southern hillsides of the Analysis Area is within a Very High Fire Hazard Severity Zone (FHSZ). The rest of the area is within a Moderate FHSZ, due to the extensive areas of irrigated agriculture. Access improvements would be required throughout the Analysis Area in order to accommodate further subdivisions, but it is estimated that most of the area could meet the General Plan travel time standard of 10 minutes upon provision of access roads to fire protection standards. Existing access (and feasibility of improvements) is most sufficient in the northeastern portion, which is the only portion that would be changed in the alternative map mentioned above. Improving access in the southern and western portions of the Analysis Area (near Rancho Amigos Road in the south and the western portion of Calle de Tallar in the west) will be challenging given the extent of steep slopes, some very steep roadside drop-offs, and coastal sage



*scrub in these areas. Areas adjacent to the southern end of the Analysis Area have limited fire clearing due to the steep slopes and sensitive vegetation on hillsides above the Moosa Creek corridor. Most of the parcels with additional density potential (associated with the proposal) in the western portion of the Analysis Area are accessed via dead end roads or have no access at all. In their comments, the Deer Springs Fire Protection District (DSFPD) noted the problematic road network in portions of the Analysis Area. **As a result of these issues, the proposed density increase to SR-4 within the southern and western portions of the Analysis Area results in a conclusion of inconsistency with S-1.1 for the Proposed Project map.***

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-4 designation is 10 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that approximately 90% of the Analysis Area would be within the 5-10 minute travel time range. Though substantial access improvements would be required for subdivisions in the western and eastern portions, a consistency finding can be made at this programmatic land use designation mapping stage, given the current estimates for travel time.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.



S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

The floodplain/floodway policies are not applicable because the BO18+ Analysis Area does not contain any FEMA or County-designated floodways or floodplains. Though a very small portion of a dam inundation zone touches the southwestern two parcels in the Analysis Area, neither of those two parcels would have any additional subdivision potential under the proposal. Therefore, the proposal would not provide any additional development potential for those parcels. The Proposed Project Map has been found to be consistent with Policy S-9.6 and the others noted above are not applicable, due to the lack of floodplains/floodways in the Analysis Area.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The BO18+ Analysis Area is within the Bonsall Community Planning Area (CPA). While most of the policies of the Community Plan apply to projects with a development component (development design to review), there are a few that are applicable to the proposals. Policy LU-1.1.2 seeks to “Maintain the existing rural lifestyle by continuing the existing pattern of residential, equestrian, and agricultural uses within the CPA.” Similarly, Policy LU-4.1.7 notes, “Discourage incompatible land uses on areas of agricultural use and land suitable for agricultural usage.” No changes in the zoning use regulations are proposed for BO18+, so no changes in allowed land uses would occur as a result of the proposed changes there. Policy LU-5.2.1 is most directly related to a stand-alone GPA/Rezone like the Proposed Project, as it states, “Require lot sizes, except through planned development, lot area averaging or specific plan projects, to be no smaller than 50 percent of the density indicated on the Land Use Map, without clustering or lot averaging, for Semi-Rural 4 and higher densities, or four acres for Semi-Rural 10 and lower densities.” The zoning minimum lot sizes associated with the Proposed Project would be consistent with this policy. In consideration of the applicable policies and the factors noted above, there are no policy inconsistency issues with the Bonsall Community Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 120 parcels totaling approximately 921 acres in the northeastern portion of Bonsall. Considering existing parcelization, the proposed change from SR-10 to SR-4 is anticipated to increase potential dwelling units by 67 (estimated 129 potential units under the current designations and 196 under the Proposed Project Map). The Alternative map (shown on Page 1 of this report) would only change the northeastern portion (approximately 345 acres) to SR-4, leaving the rest of the Analysis Area designated SR-10. This change is estimated to result in an increase of 36 potential



dwelling units (estimated 129 potential units under the current designation and 165 under the Reduced Density Alternative Map).

The BO18+ Proposed Project Map was found to be inconsistent with General Plan Policy LU-6.11, which calls for assigning land uses and densities in a manner that minimizes development in extreme, very high, and high fire hazard areas and other unmitigable hazardous areas. This Proposed Project Map was also found to be inconsistent with General Plan Policy S-1.1 which calls for minimizing the population exposed to hazards by assigning land use designations and density allowances that reflect site-specific constraints and hazards. These policies cover similar issues. The Alternative Map option would consolidate the area of density increase in the northeastern portion of the area, with multiple current access roads built to fire protection access standards, where the Fire Hazard Severity Zone (FHSZ) is Moderate, and there is very little steep slope or other constraints that could limit fire protection access improvements and clearing. Therefore, the Alternative Map for BO18+ has been determined to be consistent with Policies LU-6.11 and S-1.1.

The Proposed Project Map was also found to be inconsistent with Policy LU-1.1, which discusses assigning land use designations in accordance with the CDM, including the CDM parameters discussed in Guiding Principle 2, such as proximity to jobs, services, and infrastructure. Similar to the issues affecting consistency with Policies LU-6.11 and S-1.1, the Policy LU-1.1 inconsistency finding was based on the road infrastructure limitations and habitat and slope constraints (posing challenges to extensive infrastructure improvements) in the southern and western portions of the Analysis Area. The Alternative map was developed in consideration of these infrastructure limitations and constraints. As the northeastern portion (only portion changing to SR-4 in the alternative), is adjacent to a public Mobility Element Road (Old Highway 395) and the I-15 corridor, also has multiple private roads currently built to fire access standards, and has a low level of habitat and slope constraints, the Alternative Map has been found to be consistent with Policy LU-1.1.

The Proposed Project Map for BO18+ was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Bonsall Community Plan. The Alternative Map for BO18+ would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Bonsall Community Plan, as it would include a much smaller area of proposed land use designation change, in comparison to the Proposed Project Map.



CD14 General Plan and Community Plan Conformance

The CD14 Analysis Area covers 10 parcels over approximately 101 acres in the western portion of the Crest-Dehesa Community Planning Area (CPA). The Analysis Area is accessed via Euclid Avenue, and is approximately 1.5 miles southeast of I-8 and ¼ mile north of Dehesa Road. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from a combination of RL-20 and SR-1 to a combination of RL-20 and SR-2, with the area proposed for SR-2 consolidated in the western portion and substantially larger than the current area of SR-1. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 7 (total potential of 17 DU). An Alternative Map is also available for consideration, which would reduce the area proposed to change SR-2, resulting in an estimated DU increase of 4 (total potential of 14 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

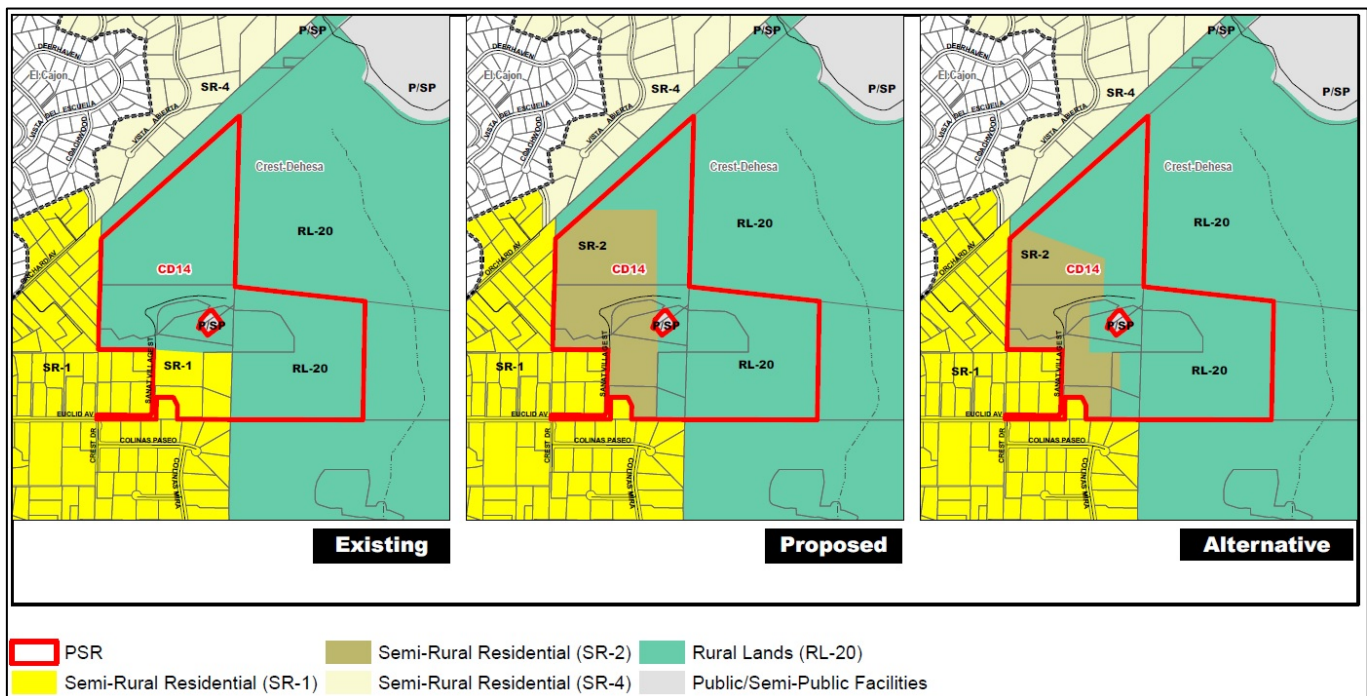


Figure 1: CD14 Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Crest-Dehesa Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The northern portion of the Analysis Area is only about 400 feet from a border with the City of El Cajon and just over 3 miles from the geographic center of the city jurisdiction. The City of El Cajon has an estimated 37,643 jobs; therefore, the proposed SR-2 in the western portion of CD14 would not be out of line with the distance to a substantial job center. CD14 is on the eastern edge of a built out unincorporated neighborhood of SR-1 density. The neighborhood maintains a closer connection with the suburban edge of the city than it does to either of the Villages of the CPA, due to the rugged terrain of open space preserves separating the neighborhood from the closest CPA Village. Fire service is available from the San Miguel Fire Protection District, with the 5-10 minute estimated travel time for most of the Analysis Area being consistent with the proposed SR-2 designation for the western portion (per General Plan standards). Water service is available from the Padre Dam Municipal Water District and the Helix Water District (Helix covers three parcels in the southwest portion). Sewer service is not currently available. Access options would likely branch out from Euclid Avenue, which is a public road up to the southwestern edge of the Analysis Area.

Though the majority of the Analysis Area is currently designated RL-20, the Analysis Area is currently entirely within the Semi-Rural Regional Category, reflecting its connection to the neighborhood of built out SR-1 just outside the City of El Cajon. The proposed SR-2 in the western portion of the Analysis Area provides a transition from the built out neighborhood to the highly constrained hillsides of Rural Lands and open space preserves. Due to the availability of, and proximity to infrastructure, services, and jobs,



and the SR-2 providing a transition to a more constrained area, the Proposed Project Map has been found to be consistent with the CDM and Policy LU-1.1.

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the CD14 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

As discussed above, the area of SR-2 proposed for the western portion of the Analysis Area provides a transition from the built out neighborhood of SR-1 on the west to the hillsides of habitat constraints starting in the Analysis Area, where RL-20 would remain over the majority of the area, consistent with the RL-20 on the east. This would be consistent with development patterns in the CPA. Given these considerations, the Proposed Project Map has been found to be consistent with Policy LU-1.3.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the CD14 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.



The Analysis Area is not adjacent to another jurisdiction; however the eastern boundary of the City of El Cajon is only approximately 400 feet away from the northwestern edge of CD14. As discussed above, the proximity to El Cajon is ideal from the standpoint of proximity to jobs, transportation options, and commercial goods/services; however, in terms of land use patterns, primary considerations are based on surrounding land use patterns in the unincorporated County.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-2 designation for the western portion applies a 1 unit per 2 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below. Using a GIS slope model for mapping areas of steep slope, it is estimated that 17 lots would be possible under the Proposed Project Map, based on the area of the two designations and factoring in estimated steep slopes in the SR-2 portion.

A number of factors are considered in evaluating the feasibility of 17 potential lots in the Analysis Area. There is currently a D3 Special Area Zoning Designator on the property with a number of requirements for a subdivision project, including: minimizing alterations of the natural topography, prohibiting the grading of level building pads or terracing of septic systems, prohibiting removal of large rock outcroppings, and placing open space easements on two portions of the east side of the property (both areas proposed for RL-20 in the Proposed Project Map). Most of the Analysis Area is within the Pre-Approved Mitigation Area (PAMA) of the adopted South County MSCP, which will require clustering to the southwest as much as possible, away from more sensitive habitat areas and wildlife corridors on the east. The Crest-Dehesa Community Plan prohibits the modification of ridgetops, which are found in the northern portion of the area proposed for SR-2. As most new parcels would be less than five acres, the maximum dead end road length (per the Fire Code) for a subdivision project in the western portion would be 1,320 feet. This measurement would be taken from the intersection Euclid Avenue and Valley View Boulevard, which is approximately 1,500 feet from the non-panhandle portion of the Analysis Area. Because of this maximum dead end road length constraint, it is likely that secondary access will be required in the north, to connect to Orchard Avenue.

*Due to these issues, it will be essential to consolidate new lots, roads, and other infrastructure in the southwest portion as much as possible, utilizing the ability to get down to 1-acre lots. The feasibility of meeting all of the requirements and fitting in the Proposed Project Map density of 17 units is questionable. **Due to the existing plans/regulations impacting the area available for 17 homes on septic, the Proposed Project Map has been found to be inconsistent with Policy LU-1.9.** A higher level of feasibility assurance is provided with the Alternative Map, which is estimated to yield a maximum of 14 lots.*



Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The Analysis Area is in a transition area of Crest-Dehesa, as it is adjacent to an SR-1 neighborhood to the west, but portions of the Analysis Area are on a hillside transition area with Rural Lands and open space to the east beyond the established neighborhood. Parcel sizes range from ½ acre to 280 acres within a one mile radius with larger parcels to the west and smaller parcels to the east in this area. The northern portion of the area proposed for SR-2 in the Proposed Project Map contains extensive steep slopes, habitat constraints, and ridgeline viewpoints from the neighborhood to the west. An Alternative Map has been developed and analyzed (see Chapter 4), which would reduce the area proposed for SR-2 in the northern portion, leaving that area as RL-20, thus reducing potential community character issues. Due to the limited additional density potential associated with the proposal and location of the portion proposed for change (adjacent to a built-out neighborhood of slightly higher density) a consistency finding can be made. Therefore, the Proposed Project Map for CD14 is consistent with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

A main land use mapping theme for the community is reflected in Issue LU-1.1 of the Community Plan, which discusses retaining the character of four small communities, each surrounded by hilly areas of very low density and open space. The CPA includes the unincorporated communities and Crest, Dehesa, Harbison Canyon, and Granite Hills, which includes CD14. As discussed above, CD14 is on the eastern edge of Granite Hills, in a transition area between the built out neighborhood to the west and the canyons of sensitive habitats to the east. A subdivision project within the Analysis Area will have to adhere to numerous policies of the Community Plan that apply to development, in an effort to preserve the character of the community, including scenic and biological resources. At this programmatic land use mapping stage, the Proposed Project Map has been found to be consistent with Policy LU-2.4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.



The RL-20 designated northern portion of the PSR area is less than ¼ mile from a border with the City of El Cajon; however, there is an area of SR-1 and SR-4 separating CD14 from this border. As such, there is not a greenbelt (of very low density, agricultural lands, and open space) separating this area of Crest-Dehesa from El Cajon. Therefore, the Proposed Project Map for CD14 is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

Most of the 101-acre Analysis Area contains coastal sage scrub and chaparral vegetation communities, and almost the entire area is within a Pre-Approved Mitigation Area (PAMA) in the adopted South County MSCP, signifying an area of high biological value and typically serving as a wildlife corridor, where preservation will be encouraged. The Analysis Area connects to extensive areas of open space preserves to the east. The area proposed for SR-2 would be limited to the western portion, adjacent to an existing built out single family residential neighborhood. The estimated increase in potential dwelling units of seven would require clustering to the maximum extent allowed in order to preserve a functional wildlife corridor. An Alternative Map has been developed and analyzed which would reduce the area proposed for SR-2, consolidating it closer to existing development and keeping the steepest hillsides at RL-20. As the area proposed for SR-2 would be consolidated in the western portion, adjacent to the existing built out neighborhood, a consistency finding can be made.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The entire area is within the Very High Fire Hazard Severity Zone (FHSZ). Access improvements would be required, but current GIS estimates show the 10-minute response time could likely be met for the SR-2 proposed area, upon implementation of access improvements to fire protection standards. Depending on the proposed location of homes, subdivisions within the Analysis Area could have difficulty meeting the maximum dead-end road length requirements and will likely require secondary access. An Alternative Map has been prepared and analyzed that would reduce the area of SR-2 in the northwestern portion, which is more problematic for access and fire protection than the southwestern portion with less steep slope and closer proximity to public roads. While this Alternative would demonstrate a greater level of consistency with Policy LU-6.11, a consistency finding can be made for the CD14 Proposed Project Map due to the fact that the most hazardous areas in the eastern portion would remain unchanged and additional density would be focused in the area closest to existing access and development.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

The Analysis Area does not contain any current agricultural operations or a recent history of agricultural operations. In addition, there are no prime agricultural soils in the area proposed for SR-2. Therefore, the Proposed Project Map does not pose any inconsistency issues with Policy LU-7.1 and a consistency finding can be made.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.



This policy is not applicable to the CD14 proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent. Water service is available from the Padre Dam Municipal Water District and the Helix Water District (southwestern portion of the Analysis Area).

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the CD14 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the CD14 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the CD14 proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Towner Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Analysis Area is closer in proximity to the City of El Cajon boundary than it is to the closest Village of the Crest-Dehesa CPA. The current area of SR-1 designated land in the Analysis Area is connected to an unincorporated neighborhood of built out SR-1 density adjacent to the southeastern boundary of El Cajon. The Proposed Project Map would continue to be part of a transition area to lower densities to the east and would replace the SR-1 portion with a larger area of SR-2. Considering these factors, the Proposed Project Map has been found to be consistent with this policy.



LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the CD14 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the CD14 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

Approximately 2 acres of the Analysis Area are within a 1,300-foot buffer from MRZ-2 lands, which is identified for consideration of effects on the potential for future mineral resource extraction. This 2-acre area is proposed to remain unchanged at RL-20, which is a density low enough to not preclude future mining operations. The remaining area is classified as MRZ-3. The area proposed for SR-2 within the MRZ-3 area is adjacent to an existing neighborhood with typical lot sizes of one acre, which would preclude future mining operations due to the proximity to existing homes. Therefore, the Proposed Project Map for CD14 has been found to be consistent with Policy COS-10.2.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.



The proposed change would be consistent with this policy because a combination of Semi-Rural 2 and Rural Lands 20 is proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is just over a mile from the Crest Village, which is rather limited in terms of commercial services and jobs. Due to this lack of extensive services in the Village and intervening steep slopes and conserved areas, residents in the CD14 area would be more likely to travel to commercial areas approximately 1 mile away within the City of El Cajon. The Analysis Area is approximately 1.5 miles from the nearest transit stop, approximately 3 miles from the nearest park-and-ride, and approximately 4 miles from the trolley park-and-ride. The majority of the Analysis Area would remain unchanged at RL-20 and the portion proposed for SR-2 (part of which is currently SR-1) is adjacent to an existing built out neighborhood of SR-1. As a result, a consistency finding can be made for the CD14 Proposed Project Map.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The CD14 Analysis Area is not within a Village, is not within a sewer service area, and does not currently have public road access. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains or dam inundation zones in the Analysis Area and the fault zone that runs through a small portion is a pre-quaternary fault (inactive). The entire area is within the Very High FHSZ. Access improvements would be required, but current GIS estimates show the 10-minute response time could likely be met for the SR-2 proposed area, upon implementation of access improvements to fire protection standards. Depending on the proposed location of homes, subdivisions within the Analysis Area could have difficulty meeting the maximum dead-end road length requirements and will likely require secondary access. An Alternative Map has been prepared and analyzed that would reduce the area of SR-2 in the northwestern portion, which is more problematic for access and fire protection than



the southwestern portion with less steep slope and closer proximity to public roads. While this alternative would demonstrate a greater level of consistency with Policy S-1.1, a consistency finding can be made for the CD14 Proposed Project Map due to the fact that the most hazardous areas in the eastern portion would remain unchanged and additional density would be focused in the area closest to existing access and development.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-2 designation (in the western portion) is 10 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that most of the Analysis Area would be within the 5-10 minute travel time range and parts of the southern portion would be in the 0-5 minute range. Though substantial access improvements would be required for subdivisions, a consistency finding can be made at this programmatic land use designation mapping stage, given the current estimates for travel time.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.

S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the



floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

The floodplain/floodway and dam inundation policies are not applicable because the CD14 Analysis Area does not contain any FEMA or County-designated floodways or floodplains, nor does it contain any dam inundation zones.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

As mentioned above, the CD14 Analysis Area is within the Crest-Dehesa Community Planning Area (CPA). The policies of the Community Plan are generally focused on considerations in review of development design, including location of uses and development pads. A couple policies could be considered in light of the CD14 stand-alone GPA proposal, even though they are more geared toward review of development. Policy LU-1.1.2 restricts development with residential clustering from using lots of less than one acre net, and CD14 does not include proposals for zoning minimum lot sizes of less than one acre. Policy COS-1.1.1 notes, "Preserve the integrity and continued function of natural habitat within the Subregion by maximizing the amount of areas left in natural coastal sage scrub cover to ensure its long-term value as a vegetation community and wildlife habitat." Much of the Analysis Area contains coastal sage scrub and the area proposed to change to SR-2 is consolidated in the western portion, which is closest to the existing neighborhood and already contains disturbed areas for dirt roads and an existing single-family residence. An Alternative Map has been developed and analyzed (see Chapter 4) which would reduce the area proposed for SR-2. While the Alternative Map would demonstrate a greater level of consistency with Community Plan Policy COS-1.1.1, the Proposed Project Map for CD14 does not present a clear inconsistency with either of these two policies that could be applicable to a stand-alone GPA/Rezone, under this programmatic review approach. Therefore, there are no policy inconsistency issues with the Crest-Dehesa Community Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 10 parcels covering approximately 101 acres of rolling topography in the western portion of the planning area, just outside the City of El Cajon. The proposed change from a combination of SR-1 and RL-20 to SR-2 (substantially more acreage of SR-2 than the current SR-1 area) and RL-20 is estimated to result in an increase of seven potential dwelling units (estimated 10 potential units under the current designations and 17 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would reduce the area proposed to change to SR-2 in the northwest portion (leaving that area RL-20). This change is estimated to result in an increase of four potential dwelling units (estimated 10 potential units under the current designation and 14 under the Reduced Density Alternative Map).

The CD14 Proposed Project Map was found to be inconsistent with General Plan Policy LU-1.9, which calls for a programmatic-level assessment of the general feasibility of the proposed land use designation



density. With the reductions in SR-2 area under the Alternative Map (reducing the estimated potential units to 14 total), there is a more reasonable assurance of feasibility. The considerations discussed in the Proposed Project Map review of LU-1.9 above will of course still be major project issues under the Alternative Map (D3 Designator on the property, grading limitations, fire access, MSCP PAMA, septic planning), but the reduction in potential units can provide for a more consolidated approach. Therefore, the Alternative Map for CD14 has been determined to be consistent with Policy LU-1.9. It should be noted that an applicant may attempt a more spread out approach under the Alternative Map (if approved), which may not be supported or feasible, given the required consistency with all current plans and regulations governing development of the site.

While there were no additional General Plan or Crest/Dehesa Community Plan policy inconsistencies identified for the Proposed Project Map for CD14 in this programmatic approach, the Alternative Map would demonstrate a greater level of consistency with certain policies applicable to a stand-alone GPA/Rezone. In comparison to the Proposed Project Map, the Alternative Map would reduce the area proposed to change from RL-20 to SR-2 in the northwestern and central portions of the Analysis Area (by approximately 9 acres), where there is less existing disturbance from access roads and more intact coastal sage scrub. Reducing the area of change in these portions would demonstrate greater consistency with General Plan Policy LU-6.2, which calls for assigning lower densities in areas with sensitive natural resources, and with Crest-Dehesa Community Plan Policy COS-1.1.1, which seeks to maximize areas left in natural coastal sage scrub. The alternative map would also demonstrate a greater level of consistency with General Plan Policies LU-6.11 and S-1.1, which deal with land use mapping with consideration of fire hazards. The reduction in the area proposed to change to SR-2 is in the northwestern portion of the Analysis Area, which is further from current fire access options than the rest of the proposed SR-2 area, and adding homes in that northwestern portion could be challenging in terms of meeting dead-end road length requirements and developing secondary access, in order to meet fire protection access requirements.



DS8 General Plan and Community Plan Conformance

The DS8 Analysis Area covers 3 parcels over approximately 169 acres in the central portion of the Borrego Springs Community Planning Area (CPA). The Analysis Area is less than ¼ mile northeast of Christmas Circle and is bordered on the west by Borrego Springs Road and on the east by Di Giorgio Road. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from VR-2 to VR-4.3. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 389 (total potential of 726 DU). An Alternative Map is also available for consideration, which would change the Analysis Area to VR-2.9, resulting in an estimated DU increase of 152 (total potential of 489 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps.

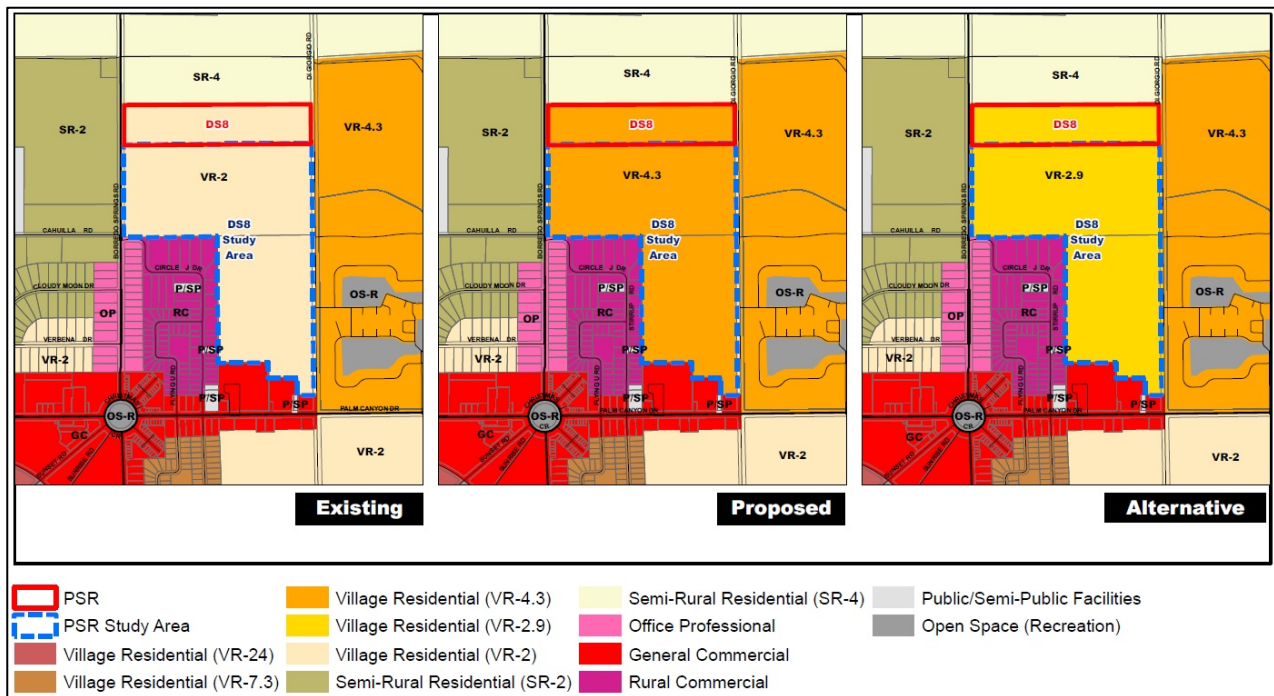


Figure 1: DS8 Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Borrego Springs Community Plan policies is



provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. Though Borrego Springs has grown as a popular winter/spring tourist destination with associated service sector jobs, retirement income continues to be a major source of income for the community. The closest major job center is in Escondido, approximately 60 miles away via road distance. The Analysis Area is adjacent to two County-maintained Mobility Element Roads (Borrego Springs Road and Di Giorgio Road) and in close proximity to others. There is a Class II bike lane and a bus stop ¼ mile away, along Palm Canyon Drive, though bus service only runs on Thursdays and Fridays (to and from El Cajon). All three parcels of the Analysis Area are within the water service area for Borrego Water District (BWD). The southernmost parcel is within BWD's sewer service area, and the other two are within the sewer service sphere of influence (SOI). The Analysis Area is served by the Borrego Springs Fire Protection District, and the station is only approximately 200 feet from the southern end of the Analysis Area, with the estimated 0-5 minute emergency response travel time estimated for the whole Analysis Area.

*The Borrego Springs CPA has some unique characteristics, in terms of application of Village designations and high densities. Considering groundwater limitations and the location of the CPA, far from job centers, the Land Use Map developed during the General Plan Update reflected pre-existing development patterns for the most part. The application of Village densities in areas without pre-existing density or parcelization was limited to a few areas around the Village Core, including the DS8 area. The greatest obstacle for increased residential development in the CPA is the reliance on groundwater. Per the requirements of the Sustainable Groundwater Management Act (SGMA), a Groundwater Sustainability Plan will soon be prepared for the Borrego Valley, in order to ensure long term groundwater sustainability. Early estimates indicate that groundwater use in the CPA will have to be reduced by approximately 70% in order to comply with the requirements of SGMA. The current overdraft situation presents a severe constraint, in terms of resources/services available for development. More than doubling the potential density of any site in the CPA at this time would not be in line with the parameters of the CDM, as outlined in Guiding Principle 2. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.1.***



LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. *[See applicable community plan for possible relevant policies.]*

This Proposed Project Map would not pose any inconsistencies with Policy LU-1.2 because the Village density is proposed within an established Village. Therefore, the proposal does not meet the policy's definition of leapfrog development.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

As discussed in the review of Policy LU-1.1, most of the land use mapping in the area surrounding the Town Center is reflective of pre-existing development patterns, with only a few undeveloped or unparcelized areas receiving Village designations. The SR-2 and SR-4 areas to the west are mostly reflective of existing parcelization, with the exception of the large undeveloped SR-2 property adjacent to the high school. Also to the west of DS8 is an area of VR-2, adjacent to the Palm Canyon Drive commercial corridor, which is also reflective of existing parcelization.

*An existing land use mapping pattern is apparent within the Village Regional Category area of DS8, between Borrego Springs Road and Borrego Valley Road, north and south of Palm Canyon Drive. The VR-4.3 designation is applied to the Roadrunner Club property, which is adjacent to the DS8 Analysis Area, on the east. This designation generally reflects the existing residential density of condos and timeshares on that site. On the east side of the Roadrunner Club property, the VR-4.3 is extended another 30 acres east, to reflect existing parcelization. The other residential properties in this area are designated VR-2. The VR-2 designation for this area represents one of the biggest potential growth areas in the CPA, as these are mostly large, undeveloped parcels. The VR-2 designation recognizes proximity to road networks, infrastructure, and services, while also considering the constraints to further growth in this area; particularly groundwater and the floodplain (see Policy LU-1.9 review). **Considering these factors, the Proposed Project Map has been found to be inconsistent with Policy LU-1.3.***

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area



The Proposed Project Map would not pose any inconsistencies with Policy LU-1.4 because the Analysis Area is already within the Village.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The DS8 Analysis Area is approximately 11 miles from the border with Riverside County, 7 miles from the Los Coyotes Reservation, and the Borrego CPA is mostly surrounded by State Park lands. Land use patterns in nearby jurisdictions are not used as primary precedents or justifications for consideration of the proposed Land Use designation change.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The Proposed Project Map would be estimated to yield a total of 726 potential dwelling units over the whole Analysis Area. This amounts to an increase of 389 potential dwelling units, over the 337 potential units under the current General Plan.

As discussed in the review of Policy LU-1.1, the biggest obstacle to increased residential development in the CPA is the unsustainable pattern of groundwater use, in light of requirements associated with the SGMA. A Groundwater Sustainability Plan (GSP) and associated implementation plan will soon be prepared for the Borrego Valley to reduce groundwater use to a sustainable level. Such a drastic increase in potential density in this Analysis Area would likely require density reductions in other portions of the CPA in order to meet required reductions.

The Analysis Area is within a FEMA alluvial floodplain and also a fan terminus alluvial wash (FTAW). The FTAW is the flow path where the bottom of an alluvial fan intersects with the edge of another alluvial fan. These areas can concentrate flows during flash floods. The County's Flood Damage Prevention Ordinance requires that projects in the FTAW be designed so that any obstruction to flow would not cause a cumulative increase in the base flood depth of more than ½ foot. Projects at densities higher than 2 dwelling units per acre would present potential feasibility issues. Even on piers, such densities may not be able to demonstrate that they would be unobstructive to the flood flows.

Sewer service would be required for development at the proposed density, due to additional septic restrictions that are likely forthcoming with the GSP and the limited space that would be available for septic under the proposed density. Currently, only the southernmost parcel is in the sewer service area.

*These issues are anticipated to substantially limit the feasibility of reaching the density potential of 726 units. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.9.***



LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

*The review of Policy LU-1.3 provides information on the existing mapping pattern in this portion of the CPA and how the Proposed Project Map would present a different pattern of land use mapping, where there are currently only large lots in the Analysis Area (3 lots over 169 acres). Estimates from the Groundwater Study of the General Plan Update showed over 10,000 additional dwelling units would be possible when adding legally buildable vacant lots to the additional subdivision and multi-family development potential in the current Land Use Map for the CPA. As such, the currently available density in the community is well beyond the current demand. Considering the over-abundance of existing vacant lots and existing density on the Land Use Map, along with the current groundwater overdraft situation, the proposed substantial increase in density associated with the DS8 Proposed Map (389-unit increase in potential dwelling units) would not be consistent with community character. **Therefore, Proposed Project Map for DS8 has been found to be inconsistent with Policy LU-2.3.***

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

Preliminary estimates indicate that the CPA will have to function within a groundwater use limit of roughly 5,600 acre-feet per year as part of implementation of a Groundwater Sustainability Plan. If legally buildable vacant lots were developed with housing and additional density potential associated with the current General Plan were built out, it is estimated almost 6,000 acre feet of groundwater use per year would be added to the roughly 19,000 acre feet per year use now.

Though related to the groundwater issue, existing vacant lots is also a major issue onto itself, which the community has grappled with for some time. Based on analysis prepared for the General Plan Update Groundwater Study, estimates show that there were approximately 3,700 existing, private, unbuilt parcels in the Borrego Valley in 2007. Of those, it was estimated that approximately 3,200 had legal lot status. This excess supply of buildable vacant lots is discussed in the Community Plan (Issue 2.2) and limits justification for adding additional density and subdivision potential.

Another issue of importance to the community and discussed throughout the Community Plan is preservation of native desert habitat areas and favoring development of fallowed agricultural lands and other previously disturbed sites. While much of the northern end of the Analysis Area includes current and former agricultural lands, the southern and eastern ends contain desert saltbush scrub, which is a sensitive desert native habitat.

Considering these issues, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.



The Analysis Area is not within a “greenbelt” as it currently has a Village land use designation and Regional Category, and it is also not on the edge of the community. Therefore, the Proposed Project Map is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

While the PSR parcel contains very little vegetative cover, much of the Study Area contains native vegetation, consisting of desert saltbush scrub, particularly in the southern portion. Wildlife corridor opportunities would be limited due to the adjacent roads and Village uses, and the Analysis Area is already within the Village.

*In terms of natural resources, the greatest obstacle for increased development in this CPA is the reliance on groundwater. Per the requirements of the Sustainable Groundwater Management Act (SGMA), a Groundwater Sustainability Plan (GSP) will soon be prepared for the Borrego Valley, in order to ensure long term groundwater sustainability. Preliminary estimates indicate that the CPA may have to reduce groundwater use by 70% or more as part of implementing a GSP. Estimates from the Groundwater Study of the General Plan Update showed over 10,000 additional dwelling units would be possible when adding legally buildable vacant lots to the additional subdivision and multi-family development potential in the current Land Use Map for the CPA. As such, even though the Analysis Area is currently within a Village, with a Village density on the Land Use Map, increasing allowed density within the CPA would further exacerbate an already critical overdraft situation. **Due to the critical nature of the groundwater situation in the valley, combined with the substantial decrease in groundwater use that will be necessary to meet SGMA requirements, the Proposed Project Map has been found to be inconsistent with Policy LU-6.2.***

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The Analysis Area is in a Moderate FHSZ. The southern portion is only approximately 200 feet from the Borrego Springs FPD fire station on Stirrup Road. With the public roads surrounding the Analysis Area, it is anticipated that the 5-minute General Plan travel time standard could be met. Therefore, a consistency finding can be made for Policy LU-6.11.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

Most of the Analysis Area contains prime agricultural soils and there is an existing agricultural operation in the northern parcel. The proposed change to VR-4.3 would not constitute a change that would be attributable to negatively impacting the protection of agricultural resources, as both the existing VR-2 and proposed VR-4.3 would facilitate lot sizes and densities too high for continued agricultural operations upon buildout to density potential. Therefore, the Proposed Project Map for DS8 has been found to be consistent with Policy LU-7.1.



LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

As noted in the language of the policy, LU-8.1 does not apply to the Borrego Valley; however, the current groundwater overdraft in relation to the SGMA process is discussed in multiple policy reviews of this report for the DS8 Analysis Area.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is applicable to proposals for new Village designations. The Analysis Area already contains a Village designation.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

The Proposed Project Map does not present any policy inconsistency issues with LU-9.5. The proposal would not reduce the current mix of uses within the Village.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

The Proposed Project Map does not present any policy inconsistency issues with LU-9.6 because a Village density is proposed in a Village, within ¼ mile of the Town Center area.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

The Proposed Project Map does not present any policy inconsistency issues with LU-9.9 because a Village density is proposed in a Village area near the Town Center.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Analysis Area is near the center of the Village and Village densities are proposed; therefore, there are no policy inconsistency issues.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.



This policy is not applicable to the DS8 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses. In addition, the Analysis Area is within a Village.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the DS8 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses. In addition, the Analysis Area is within a Village.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

This policy is not applicable to the DS8 Analysis Area because it does not contain MRZ-2 or MRZ-3 lands.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

This policy is not applicable to the DS8 Analysis Area because it does not contain undeveloped ridgelines or steep hillsides.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.



The Analysis Area is already within the Village of Borrego Springs and the Town Center at Christmas Circle is less than a half mile away, so it is in a central location with many services available in the community located within walking distance. In the context of this policy, decision-makers will consider the limited jobs in the community, the large number of vacant parcels and the limited demand for the additional density potential currently on the Land Use Map for this community. Though these factors will be considered in the context of Policy COS-14.1 and other policies, the central location within the Village allows a finding of consistency to be made.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. While the Analysis Area is within a Village, it is not in close proximity to major job centers, the only transit service available to the Village is bus service to/from El Cajon on Thursdays and Fridays, and only the southern parcel is within the sewer service area. In addition, the current groundwater overdraft situation, discussed earlier in this report will likely require an approximate 70% reduction in water use in the Valley, thus reducing justification for density increases. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

The Analysis Area is in a Moderate FHSZ. The southern portion is only approximately 200 feet from the Borrego Springs FPD fire station on Stirrup Road, and there is a good network of public roads surrounding the Analysis Area. The entire Analysis Area is within a FEMA-mapped alluvial floodplain, which is the case for much of the Village of Borrego Springs and other areas in the northern portion of the CPA. The Analysis Area is not within a dam inundation zone or fault zone. Given the ideal fire access roads and close proximity to the fire station, the floodplain hazard would be more of a concern in relation to this policy. A finding of consistency can be made under consideration of surrounding densities with similar floodplain constraints and the measures in place for discretionary reviews and building permit reviews to ensure reasonable assurance of minimizing flood hazards on development. However, reaching the density potential is questionable due to requirements in the FTAW, as discussed in the review of Policy LU-1.9.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).



Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed VR-4.3 designation is 5 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that most of the Analysis Area would be within the 0-5 minute travel time range. Therefore, a consistency finding can be made at this programmatic land use designation mapping stage, given the current estimates for travel time.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.
- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

Policies S-9.4, S-9.6 and S-10.1 are not applicable to the DS8 Analysis Area because it does not contain a floodway, it is not within a dam inundation zone, and it is not within Semi-Rural or Rural Lands.

Policy S-9.2 review: The Analysis Area is within a FEMA alluvial floodplain and also a fan terminus alluvial wash (FTAW), as discussed in the review of Policy LU-1.9. Building regulations address specific requirements for elevating structures above the base flood elevation, to allow residential development in the community without impeding flood flows. At this programmatic review level, the approach to



evaluating policy consistency with these floodplain and floodway policies is similar to the approach of the General Plan Update. Considering the extent of the alluvial floodplain in the Community Planning Area, development review includes design considerations and mitigation to elevate structures above the base flood elevation, so that development of habitable structures is still possible. However, reaching the density potential is questionable due to requirements in the FTAW, as discussed in the review of Policy LU-1.9. Considering the higher density designations applied during the General Plan Update in areas of the community with similar alluvial floodplain constraints, a finding of consistency with these policies can be made at this programmatic stand-alone GPA stage.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

A few policies of the Community Plan have been considered for the Proposed Project because they are applicable to a stand-alone GPA/Rezone and have a purpose that is related to the proposal. Community Plan policy LU-2.1.1 discourages development on undisturbed and substantially undisturbed desert native habitat lands outside the Village Core. Policy LU-1.1.1 follows along these guidelines by ensuring these types of undisturbed desert native habitat lands are conserved to the greatest extent possible. The Analysis Area contains desert saltbush scrub (a native desert habitat) in the southern parcel and in the eastern portion of the middle parcel, though it is not dense vegetation throughout these portions. LU-2.1.1 only applies to land outside the Village Core, but LU-1.1.1 would promote consolidating development away from areas of substantial native vegetation as much as possible during the development application phase. Policy LU-1.5.1 encourages the siting of new development in areas that will make optimum use of existing infrastructure. The Analysis Area is near the Town Center of the Village, with adjacent public roads and water lines, and in close proximity to the fire station and schools. While a number of issues in applicable policies would carry over to considerations in the design of future development, no clear inconsistencies have been found at this programmatic stand-alone GPA stage.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of three parcels totaling approximately 169 acres within the Village area of Borrego Springs. The proposed change from VR-2 to VR-4.3 is estimated to result in an increase of 389 potential dwelling units (estimated 337 potential units under the current designations and 726 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would instead change the entire Analysis Area to VR-2.9. This change is estimated to result in an increase of 152 potential dwelling units (estimated 337 potential units under the current designation and 489 under the Alternative Map).

The Proposed Project Map for DS8 was found to be inconsistent with General Plan Policies LU-1.1, LU-1.3, LU-1.9, LU-2.3, LU-2.4, and LU-6.2, as discussed earlier in this report. The Alternative Map for DS8 has also been determined to be inconsistent with each of these policies for the same reasons as noted for the Proposed Project Map option. As noted earlier, the Alternative Map would not keep any portion of the Analysis Area unchanged. Instead it would apply VR-2.9 over the entire Analysis Area which is a higher density than the existing VR-2, but lower than the VR-4.3 of the Proposed Project Map. This would still constitute a substantial increase in density of 152 potential units (total of 489 potential units), which



would further exacerbate the critical groundwater overdraft problem and hinder the upcoming Groundwater Sustainability Plan process. In addition, meeting requirements associated with the FTAW would also be questionable under this density. The Proposed Project Map was not found to be inconsistent with any other policies of the General Plan that are applicable to a stand-alone GPA/Rezone, nor was it found to be inconsistent with any policies of the Community Plan when considered at this programmatic stand-alone GPA/Rezone approach. The same would hold true for the lower density Alternative Map.



DS24 General Plan and Community Plan Conformance

The DS24 Analysis Area covers two parcels over approximately 169 acres in the western portion of the Borrego Springs Community Planning Area (CPA). The Analysis Area is located near the intersection of Borrego Springs Road and Country Club Road, approximately two miles south of Palm Canyon Drive. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the entire Analysis Area would change from SR-10 to SR-1. The Proposed Project Map would be estimated to increase the overall dwelling unit (DU) potential by 153 (total potential of 169 DU). An Alternative Map is also available for consideration, which would only change approximately 20 acres in the northeastern edge of the Analysis Area to SR-1, resulting in an estimated DU increase of 18 (total potential of 34 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

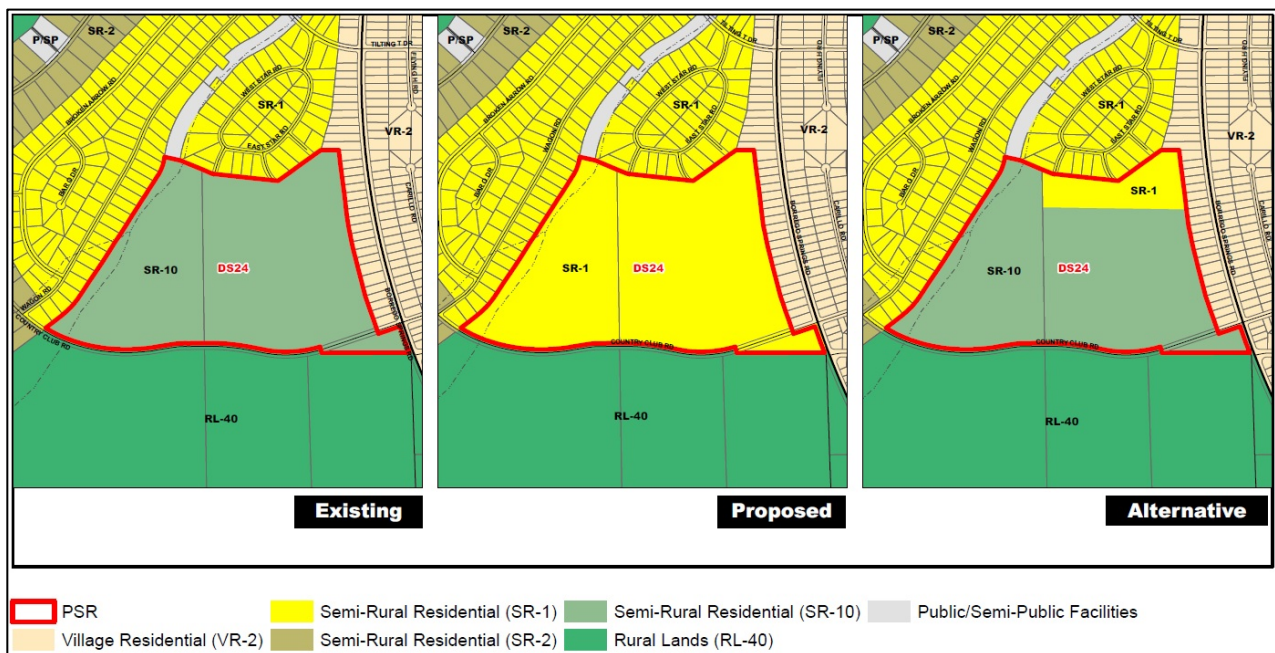


Figure 1: DS24 Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for



the Proposed Project map, a discussion of applicable Borrego Springs Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. Though Borrego Springs has grown as a popular winter/spring tourist destination with associated service sector jobs, retirement income continues to be a major source of income for the community. The closest major job center is in Escondido, approximately 60 miles away via road distance. A small portion of the southeastern end of the Analysis Area is adjacent to a County-maintained Mobility Element Road (Borrego Springs Road) and two additional public roads dead end at the northern end of the site (Lapped Circle Drive and Lightning Road). The public portions of Country Club Road terminate at the southwestern and southeastern edges of the site and along the southern perimeter of the site, Country Club Road is private (and currently dirt with a berm preventing use as a through road). The town center at Christmas Circle is approximately 2 miles north and SR-78 is approximately 10 miles south, via roads. There is a bus stop 2 miles away, on Palm Canyon Drive, though bus service only runs on Thursdays and Fridays (to and from El Cajon). The property is within the water service area for the Borrego Water District (BWD), but there is no current water service to the site or water infrastructure. The property is not within the sewer service area for BWD, but it is within the sewer service Sphere of Influence (SOI). The Analysis Area is served by the Borrego Springs Fire Protection District (BSFPD), and the station is approximately 2.5 miles away, with the 5-10 minute emergency response travel time estimated for most of the Analysis Area (General Plan standard of 5-minute maximum for SR-1 development; see the review of Policy S-6.4 in this report).

The Analysis Area is in a transition area between the previously subdivided areas of SR-1, SR-2 and VR-2 between the Analysis Area and the town center/Village core area and Rural Lands to the south and west. The site is less than a mile from State Park lands to the west and south. The land use mapping of these adjacent and nearby SR-1, SR-2 and VR-2 areas reflected pre-existing parcelization, as the existing lot sizes generally matched the densities applied. The majority of the parcels in these nearby areas of higher Land Use Map densities are vacant, but have access to existing public roads and water lines in the road right-of-way. In accordance with the parameters of the CDM and associated Guiding Principle 2, additional residential development should be directed to these parcels with existing infrastructure and



public road access, prior to increasing densities on large lot properties like DS24, in sensitive habitat lands and in close proximity to State Park lands. Overall, estimates show there are approximately 3,700 private unbuilt parcels in the CPA, and over 10,000 additional dwelling units would be possible in the CPA when adding vacant lots to the additional subdivision potential and multi-family potential on the current Land Use Map. This is well beyond the demand for housing in the CPA.

The greatest obstacle for increased residential development in the CPA is the reliance on groundwater. Per the requirements of the Sustainable Groundwater Management Act (SGMA), a Groundwater Sustainability Plan will soon be prepared for the Borrego Valley, in order to ensure long term groundwater sustainability. Early estimates indicate that groundwater use in the CPA will have to be reduced by approximately 70% in order to comply with the requirements of SGMA. The current overdraft situation presents a severe constraint, in terms of resources/services available for development.

Due to the reasons summarized above, the proposal to apply a density 10 times that of the existing allowed density for the site would not be in line with the parameters of the CDM, as outlined in Guiding Principle 2. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.1.**

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the DS24 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

*As discussed in the review of Policy LU-1.1, the land use mapping pattern in the area of the DS24 site generally reflected parcel sizes existing at the time of the General Plan Update. Nearby areas of higher densities include pre-existing parcel sizes that generally reflect the applied density. The majority of these nearby areas of higher density are vacant, but are adjacent to public roads and water lines. The DS24 site shares many similarities with the adjacent Rural Lands to the south and west, including large parcel sizes, sensitive habitats, high flood hazard, and close proximity to State Park lands; however, it serves as a low density Semi-Rural edge and transition area between the parcelized area of higher densities and this Rural Lands area. **The proposed change to SR-1 would not be in line with the existing land use mapping pattern in this area; therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.3.***

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:



Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the DS24 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The DS24 Analysis Area is approximately 14 miles from the border with Riverside County, 10 miles from the Los Coyotes Reservation, and less than a mile from State Park lands. Land use patterns in nearby jurisdictions are not used as primary precedents or justifications for consideration of the proposed land use designation change.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-1 designation applies a 1 unit per acre density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes (25% and greater); however, there are no steep slopes within the Analysis Area. The Proposed Project Map would be estimated to yield a total of 169 potential dwelling units over the whole Analysis Area. This amounts to an increase of 153 potential dwelling units, over the 16 potential units under the current General Plan.

As discussed in the review of Policy LU-1.1, the biggest obstacle to increased residential development in the CPA is the unsustainable pattern of groundwater use, in light of requirements associated with the SGMA. A Groundwater Sustainability Plan (GSP) and associated implementation plan will soon be prepared for the Borrego Valley to reduce groundwater use to a sustainable level. Estimates show that groundwater use will have to be reduced by approximately 70%. Such a drastic increase in potential density in this Analysis Area would likely require density reductions in other portions of the CPA in order to meet required reductions.

The site is mostly within the 100-year floodplain and the potential for particularly hazardous flooding is apparent, due to the confluence of west to east drainage flows associated with the alluvial fans of Dry Canyon, Tubb Canyon, Culp Canyon, and Loki Canyon. A County Department of Public Works (DPW)



brochure (“Guidelines for Flood Protection of Structures in Borrego Springs”) notes the Dry Canyon and Culp-Tubb Canyon complexes as specific sources of flash floods. A previous subdivision application (placed in “idle” status when the applicants chose not to move forward) seeking 148 lots under the previous General Plan designation (equivalent of SR-1) included a hydrology/drainage study which called for improvements to an existing off-site diversion dike and additional diversion structures, in addition to the proposed formation of a “Geological Hazard Abatement District” in order to construct regional flood control facilities. County staff noted that such a district must be formed prior to the approval of a Tentative Map (if relied on for satisfying flood control requirements of the TM), and it is apparent that there would be extensive opposition from nearby property owners to the formation of such a district. In addition, the offsite diversion dike is completely on private property with no maintenance easements, has been breached in recent heavy rain years, and is slowly naturalizing with the property owners not seeking to maintain it. Satisfying flood control requirements could limit feasibility of the proposed density.

The plans for the TM application relied on a Boundary Adjustment of 3.3 acres from an adjacent parcel to the south in order to connect Country Club Road and provide access to proposed new parcels in the western portion of the site; however, no Boundary Adjustment was submitted, nor any correspondence from the owner of the adjacent parcel, regarding willingness to sell a portion of the property. In addition, the further processing of the TM application required focused surveys for two California Species of Special Concern, the burrowing owl and the flat-tailed horned lizard. If surveys were to detect evidence of the presence of these species, additional requirements would be placed on a subdivision application, which could limit the available area that would be required to reach the density potential under SR-1.

These issues are anticipated to substantially limit the feasibility of reaching the density potential of 169 units. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.9.**

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The densities surrounding the DS24 site were developed with consideration of existing parcelization. There are only a few parcels in the VR-2, SR-1, and SR-2 areas near the DS24 site that have any additional subdivision potential. Issue LU-2.2 of the Community Plan calls for GPAs to consider the



number of existing vacant lots in the community. The majority of the lots in the areas of SR-2, SR-1, and VR-2 that are near the DS24 site (between the site and the Village core) are vacant. Estimates indicate there are approximately 3,700 vacant undeveloped lots in the CPA.

The Borrego Springs Community Plan also includes issue and policy references to the community character impacts of increased development on undisturbed desert vegetation (like the DS24 site), as opposed to fallowed agricultural lands and other previously cleared parcels. Page 8 of the Community Plan under d. Existing Land Uses and Community Character notes, “There is significant development pressure for housing and commercial development projects that are not consistent with our community character. Of special concern are those proposed plans that do not take the fragile ecosystem into account, or are sited on botanically-rich, native desert vegetation and which would significantly impact dark skies, scenic and vegetative elements of the community character.” In addition to the biological and erosion control values of the dense ocotillo forest in this Analysis Area, it is directly visible from County Scenic Highway Montezuma Valley Road, which is the main community entry road from the west, and from Borrego Springs Road, which is the main community entry road from the south. The aesthetic values of the native vegetation in the Analysis Area make it a draw for tourists, in addition to providing substantial aesthetic value to residents. This is a particularly significant issue because policy LU-2.3 was relied upon in the 2011 General Plan Update PEIR to reduce aesthetic impacts. All of these factors were considered in applying the current SR-10 designation on the property, which requires a Conservation Subdivision approach to facilitate clustering and maximize preservation. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-2.3.**

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

Preliminary estimates indicate that the CPA will have to function within a groundwater use limit of roughly 5,600 acre-feet per year as part of implementation of a Groundwater Sustainability Plan. If legally buildable vacant lots were developed with housing and additional density potential associated with the current General Plan were built out, it is estimated almost 6,000 acre feet of groundwater use per year would be added to the roughly 19,000 acre feet per year use now.

Though related to the groundwater issue, existing vacant lots is also a major issue onto itself, which the community has grappled with for some time. Based on analysis prepared for the General Plan Update Groundwater Study, estimates show that there were approximately 3,700 existing, private, unbuilt parcels in the Borrego Valley in 2007. Of those, it was estimated that approximately 3,200 had legal lot status. This excess supply of buildable vacant lots is discussed in the Community Plan (Issue 2.2) and limits justification for adding additional density and subdivision potential.

Another issue of importance to the community and discussed throughout the Community Plan is preservation of native desert habitat areas and favoring development of fallowed agricultural lands and other previously disturbed sites. The vegetation of the site is categorized as Sonoran creosote bush scrub. This classification includes ocotillos (*Fouquieria splendens*) and the site contains one of the densest concentrations of ocotillos in the Borrego Valley, outside the State Park. The site is also valued for its



aesthetic value and is directly visible from two main community entry roads, Montezuma Valley Road (a County Scenic Highway) and Borrego Springs Road.

Considering these issues, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is currently undeveloped and designated SR-10 so it is not in “very low density rural residential lands” as discussed in the greenbelts definition. There is an area of Rural Lands separating the Analysis Area from the state parks lands to the south and west. This Rural Lands area makes up the greenbelt (as discussed in the General Plan definition) for this area of Borrego Springs. Therefore, the Proposed Project Map for DS24 is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

*The vegetation of the site is categorized as Sonoran creosote bush scrub. This classification includes ocotillos (*Fouquieria splendens*) and the site contains one of the densest concentrations of ocotillos in the Borrego Valley. In addition to the limited recovery capabilities of this type of vegetation community, the removal of native vegetation in this area can have substantial impacts to air quality, as high winds are common. The site provides potential habitat for some sensitive species, including flat-tailed horned lizard and burrowing owl. The site is also near Recovery Region 7 (South San Ysidro Mountains) for the peninsular bighorn sheep which has the potential to visit the site from the nearby east-facing slopes, for foraging and for a seasonal water source. A drainage corridor (USGS blue line stream) is found on the western end of the Analysis Area.*

*In terms of natural resources, the greatest obstacle for increased development in this CPA is the reliance on groundwater. Per the requirements of SGMA, a GSP will soon be prepared for the Borrego Valley, in order to ensure long term groundwater sustainability. Preliminary estimates indicate that the CPA may have to reduce groundwater use by 70% or more as part of implementing a GSP. Estimates from the Groundwater Study of the General Plan Update showed over 10,000 additional dwelling units would be possible when adding legally buildable vacant lots to the additional subdivision and multi-family development potential in the current Land Use Map for the CPA. As such, increasing allowed density within the CPA would further exacerbate an already critical overdraft situation. **Considering these issues, the Proposed Project Map has been found to be inconsistent with Policy LU-6.2.***

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The Analysis Area is within a Moderate FHSZ. The estimated fire response travel time is currently estimated to be beyond the 5-minute General Plan standard. This will require confirmation during the subdivision application process, based on existing and proposed access roads at that time. The proposed designation is not inconsistent with the level of fire hazard in this area, though extensive access



improvements would be required for a subdivision. The site is mostly within the 100-year floodplain and the potential for particularly hazardous flooding is apparent, due to the proximity to the confluence of west to east drainage flows associated with the alluvial fans of Dry Canyon, Tubb Canyon, Culp Canyon, and Loki Canyon. The flood hazards and fire response times could prove challenging to mitigate during the development review process, and could render the proposed densities infeasible, as discussed in the review of Policy LU-1.9. However, a consistency finding can be made at this programmatic level, based on nearby designations of the same or slightly higher densities, with similar hazard constraints.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

The Analysis Area does not contain any agricultural operations or a recent history of agricultural operations. Therefore, there are no inconsistency issues with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

As noted in the language of the policy, LU-8.1 does not apply to the Borrego Valley; however, the current groundwater overdraft in relation to the SGMA process is discussed in multiple policy reviews of this report for the DS24 Analysis Area.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. *[See applicable community plan for possible relevant policies.]*

This policy is not applicable to the DS24 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the DS24 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the DS24 proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.



LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Townner Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Analysis Area is on the outer edge of the Semi-Rural area in this portion of the CPA. Given that the Analysis Area would not change the Semi-Rural Regional Category and the Rural Lands designated properties at the edge of the CPA in this portion would not change, there are no inconsistency issues with the policy.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the DS24 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the DS24 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential



mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

This policy is not applicable to the DS24 Analysis Area because it does not contain MRZ-2 or MRZ-3 lands.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

This policy is not applicable to the DS24 Analysis Area because it does not contain undeveloped ridgelines or steep hillsides. In addition, a Semi-Rural designation is proposed.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

*The Analysis Area is approximately two miles from the town center area of Borrego Springs. However, there are many vacant undeveloped lots between the Analysis Area and the Village. For the most part, the vacant parcels in this area already have the necessary road network and adjacent water lines to facilitate development (groundwater sustainability concerns notwithstanding), while the DS24 site lacks this existing infrastructure. In the context of this policy, decision-makers will consider the limited jobs in the community, the large number of vacant parcels and the limited demand for the additional density potential currently on the Land Use Map for this community. Estimates indicate there are approximately 3,700 vacant undeveloped lots in the community and over 10,000 additional dwelling units possible when adding the additional density potential currently on the Land Use Map to this estimate of vacant undeveloped lots. **Considering these factors and the fact that the Analysis Area is outside the Village and close to State Park lands, the Proposed Project Map has been found to be inconsistent with Policy COS-14.1.***

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The DS24 Analysis Area is not within a Village, not within a sewer service area, is not within close proximity to job centers, and most of it is estimated to be beyond the 0-5 minute emergency response travel time standard for SR-1. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.



APPLICABLE SAFETY ELEMENT POLICIES

- S-1.1 Minimize Exposure to Hazards.** Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

The Analysis Area is within the Moderate FHSZ. The fire response travel time is currently estimated to be beyond the 5-minute General Plan standard. This will require confirmation during the subdivision application process, based on existing and proposed access roads at that time. The site is mostly within the 100-year floodplain and the potential for particularly hazardous flooding is apparent, due to the proximity to the confluence of west to east drainage flows associated with the alluvial fans of Dry Canyon, Tubb Canyon, Culp Canyon, and Loki Canyon. These factors will be considered by decision makers, in the context of existing designations in this area. There are no dam inundation zones in the Analysis Area. A pre-quaternary (inactive) fault zone goes through a small portion of the site near the eastern boundary. The flood hazards and fire response times could prove challenging to mitigate during the development review process, and could render the proposed densities infeasible. However, a consistency finding can be made at this programmatic level, based on nearby designations of the same or slightly higher densities, with similar hazard constraints.

- S-6.4 Fire Protection Services for Development.** Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-1 designation is 5 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that most of the Analysis Area would be within the 5-10 minute travel time range. This current problematic estimate should be considered by decision-makers in light of the fire hazards; however, considering the standard requires review and consideration at the subdivision application stage, there is not a clear inconsistency with the policy at this stage.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless



specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County’s emergency response and evacuation plans.

S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

Policies S-9.4, S-9.6 and S-10.1 are not applicable to the DS24 Analysis Area because it does not contain a floodway or dam inundation zone and is not within a Village.

Policy S-9.2 and S-9.5 review: The Analysis Area is mostly within a FEMA alluvial floodplain, as discussed in the review of Policy LU-1.9. Building regulations address specific requirements for elevating structures above the base flood elevation, to allow residential development in the community without impeding flood flows. At this programmatic review level, the approach to evaluating policy consistency with these floodplain and floodway policies is similar to the approach of the General Plan Update. Considering the extent of the alluvial floodplain in the Community Planning Area, development review includes design considerations and mitigation to elevate structures above the base flood elevation, so that development of habitable structures is still possible. However, reaching the density potential is questionable, as discussed in the review of Policy LU-1.9. Considering the higher density designations applied during the General Plan Update in areas of the community with similar alluvial floodplain constraints, a finding of consistency with these policies can be made at this programmatic stand-alone GPA stage.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

*A few policies of the Community Plan have been considered for the Proposed Project because they are applicable to a stand-alone GPA/Rezone and have a purpose that is related to the proposal. Community Plan policy LU-2.1.1 discourages development on undisturbed and substantially undisturbed desert native habitat lands outside the Village Core. Policy LU-1.1.1 follows along these guidelines by ensuring these types of undisturbed desert native habitat lands are conserved to the greatest extent possible. The Analysis Area contains Sonoran creosote bush scrub, including a dense concentration of ocotillos, with the potential to host multiple sensitive species, as discussed in the review of Policy LU-6.2. In the proposed change from SR-10 to SR-1, the DS24 Analysis Area proposal would remove the Conservation Subdivision requirements from the site and allow a density ten times what is allowed now. **Therefore, the Proposed Project Map has been found to be inconsistent with Community Plan Policies LU-2.1.1 and LU-1.1.1.** Policy LU-1.5.1 encourages the siting of new development in areas that will make optimum use of existing infrastructure. As discussed in the review of General Plan Policy LU-1.1, there is an area of SR-*



1, SR-2, and VR-2 properties between the Analysis Area and the town center. The majority of these parcels are vacant, but they are adjacent to public roads and water lines, and are in closer proximity to the fire station. **These issues are considered in combination with the lack of demand for additional lots in the CPA and the critical groundwater overdraft, in determining that the Proposed Project Map is also inconsistent with Community Plan Policy LU-1.5.1.**

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of two parcels totaling approximately 169 acres in the western portion of the CPA. The proposed change from SR-10 to SR-1 is estimated to result in an increase of 153 potential dwelling units (estimated 16 potential units under the current designation and 169 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would only change the northeastern approximately 20 acres to SR-1, leaving the rest at SR-10. This change is estimated to result in an increase of 18 potential dwelling units (estimated 16 potential units under the current designation and 34 under the Alternative Map).

The Proposed Project Map for DS24 was found to be inconsistent with General Plan Policies LU-1.1, LU-1.3, LU-1.9, LU-2.3, LU-2.4, LU-6.2, and COS-14.1, and Community Plan Policies LU-1.1.1, LU-2.1.1 and LU-1.5.1 as discussed earlier in this report. The Alternative Map for DS24 has also been determined to be inconsistent with each of these policies, except General Plan Policies LU-1.9 and COS-14.1, for the same reasons as noted for the Proposed Project Map option. The issues of excessive amounts of unbuilt available density in the community (existing buildable vacant lots, additional subdivision potential, and additional multi-family development potential on the current Land Use Map), and forthcoming reductions in groundwater use present difficult hurdles to overcome with regard to making community character consistency findings for increasing densities. Beyond groundwater resources, the highly sensitive habitats within DS24 are discussed in the review of LU-6.2 for the Proposed Project Map, and this issue remains with the Reduced Density Alternative Map, as the sensitive habitats are also within the SR-1 area of the Reduced Density Alternative Map. At this programmatic stand-alone GPA/Rezone stage, a consistency finding can be made for General Policy LU-1.9, as most of the portion that would change to SR-1 in that option would be out of the alluvial floodplain and most of the site would remain SR-10, which greatly reduces the unit potential and leaves more room for potential open space preservation requirements. In addition, a consistency finding can be made for General Plan Policy COS-14.1, as the much smaller area of SR-1 would be adjacent to existing homes, two public roads, and on the side closest to the Village and fire station. The Proposed Project Map was not found to be inconsistent with any other policies of the General Plan that are applicable to a stand-alone GPA/Rezone, nor was it found to be inconsistent with any other policies of the Community Plan when considered at this programmatic stand-alone GPA/Rezone approach. The same would hold true for the much lower density Alternative Map.



FB2+ General Plan and Community Plan Conformance

The FB2+ Analysis Area covers 23 parcels over approximately 491 acres in the eastern portion of the Fallbrook Community Planning Area (CPA). The Analysis Area is adjacent to SR-76/Pala Road and the San Luis Rey River, just over a mile east of I-15, and it is accessed via Rice Canyon Road, which bisects the Analysis Area. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from a combination of RL-40 and RL-20 to a combination of RL-20 and SR-4. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 16 (total potential of 42 DU). An Alternative Map is also available for consideration, which applies RL-20 over the entire Analysis Area (only changing the portion that is currently RL-40), resulting in an estimated DU increase of 11 (total potential of 37 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 6 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

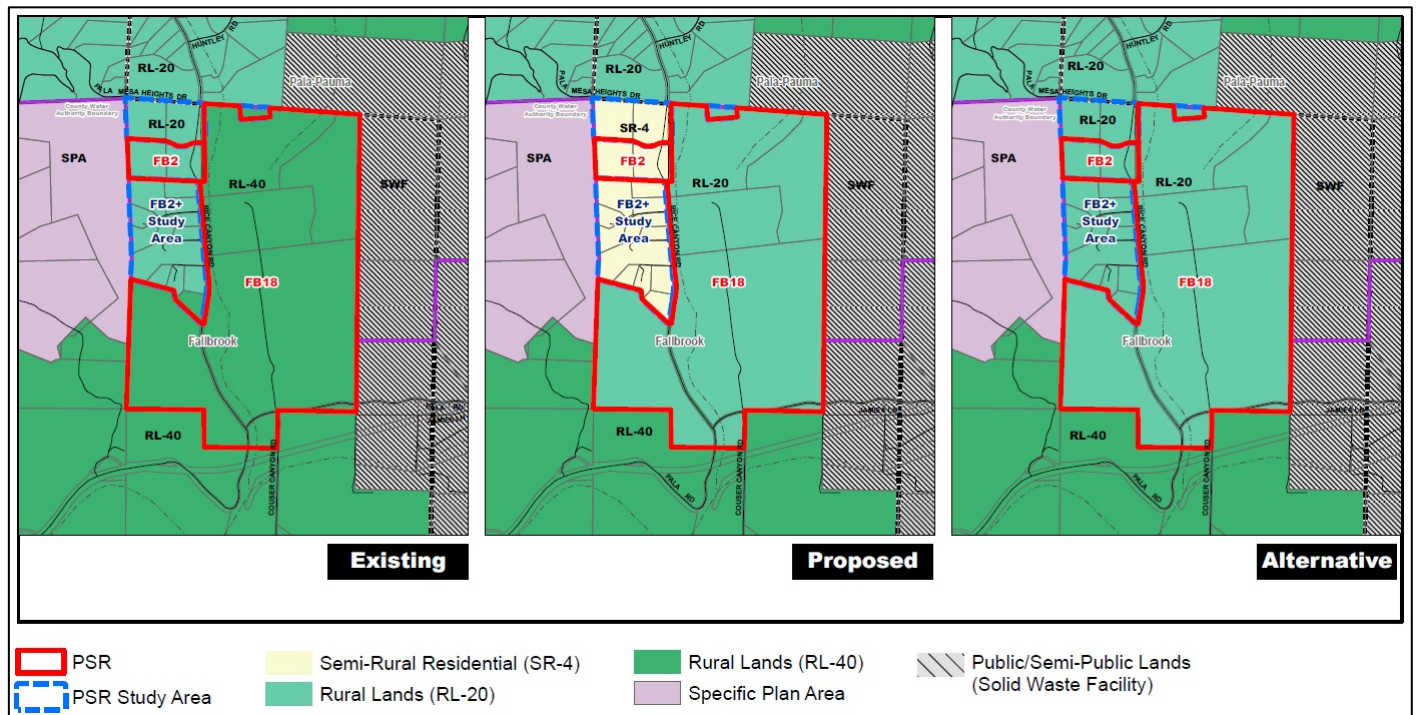


Figure 1: FB2+ Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Fallbrook Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 14 miles from the geographic center of Escondido and 19 miles from the geographic center of Carlsbad, with an estimated 44,289 jobs and 67,713 jobs, respectively. Much smaller job centers are closer in the Fallbrook Village and tribal casinos along the SR-76 corridor. The proposed densities (relatively low) would not be out of line with the distance to jobs. The portion proposed for SR-4 is within the water service area for the Rainbow Municipal Water District. The portion proposed for RL-20 is groundwater dependent. No sewer service is available. The entire Analysis Area is within the fire protection jurisdiction of the County Fire Authority, with the closest station approximately 15 miles east at SR-76 and Valley Center Road. The estimated 20-minute emergency response travel time to the site would be sufficient for the proposed RL-20 portion, but not for the proposed SR-4 portion. The public road access of SR-76 on the southern end of the Analysis Area and Rice Canyon Road through the middle provide a solid existing framework and would limit the needed length of additional access roads to support subdivisions.

The Analysis Area is currently entirely within the Rural Lands Regional Category and the Proposed Project Map would require changing the western portion (SR-4 proposed portion) to the Semi-Rural Regional Category. The closest Semi-Rural designations on this east side of the I-15 are just over a mile away to the northwest, and approximately two miles away to the south and southeast. The site is in the outer ring of the Fallbrook CPA. The northern portion is adjacent to the Pala-Pauma Subregional Planning Area boundary. On the east, the site is ¼ mile from the Pala-Pauma boundary, separated by an area of steep slopes and sensitive habitats. As such, the makes up part of the “greenbelt” community buffer of very low density residential, agriculture, and open space (see the LU-2.5 review). This type of community



buffer is found throughout the entire northern portion of the Fallbrook CPA and almost all of the eastern portion. Most of this area of the County is Rural Lands, including over 20,000 acres directly north and south of the Analysis Area. These Rural Lands areas contain many large lots of agricultural uses, including over 1,800 acres of Williamson Act contract lands for agriculture preservation. The Analysis Area is in close proximity to the Campus Park-Meadowood development node in the area of the I-15/SR-76 interchange. Upon build out, these specific plan areas will include commercial, office, and residential (in addition to open space preserves and agricultural preserves), with overall residential densities between 2 to 2.5 units per acre. Separating the Analysis Area from these areas of the specific plans to be developed is a mountainous 130-acre area of biological open space preserve and a 50-acre agricultural preserve. Just south of these areas and adjacent to the southwestern end of FB18 is the Rosemary's Mountain Quarry.

*While the nearby area of higher specific plan densities warrants consideration, **the physical separation from this area, considerations of consistency with adjacent rural uses/densities, the limited infrastructure, and the lack of nearby Semi-Rural designations lead to a conclusion that the proposed area of SR-4 in the Proposed Project Map would be inconsistent with the CDM and Policy LU-1.1.***

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the FB2+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

*As discussed above, most of this area on the eastern end of the Fallbrook CPA is designated Rural Lands, including approximately 20,000 acres directly north and south of the Analysis Area. The closest Semi-Rural designations on this east side of the I-15 are just over a mile away to the northwest, and the town center area of Fallbrook is just over 7 miles away, via roads. The Analysis Area is separated from higher densities in the Specific Plan areas of Campus Park and Meadowood by a mountainous area of biological and agricultural preserves. **Changing the western portion of the Analysis Area to the SR-4 designation would not fit the existing land use mapping pattern and would not serve to preserve rural lands in this outer ring of the Fallbrook CPA; therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.3.***

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding



Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the FB2+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is approximately five miles from the border with Riverside County and two miles from the Pala Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with FB2+.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-4 designation for the western portion applies a 1 unit per 4 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. The RL-20 designation proposed for the rest of the Analysis Area is not slope-dependent and allows a density of one unit per 20 acres. Using a GIS slope model for mapping areas of steep slope in the SR-4 proposed portion, it is estimated that 42 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential), based on the proposed area of the two designations. This policy review will include separate discussions of the area proposed for RL-20 and the area proposed for SR-4, as they have some key differences, beyond just the designation proposed.

The area proposed for RL-20 is approximately 392 acres. With consideration of most of the parcels in common ownership (just one Study Area parcel) and the existing parcelization, it is estimated that a total of 20 lots would be possible under the proposed RL-20 (an increase of 10 potential dwelling units over the current density). The Study Area parcel on the northern end of the RL-20 proposed area is developed with a residence and would not have any subdivision potential with the proposed change. The existing zoning minimum lot size of 8 acres is the same as the Groundwater Ordinance minimum lot size for this groundwater dependent portion, and it provides some flexibility in subdivision design, in order to meet Conservation Subdivision requirements (which apply in RL-20). The Conservation Subdivision approach requires consolidating development to the maximum extent practicable, for habitat preservation considerations (in addition to preservation of agriculture and cultural resources in applicable situations) and to maximize fire protection without unnecessary impacts to resources. With the Conservation



Subdivision requirement and PAMA designation in the Draft NCMSCP, it's likely that the steep hillsides of coastal sage scrub and chaparral (on the southwestern and eastern ends of the FB18 area) would require preservation, in order to maintain the wildlife corridors in these areas. In addition to those areas, and development would have to avoid the floodplain of the San Luis Rey River in the far southern end. The development footprint could be consolidated in the previously graded areas east of Rice Canyon Road and north of the existing residence in the southern end. The areas adjacent to Rice Canyon Road on the northern end of FB18 include a small riparian corridor that would likely be classified as a wetland, but it's not likely the wetland delineation there would continue beyond 1/3 mile south of the northern border of FB18. As such, multiple access roads would likely be feasible, leading east from Rice Canyon Road. Dead end roads can be up to a half mile long in this area of 8 acre zoning minimum lot sizes, and Fire Marshal consideration of the applicable density could potentially allow dead end roads of longer length (up to one mile), so as to minimize the new roads required. With almost 2/3 of the FB18 area previously graded and cleared, required fire clearing for development pads would be feasible in the central portion and would not have to encroach into native habitat areas on the southwestern and eastern ends of the FB18 portion. As steep slopes are limited to approximately 130 acres (of the 392 acres total) of the FB18 portion, mostly consolidated on the southwestern and eastern ends, Resource Protection Ordinance (RPO) steep slope encroachment restrictions would not make the density potential infeasible in this portion proposed for RL-20.

Reaching the density potential in the area proposed for SR-4 is likely feasible, but there are some concerns to note with regard to the FB2 PSR parcels and the two Study Area parcels adjacent to FB2 on the north. In the Study Area parcels south of FB2, only one would have additional subdivision potential associated with the proposal, and that parcel has previous grading and clearing throughout most of the parcel, associated with existing agricultural and residential uses. The current emergency response travel time is estimated at 20 minutes. This would be sufficient to meet the General Plan standard for the RL-20 proposed portion, but not the SR-4 proposed portion. As this would verification at the development review stage, it would not automatically lead to an inconsistency finding with LU-1.9 for feasibility concerns, but it should be considered in relation to other issues.

The FB2 PSR parcels are approximately 10 acres each, with about half of the acreage in steep slopes. They are situated on the eastern slope associated with Monserate Mountain. Per the RPO requirements, only 10% encroachment would be allowed in the steep slope areas. This portion is in a water service area and the proposed 2-acre zoning minimum lot size would allow the flexibility to consolidate residential footprints in the northeastern portion with less steep slope and close to the public road. The PAMA designation in the Draft NCMSCP and the likelihood of the habitat of the FB2 site to host sensitive species covered in the Draft NCMSCP (critical section of the wildlife corridor) will limit the potential location of housing pads. See the review of Policy LU-6.2 for additional information. The situation on the side of the mountain (surrounded by dense native vegetation) increases the fire hazard, so it's possible that clearing even beyond 100 feet of structures would be required, increasing potential impacts to habitat.

Within the two large Study Area parcels north of the FB2 PSR parcels there are a couple small areas of previous clearing, but for the most part, the two large parcels are very similar to the PSR parcels, in terms of potential density feasibility issues. These Study Area parcels along with the FB2 PSR parcels are adjacent to an approximately 130-acre area of biological open space of the Meadowood Specific Plan, so no structures would be allowed within 100 feet of that area (possibly more than 100 feet if additional



clearing is required, due to the particularly hazardous location). The 130-acre biological conservation area is adjacent to an approximately 50-acre agricultural conservation area further west of that.

These issues discussed above will limit the location of housing pads and restrict the overall design of subdivisions in the Analysis Area, particularly to address issues associated with sensitive habitats, wildlife corridors, and fire hazards. However, future applications could be designed to address these constraints and consolidate new development for maximum extent possible. Therefore, inconsistencies with Policy LU-1.9 have not been found.

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The Analysis Area is in an area of many large agricultural operations, including extensive Williamson Act contract lands; however, to the west is an area of higher planned densities within the Campus Park and Meadowood Specific Plan Areas. The Analysis Area is separated from these Specific Plan areas by a mountainous area of biological preserves and agricultural preserves. As there are already extensive Rural Lands designations in this area, potential community character concerns would be limited to the area proposed for SR-4, which is on a hillside mostly surrounded by open space preserves and undeveloped areas. Though the LU-2.3 language is somewhat open for interpretation, requiring the judgement of decision-makers in policy consistency, these issues will be taken into consideration. Though the area proposed for SR-4 would pose some inconsistency issues with existing mapping patterns and the CDM (as discussed in the review of Policies LU-1.3 and LU-1.1), consideration of the nearby Specific Plans of higher densities suggest there is not a clear inconsistency with community character and therefore not a clear inconsistency with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

See the review of Policy LU-2.3 for a discussion of community character issues. In terms of development objectives, a community-specific planning rationale developed for Fallbrook during the General Plan Update (in Board Letters) was to map Rural Lands designations in environmentally sensitive lands



surrounding the San Luis Rey and Santa Margarita Rivers. The San Luis Rey River runs through the southern end of the Analysis Area. The Analysis Area includes areas of floodplain, wetlands, riparian vegetation and coastal sage scrub vegetation with adjacent habitat corridor connections. The adjacent and nearby areas include large areas of preserved lands to the west and northwest, and very low density residential with limited development footprint to the north. Adding an area of Semi-Rural within this critical corridor connection to the San Luis Rey River would not be in line with protecting Rural Lands remaining near the San Luis Rey River. Guiding Principle 2 is one of the key Principles influencing the land use mapping process, and calls for mapping in consideration of the CDM and proximity to infrastructure, services, and jobs. Policy LU-1.1 is an important step in considering the CDM in review of GPA proposals. The Proposed Project Map was found to be inconsistent with LU-1.1, due to issues associated with the portion proposed for SR-4. **Considering this and adherence to development objectives for Fallbrook during the General Plan Update, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.**

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area currently has Rural Lands designations (RL-20 and RL-40) and is partially at an edge of the Fallbrook CPA. The northern end of the area proposed for SR-4 is at the edge of the community with ideal wildlife corridor potential as it is adjacent to over 1,000 acres of undeveloped similar native habitat to the north and northwest (with the majority in open space preserves). This area proposed for SR-4 is also within a Pre-Approved Mitigation Area (PAMA) of the draft North County MSCP. The Alternative Map would maintain the current RL-20 designation in the area proposed for SR-4, while including the change from RL-40 to RL-20 in the other portion. **As the Proposed Project Map would change an area of sensitive habitat at the edge of the Fallbrook community from Rural Lands to Semi-Rural (with additional density potential under the proposal), the Proposed Project Map for FB2+ has been determined to be inconsistent with Policy LU-2.5.**

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

The central portion of this Analysis Area (much of the FB18 portion) has been previously cleared and graded for agricultural uses. The hillsides on the eastern and western edges of the Analysis Area contain coastal sage scrub and chaparral vegetation communities with minimal existing development. Most of the western hillside portion that includes the FB2 PSR and associated Study Area parcels is proposed for SR-4. With most of the Analysis Area in the PAMA of the draft North County MSCP, this portion would have the best wildlife corridor potential as it is adjacent to over 1,000 acres of undeveloped similar native habitat to the north and northwest (with the majority in open space preserves). The Alternative Map would keep the RL-20 in the area proposed for SR-4, while changing the remainder with a high level of existing graded footprint, from RL-40 to RL-20. **As the Proposed Project Map would place the highest density (SR-4) in the area that would serve as the most critical wildlife corridor of the Analysis Area, the Proposed Project Map has been found to be inconsistent with Policy LU-6.2.**

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.



Most of the extent of the previously graded central portion of the Analysis Area that is used for agriculture is in the Moderate Fire Hazard Severity Zone (FHSZ). The hillsides on the western and eastern portions along with ungraded portions on the northern end are in the Very High and High FHSZs. For fire protection, the Analysis Area is under the County Fire Authority with the closest station located approximately 15 miles east on SR-76 with an estimated 20-minute travel time, which would be sufficient for the RL-20 proposed portion, but would not meet the 10-minute standard for the SR-4 proposed portion. This would be reviewed at the subdivision application stage, based existing and proposed roads and fire protection infrastructure available at that time. In considering fire protection infrastructure, the Analysis Area has a good public road network for this area of Fallbrook, with SR-76 traversing through the southern portion of the Analysis Area and Rice Canyon Road traversing through the western portion (separating the area proposed for SR-4 from the area proposed for RL-20). In addition to fire hazards, the floodplain and dam inundation zones along the San Luis Rey River encroach into the southern portion of the Analysis Area; however, the allowed density associated with the Proposed Project could likely be achieved with complete avoidance of these areas. **Considering the high fire hazards in the area proposed for SR-4, the limited fire clearing in that area, and the emergency response travel time being beyond the SR-4 standard, the Proposed Project Map has been found to be inconsistent with Policy LU-6.11.**

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing



one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for FB2+: The Analysis Area contains a large agricultural operation in the central portion proposed for RL-20, which is a density low enough to support continued agricultural operations. A couple smaller agricultural operations (combined with residential uses) are found in the Study Area portion proposed for SR-4, which would also not be anticipated to conflict with continued agricultural operations, due to the reasons noted above for consideration of an SR-2 threshold used for this policy. Therefore, the Proposed Project Map for FB2+ has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

The FB18 portion of the FB2+ Analysis Area (portion currently designated RL-40 and proposed for RL-20) is outside the County Water Authority boundary and is groundwater dependent. The average annual precipitation for this area is 15 to 18 inches. Per the County's Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 8 acres. The proposed RL-20 density would not be inconsistent with this minimum lot size requirement. Though additional groundwater analysis may be required at the development review stage, a finding of Policy LU-8.1 consistency can be made at this programmatic level.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the FB2+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the FB2+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the FB2+ proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.



LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Towner Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Proposed Project Map for FB2+ does not pose a clear inconsistency with LU-10.3 at this programmatic land use mapping level because there is a Village Regional Category adjacent to the portion of the Analysis Area proposed for SR-4, but not a Village boundary, and the area of the Specific Plan (associated with the Village Regional Category) adjacent to the Analysis Area is a mountainous area of open space preserve and agricultural preserve. On the flip side of this adjacency on the west, the northern edge of the Analysis Area (including the northern edge of the area proposed for SR-4) is at the edge of the community.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the FB2+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the FB2+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).



APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The southern portion of the Analysis Area (approximately 200 acres) includes some MRZ-2 lands and the corresponding 1,300-foot buffer from MRZ-2. All of this area is proposed for an RL-20 designation, which is low enough so as not to preclude a future mining operation. Therefore, the Proposed Project Map for FB2+ has been found to be consistent with Policy COS-10.2.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a combination of Semi-Rural 4 and Rural Lands 20 is proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is approximately 1.5 miles road distance from a planned Village in the area of the SR-76/I-15 interchange; however, this new Village will be more limited in terms of services and jobs than the main Village of Fallbrook, which is over six miles away. The closest current transit stop, park-and-ride facility, and commercial area (convenience-type commercial) are also in the area of the SR-76/I-15 interchange. As discussed previously, the portion of the Analysis Area proposed for SR-4 will be under the most scrutiny for a number of policies, as Rural Lands designations are most prevalent in this area of large lots and agricultural operations, which is separated from the higher densities planned in the SR-76/I-15 interchange by a mountainous area of open space preserves and agricultural preserves. Considering the language of the Policy, the Proposed Project Map for FB2+ has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas



outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The FB2+ Analysis Area is not within a Village, is not within a sewer service area, and the majority of the acreage of the Analysis Area is groundwater dependent. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

Most of the extent of the previously graded central portion of the Analysis Area that is used for agriculture is in the Moderate FHSZ. The hillsides on the western and eastern portions along with ungraded portions on the northern end are in the Very High and High FHSZs. For fire protection, the Analysis Area is under the County Fire Authority with the closest station located approximately 20 miles east on SR-76 with an estimated 20-minute travel time, which would be sufficient for the RL-20 proposed portion, but would not meet the 10-minute standard for the SR-4 proposed portion. As discussed previously, this would be reviewed at the subdivision application stage. In considering fire protection infrastructure, the Analysis Area has a good public road network for this area of Fallbrook, with SR-76 traversing through the southern portion of the Analysis Area and Rice Canyon Road traversing through the western portion (separating the area proposed for SR-4 from the area proposed for RL-20). In addition to fire hazards, there is a pre-Quaternary (inactive) fault zone within the northwest corner of the Analysis Area; the floodplain and dam inundation zones along the San Luis Rey River encroach into the southern portion of the Analysis Area; however, the allowed density associated with the Proposed Project Map could be achieved with complete avoidance of these areas. Therefore, a consistency finding can be made.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-4 designation (in most of the western portion) is 10 minutes. The maximum allowable emergency response travel time for the proposed RL-20 designation (in the rest of the Analysis Area) is 20 minutes. The entire Analysis Area is under the jurisdiction of the County Fire Authority and the Fire Marshal estimates the travel time to the Analysis Area would be approximately 20 minutes from their nearest station, approximately 15 miles away at 16791 Highway 76. This current problematic estimate should be considered by decision-makers in light of the fire hazards; however, considering the standard requires review and consideration at the subdivision application stage, there is not a clear inconsistency with the policy at this stage.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.



- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

Policy S-9.4 is not applicable because the Analysis Area is not within a Village and no Village designations are proposed.

Approximately 28 acres in the southern portion of the Analysis Area is within a FEMA and County-mapped floodplain. Approximately 6 acres of this area is also part of a County-mapped floodway, and approximately 26 acres of this area is also part of a dam inundation zone. The entire area covered by these constraints is proposed for RL-20 and the lot size flexibility would facilitate meeting the density potential for the RL-20 area while completely avoiding the floodplain (including floodway) and dam inundation zone. Therefore, a finding of consistency can be made for FB2+ at this programmatic land use mapping stage, in relation to Policies S-9.2, S-9.5, S-9.6, and S-10.1.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

As mentioned above, the FB2+ Analysis Area is within the Fallbrook Community Planning Area (CPA). Though most of the policies of the Community Plan are focused on considerations in review of development design, there are a few policies of the Community Plan that could be applied to a stand-alone GPA/Rezone. Policy LU 2.1.6 calls for minimum lot sizes to be no less than a half-acre in the Semi-Rural Regional Category and one acre in the Rural Lands Regional Category. The proposed minimum lot



sizes associated with the Proposed Project Map (and the Alternative Map) would not be in violation of this policy. Policy 2.1.4 encourages country estates which combine agricultural and residential uses. See the reviews of General Plan Policy LU-7.1 for a discussion of the proposal in relation to preserving agriculture. The proposed designations would be able to facilitate country estates which combine agricultural and residential uses, not conflicting with the potential for continuing agricultural operations. Policy LU 2.4.7 seeks to limit development of steep slopes to agriculture and very low density residential and allowing clustering in flatter areas only. Per the County's Resource Protection Ordinance (RPO) requirements and considering the percentage of steep slopes in the Analysis Area, subdivisions in the Analysis Area would be limited to 10% development footprint encroachment into steep slopes, so there are no policy inconsistency issues at this programmatic stage. Policy COS-1.2.1 encourages floodplains and natural stream courses to be preserved in permanent open space and uses limited to recreational or light agricultural uses. Though this policy is geared toward review of development projects, at this stand-alone GPA/Rezone level, a policy review can consider changes in zoning use regulations within these areas. FB2+ does not include proposals for changes in zoning use regulations, so the allowed uses would not change. Therefore, there are no policy inconsistency issues with the Fallbrook Community Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 23 parcels covering approximately 491 acres in the eastern portion of the planning area. The proposed change from a combination of RL-40 and RL-20 to RL-20 and SR-4 is estimated to result in an increase of 16 potential dwelling units (estimated 26 potential units under the current designations and 42 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would change the current RL-40 portion to RL-20, while leaving the current RL-20 portion at RL-20 (resulting in RL-20 over the entire Analysis Area). This change is estimated to result in an increase of 11 potential dwelling units (estimated 26 potential units under the current designation and 37 under the Alternative Map).

The FB2+ Proposed Project Map was found to be inconsistent with General Plan Policies LU-1.1, LU-1.3, LU-2.4, LU-2.5, LU-6.2, and LU-6.11, as discussed earlier in this report. A common theme of these inconsistency findings was the proposed designation of SR-4 in the western portion under the Proposed Project Map. As discussed in the findings, that portion is the most hazardous from a fire perspective (on a hillside of mostly native vegetation mostly surrounded by preserves and other undeveloped land; estimated beyond emergency response travel time standard for SR-4), it is in the most critical portion from a wildlife corridor perspective (over 1,000 acres of adjacent undeveloped native habitat; majority in preserves), and would not follow the existing land use mapping of Rural Lands in this area at the edge of the CPA. The Alternative Map would maintain the RL-20 in that portion and only change the portion currently RL-40 to RL-20, leaving the whole Analysis Area in Rural Lands. Therefore, the Alternative Map for FB2+ has been determined to be consistent with these policies.

The Proposed Project Map for FB2+ was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezoning. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Fallbrook Community Plan. The



ATTACHMENT: C
PSRS GPA GENERAL PLAN CONFORMANCE – FB2+ ANALYSIS AREA

Alternative Map for FB2+ would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Fallbrook Community Plan.



FB17 General Plan and Community Plan Conformance

The FB17 Analysis Area covers 6 parcels over approximately 107 acres in the eastern portion of the Fallbrook Community Planning Area (CPA). The Analysis Area is adjacent to Reche Road on the south, Ranger Road on the east, and is approximately ½ mile west of I-15. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from SR-2 to a combination of SR-1 and SR-2, with the proposed SR-1 covering the eastern portion and the majority of the Analysis Area. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 33 (total potential of 82 DU). An Alternative Map is also available for consideration, which would only change the northeastern portion of the Analysis Area to SR-1 (approximately 27 acres), resulting in an estimated DU increase of 15 (total potential of 64 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

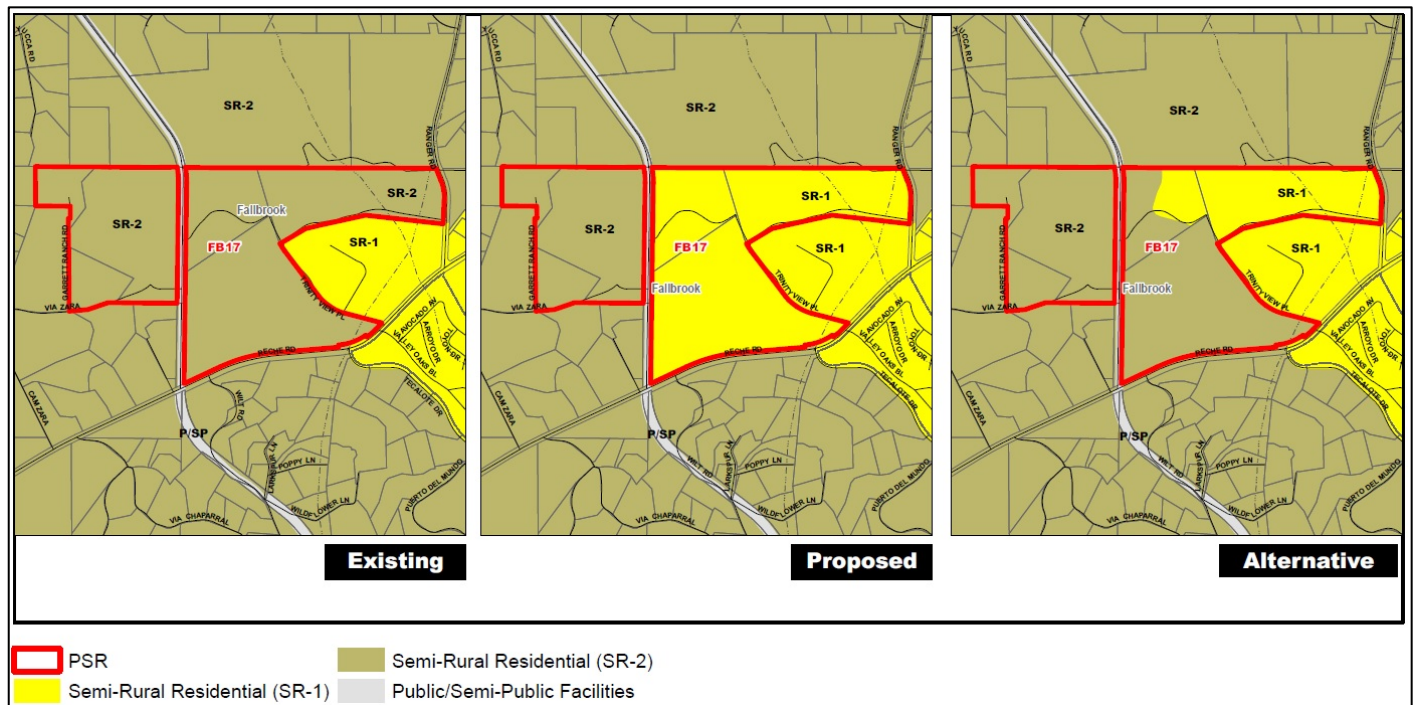


Figure 1: FB17 Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Fallbrook Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 15 miles from the geographic center of Escondido and 19 miles from the geographic center of Carlsbad, with an estimated 44,289 jobs and 67,713 jobs, respectively. Much smaller job centers are closer in the Fallbrook Village and tribal casinos along the SR-76 corridor. The proposed densities would not be out of line with the distance to jobs. The Analysis Area is in the water service area for the Rainbow Municipal Water District (RMWD) and five of the six parcels have current meter service. No sewer service is available, but the RMWD sewer service area is adjacent to the site. The entire Analysis Area is within the North County Fire Protection District (NCFPD), with the closest station approximately three miles south (via road distance) at 4375 Pala Mesa Drive. Almost all of the site is estimated to be within the 5-10 minute emergency response travel time (see the review of Policy S-6.4). Adjacent public roads are available on the south (Reche Road) and on the east (Ranger Road), though constraints could limit the feasibility of new access to Reche Road (see the review of Policy LU-1.9). The closest I-15 freeway on-ramp is only 1.5 miles away via road distance.

The Analysis Area is currently within the Semi-Rural Regional Category, which covers most of the Fallbrook Community Planning Area (CPA). Surrounding to the north, south, and west are SR-2 designated lands. On the east is an area of SR-1 and slightly higher densities to the southeast, which are in the sewer service area. The Pala Mesa Specific Plan Area to the southeast is within the Village Regional Category with an overall density of 1.3 units per acre, and certain portions with a neighborhood density of 2.5 to 5 units per acre. Given the proximity to that area, it would be considered in a CDM evaluation and there is not a clear inconsistency with Policy LU-1.1.



- LU-1.2 Leapfrog Development.** Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See *applicable community plan for possible relevant policies.*]

This policy is not applicable to the FB17 proposals (Proposed or Alternative Map) because no Village designations are proposed.

- LU-1.3 Development Patterns.** Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

The vast majority of the CPA outside the Village boundary and south of the Santa Margarita River is currently designated SR-2 (over 12,000 acres). Almost all of this area of SR-2 was an equivalent designation density under the former General Plan, so the density was carried forward in the 2011 General Plan Update for most of the area of current SR-2. The SR-2 pattern reflects the community's desired combination of residential and agricultural uses. As discussed above there is an area of Village Regional Category in the area of the Pala Mesa Specific Plan, starting approximately ½ mile to the southeast. Though adjacent areas of SR-1 are mostly within the RMWD sewer service area (while FB17 is not), considering the adjacency to SR-1 and proximity to a Village Regional Category, a consistency finding can be made for Policy LU-1.3.

- LU-1.4 Village Expansion.** Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

- Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding
- Potential Village development would be accommodated by the General Plan road network
- Public facilities and services can support the expansion without a reduction of services to other County residents
- The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the FB17 proposals (Proposed or Alternative Map) because no Village designations are proposed.

- LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions.** Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.



The Analysis Area is approximately 13 miles from the border with Riverside County and five miles from the Pala Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with FB17.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-1 designation for the eastern end (majority of the Analysis Area) applies a 1 unit per acre density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. The same applies for the SR-2 proposed to remain in the western portion, with a 1 unit per 2 acres density applied only in the areas of less than 25% slope. Using a GIS slope model for mapping areas of steep slope, it is estimated that 82 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential), based on the proposed area of the two designations.

The two large parcels in the central portion would present the most feasibility challenges. There are approximately 17 acres of estimated wetlands in the area proposed for SR-1, with most of this acreage in the central portion, with estimated wetlands along the Reche Road frontage and a wetland corridor also running diagonally northwest-southeast through the central portion. Exact wetland extents would be delineated during the development application process and buffers of 50 to 200 feet would be required from delineated wetlands. Though a single road crossing of a wetland may be possible under certain necessary Resource Protection Ordinance (RPO) findings (in addition to other necessary federal, state, and local permit requirements, depending on the wetland delineation and the proposed impact), additional development footprint would not be allowed to encroach in wetlands or buffers, including septic systems/leach fields. In addition, the location of some steep slopes in between areas of estimated wetlands in the central portion presents additional feasibility issues. The maximum encroachment into steep slopes (per the RPO) for the Analysis Area would be 10%. Addressing these constraints would require clustering to the maximum extent allowed; however, clustering options will be limited due to the lack of sewer service for the site. **Considering these factors, the Proposed Project Map has been determined to be inconsistent with Policy LU-1.9.**

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands



LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

Most of the Fallbrook CPA in this area between the Village and I-15 is designated SR-2, including the Analysis Area. The Analysis Area is adjacent to an area of SR-1; however, most of that SR-1 area is within a sewer service area, while the Analysis Area is not. The Fallbrook Community Plan encourages 'country estates' which combine residential and agricultural uses and are prevalent in this portion of the CPA. Some judgement is required in determining whether this pattern of development would be maintained in SR-1 areas, as some research points to SR-1 and higher densities having compatibility issues with agriculture. Based on comparisons with the nearby and adjacent areas of SR-1, the FB17 Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

*Key objectives (developed with community stakeholders) in the land use mapping process for Fallbrook during the General Plan Update referred to retaining the vitality of the town center while preserving the rural character and agriculture within the community. The Fallbrook Community Plan encourages the development of combined agricultural and residential uses. General Plan Guiding Principle 7 states, "Preserve agriculture as an integral component of the region's economy, character, and open space network." See the review of Policy LU-7.1 for a discussion of research of County reports and guidelines that outline limitations in agricultural preservation and agriculture/residential compatibility issues where densities move into SR-1 and higher. With the number of potential units allowed over the whole site under the Proposed Project Map and the limited potential development footprint locations with the estimated wetlands and slope constraints (particularly in the central portion), it would be difficult to reach the development potential (see the review of Policy LU-1.9), and areas outside wetlands, wetland buffers and slope constraints would likely be needed for new housing development footprint. Thus, preservation of agricultural uses becomes less likely. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.***

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density. It is also not at the edge of the community. Therefore, the Proposed Project Map for FB17 is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

FB17 contains a corridor of estimated riparian wetlands running from northwest to southeast through the central portion and along the southern perimeter, adjacent to Reche Road. Some small areas of oaks are found in the eastern portion, in addition to a smaller area of estimated wetlands. Outside of these areas, there are agricultural uses with some coastal sage scrub growing back in areas mapped as



agriculture. The wetland areas are fairly extensive in the western part of the area proposed for SR-1 and could pose feasibility issues for access options. There are developable areas, but it may be difficult to reach the development potential after appropriate wetland buffers are factored in. In addition, the Analysis Area is not in a sewer service area and septic systems/leach fields cannot encroach into wetlands or wetland buffers. **Consideration of the density allowed under SR-1 and the spread-out nature of the wetlands results in a finding of inconsistency for the Proposed Project Map in relation to LU-6.2.**

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

Most of the Analysis Area is within the Moderate FHSZ, due to the presence of agricultural operations. Current estimates show the site would not meet the 5-minute fire protection service travel time standard for the proposed SR-1. Access will be a critical issue for fire protection in subdivision review. The Alternative Map would only change the eastern leg of the Analysis Area to SR-1. That portion would not have the access issues of the central portion as it's adjacent to the public Ranger Road, without a wetland area along the road. Though the Alternative Map would provide a greater level of policy consistency, a consistency finding can be made for the FB17 Proposed Project Map, given the mapped FHSZs here in relation to nearby areas of SR-1.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define 'lower-density land use designations that support continued agricultural operations' or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County's CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County's unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include 'rural residential lands,' which is defined in these Guidelines as parcel sizes of two acres or greater.



Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

*Review for FB17: The Analysis Area contains agricultural operations, which is generally consistent with many adjacent land uses combining agricultural and residential land uses. Prime soils are limited in the Analysis Area, with a few small, disconnected areas of prime soils. **Based on the research noted above, a switch from the SR-2 to SR-1 designation for the 71 acres (portion proposed to change to SR-1) would not be in line with a 'lower density land use designation that supports continued agricultural operations' due to the increased edge effects associated with homes in such close proximity and the Proposed Project Map for FB17 has been found to be inconsistent with Policy LU-7.1.***

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the FB17 proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent. Water service is available from the Rainbow Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the FB17 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the FB17 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the FB17 proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.



LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Towner Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The proposal would not change the current Semi-Rural Regional Category. Therefore, it has not been determined to pose inconsistencies with this Policy.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the FB17 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the FB17 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of



substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The entire Analysis Area is within MRZ-3 designated lands. The existing density of SR-2 would already preclude future mining operations, due to the proximity of homes associated with that density. Therefore, the Proposed Project Map for FB17 has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is approximately 2 miles from the Fallbrook Village boundary and just over 4 miles from the Town Center area, via roads. The Fallbrook CPA has a large ring of Semi-Rural outside the Village, with SR-2 being the most prevalent designation, reflecting objectives of the Community Plan to foster combined residential and agricultural uses. The closest transit stop, park-and-ride facility and convenience commercial are just over three miles away at the SR-76/I-15 interchange. A Class II bike line is available on nearby Old Highway 395. Considering the language of the Policy, the Proposed Project Map for FB17 has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The FB17 Analysis Area is not within a Village, is not within a sewer service area, and the current emergency response travel time would not meet the General Plan standard for the proposed SR-1. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES



- S-1.1 Minimize Exposure to Hazards.** Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, fault zones, or dam inundation zones within the Analysis Area. Most of the Analysis Area is within the Moderate FHSZ, due to the presence of agricultural operations. Current estimates show the site would not meet the 5-minute fire protection service travel time standard for the proposed SR-1; however, verification would be required at the subdivision application stage, based on existing and proposed access at that time. Access will be a critical issue for fire protection in subdivision review. The Alternative Map would only change the eastern leg of the Analysis Area to SR-1. That portion would not have the access issues of the central portion as it's adjacent to the public Ranger Road, without an estimated wetland area along the road. Though the Alternative Map would provide a greater level of policy consistency, a consistency finding can be made for the FB17 Proposed Project Map, given the mapped FHSZs here in relation to nearby areas of SR-1.

- S-6.4 Fire Protection Services for Development.** Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-1 designation (in the eastern portion and covering the majority of the Analysis Area in the Proposed Project Map) is 5 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. Almost all of the site is estimated to be within the 5-10 minute emergency response travel time. This current problematic estimate should be considered by decision-makers in light of the fire hazards; however, considering the standard requires review and consideration at the subdivision application stage, there is not a clear inconsistency with the policy at this stage.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a



single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County’s emergency response and evacuation plans.

S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

These policies are not applicable to the FB17 proposals (Proposed or Alternative Map) because there are no mapped floodways, floodplains, or dam inundations areas within the Analysis Area.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

As mentioned above, the FB17 Analysis Area is within the Fallbrook Community Planning Area (CPA). Though most of the policies of the Community Plan are focused on considerations in review of development design, there are a few policies of the Community Plan that could be applied to a stand-alone GPA/Rezone. Policy LU 2.1.6 calls for minimum lot sizes to be no less than a half-acre in the Semi-Rural Regional Category and one acre in the Rural Lands Regional Category. The proposed minimum lot size of one acre associated with proposed SR-1 areas in the Proposed Project Map (and the Alternative Map) would not be in violation of this policy. Policy 2.1.4 encourages country estates which combine agricultural and residential uses. See the review of General Plan Policy LU-7.1 for a discussion of the proposal in relation to preserving agriculture. The research tends to support the idea that getting into densities of SR-1 and higher would impact agricultural preservation; however, this policy of the Community Plan only encourages these types of estates and is not specifically tied to application of designations for agricultural preservation, so there is no clear inconsistency. Policy LU 2.4.7 seeks to limit development of steep slopes to agriculture and very low density residential and allowing clustering in flatter areas only. Per the County’s Resource Protection Ordinance (RPO) requirements and considering the percentage of steep slopes in the Analysis Area, subdivisions in the Analysis Area would be limited to 10% development footprint encroachment into steep slopes, so there are no policy inconsistency issues at this programmatic stage. Policy COS-1.2.1 encourages floodplains and natural stream courses to be preserved in permanent open space and uses limited to recreational or light agricultural uses. Though this policy is geared toward review of development projects, at this stand-alone GPA/Rezone level, a policy review can consider changes in zoning use regulations within these areas. FB17 does not include proposals for changes in zoning use regulations, so the allowed uses would not change. Therefore, there are no policy inconsistency issues with the Fallbrook Community Plan.



REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of six parcels covering approximately 107 acres in the eastern portion of the CPA. The proposed change from SR-2 to a combination of SR-1 and SR-2 is estimated to result in an increase of 33 potential dwelling units (estimated 49 potential units under the current designations and 82 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would only change the northeastern portion of the Analysis Area to SR-1 (approximately 27 acres), resulting in an estimated DU increase of 15 (total potential of 64 DU).

The FB17 Proposed Project Map was found to be inconsistent with General Plan Policies LU-1.9, LU-2.4, LU-6.2, and LU-7.1, as discussed earlier in this report. The feasibility issues for the Proposed Map as discussed in the LU-1.9 review were related to the spread out areas of estimated wetlands and steep slopes in the central portion of the Analysis Area, including estimated wetlands along the frontage of Reche Road, potentially limiting access options. As the Alternative Map would maintain the current SR-2 designation in that central portion, this inconsistency finding would not apply to the Alternative Map. Similarly, the inconsistency with LU-6.2 was related to the extent of sensitive habitats in the areas proposed for change in the Proposed Map. The consolidation of proposed SR-1 in the northeastern, less-constrained portion per the Alternative Map would lead to an LU-6.2 consistency finding for that option. The Proposed Map's inconsistencies with LU-2.4 and LU-7.1 considered the research on impacts to agriculture when densities get into SR-1 and higher. The Alternative Map would constitute less than half of the additional potential density in comparison to the Proposed Project Map and could facilitate consolidation of new residential uses near existing access infrastructure, while preserving agricultural uses. Therefore, the Alternative Map was not found to be inconsistent with these policies.

The Proposed Project Map for FB17 was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Fallbrook Community Plan. The Alternative Map for FB17 would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Fallbrook Community Plan, as it would include a much smaller area changing to SR-1.



FB19+ General Plan and Community Plan Conformance

The FB19+ Analysis Area covers 61 parcels over approximately 579 acres in the northeastern portion of the Fallbrook Community Planning Area (CPA). The Analysis Area is approximately ¼ mile east of I-15 and three miles north of SR-76, with Stewart Canyon Road providing the main access from the south. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the entire Analysis Area would change from RL-20 to SR-10. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by one (total potential of 62 DU). This negligible difference in dwelling units is due to the slope-dependent density applicable to the proposed SR-10, in addition to the existing parcelization. In areas of steep slope (greater than 25%), SR-10 applies the same 1 DU per 20 acres density as the existing RL-20, as shown in Figure 2 on page 4 (density formula for slope-dependent lands – Semi-Rural designations). Considering the existing parcel sizes and the estimated areas of steep slopes (per a GIS model), only the southernmost parcel in the Analysis Area is expected to have additional subdivision potential under the proposed change. With only an estimated one DU difference between the Existing Map and the Proposed Project, there isn’t an opportunity for an Alternative Map that would be less impactful than the Proposed Map and provide an increase in estimated density, in comparison to the Existing Map. Figure 1 below shows the Existing and Proposed General Plan land use designation maps.

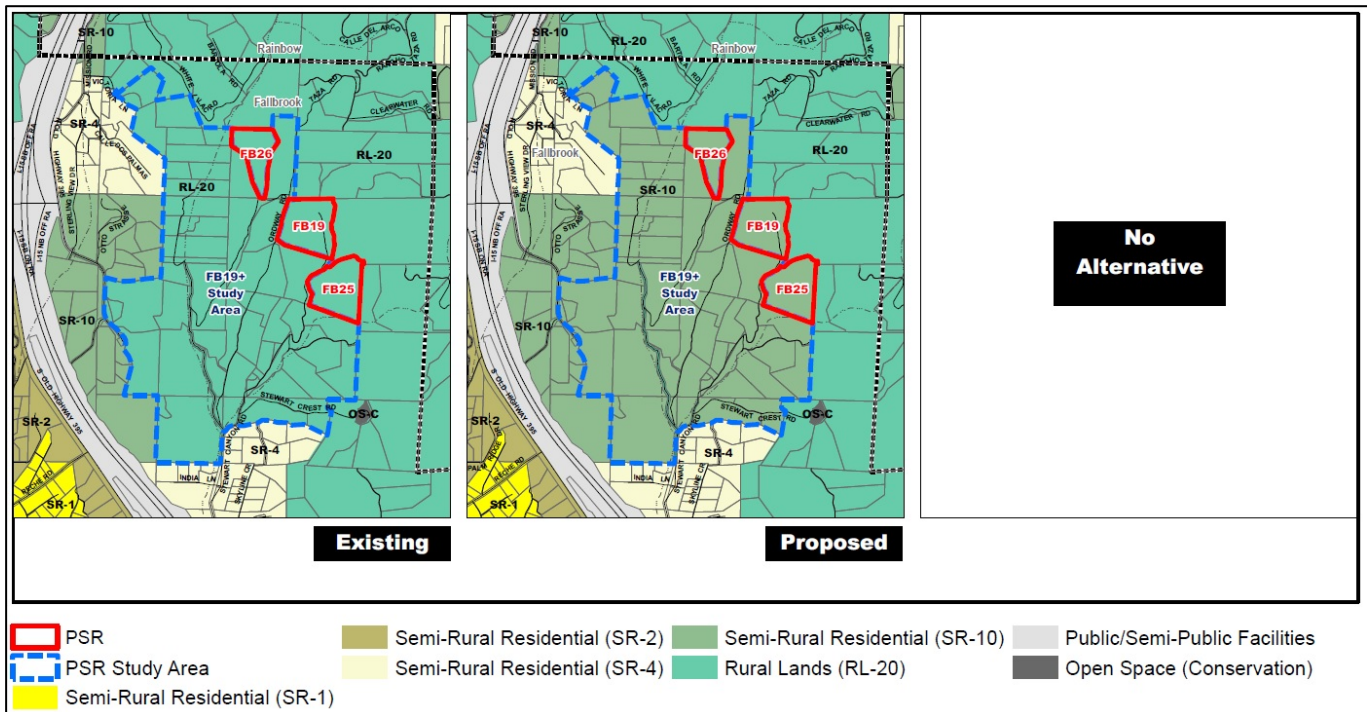


Figure 1: FB19+ Existing and Proposed Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Fallbrook Community Plan policies is provided.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 16 miles from the geographic center of Escondido and 20 miles from the geographic center of Carlsbad, with an estimated 44,289 jobs and 67,713 jobs, respectively. Much smaller job centers are closer in the Fallbrook Village and tribal casinos along the SR-76 corridor. The proposed density would not be out of line with the distance to jobs. The Analysis Area is in the water service area for the Rainbow Municipal Water District (RMWD) and approximately half of the parcels have either existing water service or access to an on-site or adjacent water line. No sewer service is available within the Analysis Area. The entire Analysis Area is within the North County Fire Protection District (NCFPD), with the closest station approximately three miles south (via road distance) at 4375 Pala Mesa Drive. Almost all of the site is estimated to be within the 5-10 minute emergency response travel time (see the review of Policy S-6.4). Sterling View Drive is a public road adjacent to the far western portion of the Analysis Area. Stewart Canyon Road is private through the Analysis Area and transitions to public at about ¼ mile south of the Analysis Area (closest to the southernmost parcel, which is the only one estimated with subdivision potential under the proposal. The western portion of the Analysis Area is approximately 1/3 mile from the closest I-15 on-ramp (via Sterling View Drive and Old Highway 395), but it would be a longer distance for other portions that do not have direct access to Sterling View Drive.

The Analysis Area is currently within the Rural Lands Regional Category, which covers most of this portion of the Fallbrook CPA that is east of I-15; however this particular portion includes areas of Semi-Rural. Adjacent on the west are areas of SR-10 and SR-4. To the north are areas of RL-20, SR-10, and SR-4, with the Rainbow Village area beyond. On the east is a mix of RL-20 and SR-10. To the south is a mix of RL-20 and SR-4, with the Specific Plan areas of Campus Park and Meadowood beyond to the south, in the area of the I-15/SR-76 interchange. Considering the mix of nearby densities, proximity to services and the estimated potential DU increase limited to one, the proposed SR-10 would not be out of line with the CDM and a consistency finding can be made.



- LU-1.2 Leapfrog Development.** Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See *applicable community plan for possible relevant policies.*]

This policy is not applicable to the FB19+ proposal because no Village designations are proposed.

- LU-1.3 Development Patterns.** Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

As discussed in the review of LU-1.1, the majority of the Fallbrook CPA east of I-15 is designated Rural Lands; however, there is a mix of Semi-Rural and Rural Lands designations in the areas adjacent to the Analysis Area. The proposed change would be consistent with existing mapping patterns. The subject area proposed for SR-10 is adjacent to SR-4 and SR-10 areas on the west and south that total about 600 acres, in addition to a large area of approximately 1,200 acres of SR-10 that is ¾ mile to the east. Existing parcelization was one of the considerations used in designating these adjacent areas as SR-4 and SR-10, and that is a main consideration that must be taken into account with the proposed change. The PSR area and study area would retain their existing character because it is anticipated that the changes would only result in one additional dwelling unit throughout the entire FB19+ Analysis Area, as discussed in the introduction for this report. As such, with the exception of one parcel (that could potentially split into two) the existing community character would be completely preserved. A change to the SR-10 designation would retain the requirement for a Conservation Subdivision approach. The Conservation Subdivision process requires 75% avoidance of resources (including biological and agricultural resources), clustering, and consolidation of the development footprint to preserve wildlife corridors/open space areas, and maximize fire protection. Therefore, the Proposed Project Map has been determined to be consistent with Policy LU-1.3

- LU-1.4 Village Expansion.** Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

- Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding
- Potential Village development would be accommodated by the General Plan road network
- Public facilities and services can support the expansion without a reduction of services to other County residents
- The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the FB19+ proposal because no Village designations are proposed.

- LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions.** Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary



precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is approximately 3.5 miles from the border with Riverside County and three miles from the Pala Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposal associated with FB19+.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-10 designation applies a 1 unit per 10 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, and considering existing parcelization, it is estimated that only one additional lot would be possible under the Proposed Project Map, in comparison to the Existing Map.

The one parcel with additional subdivision is the southernmost parcel, which could potentially be split into two lots under the proposed SR-10. That parcel has current water service, is within ¼ mile of the public portion of Stewart Canyon Road, and has the best estimated emergency response travel time in the Analysis Area, with most of the parcel being within the estimated 0-5 minute response time (20-minute response time standard for SR-10). There are some sensitive habitats on the property, but the Conservation Subdivision process required in SR-10 would facilitate directing new housing footprint to some previously disturbed portions of the site, and to maximize connected open space and fire protection measures. Considering these factors, a consistency finding can be made.

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.



The proposed change would not be anticipated to impact community character or consistency in land use mapping, as it is estimated that only one additional unit is possible over the 579 acres. This is due to the proposed density for SR-10 being the same as the existing RL-20 density in areas of steep slope, which are extensive here. Therefore, the Proposed Project Map for FB19+ is consistent with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

Key objectives (developed with community stakeholders) in the land use mapping process for Fallbrook during the General Plan Update referred to retaining the vitality of the town center while preserving the rural character and agriculture within the community. The Fallbrook Community Plan encourages the development of combined agricultural and residential uses. General Plan Guiding Principle 7 states, “Preserve agriculture as an integral component of the region’s economy, character, and open space network.” See the review of Policy LU-7.1 for a discussion of research of County reports and guidelines that outline limitations in agricultural preservation and agriculture/residential compatibility issues where densities move into SR-1 and higher. The proposed SR-10 designation would not be anticipated to impact agricultural preservation and with an estimate of only one additional potential dwelling unit over the entire 579-acre Analysis Area, the proposed change would not impact the low density character of the area. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-2.4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is in close proximity to an eastern border of the Fallbrook CPA and it currently has a Rural Lands designation. Under the proposed change, an area of RL-20 would still remain at this edge of the community. In addition, the Analysis Area would maintain its current character, as the change is only estimated to result in one additional potential dwelling unit over the entire Analysis Area. Therefore, the Proposed Project Map for FB19+ is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

Outside of areas previously graded for agricultural and recreational uses, the Analysis Area contains riparian habitats along Stewart Canyon Creek, with areas of coastal sage scrub and southern mixed chaparral on hillsides. As discussed previously, the proposal is only anticipated to result in one additional potential dwelling unit over the 579-acre Analysis Area, as the proposed SR-10 has the same allowed density as the existing RL-20, within areas of steep slopes (which are extensive here). In addition, the Conservation Subdivision requirement would remain under the proposed SR-10, ensuring the preservation of critical habitats under the minimal additional development that would be allowed. Therefore, a consistency finding can be made.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.



The majority of the Analysis Area is within the Very High FHSZ, while almost 200 acres (mostly in the eastern portion) is within the Moderate FHSZ due to the presence of agricultural operations. Current GIS and fire district estimates anticipate that the Analysis Area would be able to meet the 20-minute General Plan standard for fire response travel time. The estimated one additional potential dwelling unit would be in the southern property, closest to the fire station. Therefore, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for FB19+: The Analysis Area contains some agricultural operations, but not in the area that would be estimated to have additional density potential under the proposal. The proposed SR-10 designation is low enough to support continued agricultural operations. Therefore, the Proposed Project Map for FB19+ has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.



This policy is not applicable to the FB19+ proposal because the Analysis Area is not groundwater dependent. Water service is available from the Rainbow Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the FB19+ proposal because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the FB19+ proposal because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the FB19+ proposal because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Towner Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Analysis Area is in close proximity to an eastern border of the Fallbrook CPA and it currently has a Rural Lands designation. Under the proposed change, an area of RL-20 would still remain at this edge of the community. In addition, the Analysis Area would maintain its current character, as the change is only estimated to result in one additional potential dwelling unit over the entire Analysis Area. Therefore, the Proposed Project Map for FB19+ is consistent with Policy LU-10.3.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.



This policy is not applicable to the FB19+ proposal because the proposal would not change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the FB19+ proposal because the proposal would not change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

Approximately 29 acres of MRZ-3 designated lands are found in the southwest corner of the Analysis Area. The proposed SR-10 designation is low enough so as not to preclude a future mining operation. Therefore, the Proposed Project Map for FB19+ has been found to be consistent with Policy COS-10.2.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.



The proposal for the Analysis Area would result in a negligible change in vehicle trips, as the proposal is estimated to result in only one additional potential dwelling unit. The one property that could be subdivided based on these estimates is closest to the public road and to the I-15 interchange. Considering the language of the Policy, the Proposed Project Map for FB19+ has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages lack either sewer service or a range of transportation networks/options (or lack both). The FB17 Analysis Area is not within a Village and not within a sewer service area. Therefore, the policy is not applicable.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, fault zones, or dam inundation zones within the Analysis Area. The majority of the Analysis Area is within the Very High FHSZ, while almost 200 acres (mostly in the eastern portion) is within the Moderate FHSZ due to the presence of agricultural operations. Current GIS and fire district estimates anticipate that the Analysis Area would be able to meet the 20-minute General Plan standard for fire response travel time. The estimated one additional potential dwelling unit would be in the southern property, closest to the fire station. Therefore, a consistency finding can be made.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-10 designation is 20 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. Almost all of the Analysis Area is estimated to be within the 5-10 minute emergency response travel time. At this programmatic land use mapping stage, a consistency finding can be made.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require



development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

These policies are not applicable to the FB19+ proposal because there are no mapped floodways, floodplains, or dam inundations areas within the Analysis Area.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

As mentioned above, the FB19+ Analysis Area is within the Fallbrook Community Planning Area (CPA). Though most of the policies of the Community Plan are focused on considerations in review of development design, there are a few policies of the Community Plan that could be applied to a stand-alone GPA/Rezone. Policy LU 2.1.6 calls for minimum lot sizes to be no less than a half-acre in the Semi-Rural Regional Category and one acre in the Rural Lands Regional Category. No changes to zoning minimum lot sizes are proposed and the current zoning minimum lot sizes are in compliance with this policy. Policy 2.1.4 encourages country estates which combine agricultural and residential uses. See the review of General Plan Policy LU-7.1 for a discussion of the proposal in relation to preserving agriculture. The proposed SR-10 would continue to facilitate combined residential and agricultural uses. Policy LU 2.4.7 seeks to limit development of steep slopes to agriculture and very low density residential and allowing clustering in flatter areas only. Per the County's Resource Protection Ordinance (RPO)



requirements and considering the percentage of steep slopes in the Analysis Area, subdivisions in the Analysis Area would be limited to 10% development footprint encroachment into steep slopes, so there are no policy inconsistency issues at this programmatic stage. Policy COS-1.2.1 encourages floodplains and natural stream courses to be preserved in permanent open space and uses limited to recreational or light agricultural uses. Though this policy is geared toward review of development projects, at this stand-alone GPA/Rezone level, a policy review can consider changes in zoning use regulations within these areas. FB19+ does not include proposals for changes in zoning use regulations, so the allowed uses would not change. Therefore, there are no policy inconsistency issues with the Fallbrook Community Plan.



FB21+ General Plan and Community Plan Conformance

The FB21+ Analysis Area covers 52 parcels over approximately 679 acres at the northern edge of the Fallbrook Community Planning Area (CPA). The Analysis Area is approximately four miles north of East Mission Road and 6.5 miles west of I-15 (9 miles via roads to the closest I-15 on-ramp). The main access road through the Analysis Area is Sandia Creek Drive. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from RL-20 to SR-10. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by seven (total potential of 68 DU). An Alternative Map is also available for consideration, which would only change the portion east of Sandia Creek Drive to SR-10, resulting in an estimated DU increase of two (total potential of 63 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

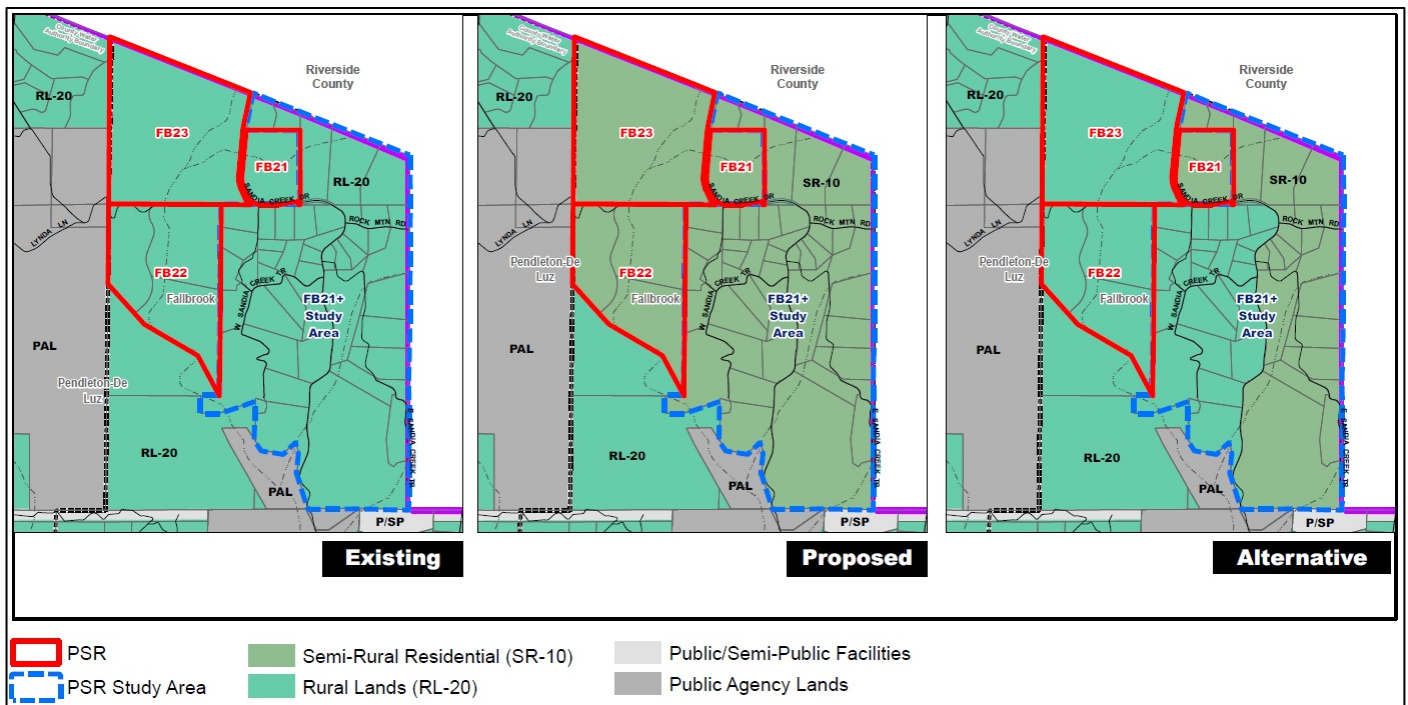


Figure 1: FB21+ Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Fallbrook Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 25 miles from the geographic center of Escondido and 24 miles from the geographic center of Carlsbad (via road distances), with an estimated 44,289 jobs and 67,713 jobs, respectively. Much smaller job centers are closer in the Fallbrook Village and tribal casinos along the SR-76 corridor. The proposed density would not be totally out of line with the distance to jobs, but the Analysis Area is in one of the most remote locations within the County Water Authority boundary. The Analysis Area is in the water service area for the Fallbrook Public Utilities District (FPUD) and the majority of the parcels have existing water service. The Analysis Area is not within a sewer service area. The entire Analysis Area is within the North County Fire Protection District (NCFPD), with the closest station approximately 4.5 miles south (via road distance) at 315 E. Ivy Street. Just over half of the Analysis Area is estimated to be within the 10-20 minute emergency response travel time, but the rest is estimated to be beyond the 20-minute travel time, including part of properties with additional density potential under the proposal (see the review of Policy S-6.4). There are no public roads within or adjacent. Sandia Creek transitions to a public road approximately 1/3 mile south of the Analysis Area, and it would constitute the closest public road. The closest I-15 freeway on-ramp is approximately nine miles away via road distance.

The Analysis Area is currently within the Rural Lands Regional Category, which covers all of the private properties of the Fallbrook Community Planning Area (CPA), north of the Santa Margarita River (and east of the river, where it curves north). This is consistent with a community-specific planning rationale for Fallbrook during the General Plan Update process. The closest Semi-Rural area within the CPA is approximately 2 miles away. Surrounding the Analysis Area within San Diego County are Rural Lands



*designations and public agency lands, including Bureau of Land Management (BLM) and FPUD lands, which are mostly preserved. The Analysis Area is adjacent to Riverside County on the north and east with areas across the County border consisting of sensitive habitats, rugged terrain, and low densities. Considering the Analysis Area is on the edge of the County, lacks public roads, is not in close proximity to major transportation networks, is not in close proximity to existing Semi-Rural and Village properties, and is in an area of rugged terrain and sensitive habitats, a change in the Regional Category here would not be in line with the CDM. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.1.***

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the FB21+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

*As discussed above, all of the private lands in the Fallbrook CPA that are north of the Santa Margarita River (and east of it where it curves north) are in Rural Lands designations, consistent with community-specific planning rationales for Fallbrook during the General Plan Update. There are over 4,000 acres of Rural Lands in this portion of the CPA, with the remaining areas in the vicinity consisting of Public Agency Lands or Public/Semi-Public Facilities designated lands which are primarily in open space (either in preserves or just undeveloped) in this area. The closest Semi-Rural designations in the CPA are approximately two miles away. Changing the Analysis Area to Semi-Rural when there are Rural Lands designations closer to the Village and closer to major transportation networks would not be consistent with mapping land use designations in patterns. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.3.***

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

- Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

- Potential Village development would be accommodated by the General Plan road network

- Public facilities and services can support the expansion without a reduction of services to other County residents

- The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area



This policy is not applicable to the FB21+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is adjacent to Riverside County and approximately six miles from the Pechanga Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with FB21+.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-10 designation applies a 1 unit per 10 acres density only in the areas of less than 25% slope, and applies a 1 unit per 20 acres density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that the proposed change would increase potential lots by seven, and a total of 68 lots would be possible under the Proposed Project (includes existing lots and additional subdivision potential).

*Six of the estimated seven additional potential DUs associated with the proposed change would be within the PSR request parcels (FB21, FB22, and FB23) in the northwestern portion of the Analysis Area, covering approximately 261 acres. The following information is focused on potential feasibility issues in this area. Just over half of the area of these properties is in steep slopes (greater than 25% slope) and the properties would be subject to the maximum of 10 percent encroachment into steep slopes. Areas of estimated wetlands include approximately 8 acres within FB21, 27 acres within FB22, and 34 acres within FB23. With approximately 80% of the PSR areas in areas of steep slopes or wetlands, the extent of these constraints presents feasibility issues for meeting the proposed density potential. The required wetland buffers (typically 50 feet to 200 feet) would further reduce the area available for development footprint. Septic will be required within the Analysis Area. The septic systems and leach fields cannot be placed in wetlands/wetland buffers and placement within steep slopes can be very challenging. Areas outside the wetlands and steep slopes also contain sensitive habitats and the potential for hosting sensitive species is high, which could result in mitigation requirements that would restrict development in additional portions. Meeting access requirements for subdivisions in this area will also be challenging, considering the lack of public roads in the Analysis Area, the limited existing road infrastructure built to fire access standards, and the regulatory limitations associated with potential road crossings of wetlands (RPO and other County, state, and federal regulations). **In consideration of these constraints in relation to existing regulations, the Proposed Project Map has been found to be inconsistent with Policy LU-1.9.***



Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

*All of the private lands in Fallbrook that are north of the Santa Margarita River (and east of it, where it curves north) have Rural Lands designations. The closest Semi-Rural area within the CPA is approximately 2 miles away. The Analysis Area contains extensive habitat, slope, and access constraints, and this portion of Fallbrook also contains large areas of open space preserves, including Bureau of Land Management (BLM) lands adjacent to the west. These characteristics tend to fit with the Rural Lands description. **Consideration of these issues results in a conclusion that the Proposed Project Map for FB21+ is not consistent with Policy LU-2.3.***

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

*As discussed previously, a community-specific planning rationale for Fallbrook during the General Plan Update process was to map Rural Lands in the environmentally sensitive areas around the Santa Margarita River. All private lands in this portion of the CPA north of the river are in Rural Lands designations. The Analysis Area is within a Resource Conservation Area of the Fallbrook Community Plan. This area makes up a “greenbelt” buffer (see the review of Policy LU-2.5) at the edge of the CPA and at the edge of the County. Low densities and sensitive habitats are also found in the adjacent areas of Riverside County, thus providing appropriate buffers to reinforce the vitality and community identities of Fallbrook and Temecula. As noted in the review of Policy LU-1.1, the proposed change would not be in line with the parameters of the CDM and corresponding Guiding Principle 2. The access currently available in the area is not designed to support higher densities and the area of additional density potential is in the most remote portion of the CPA. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.***

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.



*The Analysis Area currently has a Rural Lands designation and is within the northern edge of the Fallbrook CPA. Surrounding uses include very low density residential, open space, and agriculture. There are no Semi-Rural designations in this area of the CPA, north of the Santa Margarita River, which includes high quality riparian habitats and critical habitat areas for several sensitive species. In addition to locally important wildlife corridors in this area, it is part of the Santa Ana to Palomar regional wildlife corridor. These factors lead to a conclusion that the Analysis Area is part of an existing greenbelt (at the edge of the community, and at the edge of the County) per the General Plan definition, and the proposal would move the area from Rural Lands (“very low density rural residential” as discussed in the General Plan greenbelt definition) to Semi-Rural. **Therefore, the FB21+ proposal in the Proposed Project is inconsistent with Policy LU-2.5.***

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

*The Analysis Area is within the Santa Margarita River Resource Conservation Area of the Fallbrook Community Plan, is mostly within a Pre-Approved Mitigation Area (PAMA) of the draft North County Multiple Species Conservation Program (MSCP), and is part of the Santa Ana to Palomar regional wildlife corridor. Most of the additional density potential is within the western portion of the Analysis Area, which includes large areas of wetlands surrounding the Sandia Creek corridor (connects to the Santa Margarita River to the south), and is also adjacent to a 1,600-acre BLM preserve to the west. Portions of the Santa Margarita River corridor, less than one mile away, are within a Critical Habitat Area for federally endangered arroyo toad, least Bell’s vireo, and southwestern willow flycatcher. These Critical Habitat Areas are connected to the additional density potential portion of the Analysis Area via Sandia Creek, which provides ideal habitat for these species, both in the connection area and in the Analysis Area. These substantial habitat constraints will require consideration in the context of the proposed SR-10 designation, which requires a Conservation Subdivision design and is estimated to result in seven additional potential dwelling units. The western portion of the Analysis Area presents some feasibility issues for reaching the density potential, as there is limited acreage available, outside wetlands, typical wetland buffer widths, and steep slopes. **Therefore, the Proposed Project Map for FB21+ has been found to be inconsistent with Policy LU-6.2.***

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The Analysis Area is approximately half within the Very High Fire Hazard Severity Zone (FHSZ) and half within the Moderate FHSZ, due to the presence of agricultural operations. Travel time estimates show some of the northern portions would be outside of the 20-minute travel time standard of the General Plan for the proposed SR-10 and the existing RL-20. This is a particularly hazardous area for wildfire evacuations, as there are no public roads in the Analysis Area and the main road for ingress and egress to the area (Sandia Creek Drive) traverses over sharp curves and slopes with steep roadside drop-offs in some areas. The Analysis Area lacks a paved second option for evacuation. In addition, the Analysis Area is surrounded by extensive areas of open space preserves, so fire clearing in this area is limited. Most of the additional density potential associated with the SR-10 proposal would be in the western portion, which is adjacent to a BLM preserve of approximately 1,600 acres. Adjacent to the south are undeveloped properties of the Fallbrook Public Utilities District which contain riparian habitats connecting to preserves of the Santa Margarita River. Within the southeast portion of the Analysis Area



is the 78-acre Rock Mountain Preserve of the Fallbrook Land Conservancy, and extensive undeveloped lands are also found adjacent to the east. Due to the particularly hazardous conditions associated with wildfire evacuation, and the large expanses of flammable vegetation with limited fire clearing in this area, a proposed increase in density would not be consistent with land use mapping to minimize populations exposed to hazards, particularly when there are no Semi-Rural designations within two miles. **Therefore, the FB21+ proposal in the Proposed Project is inconsistent with Policy LU-6.11.**

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for FB21+: The Analysis Area contains agricultural operations and the proposed SR-10 designation is low enough to support continued agricultural operations. Therefore, the Proposed Project Map for FB21+ has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.



This policy is not applicable to the FB21+ proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent. Water service is available from the Rainbow Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the FB21+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the FB21+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the FB21+ proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Town Center. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

As discussed in the review of Policy LU-2.5, the Analysis Area is currently part of a “greenbelt” buffer of low density, agriculture, and sensitive habitat lands at the edge of the community and at the edge of the County. There are no Semi-Rural designations in Fallbrook within two miles of the Analysis Area. Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-10.3.



LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the FB21+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the FB21+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The Analysis Area does not contain any MRZ-2 or MRZ-3 areas. Therefore, this policy is not applicable.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are steep hillsides within the Analysis Area.



COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

*The Analysis Area is approximately 3.5 miles from the Village boundary for Fallbrook and just over four miles from the nearest transit stop and commercial area. It is approximately nine miles via roads to the nearest I-15 on ramp. There are no public roads within the Analysis Area, which is in the most remote location of Fallbrook. Precedent setting issues associated with the proposal are also considered in this policy review (in relation to the policy reference to community character), as all private lands in Fallbrook that are north of the Santa Margarita River (and east of the river, where it curves north) have Rural Lands designations. The closest Semi-Rural area is over two miles away. **In consideration of these issues, the Proposed Project Map for FB21+ has been found to be inconsistent with Policy COS-14.1.***

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The FB21+ Analysis Area is not within a Village, is not within a sewer service area, and is only served by private roads. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, dam inundation zones, or fault zones within the Analysis Area. The Analysis Area is approximately half within the Very High FHSZ and half within the Moderate FHSZ, due to the presence of agricultural operations. Travel time estimates show some of the northern portions would be outside of the 20-minute emergency response travel time standard of the General Plan for the proposed SR-10 and the existing RL-20. This is a particularly hazardous area for wildfire evacuations, as there are no public roads in the Analysis Area and the main road for ingress and egress to the area (Sandia Creek Drive) traverses over sharp curves and slopes with steep roadside drop-offs in some areas. The Analysis Area lacks a paved second option for evacuation. In addition, the Analysis Area is surrounded by extensive areas of open space preserves, so fire clearing in this area is limited. Most of the additional density potential associated with the SR-10 proposal would be in the western portion, which is adjacent to a BLM preserve of approximately 1,600 acres. Adjacent to the south are undeveloped properties of the Fallbrook Public Utilities District which contain riparian habitats connecting to preserves of the Santa



*Margarita River. Within the southeast portion of the Analysis Area is the 78-acre Rock Mountain Preserve of the Fallbrook Land Conservancy, and extensive undeveloped lands are also found adjacent to the east. Due to the particularly hazardous conditions associated with wildfire evacuation, and the large expanses of flammable vegetation with limited fire clearing in this area, a proposed increase in density would not be consistent with land use mapping to minimize populations exposed to hazards, particularly when there are no Semi-Rural designations within two miles. **Therefore, the Proposed Project Map for FB21+ has been found to be inconsistent with Policy S-1.1.***

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-10 designation is 20 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. Just over half of the Analysis Area is estimated to be within the 10-20 minute emergency response travel time, but the rest is estimated to be beyond the 20-minute travel time, including part of properties with additional density potential under the proposal. This current problematic estimate for part of the Analysis Area should be considered by decision-makers in light of the fire hazards; however, considering the standard requires review and consideration at the subdivision application stage, there is not a clear inconsistency with the policy at this stage.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.



- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

These policies are not applicable to the FB21+ proposals (Proposed or Alternative Map) because there are no mapped floodways, floodplains, or dam inundations areas within the Analysis Area.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

As mentioned above, the FB21+ Analysis Area is within the Fallbrook Community Planning Area (CPA). Though most of the policies of the Community Plan are focused on considerations in review of development design, there are a few policies of the Community Plan that could be applied to a stand-alone GPA/Rezone. Policy LU 2.1.6 calls for minimum lot sizes to be no less than a half-acre in the Semi-Rural Regional Category and one acre in the Rural Lands Regional Category. The existing 4-acre zoning minimum lot size is not proposed to change, in either the Proposed or Alternative Map, so there would be no inconsistency issues with this policy. Policy 2.1.4 encourages country estates which combine agricultural and residential uses. See the review of General Plan Policy LU-7.1 for a discussion of the proposal in relation to preserving agriculture. The proposed SR-10 designation would be anticipated to support continued agricultural operations, so there are no inconsistency issues. Policy LU 2.4.7 seeks to limit development of steep slopes to agriculture and very low density residential and allowing clustering in flatter areas only. Per the County's Resource Protection Ordinance (RPO) requirements and considering the percentage of steep slopes in the Analysis Area, subdivisions in the Analysis Area would be limited to 10% development footprint encroachment into steep slopes, so there are no policy inconsistency issues at this programmatic stage. Policy COS-1.2.1 encourages floodplains and natural stream courses to be preserved in permanent open space and uses limited to recreational or light agricultural uses. Though this policy is geared toward review of development projects, at this stand-alone GPA/Rezone level, a policy review can consider changes in zoning use regulations within these areas. FB21+ does not include proposals for changes in zoning use regulations, so the allowed uses would not change. Therefore, there are no policy inconsistency issues with the Fallbrook Community Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 52 parcels covering approximately 679 acres on the northern edge of the CPA. The proposed change from RL-20 to SR-10 is estimated to result in an increase of seven potential dwelling units (estimated 61 potential units under the current designations and 68 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would only change the



properties east of Sandia Creek Drive to SR-10, resulting in an estimated DU increase of two (total potential of 63 DU).

The FB21+ Proposed Project Map was found to be inconsistent with General Plan Policies LU-1.1, LU-1.3, LU-1.9, LU-2.3, LU-2.4, LU-2.5, LU-6.2, LU-6.11, LU-10.3, COS-14.1, and S-1.1, as discussed earlier in this report. The inconsistencies with LU-1.1, LU-1.3, LU-2.3, LU-2.4, LU-2.5, LU-10.3, and COS-14.1 were based on several issues related to the CDM, existing mapping patterns (no nearby Semi-Rural), maintaining a “greenbelt” of very low density/agriculture/open space at the edge of the community, a community-specific planning rationale of maintaining Rural Lands in this area near the Santa Margarita River, the relatively remote location, and limited access options, among other issues. **The Alternative Map has also been found to be inconsistent with these seven policies.** Even though the potential density increase would be limited, it would place an area of Semi-Rural at the edge of the CPA and edge of the County, within an area where all private lands are Rural Lands. Establishing an area of Semi-Rural in the Analysis Area would provide justification for Semi-Rural throughout this constrained area north of the Santa Margarita River, thus leading to the loss of this greenbelt and CDM pattern.

The Proposed Project Map for FB21+ was also found to be inconsistent with Policies LU-1.9 and LU-6.2, due to the steep slopes and highly sensitive habitats found in the Analysis Area, limiting feasibility of the proposal, and the location within a locally and regionally significant wildlife corridor. The Reduced Density Alternative Map would not change the designation in the western portion where Sandia Creek traverses, with steep canyons and wide wetland corridors, and would only be estimated to result in a two-unit difference, compared to the existing General Plan designation. Therefore, the Reduced Density Alternative Map has not been determined to be inconsistent with Policies LU-1.9 and LU-6.2.

Policies LU-6.11 and S-1.1 cover similar issues; addressing land use mapping that reflects hazards and constraints, particularly fire hazards. The Proposed Project Map for FB21+ was determined to be inconsistent with these policies. Changing the designation only in the eastern portion would not remove issues of no public road access, constraint limitations on improving road access to fire standards (sharp curves, steep roadside drop-offs), the prevalence of surrounding open space preserves with limited fire clearing, and portions of the Analysis Area estimated to be beyond the 20-minute travel time required for subdivisions in both the existing RL-20 and in the proposed SR-10. **Therefore, the Reduced Density Alternative Map has also been determined to be inconsistent with LU-6.11 and S-1.1.**

The Proposed Project Map for FB21+ was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Fallbrook Community Plan. The Alternative Map for FB21+ would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Fallbrook Community Plan, as it would include a much smaller area changing to SR-10.



ME26 General Plan and Community Plan Conformance

The ME26 Analysis Area covers 15 parcels over approximately 678 acres in the northern portion of the Campo/Lake Morena Community Planning Area (CPA). The Analysis Area is adjacent to Buckman Springs Road on the west, is bisected by Cameron Truck Trail, and is approximately ½ mile east of the Lake Morena Rural Village Boundary. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from RL-20 to SR-10. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 26 (total potential of 59 DU). There is no designation between the existing RL-20 and proposed SR-10, and this Analysis Area does not lend itself to an alternative that would maintain the current land use designation in the most constrained area. The western portion is the closest to a public road (Buckman Springs Road) and closest to the Village, but it is more constrained by very steep slopes (limiting access improvements) than the eastern portion. Therefore, this Analysis Area only considers the Proposed Project Map and the Existing Map. Figure 1 below shows the Existing and Proposed General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

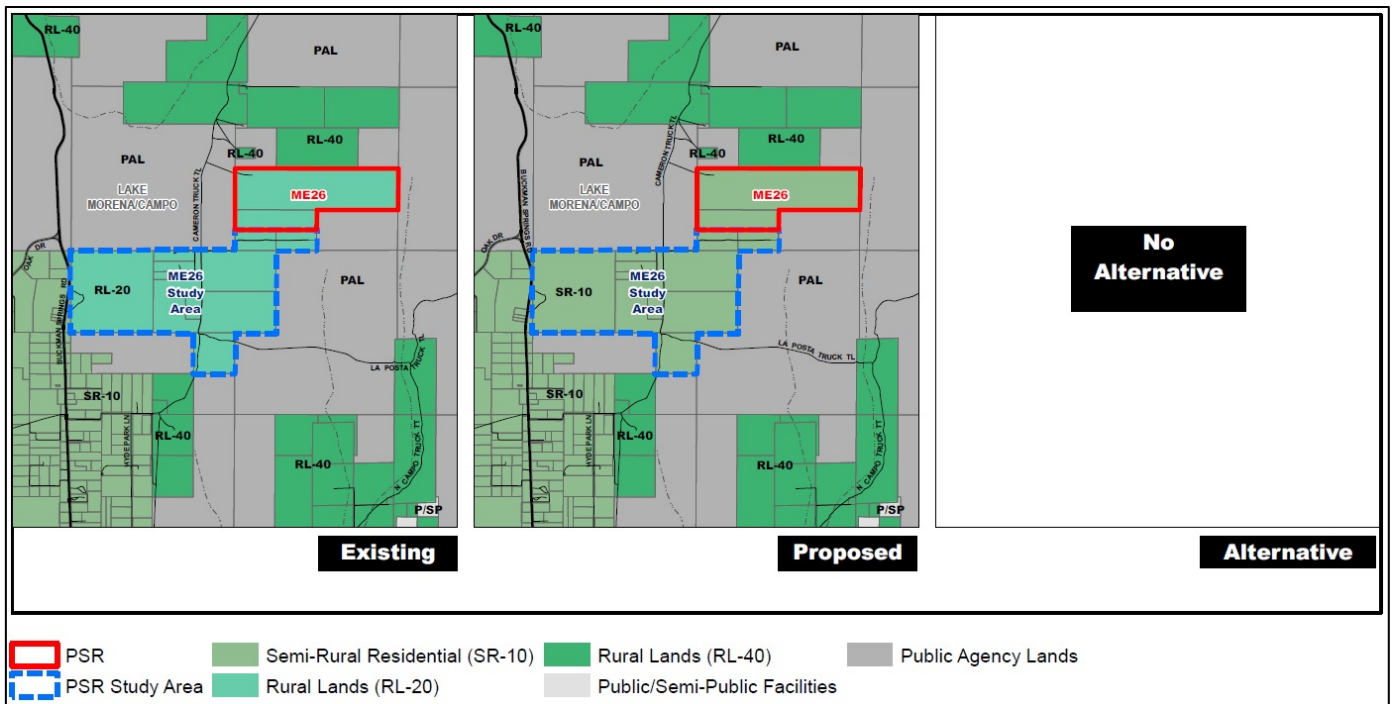


Figure 1: ME26 Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Mountain Empire Subregional Plan and Campo/Lake Morena Community Plan policies is provided.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 30 miles from the geographic center of El Cajon, with an estimated 37,643 jobs. The nearby Lake Morena Village (1.5 miles away) and Golden Acorn Casino (7 miles away) would not constitute substantial job centers with an estimated eight jobs and 347 jobs respectively. The proposed SR-10 density would still be considered low density and consistent with other nearby properties outside the Village; not necessitating close proximity to major job centers. The Analysis Area is not within a water service area or sewer service area, and is currently groundwater-dependent. The entire Analysis Area is under the jurisdiction of the County Fire Authority for fire protection services, with the closest station approximately two miles west (via road distance) at 29260 Oak Drive; however, it would be a longer distance to the central and eastern portions of the Analysis Area. Adjacent and nearby public roads include Buckman Springs Road (adjacent to the western edge), Oak Drive (connects to Buckman Springs Road near the western boundary) and La Posta Road (1.2 miles east, but over 2 miles via roads). The 1-8 is approximately 1.5 miles away via straight line distance, but approximately five miles road distance to the nearest on-ramp.

The Analysis Area is currently within the Rural Lands Regional Category, which covers most of the private lands in Campo/Lake Morena. The mapping process of the General Plan Update sought to apply Semi-Rural designations in areas of pre-existing parcelization (at Semi-Rural acreages) and pre-existing development patterns. The Analysis Area shares some similarity with other areas of existing SR-10 that are also in close proximity to- but outside of- the Village. Eight of the 15 parcels in the Analysis Area are currently 10 acres or less, so there is a mix of smaller and larger parcels. This mix of smaller and larger lots is also found in the area of existing SR-10 just south of the Village. Considering that the CDM uses Semi-Rural designations to form the boundaries of Villages (the Analysis Area is a half mile from the Village), and the lowest Semi-Rural density would be applied, retaining the Conservation Subdivision requirement, there is not a clear inconsistency with Policy LU-1.1.

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-



Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the ME26 proposal because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

As discussed in the review of Policy LU-1.1, application of Semi-Rural densities outside the Village in Campo/Lake Morena tended to follow pre-existing parcelization and pre-existing development patterns. However, the Analysis Area shares similarities with other areas of existing SR-10 in close proximity to the Village, with eight of the 15 parcels already parcelized to an SR-10 density. The Analysis Area does not contain the level of habitat constraints that are found in Rural Lands further out from the Village. Though the Campo/Lake Morena area contains a high prevalence of federal lands surrounding areas of private landholdings, the Analysis Area is in much closer proximity to the Village than it is to any of the edges of the community, so it would not be part of an area to be preserved as a Rural Lands “greenbelt” buffer at the edge of the community, as discussed in the General Plan. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-1.3.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the ME26 proposal because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is approximately 20 miles from the border with Imperial County and two miles from the Campo Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with ME26.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map,



planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-10 designation applies a 1 unit per 10 acres density only in the areas of less than 25% slope, and applies a 1 unit per 20 acres density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that 59 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential). However, since the Board direction, one of the two biggest parcels in the Analysis Area, the 160-acre parcel on the western end, has been accepted into the County's Purchase of Agricultural Conservation Easements (PACE) Program and rights to further subdivide the lot have been extinguished. Therefore, from a practical standpoint (beyond just looking at the designations, acreage, and slope), only 48 lots are possible under SR-10, the existing/current potential would be 27, and the increase in potential dwelling units would be 21.

A few feasibility factors should be considered for the other properties with additional subdivision potential under the proposed SR-10. The Conservation Subdivision process would still be applicable to the proposed SR-10, which would require clustering (to the extent allowed) to avoid sensitive habitats, maximize open space and wildlife corridors, and maximize fire protection, among other considerations. GIS estimates show approximately 39 acres of oak woodlands in areas of additional density potential that would have to be avoided where confirmed at the development stage. The Groundwater Ordinance would impose minimum lot sizes of five acres in this area, though larger lot sizes could be required, based on groundwater studies at the development stage. Outside of the oak woodlands, the native granitic chaparral habitats are quite common in this area and would not be anticipated to render the proposed density infeasible. Assuming the 5-acre minimum lot size, the maximum dead end road length (DERL) would be 2,640 feet. Meeting the fire access standards will likely require approval for road improvements from federal agencies. Bureau of Land Management (BLM) lands are adjacent to the south and east and Cleveland National Forest (CNF) lands are adjacent to the northeast. County staff consulted with CNF staff to discuss the process and prior applications of a similar purpose, but of course, there can be no assurance of approval for road improvements on CNF lands until an application is evaluated. Such an application would not be submitted until the development application stage, if road improvements through CNF lands are needed for the proposed subdivision. Staff was not successful in getting responses from BLM. The factors most affecting potential feasibility of the proposed density are the likely need for road improvements through federal lands and groundwater studies. As a feasibility determination on these issues cannot be made at this programmatic land use mapping stage, there is not a clear inconsistency with Policy LU-1.9.



Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The Analysis Area is adjacent to an area of SR-10 and is a half mile from the Village. The proposed SR-10 designation would still require a Conservation Subdivision design, which would ensure a design that preserves the most sensitive habitat areas and important agricultural resources. No change in the zoning minimum lot size is necessary or proposed and the Groundwater Ordinance would limit parcel sizes to a minimum of 5 acres, with possibly larger parcels required, depending on analysis from a groundwater investigation. Therefore, the Proposed Project Map for ME26 is consistent with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

Goal LU-5.1 of the Campo/Lake Morena Community Plan calls for preservation and enhancement of the rural character to accommodate limited growth while conserving open space and rural lands. This comment theme is reflected throughout the plan and in General Plan Update documents. The proposal would allow for limited additional density in close proximity to the Village and under the parameters of the Conservation Subdivision requirements. The Groundwater Ordinance requirements would limit new lots to sizes generally consistent with the previously subdivided (to SR-10 sizes) central portion of the Analysis Area. The proposal would not be anticipated to have substantial impacts on the character of this central portion of the community (just east of the Lake Morena Vilalge), and was supported unanimously by the Campo/Lake Morena Community Planning Group. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-2.4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area currently has a Rural Lands designation and is surrounded on the north, east, and south by very low density residential, ranching/agriculture, and open space (including federal lands), so even though it is close to the Village, it could be considered a “greenbelt” per the General Plan definition.



However, it is not at or near the edge of the community where this policy seeks to preserve greenbelts. Therefore, the Proposed Project Map would not be inconsistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

The vegetation communities found in the Analysis Area include granitic northern mixed chaparral, chamise chaparral, sagebrush scrub, and some smaller areas of oak woodlands. Though there is some sparse existing development, including residential and ranching/agricultural uses, wildlife corridor opportunities exist, with the adjacent CNF and BLM lands. The Conservation Subdivision requirement would remain, under the proposed SR-10 designation, which would serve to preserve the most critical habitats of the Analysis Area. In addition, the most sensitive habitats and important wildlife corridor areas could be preserved during the subdivision process, without impacting the feasibility of the proposed density. Therefore, a consistency finding can be made.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The Analysis Area includes portions within the Very High (approximately 410 acres) and High (approximately 268 acres) FHSZs. Current estimates show that the 20-minute fire response travel time standard for the proposed SR-10 could likely be met, though road improvements to meet fire access standards would be required, as discussed in the review of Policy LU-1.9. It is anticipated that subdivision applicants would have to obtain permission to improve roads through adjacent federal lands to fire access standards. The portion of the Analysis Area with substantial steep slopes is closest to the public road (Buckman Springs Road) and the Village. A consistency finding can be made, given that access improvements through federal lands would be reviewed by the appropriate agencies at the subdivision application stage, and those improvements have not been determined to be infeasible at this programmatic review stage.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on



this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County's unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include 'rural residential lands,' which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for ME26: The Analysis Area contains some small scale agricultural operations and the proposed SR-10 designation is low enough to support continued agricultural operations. Therefore, the Proposed Project Map for ME26 has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This Analysis Area is outside the County Water Authority boundary and is groundwater dependent. The average annual precipitation for this area is 18 to 21 inches. Per the County's Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 5 acres. The proposed SR-10 density would not be inconsistent with this minimum lot size requirement. Though additional groundwater analysis would likely be required at the development review stage, a finding of consistency with Policy LU-8.1 can be made at this programmatic land use mapping level.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the ME26 proposal because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the ME26 proposal because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.



This policy is not applicable to the ME26 proposal because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Towner Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The proposal would be consistent with this policy because a Semi-Rural designation is proposed just outside the Village, in an area that is not at the edge of the community.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the ME26 proposal because it would not change the existing zoning use regulation. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the ME26 proposal because it would not change the existing zoning use regulation. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential



mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The Analysis Area does not contain any MRZ-2 or MRZ-3 areas. Therefore, this policy is not applicable.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is approximately a half mile from the Lake Morena Rural Village and the nearest transit stop, and 17 miles from the nearest park-and-ride facility. Under the proposal, the Analysis Area would become part of the outer ring of low density Semi-Rural that is still in relatively close proximity to the Village. Therefore, the Proposed Project Map for ME26 has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The ME26 Analysis Area is not within a Village, is not within a sewer service area, and is not within a water service area. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The Analysis Area includes portions within the Very High (approximately 410 acres) and High (approximately 268 acres)



FHSZs. Current estimates show that the 20-minute fire response travel time standard for the proposed SR-10 could likely be met. It is anticipated that applicants for subdivisions in certain portions would have to obtain permission to improve roads through adjacent federal lands to fire access standards. The portion of the Analysis Area with substantial steep slopes is closest to the public road (Buckman Springs Road) and the Village. A consistency finding can be made, given that access improvements through federal lands would be reviewed by the appropriate agencies at the subdivision application stage, and that has not been determined to be infeasible at this programmatic review stage.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-10 designation is 20 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. Due to the access options to the eastern portion of the Analysis Area, current estimates show the western portion to be within the 0-5 minute range, the central portion in the 5-10 minute range and the eastern portion in the 10-20 minute range. As noted above, the closest station is in the nearby Lake Morena Village to the west, at 29690 Oak Drive. Therefore, the Proposed Project Map has been determined to be consistent with Policy S-6.4 at this programmatic land use mapping stage.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.



S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

These policies are not applicable to the ME26 proposal because there are no mapped floodways, floodplains, or dam inundations areas within the Analysis Area.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The ME26 Analysis Area is within the Mountain Empire Subregion and the Campo/Lake Morena Subregional Group Area. Though most of the policies of the Mountain Empire Subregional Plan and Campo/Lake Morena Community Plan are focused on considerations in review of development design, there are a few policies of these plans that could be applied to a stand-alone GPA/Rezone. There are certain policies that would be applicable to a stand-alone GPA/Rezone if Village densities or commercial uses were proposed, and/or if incompatible uses were planned adjacent to commercial areas. The Proposed Project Map does not include Village densities or commercial uses, and the Analysis Area is not adjacent to commercial. Beyond requirements for Village densities and commercial uses/buffering, Policy LU 5.1.1 of the Campo/Lake Morena Community Plan discourages Rural Village lot sizes (for clustering) outside of Rural Villages. No change in the zoning minimum lot size is proposed and further lot size limitations are imposed by the County's Groundwater Ordinance, limiting lot sizes within the ME26 Analysis Area to 5 acres (based on groundwater dependency and average annual precipitation). Therefore, there are no policy inconsistency issues with the Mountain Empire Subregional Plan or the Campo/Lake Morena Community Plan.



ME30A General Plan and Community Plan Conformance

The ME30A Analysis Area is made up of one parcel of 262 acres in the southern portion of the Campo/Lake Morena Community Planning Area (CPA). The Analysis Area is adjacent to SR-94 on the north, is bisected by Sheridan Road, and is adjacent to the Campo Hills neighborhood on the west. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from RL-40 to a combination of RL-40 and SR-4. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 29 (total potential of 35 DU). An Alternative Map is also available for consideration, which would place an SR-10 designation in the area proposed for SR-4 in the Proposed Project Map, resulting in an estimated DU increase 10 (total potential of 16). The northern portion of floodplain and wetlands would remain RL-40 in either option. Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 4 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

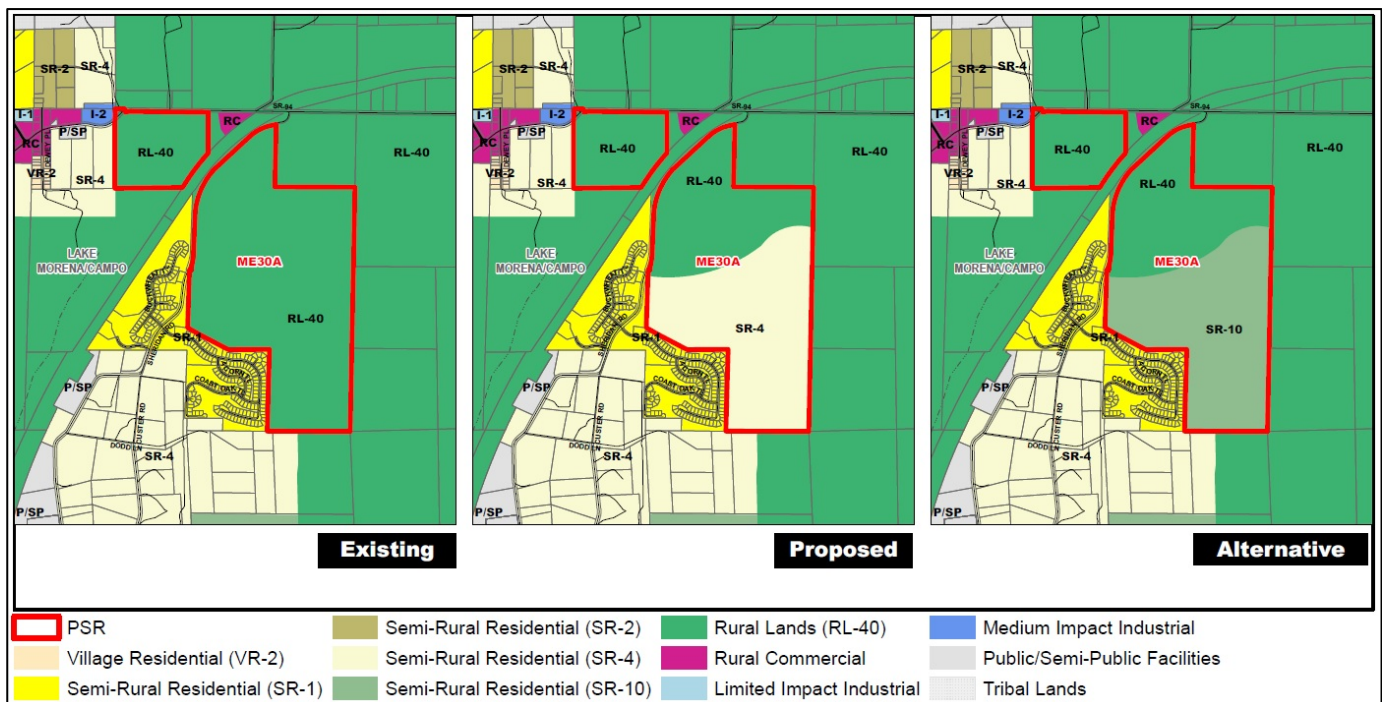


Figure 1: ME30A Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Mountain Empire Subregional Plan and Campo/Lake Morena Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 30 miles from the geographic center of El Cajon, with an estimated 37,643 jobs. The nearby Cameron Corners Rural Village (adjacent to the northern portion of ME30A) and Golden Acorn Casino (8 miles away) would not constitute substantial job centers with an estimated 103 jobs and 347 jobs respectively. The proposed SR-4 density would still be considered low density and generally in line with adjacent areas of SR-1 and SR-4, when considering proximity to job centers. The Analysis Area is not within a water service area or sewer service area, and is currently groundwater-dependent. The SR-4 density proposed over the majority of the site would not be feasible under the 8-acre Groundwater Ordinance minimum lot size. The entire Analysis Area is under the jurisdiction of the County Fire Authority for fire protection services, with the closest station approximately one mile southwest (via road distance) at 437 Jeb Stuart Road. Adjacent and nearby public roads include Sheridan Road (adjacent to part of the western edge), SR-94 (adjacent to the northern edge), and Buckman Springs Road (a half mile to the west, connecting to the Lake Morena Village). The 1-8 is approximately 6 miles away via straight line distance, but approximately 9.5 miles road distance to the nearest on-ramp.

The Analysis Area is currently within the Rural Lands Regional Category, which covers most of the private lands in Campo/Lake Morena. The mapping process of the General Plan Update for the community sought to apply Semi-Rural designations outside Villages, in areas of pre-existing parcelization (at Semi-Rural acreages) and pre-existing development patterns. Though the Analysis Area is adjacent to existing



*SR-1 and SR-4 areas, these areas contained (and still contain) Semi-Rural level parcelization and pre-existing development patterns, while the ME30A Analysis Area is just one 262-acre parcel with a single family residence. In addition, the Conservation Subdivision requirement would be removed in a conversion to SR-4. **Considering that no water service is available to the site, the proposed density would not be in line with the applicable Groundwater Ordinance minimum lot size of 8 acres, and the site does not contain the pre-existing development patterns and parcelization of the adjacent SR-4 and SR-1, the Proposed Project Map has been found to be inconsistent with Policy LU-1.1.***

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the ME30A proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

*As discussed in the review of Policy LU-1.1, application of Semi-Rural densities outside the Village in Campo/Lake Morena tended to follow pre-existing parcelization and pre-existing development patterns. This pattern was due to the limited infrastructure and services available in the community and the distance to major job centers. Though the Analysis Area is adjacent to areas of SR-4 and SR-1, it does not contain any parcelization or development patterns in line with those densities. It also does not have the infrastructure and services available to those areas. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.3.***

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the ME30A proposals (Proposed or Alternative Map) because no Village designations are proposed.



- LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions.** Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is approximately 20 miles from the border with Imperial County and ¼ mile from a portion of the Campo Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with ME30A.

- LU-1.9 Achievement of Planned Densities.** Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-4 designation applies a 1 unit per 4 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that 35 lots would be possible under the Proposed Project Map.

*A few feasibility factors should be considered in evaluating the proposed change for consistency with LU-1.9. The Conservation Subdivision process requirement would be removed for the portion that would change to SR-4; however, the most sensitive habitat area and most constrained area is the northern portion of floodplain and wetlands, which would remain RL-40 with a Conservation Subdivision process still required there. The portion proposed to change to SR-4 consists of granitic northern mixed chaparral, which is quite common in this area, and on-site mitigation (open space preservation) for impacts would likely be feasible. There are a few scattered oak trees on the property that could be avoided without affecting density feasibility. Sheridan Road is a County-maintained road adjacent to the western end of the site and the existing single family house on the site takes access off this road. The internal access road is currently mostly dirt and runs the width of the site. The Groundwater Ordinance imposed minimum lot size of 8 acres (based on the precipitation zone) would translate to a maximum dead end road length of a half mile (2,640 feet). This would be taken from Sheridan Road (assumed access point for subdivisions) and should not limit feasibility if new residential lots were placed in the central portion with open space preservation in the south and north. Emergency response travel time is currently estimated to be 0-5 minutes in the northern portion and 5-10 minutes in the southern portion, which would not be problematic given the General Plan standard of 10 minutes for the proposed SR-4 designation (verification required at the subdivision application stage). The greatest obstacle to achieving the proposed density is the Groundwater Ordinance imposed minimum lot size of 8 acres, noted above. With that limitation, reaching the density potential in the SR-4 proposed area would not be feasible. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.9.***



Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The Analysis Area is adjacent to an area of SR-1 to the west and adjacent to the Cameron Corners Village on the northwest, but RL-40 to the east and southeast, so it's in a transition area on the Land Use Map. The site is groundwater dependent, with a Groundwater Ordinance minimum lot size of 8 acres, so the SR-4 density proposed for the southern portion is not feasible under these limitations. This lot size limitation would limit community character conflicts and lot size consistency issues. Based on the nearby areas of higher densities and higher intensity uses, the ME30A Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

Goal LU-5.1 of the Campo/Lake Morena Community Plan calls for preservation and enhancement of the rural character to accommodate limited growth while conserving open space and rural lands. This comment theme is reflected throughout the plan and in General Plan Update documents for the community. The proposal would allow for limited additional density in close proximity to two Rural Villages. The Groundwater Ordinance requirements would limit new lots to a minimum of 8 acres. The proposal would not be anticipated to have substantial impacts on the character of this central portion of the community due to the adjacency to the Campo Hills development of higher densities, and it was supported unanimously by the Campo/Lake Morena Community Planning Group. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-2.4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area currently has a Rural Lands designation, but it is not on the edge of the community, where this policy seeks to maintain greenbelts. Therefore, the Proposed Project Map for ME30A is consistent with Policy LU-2.5.



LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

The portion of the Analysis Area proposed to remain RL-40 includes the greatest habitat constraints, with wetlands and floodplain area. The southern portion proposed to change to SR-4 is limited to granitic northern mixed chaparral and sagebrush scrub. The 8-acre minimum lot size required under the Groundwater Ordinance would make the proposed SR-4 density infeasible, while the site continues to be reliant on on-site groundwater resources. This limitation would facilitate the maintenance of important wildlife corridors. Therefore, a consistency finding can be made.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The southern portion of the Analysis Area which is proposed to change designations is within the Very High FHSZ. The Analysis Area is approximately one mile from the closest fire station, and it is anticipated the 10-minute travel time standard for SR-4 could be met, upon implementation of access improvements to fire protection standards. Floodplain, floodway, and dam inundation zone hazards are limited to the northern portion that is proposed to remain unchanged at RL-40. Therefore, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define 'lower-density land use designations that support continued agricultural operations' or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County's CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County's unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include 'rural residential lands,' which is defined in these Guidelines as parcel sizes of two acres or greater.



Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for ME30A: The Analysis Area does not contain any agricultural operations. Therefore, the Proposed Project Map for ME30A has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

*This Analysis Area is outside the County Water Authority boundary and is groundwater dependent. The average annual precipitation for this area is 15 to 18 inches. Per the County's Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 8 acres. The SR-4 component (proposed for the southern portion) of the Proposed Project map for ME30A would not be consistent with this requirement and the SR-4 density would not be feasible. **Therefore, the ME30A proposal in the Proposed Project is inconsistent with Policy LU-8.1.***

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the ME30A proposal because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the ME30A proposal because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the ME30A proposal because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.



Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Towner Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The proposal would be consistent with this policy because a Semi-Rural designation is proposed just outside the Village, in an area that is not at the edge of the community.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the ME30A proposal because it would not change the existing zoning use regulation. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the ME30A proposal because it would not change the existing zoning use regulation. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The northwestern edge of the Analysis Area is adjacent to an undeveloped property which is currently designated Medium Impact Industrial (I-2). This northern portion of the Analysis Area is not proposed to change designations (in either the Proposed or Alternative Map). The area proposed to change to SR-4 is more than a half mile from the industrial designated area. Therefore, there are no inconsistency issues with Policy LU-11.10.

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.



The Analysis Area does not contain any MRZ-2 or MRZ-3 areas. Therefore, this policy is not applicable.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are small areas of steep hillsides in the eastern portion of the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

Portions of ME30A are adjacent to the Village boundary for the Rural Villages of Campo and Cameron Corners. It is ¼ mile from the nearest transit stop and just over 20 miles from the nearest park-and-ride facility. Villages and higher density Semi-Rural areas are kept relatively small in area in Mountain Empire to reflect the rural character of the area. ME30A is adjacent to the Campo Hills subdivision of SR-1 densities on the west, but is currently RL-40 (southern portion proposed to change to SR-4) and adjacent to large areas of RL-40 to the east and preserved lands further east. Considering the language of the Policy, the Proposed Project Map for ME30A has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The ME30A Analysis Area is not within a Village, is not within a sewer service area, and is not within a water service area. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

The southern portion of the Analysis Area which is proposed to change designations is within the Very High FHSZ. The Analysis Area is approximately one mile from the closest fire station, and it is anticipated the 10-minute travel time standard for SR-4 could be met, upon implementation of access improvements to fire protection standards. Floodplain, floodway, and dam inundation zone hazards are limited to the



northern portion that is proposed to remain unchanged at RL-40. Therefore, a consistency finding can be made.

- S-6.4 Fire Protection Services for Development.** Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-4 designation is 10 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. Current GIS estimates show a little more than half of the Analysis Area would be in the 0-5 minute travel time range and the other portion would be in the 5-10 minute range. Therefore, the Proposed Project Map has been determined to be consistent with Policy S-6.4 at this programmatic land use mapping stage.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.
- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.



A County-mapped floodplain and floodway are found in the northern portion of the Analysis Area, in the portion proposed to remain unchanged at RL-40. There are no mapped floodplains/floodways or dam inundation zones in the portion proposed to change designations (in the Proposed or Alternative Map).

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The ME30A Analysis Area is within the Mountain Empire Subregion and the Campo/Lake Morena Community Planning Area. Though most of the policies of the Mountain Empire Subregional Plan and Campo/Lake Morena Community Plan are focused on considerations in review of development design, there are a few policies of these plans that could be applied to a stand-alone GPA/Rezone. There are certain policies that would be applicable to a stand-alone GPA/Rezone if Village densities or commercial uses were proposed, and/or if incompatible uses were planned adjacent to commercial areas. The Proposed Project Map does not include Village densities or commercial uses, and the portion of the Analysis Area proposed to change designations is ½ mile from the closest commercial area. Beyond requirements for Village densities and commercial uses/buffering, Policy LU 5.1.1 of the Campo/Lake Morena Community Plan discourages Rural Village lot sizes (for clustering) outside of Rural Villages. No change in the zoning minimum lot size is proposed and further lot size limitations are imposed by the County's Groundwater Ordinance, limiting lot sizes within the ME30A Analysis Area to 8 acres (based on groundwater dependency and average annual precipitation). Therefore, there are no policy inconsistency issues with the Mountain Empire Subregional Plan or the Campo/Lake Morena Community Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of one parcel covering approximately 262 acres in the southern portion of the CPA. The proposed change from RL-40 to a combination of SR-4 and RL-40 is estimated to result in an increase of 29 potential dwelling units (estimated 6 potential units under the current designations and 35 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would apply SR-10 in the portion proposed for SR-4 in the Proposed Project Map, resulting in an estimated DU increase of 10 (total potential of 16 DU).

The ME30A Proposed Project Map was found to be inconsistent with General Plan Policies LU-1.1, LU-1.3, LU-1.9, and LU-8.1, as discussed earlier in this report. The feasibility issues for the Proposed Map are related to mapping patterns, availability of infrastructure and services, and Groundwater Ordinance limitations. As the application Semi-Rural densities during the General Plan Update considered pre-existing parcelization and pre-existing development patterns, there isn't a precedent in the CPA for such a large parcel outside the Village to be designated higher than SR-10. The SR-10 designation for the southern portion in the Alternative Map would demonstrate greater consistency with the mapping pattern of the CPA outside the Villages, and considers the limited infrastructure and services available, including lack of water service. In addition, the SR-10 designation would be compatible with the 8-acre minimum lot size imposed by the Groundwater Ordinance. Considering these issues, the Alternative Map was found to be consistent with Policies LU-1.1, LU-1.3, LU-1.9, and LU-8.1.



The Proposed Project Map for ME30A was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Mountain Empire Subregional Plan or the Campo/Lake Morena Community Plan. The Alternative Map for ME30A would also not present any inconsistencies with the remainder of the applicable policies of the General Plan, Subregional Plan, or Community Plan, as it would apply a lower density designation in the southern portion, and like the Proposed Project Map, would not change the RL-40 designation in the northern portion.



NC3A General Plan and Community Plan Conformance

The NC3A Analysis Area covers 48 parcels over approximately 1,015 acres in the southeastern portion of the Hidden Meadows Community Planning Area (CPA), which is part of the North County Metro Subregion. The Analysis Area is approximately 1.7 miles east of I-15, one mile south of El Norte Parkway, and its main access road in the southern portion is Rincon Avenue. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from RL-20 to SR-10. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 11 (total potential of 77 DU). An Alternative Map is also available for consideration, which would only change the southern portion of the Analysis Area to SR-10 (approximately 350 acres), resulting in an estimated DU increase of 3 (total potential of 64 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 4 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

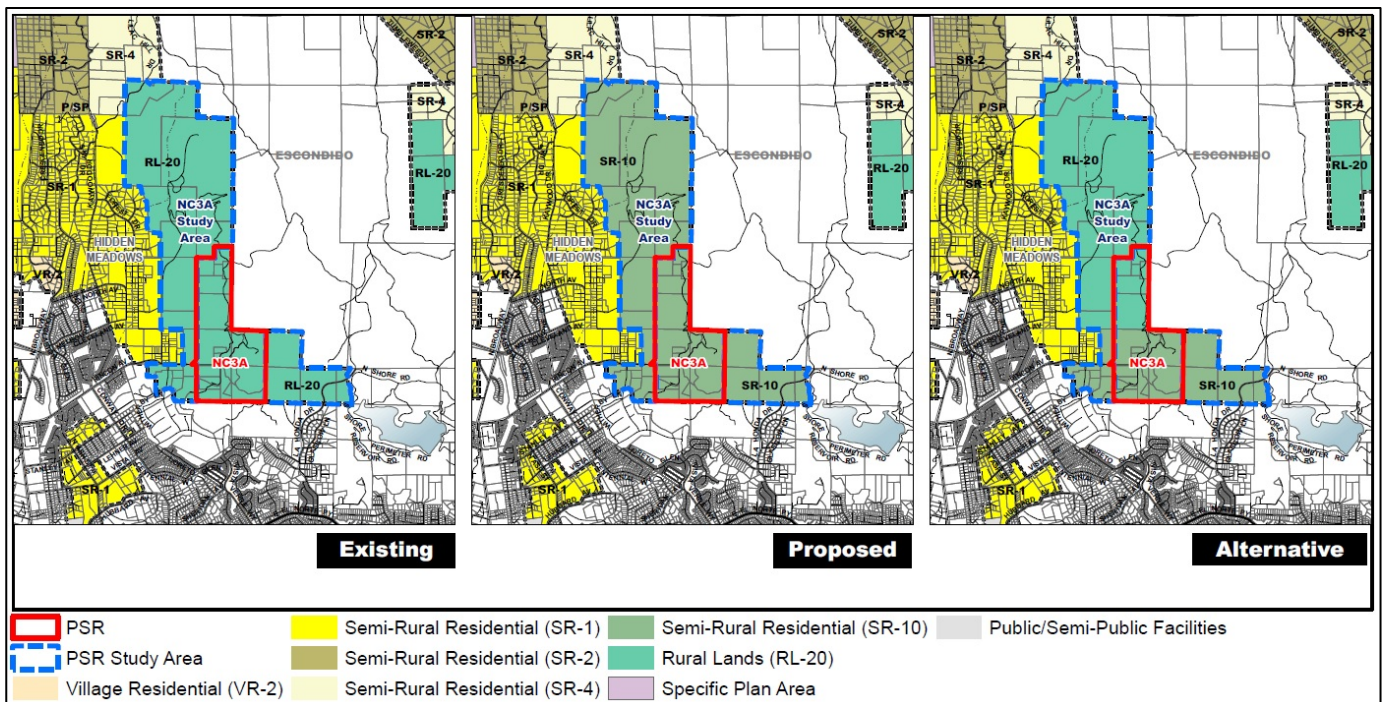


Figure 1: NC3A Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable North County Metro Subregional Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 3 miles from the geographic center of Escondido (adjacent to a portion of the City’s jurisdiction) and 13 miles from the geographic center of Carlsbad, with an estimated 44,289 jobs and 67,713 jobs, respectively. The proposed density would not be out of line with the distance to jobs. Most of the Analysis Area is in the water service area for the Valley Center Municipal Water District (VCMWD), but the southern portion is within the City of Escondido Water Division service area. No sewer service is available. Fire protection service within the Analysis Area is split between Deer Springs FPD covering the northern and central portions (majority of the area), and Escondido Fire District and Valley Center FPD covering the southern portion. Current estimates for emergency response travel time anticipate that the Analysis Area would be within the 20-minute travel time required for SR-10. Public road access in the Analysis Area is limited to Rincon Avenue in the southern portion. The closest I-15 freeway on-ramp is approximately 3 miles away via road distance and the closest transit stop is approximately 1.5 miles away.

The Analysis Area is currently within the Rural Lands Regional Category, which has a very limited application in the North County Metro Subregion, particularly within Spheres of Influence (SOI) for adjacent cities, which is the case for NC3A (within the Escondido SOI). In the Escondido General Plan, this SOI area is mapped for a mix of SR-2 and SR-4 equivalent densities. Adjacent unincorporated County properties to the west are designated SR-1 and SR-4. Though the Analysis Area is more constrained than these adjacent areas of SR-1 and SR-4, the lowest Semi-Rural density of SR-10 would not be out of line with the CDM. Considering the availability of, and proximity to infrastructure and services, the proximity to the City of Escondido, and the adjacent unincorporated County densities, a consistency finding can be made with Policy LU-1.1.

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-



Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See *applicable community plan for possible relevant policies.*]

This policy is not applicable to the NC3A proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

As discussed in the review of Policy LU-1.1 above, there is limited application of the existing RL-20 in the Subregion, particularly in SOIs, like NC3A is a part of (for Escondido). The adjacent unincorporated County designations and the SOI designations for the site in the Escondido General Plan are both substantially higher than the proposed SR-10. The proposed SR-10 would maintain a Conservation Subdivision requirement throughout the Analysis Area, addressing topography and habitat constraints within the Analysis Area. Therefore, the proposal has been found to be consistent with Policy LU-1.3.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the NC3A proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is adjacent to the City of Escondido jurisdiction (and within its SOI) and approximately three miles from the San Pasqual Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with NC3A.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.



The proposed SR-10 designation applies a 1 unit per 10 acres density only in the areas of less than 25% slope, and applies a 1 unit per 20 acres density (same as the existing RL-20) in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that 77 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential).

Due to the prevalence of steep slope within the Analysis Area and the SR-10 applying the same density as RL-20 in areas of steep slopes, there isn't a lot of additional density potential within the Analysis Area. Of the parcels that could subdivide under SR-10, only one would see an increase of more than one potential lot, as a result of the proposed change. There are some areas of sensitive habits, including oak woodlands and coastal sage scrub; however, they are not so widespread as to substantially affect the feasibility of the minimal change in allowed density. Access improvements would of course be necessary, but are not infeasible. As mentioned previously, the area is estimated to be within the 20-minute emergency response travel time for the proposed SR-10. Considering the minimal additional density potential and the proximity to infrastructure and services, the Proposed Project Map has been found to be consistent with Policy LU-1.9.

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The Analysis Area is adjacent to the Daley Ranch Preserve in the City of Escondido. Within the unincorporated lands surrounding the northern and western sides of the Analysis Area, there are higher densities of SR-1 and SR-4, so the proposed SR-10 is not a stretch in terms of community character. There are extensive steep slopes in the Analysis Area, which limit the additional density potential, as the allowed SR-10 density is the same as the RL-20 density in areas of steep slopes. Therefore, the Proposed Project Map for NC3A is consistent with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.



The goals of the North County Metro Subregional Plan and the key community issues for North County Metro discussed in General Plan Update reports share some common themes. The community seeks to promote agriculture by protecting Semi-Rural and Rural areas from urbanization and incompatible development. A related goal is to protect scenic rugged terrain and environmentally sensitive areas with Semi-Rural and Rural Lands designations. There are some agricultural operations in the Analysis Area, in addition to rugged terrain, scenic view sheds, and sensitive habitats. The proposal would put the Analysis Area in the lowest density designation of the Semi-Rural Regional Category, with the slopes in the Analysis Area limiting additional density potential. The site would still be lower density than adjacent unincorporated areas and lower than the Sphere of Influence designations for the site in the Escondido General Plan, with the Proposed Project designation better reflecting community objectives. Therefore, the proposal has been found to be consistent with Policy LU-2.4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area currently has a Rural Lands designation at the edge of the community. Greenbelts of Rural Lands and open space are very limited in the North County Metro Subregion (includes Hidden Meadows) due to many of the edges of the Subregion being located within a Sphere of Influence (SOI) of adjacent cities. Most of the edges of the Subregion received Semi-Rural designations during the 2011 General Plan Update, in consideration of the SOIs and planning documents of the adjacent cities. Considering this unique situation of the Subregion, the Proposed Project Map for NC3A has been found to be consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

The majority of the Analysis Area contains undeveloped areas of coastal sage scrub and chaparral, and there is also an area of oak woodlands covering just over 100 acres. Existing agricultural operations, residential development, and sufficient access options are more prevalent in the southern portion. With an estimate of only 11 additional potential dwelling units over a 1,015-acre area, and with the Conservation Subdivision requirement remaining with the proposed SR-10 designations, the most sensitive habitat areas could be preserved. Therefore, a consistency finding can be made.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

Approximately 800 acres of the 1,015 total acres is within the Very High FHSZ, while the southern end is in the Moderate FHSZ. Current estimates show the 20-minute fire response travel time could be met for this area. Additional internal access roads built to fire protection standards would be required, with the extent of these dependent upon the particular subdivision application (lots proposed, location, etc.). With the limited additional density potential, it is anticipated that the additional fire protection infrastructure needs would be feasible. Therefore, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.



This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for NC3A: The Analysis Area contains some small scale agricultural operations and the proposed SR-10 designation is low enough to support continued agricultural operations. Therefore, the Proposed Project Map for NC3A has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the NC3A proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]



This policy is not applicable to the NC3A proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the NC3A proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the NC3A proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Town Center Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

See the review of Policy LU-2.5. The Proposed Project Map would apply the lowest density of the Semi-Rural designations and would be consistent with mapping practices of the North County Metro Subregion. The Proposed Project Map has been found to be consistent with LU-10.3.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the NC3A proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.



This policy is not applicable to the NC3A proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The entire Analysis Area is within MRZ-3 designated lands. The proposed SR-10 designation is low enough so as not to preclude a future mining operation, though the existing conditions of residences and a habitat preserve in close proximity likely would (depending on the location of a proposed mining operation). Therefore, the Proposed Project Map for NC3A has been found to be consistent with Policy COS-10.2.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is approximately 4 miles from the North County Metro-East Village, but due to its location, residents within NC3A would be more likely to utilize areas within the City of Escondido for services, uses, and amenities typically associated with villages. NC3A is within Escondido's Sphere of Influence. It is approximately 1.5 miles from the nearest transit stop and three miles from the nearest park-and-ride facility. The Analysis Area is within a transition area between the higher density SR-1 adjacent to the west and Escondido's Daley Ranch Preserve adjacent to the east. The steep slopes within



the Analysis Area greatly limit the additional density potential associated with the proposed SR-10 (slope-dependent). Considering the language of the Policy, the Proposed Project Map for NC3A has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The NC3A Analysis Area is not within a Village, is not within a sewer service area, and contains only one public road in the 1,015-acre Analysis Area. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. Approximately 800 acres of the 1,015 total acres is within the Very High FHSZ, while the southern end is in the Moderate FHSZ. Current estimates show the 20-minute fire response travel time could be met for this area. With the limited additional density potential, it is anticipated that the additional fire protection infrastructure needs would be feasible. Therefore, a consistency finding can be made.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-10 designation is 20 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. Current estimates show the Analysis Area is almost half in the 10-20 minute travel time and half in the 5-10 minute travel time, though there is a small portion in the southern end that is estimated to be within the 0-5 minute travel time. Therefore, the Proposed Project Map has been determined to be consistent with Policy S-6.4 at this programmatic land use mapping stage.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require



development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

These policies are not applicable to the NC3A proposals (Proposed or Alternative Map) because there are no mapped floodways, floodplains, or dam inundations areas within the Analysis Area.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

As mentioned above, the NC3A Analysis Area is within the Hidden Meadows CPA, which is part of the North County Metro Subregion. There is not currently a community plan that only covers the Hidden Meadows area, and the only applicable community plan would be the North County Metro Subregional Plan. Though most of the policies of the Subregional Plan are focused on considerations in review of development design, there are a couple policies of the Subregional Plan that could be applied to a stand-alone GPA/Rezone for changing land use designations and zoning. Land Use Policy 7 prohibits new subdivisions exceeding the one dwelling unit per acre density within the City of Escondido Sphere of Influence. The existing zoning minimum lot size of 4 acres is not proposed to change and would not be in violation of this policy. Land Use Policy 8 calls for designating the Twin Oaks Valley outside the City of San Marcos Sphere of Influence under the Semi-Rural and Rural Lands Regional Categories. The Analysis



Area is not within the Twin Oaks Valley (though a Semi-Rural designation is proposed). Therefore, there are no policy inconsistency issues with the North County Metro Subregional Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 48 parcels covering approximately 1,015 acres in the southeastern portion of Hidden Meadows. The proposed change from RL-20 to SR-10 is estimated to result in an increase of 11 potential dwelling units (estimated 66 potential units under the current designations and 77 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would only change the southern portion of the Analysis Area to SR-10 (approximately 350 acres), resulting in an estimated DU increase of 3 (total potential of 69 DU).

The NC3A Proposed Project Map was not found to be inconsistent with any policies of the General Plan or the North County Metro Subregional Plan. The same conclusions would apply to the Alternative Map, as it would limit the area of change to approximately 350 acres in the southern portion, which has better access to road infrastructure and less constraints than the northern portion.



NC18A General Plan and Community Plan Conformance

The NC18A Analysis Area covers 5 parcels over approximately 93 acres in the southern portion of the North County Metro Subregion. The Analysis Area is within an unincorporated County island just southeast of Escondido. It is approximately $\frac{3}{4}$ mile east of Bear Valley Parkway and $\frac{3}{4}$ mile north of San Pasqual Valley Road. Its main access roads are Skyline Drive and Birch Avenue. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from SR-2 to a combination of SR-1 and SR-2. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 34 (total potential of 77 DU). An Alternative Map is also available for consideration, which would limit the SR-1 change to just the westernmost parcel (approximately 30 acres), resulting in an estimated DU increase of 14 (total potential of 57 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 4 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

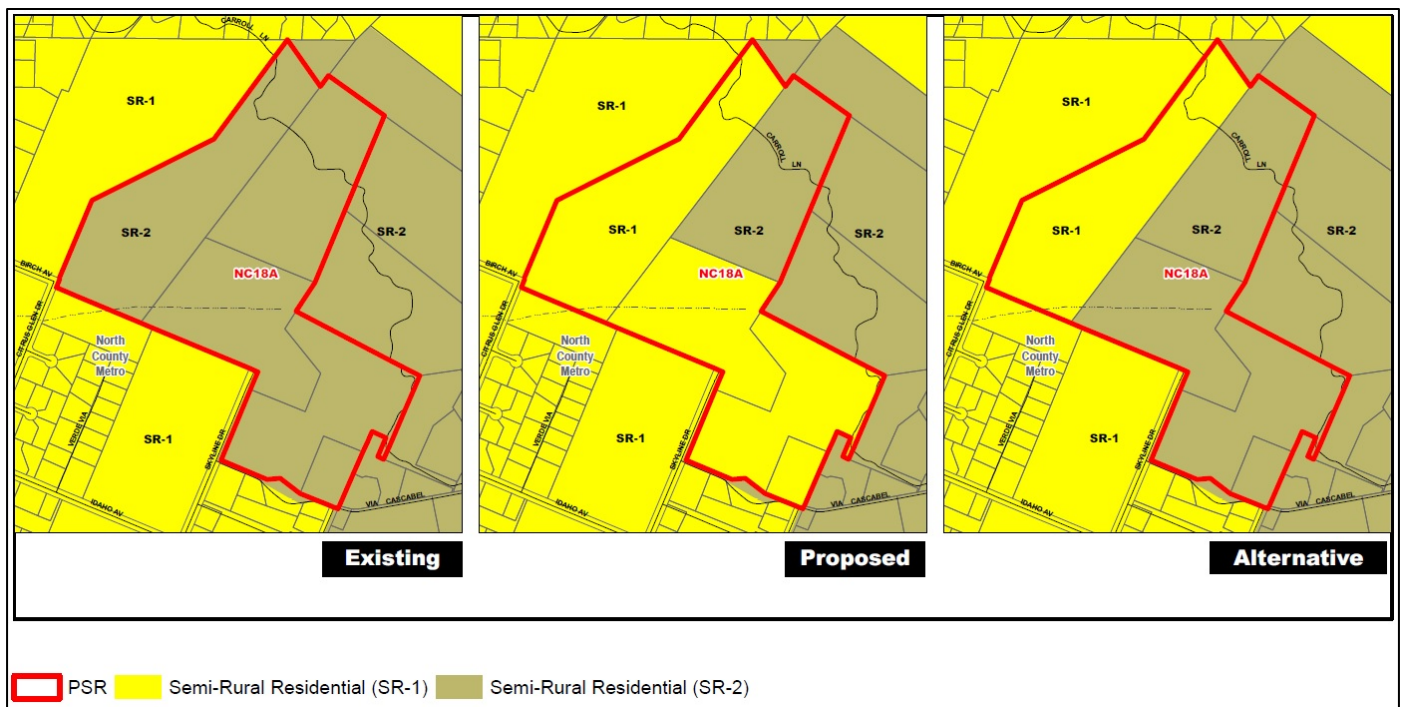


Figure 1: NC18A Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review



is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable North County Metro Subregional Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 2.5 miles from the geographic center of Escondido (only ½ mile from the closest edge of the City's jurisdiction) and 14 miles from the geographic center of Carlsbad, with an estimated 44,289 jobs and 67,713 jobs, respectively. The proposed density would not be out of line with the distance to jobs. Water service is available from City of Escondido Water Division; however, none of the parcels have existing service (utilizing wells). No sewer service is available. The Analysis Area is in the Rincon Del Diablo Fire Protection District, with service currently provided by the Escondido Fire Department. Current estimates show only the western edge would be within the 0-5 minute emergency response travel time, as discussed further in the review of Policy S-6.4. Public road access is available via Skyline Drive and Oro Verde Road, which dead end at the southern end of the Analysis Area. On the western end, Birch Avenue is public up to about 350 feet west of the Analysis Area boundary, and the portion between the end of the public portion and the border of the Analysis Area is estimated to be built to fire access standards.

The Analysis Area is currently within the Semi-Rural Regional Category, which is not proposed to change. It is within an unincorporated County island of approximately 5,000 acres, surrounded by the City of Escondido on the north, west, and south, and the City of San Diego on the east. This County island transitions from higher density (Village designations) with a suburban character on the west to lower densities with a more agricultural character on the east. NC18A is within the transition area from SR-1 to SR-2 and includes some areas of sensitive habitats (including wetlands) and slope constraints outside the agricultural and residential uses. It is within the Sphere of Influence (SOI) for the City of Escondido and Escondido's SOI General Plan designations include a mix of SR-1 and SR-2 equivalents. Considering the proximity to jobs, infrastructure, and services, and the existing CDM pattern in this County island area, the Proposed Project Map has been found to be consistent with LU-1.1.



LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See *applicable community plan for possible relevant policies.*]

This policy is not applicable to the NC18A proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

The Analysis Area is in a transition area with SR-1 to the west and south and SR-2 within the Analysis Area and to the east. Further west are areas of unincorporated County Village designations with more suburban character, just outside Escondido. There is more of an agricultural focus in this area of NC18A; however there are large lots of agricultural uses in the adjacent SR-1 areas as well. Considering this existing mixed pattern of development and General Plan densities, there is not a clear inconsistency with Policy LU-1.3.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the NC18A proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is approximately ½ mile from the City of Escondido jurisdiction (and within its SOI) and approximately 11 miles from the San Pasqual Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with NC18A.



LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-1 designation (for most of the Analysis Area) applies a 1 unit per acre density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that 77 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential).

A number of factors are considered in evaluating the feasibility of 77 potential lots within the Analysis Area. The southeastern parcel is currently under a Williamson Act contract for agricultural preservation that would not allow further subdivision while under the contract. Though additional units are considered for this parcel in the density calculations, subdividing to create these lots would not be allowed until/if a contract non-renewal process is completed, which typically takes 10 years. The central portion contains areas of estimated wetlands. With the application of typical wetlands buffers, development pad options and access options would be limited; however, there are more options for potential secondary access than in other PSR Analysis Areas. The northern portion contains hillsides of coastal sage scrub, which would likely be avoided, due to mitigation requirements and Resource Protection Ordinance (RPO) limitations on steep slope encroachment (10% maximum encroachment). There is no sewer service in the Analysis Area and septic systems/leach fields cannot encroach into wetlands or wetland buffers. Given the multiple possibilities for access, the density potential could likely be met (when/if the southeast parcel completes a Williamson Act contract non-renewal process, if desired) under a design that includes open space easements on several 1-acre parcels for protection of the resources. This would likely be required as the lack of sewer limits clustering possibilities. Considering these factors, the Proposed Project Map does not present a clear inconsistency with Policy LU-1.9.

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

NC18A is in an area where SR-1 densities closer to central Escondido transition to more agricultural lands of SR-2 densities. Parcels of 1-2 acres are more common to the west while 5-20 acre parcels are more



common to the east. Though the Analysis Area is part of a transition area, with regard to typical uses, community character, and lot sizes, its close proximity to more suburban patterns reduces potential community character inconsistencies. Based on the nearby areas of SR-1, the NC18A Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

*The goals of the North County Metro Subregional Plan and the key community issues for North County Metro discussed in General Plan Update reports share some common themes. A Subregional Plan goal seeks to protect scenic rugged terrain and environmentally sensitive areas with Semi-Rural and Rural Lands designations. A goal related to agriculture notes the community seeks to promote agriculture by protecting Semi-Rural and Rural areas from urbanization and incompatible development. Expanding on this, a community issue noted in hearing reports for the General Plan Update was to ensure preservation of agriculture in areas adjacent to rapidly growing cities. The Analysis Area contains current agricultural operations and areas of prime agricultural soils, particularly in the southern and central portions. General Plan Guiding Principle 7 states, "Preserve agriculture as an integral component of the region's economy, character, and open space network." See the review of Policy LU-7.1 for a discussion of research of County reports and guidelines that outline limitations in agricultural preservation and agriculture/residential compatibility issues where densities move into SR-1 and higher. With the number of potential units allowed over the whole site under the Proposed Project Map and the limited potential development footprint locations with the estimated wetlands in the south-central portion and slopes of coastal sage scrub in the northern portion, it would be difficult to reach the development potential (see the review of Policy LU-1.9) without substantial loss of agriculture. Most areas outside wetlands, wetland buffers and slope constraints would likely be needed for new housing and access development footprint. Thus, preservation of agricultural uses becomes less likely. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.***

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). It is also not at the edge of the community. Therefore, the Proposed Project Map for NC18A is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

While much of this Analysis Area has been previously cleared for residential and agricultural uses, a riparian corridor of estimated wetlands remains in the south-central portion and some pockets of coastal sage scrub remain on hillsides. Consideration is given to the location outside of PAMA for draft North County MSCP and outside of a Resource Conservation Area of the Subregional Plan. Given the level of constraints in relation to the extent of previously cleared areas, the Proposed Project Map does not present a clear inconsistency with Policy LU-6.2.



- LU-6.11 Protection from Wildfires and Unmitigable Hazards.** Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

Most of the Analysis Area is within the Very High FHSZ, like much of the adjacent and nearby areas of existing SR-1. Current estimates show most of the Analysis Area would be just beyond the 5-minute General Plan standard for fire response travel time. Verification of emergency response travel time would be required at the development review stage. Considering the level of fire hazards in relation to adjacent and nearby SR-1 areas, a consistency finding can be made.

- LU-7.1 Agricultural Land Development.** Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for NC18A: The Analysis Area contains agricultural operations and is in an area of transition from the mostly small lot, suburban-style residential to the south and west (just outside the City of Escondido) and larger lots of combined residential and agricultural uses in the area of NC18A and to the east. There are substantial areas of prime agricultural soils in the southern and central portions of NC18A. Based on



the research noted above, a switch from the SR-2 to SR-1 designation for the 93 acres would not be in line with a “lower density land use designation that supports continued agricultural operations” due to the increased edge effects associated with homes in such close proximity. Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the NC18A proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the NC18A proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the NC18A proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the NC18A proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Townner Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.



The Proposed Project Map would be consistent with LU-10.3 because a Semi-Rural designation is proposed in an area less than a mile from Village designations in the unincorporated County and from the City of Escondido boundary. In addition, the Analysis Area is not at the edge of a community.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the NC18A proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the NC18A proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The entire Analysis Area is within MRZ-3 designated lands. The existing density of SR-2 would already preclude future mining operations, due to the proximity of homes associated with that density. Therefore, the Proposed Project Map for NC18A has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.



COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is approximately one mile from the North County Metro-East Village, but would also maintain a closer connection to services within the nearby City of Escondido and is within their Sphere of Influence. NC18A is approximately ¾ mile from the nearest transit stop and 4.5 miles from the nearest park-and-ride facility. NC18A is in an area where SR-1 densities closer to central Escondido transition to more agricultural lands of SR-2 densities. Considering the language of the Policy, the Proposed Project Map for NC18A has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The NC18A Analysis Area is not within a Village, is not within a sewer service area, and most of it is not within the estimated 0-5 minute emergency response travel time area (General Plan standard for the proposed SR-1). Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. Most of the Analysis Area is within the Very High FHSZ, like much of the adjacent and nearby areas of existing SR-1. Current estimates show most of the Analysis Area would be just beyond the 5-minute General Plan standard for fire response travel time. Considering the level of fire hazards in relation to adjacent and nearby SR-1 areas, and the multiple adjacent public roads for potential access, a consistency finding can be made.



- S-6.4 Fire Protection Services for Development.** Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-1 designation (proposed for most of the Analysis Area) is 5 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. Almost all of the site is estimated to be within the 5-10 minute emergency response travel time. This current problematic estimate should be considered by decision-makers in light of the fire hazards; however, considering the standard requires review and consideration at the subdivision application stage, there is not a clear inconsistency with the policy at this stage.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.
- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

These policies are not applicable to the NC18A proposals (Proposed or Alternative Map) because there are no mapped floodways, floodplains, or dam inundations areas within the Analysis Area.



REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The NC18A Analysis Area is within the North County Metro Subregion. There are two policies of the North County Metro Subregional Plan that are considered during the review of a stand-alone GPA/Rezone. Land Use Policy 7 prohibits new subdivisions exceeding the one dwelling unit per acre density within the City of Escondido Sphere of Influence. The Analysis Area is within the Escondido Sphere of Influence and the proposal would not exceed the one dwelling unit per acre density. Land Use Policy 8 calls for designating the Twin Oaks Valley outside the City of San Marcos Sphere of Influence under the Semi-Rural and Rural Lands Regional Categories. Though a Semi-Rural designation is proposed, the Analysis Area is not in the Twin Oaks Valley. Therefore, there are no policy inconsistency issues with the North County Metro Subregional Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of five parcels covering approximately 93 acres within a County island, just east of a border with the City of Escondido. The proposed change from SR-2 to a combination of SR-1 and SR-2 is estimated to result in an increase of 34 potential dwelling units (estimated 43 potential units under the current designations and 77 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would only change the westernmost parcel of the Analysis Area to SR-1 (approximately 30 acres), resulting in an estimated DU increase of 14 (total potential of 57 DU).

The NC18A Proposed Project Map was found to be inconsistent with General Plan policies LU-2.4 and LU-7.1, as discussed earlier in this report. These inconsistencies considered the research on impacts to agricultural preservation when densities get into SR-1 and higher. Preserving agricultural areas is a common theme discussed in the goals section of the Subregional Plan and in community issues for this area noted in General Plan Update reports. Given the constraints that will need to be avoided and the lack of sewer service limiting clustering, it is anticipated that the feasibility of reaching the density associated with the Proposed Project Map would necessitate substantial loss of agriculture in the Analysis Area. The Alternative Map would only change the western parcel (approximately 30 acres) to SR-1. Current agricultural operations and prime agricultural soils are limited to a much smaller percentage of the area of this parcel than the others. It also only has a small area of estimated wetlands in a location that would not be anticipated to substantially hinder access options. Considering these factors and the 20-unit reduction in overall estimated density potential associated with this option, it is anticipated that reaching the density potential would be possible without such a substantial loss of agriculture, and the Alternative Map has been found to be consistent with these two policies.

The Proposed Project Map for NC18A was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezonses. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the North County Metro Subregional Plan. The Alternative Map for NC18A would also not present any inconsistencies with the remainder of the



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applicable policies of the General Plan and the North County Metro Subregional Plan, as it would include a much smaller area changing to SR-1.



NC22 General Plan and Community Plan Conformance

The NC22 Analysis Area covers 17 parcels over approximately 154 acres in the southern portion of the Twin Oaks Community Planning Area (CPA), which is part of the North County Metro Subregion. It is located approximately ½ mile south of Buena Creek Road and 2 miles north of SR-78. The only public road access is Esplendido Avenue, which provides access to the Study Area parcels. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from SR-10 to a combination of SR-1 and SR-10. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 52 (total potential of 73 DU). An Alternative Map is also available for consideration, which would instead apply SR-4 to the area proposed for SR-1 in the Proposed Project Map. Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

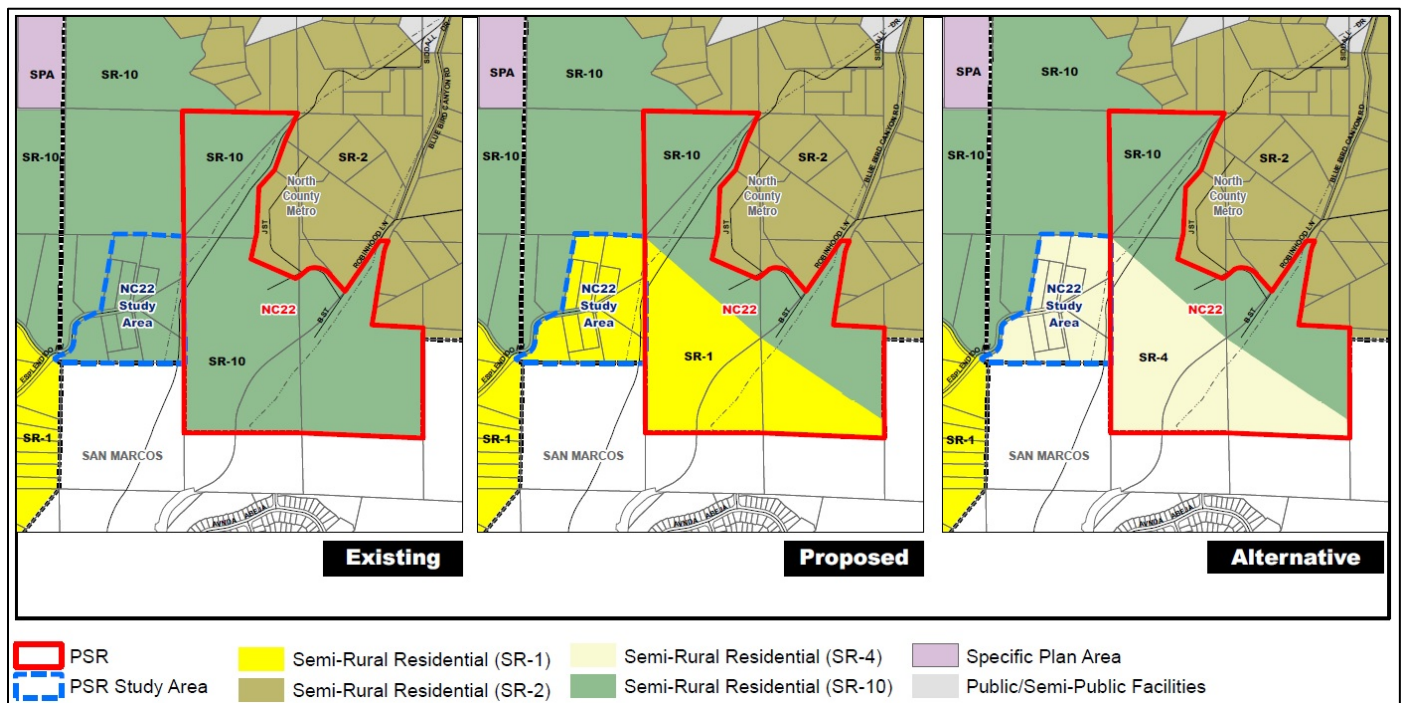


Figure 1: NC22 Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review



is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable North County Metro Subregional Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 2.7 miles from the geographic center of San Marcos (though adjacent to the northern border of San Marcos) and 6.5 miles from the geographic center of Carlsbad, with an estimated 34,576 jobs and 67,713 jobs, respectively. The proposed density would not be out of line with the distance to jobs. Water service is available from the Vista Irrigation District. The 11 Study Area parcels are in the Buena Sanitation District; however, they do not currently have sewer service or access to sewer lines. The two northernmost PSR parcels are within the Vista Fire Protection District (FPD) service area, and all of the remaining parcels are within the San Marcos FPD service area. Current estimates show the Analysis Area would be within the 5-10 minute emergency response travel time, as discussed further in the review of Policy S-6.4. Current public road access is limited to Esplendido Avenue, which provides access to the Study Area parcels, but ends in a cul-de-sac there. There is no current public road access to the PSR parcels; however, Las Posas Road (which currently dead ends south of the Analysis Area) is in the Mobility Element with an alignment that would go through the PSR parcels, and connect to Buena Creek Road, a half mile north.

The Analysis Area is currently within the Semi-Rural Regional Category, which is not proposed to change. The Study Area, on the western side of the Analysis Area, is adjacent to and area of SR-1 that is in the Village boundary for the North County Metro North Village. Part of the justification for higher densities in this nearby Village area is the location of the Buena Creek Sprinter Station, where there are Village designations that transition out to Semi Rural. The Sprinter Station is approximately two miles away via roads, but just over one mile straight line distance. The existing SR-10 on the site is was applied in consideration of the large parcels in the PSR Area and the very high quality habitat within an important wildlife corridor. However, the North County Metro Subregion does not include “greenbelt” buffers at the edge of the community, due to the numerous properties at the edge of the community being within Spheres of Influence (SOIs) for adjacent cities. The lower density Semi-Rural designations applied near



the edges of San Marcos were generally in consideration of pre-existing parcelization and development patterns, in addition to agriculture and sensitive habitat preservation considerations. These issues are discussed in the review of other policies below. Considering the proximity to jobs, transportation networks, and higher density unincorporated areas, the Proposed Project Map does not present a clear inconsistency with Policy LU-1.1.

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the NC22 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

*Though the Analysis Area is close to higher density areas of the unincorporated County and the City of San Marcos, the existing designation considers the large parcels in the PSR area and the need to provide a level of preservation of its sensitive habitats within an important wildlife corridor. The SR-10 fits the pattern of mapping in this area of southern Twin Oaks, where existing parcelization and development patterns were considered in combination with the need to provide some preservation of agricultural areas, sensitive habitats, and wildlife corridors. The application of SR-1 in the southeastern portion of the PSR parcels would not be in line with this existing land use mapping pattern. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.3.***

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the NC22 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary



precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is adjacent to a northern border of the City of San Marcos and is approximately 1.5 miles from the City of Vista. Land use patterns in adjacent and nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with NC22.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-1 designation (for the Study Area and southwestern portion of the PSR area) applies a 1 unit per acre density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that 73 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential).

A number of factors are considered in evaluating the feasibility of 73 potential lots within the Analysis Area. Four of the Study Area parcels would have additional subdivision potential under SR-1, but there is existing public road access and existing residential development in that portion. As this portion is within the sewer service area for the Buena Sanitation District, a half-acre minimum lot size is proposed and clustering of potential new lots could be used to avoid most slope and habitat constraints. The issues discussed below are more focused on the PSR parcels which make up approximately 126 acres of the 154-acre Analysis Area.

*In the PSR parcels, SR-10 would remain in the northeastern portion, while SR-1 would be applied in the southwestern portion. Under this map, it is estimated that 56 lots would be possible in these PSR parcels, with most of them consolidated in the proposed SR-1 portion. There is no current access to this southwest portion and only dead end private road access is available on the north side. Though there is a Mobility Element planned alignment showing a Las Posas Road connection through this area, there are not guarantees that the road connection would be built, as it would have to cross highly constrained areas and block off a critical wildlife corridor. Almost half of the PSR portion is estimated to be within steep slopes and only 10% development footprint encroachment into steep slopes would be allowed. It is estimated that coastal sage scrub covers approximately 85% of the PSR area, which will make mitigation difficult, and there is a high potential to host sensitive species which may require extensive onsite habitat preservation. The entire area is in the Draft NCMSCP Pre-Approved Mitigation Area (PAMA) where mitigation ratios will encourage preservation within the PAMA and development outside the PAMA. Outside the steep slopes and coastal sage scrub, there is a riparian corridor running northeast to southwest through the Analysis Area, which includes a natural pond area and makes up the headwaters of Agua Hedionda Creek. With the extent of additional access roads that would be required and the restrictions on wetland crossings outline in the County's Resource Protection Ordinance, the corridor would have a major impact on the feasibility of reaching the density potential. **Considering these factors, the Proposed Project Map has been found to be inconsistent with Policy LU-1.9.***



Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

Parcel sizes range from ¼ acre to 40 acres within a one mile radius. Smaller parcels are found to the west in the transition to the Village and larger parcels are found in the SR-10 area to the north and SR-2 area to the east. General Plan designations vary widely in this portion of Twin Oaks and this area of SR-10 is reflective of a prime wildlife corridor that forms the headwaters of Agua Hedionda Creek. Considering the higher densities to the west and the variations in land use designations in this area of Twin Oaks, the NC22 Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

*The goals of the North County Metro Subregional Plan and the key community issues for North County Metro discussed in General Plan Update reports share some common themes. A Subregional Plan goal seeks to protect scenic rugged terrain and environmentally sensitive areas with Semi-Rural and Rural Lands designations. The Analysis Area is within Draft NCMSCP PAMA and is part of an undeveloped native habitat corridor that spans over 1,200 acres on 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, and there isn't an area of limited constraints. The switch to SR-1 for a portion of the Analysis Area would remove the Conservation Subdivision requirement on that portion. Considering the critical nature of this wildlife corridor in the overall NCMSCP planning for this area, the change would not reflect the unique issues in this portion of CPA and would not reflect General Plan Guiding Principle 4, to promote environmental stewardship that protects the range of natural resources and habitats. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.***

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.



The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). Greenbelts (per the General Plan definition) are limited in the North County Metro Subregion, due to the Spheres of Influence for adjacent cities covering many of the edges of the Subregion. Therefore, the Proposed Project Map for NC22 is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

*The entire Analysis Area is within a PAMA area for the draft North County MSCP (see Biology sections 2.4.2 and 2.4.3.4), and it is within an important wildlife corridor for this area near the border between the City of San Marcos and the North County Metro Subregion, due to the size of the corridor and the development pressures in this area. The majority of the Analysis Area (126 acres of the 154 acres) is comprised of the NC22 PSR parcels, which are undeveloped, with the southwestern half of the area proposed for SR-1. This area contains a riparian corridor in the headwaters of Agua Hedionda Creek. Surrounding the riparian corridor are hillsides of high quality coastal sage scrub habitat. Several species covered in the draft North County MSCP have the potential to occur within the Analysis Area. The Conservation Subdivision design required in the current SR-10 would be removed with the proposed change to SR-1. **Therefore, the NC22 Proposed Project Map has been determined to be inconsistent with Policy LU-6.2.***

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The Analysis Area is almost entirely within the Very High FHSZ. Current estimates show the area would not meet the 5-minute General Plan travel time standard for the proposed SR-1. Fire protection access improvement requirements along with the extent of sensitive habitats could affect the feasibility of the density allowed under the Proposed Project Map. Considering the level of fire clearing in surrounding properties and higher density development in close proximity, a consistency finding can be made, though extensive access improvements would be required for the potential density associated with the proposed SR-1.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define 'lower-density land use designations that support continued agricultural operations' or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County's CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.



Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County's unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include 'rural residential lands,' which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for NC22: The PSR parcels that cover most of the Analysis Area do not contain agricultural operations. There are some small agricultural operations within the 28-acre Study Area; however, all of the parcels used partially for agriculture within the Study Area except one, are already less than two acres. Considering the existing parcel sizes of the Study Area properties that contain agricultural operations, a consistency finding can be made, as the proposed change would not be anticipated to result in a substantial loss of agriculture.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the NC22 proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the NC22 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the NC22 proposals (Proposed or Alternative Map) because no Village designations are proposed.



LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the NC22 proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Town Center Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Proposed Project Map would be consistent with LU-10.3 because a Semi-Rural designation is proposed in an area that is adjacent to a Village. As discussed in the review of Policy LU-2.5, the North County Metro Subregion has a development pattern that doesn't lend itself to extensive application of Rural Lands on the edges of the Subregion, as many of these areas are in Spheres of Influence of adjacent cities and adjacent to substantially higher densities.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the NC22 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the NC22 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to



retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The entire Analysis Area is within MRZ-3 designated lands. The change to the SR-1 designation for the southwestern portion of the PSR area and the entire Study Area would not constitute a density low enough to facilitate future mining operations; however, the proximity of existing homes would preclude future mining operations in this area. Therefore, the Proposed Project Map for NC22 has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The western portion of the Analysis Area is adjacent to the Village boundary for the North County Metro-North Village, but Village densities are approximately ¼ mile away. Village densities of single family residential are also in close proximity within the City of San Marcos to the south, but commercial uses are approximately one mile away; to the west within the unincorporated County and to the south within the City of San Marcos. Approximately half of the Analysis Area is within the Sphere of Influence for San Marcos. The Analysis Area is approximately 1.5 miles from the nearest transit stop. Considering the language of the Policy, the Proposed Project Map for NC22 has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES



- H-1.3 Housing near Public Services.** Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The NC22 Analysis Area is not within a Village, most of it is not within a sewer service area, there is no current public road access to the PSR area where almost all of the additional density potential would be found, and the site is not currently estimated to be within the 5 minute emergency response travel time standard for the proposed SR-1. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

- S-1.1 Minimize Exposure to Hazards.** Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The Analysis Area is almost entirely within the Very High FHSZ. Current estimates show the area would not meet the 5-minute General Plan travel time standard for the proposed SR-1. Fire protection access improvement requirements along with the extent of sensitive habitats could affect the feasibility of the density allowed under the Proposed Project Map. Considering the level of fire clearing in surrounding properties and higher density development in close proximity, a consistency finding can be made, though extensive access improvements would be required for the potential density associated with the proposed SR-1.

- S-6.4 Fire Protection Services for Development.** Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-1 designation (proposed for the majority of the Analysis Area) is 5 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. The Analysis Area is estimated to be within the 5-10 minute emergency response travel time. This current problematic estimate should be considered by decision-makers in light of the fire hazards; however, considering the standard requires review and consideration at the subdivision application stage, there is not a clear inconsistency with the policy at this stage.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.



- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

These policies are not applicable to the NC22 proposals (Proposed or Alternative Map) because there are no mapped floodways, floodplains, or dam inundations areas within the Analysis Area.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The NC22 Analysis Area is within the Twin Oaks CPA, which is part of the North County Metro Subregion. There is not currently a separate community plan for Twin Oaks, covering only that CPA. Therefore, the only applicable community plan is the North County Metro Subregional Plan. There are two policies of the North County Metro Subregional Plan that are considered during the review of a stand-alone GPA/Rezone. Land Use Policy 7 prohibits new subdivisions exceeding the one dwelling unit per acre density within the City of Escondido Sphere of Influence. Though the proposal would not exceed the one dwelling unit per acre density, the Analysis Area is not within the Escondido Sphere of Influence. Land Use Policy 8 calls for designating the Twin Oaks Valley outside the City of San Marcos Sphere of Influence under the Semi-Rural and Rural Lands Regional Categories. A combination of Semi-Rural designations is proposed. Approximately 2/3 of the Analysis Area is within the San Marcos Sphere of Influence. Therefore, there are no inconsistencies with the North County Metro Subregional Plan.



REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 17 parcels covering approximately 154 acres in the southern portion of the Twin Oaks CPA, adjacent to the City of San Marcos jurisdiction. The proposed change from SR-10 to a combination of SR-1 and SR-10 is estimated to result in an increase of 52 potential dwelling units (estimated 21 potential units under the current designations and 73 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would instead apply SR-4 to the area proposed for SR-1 in the Proposed Project Map, resulting in an estimated DU increase of 7 (total potential of 28 DU).

The NC22 Proposed Project Map was found to be inconsistent with General Plan policies LU-1.3, LU-1.9, LU-2.4 and LU-6.2, as discussed earlier in this report. These inconsistency with LU-1.3 was related to the mapping pattern that considers the level of existing parcelization, pre-existing development patterns, agricultural preservation, and level of sensitive habitats and constraints in the application of Semi-Rural densities in this southern portion of Twin Oaks. The application of SR-4 instead of SR-1 provides a greater level of consistency with this pattern, and therefore, the Alternative Map would be consistent with LU-1.3. The inconsistency with Policy LU-1.9 would also not carry forward to the Alternative Map. The Alternative would only be estimated to allow seven additional potential lots over the current General Plan and overall dwelling unit potential would be about half that of the Proposed Project Map. While mitigation for habitat impacts and access will still require creative solutions in the PSR area, there is more reasonable assurance of feasibility.

The inconsistencies with LU-2.4 and LU-6.2 would remain with the Alternative Map, as they are related to lower densities for areas with sensitive habitats and adhering to land use objectives for the community. The PSR parcels that make up most of the Analysis Area contain some of the highest quality habitat in the area and the SR-4 designation would remove the Conservation Subdivision requirement and necessitate partially cutting off a critical wildlife corridor for both wetland and upland species. Thus the Alternative.

The Proposed Project Map was not found to be inconsistent with any other applicable General Plan policies or applicable policies of the North County Metro Subregional Plan. The same would hold true for the Alternative Map, as it would substantially reduce the number of potential dwelling units.



NC37 General Plan and Community Plan Conformance

The NC37 Analysis Area covers 15 parcels over approximately 158 acres in the northwestern portion of the Twin Oaks Community Planning Area (CPA), which is part of the North County Metro Subregion. It is located adjacent to Twin Oaks Valley Road, approximately 1.5 miles north of Deer Springs Road and 2 miles west of I-15 (though 4 road miles to the nearest I-15 on-ramp). Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from SR-10 to SR-4. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 12 (total potential of 31 DU). An Alternative Map is also available for consideration, which would maintain SR-10 in the western leg of the Analysis Area, while changing the rest to SR-4. Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 4 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

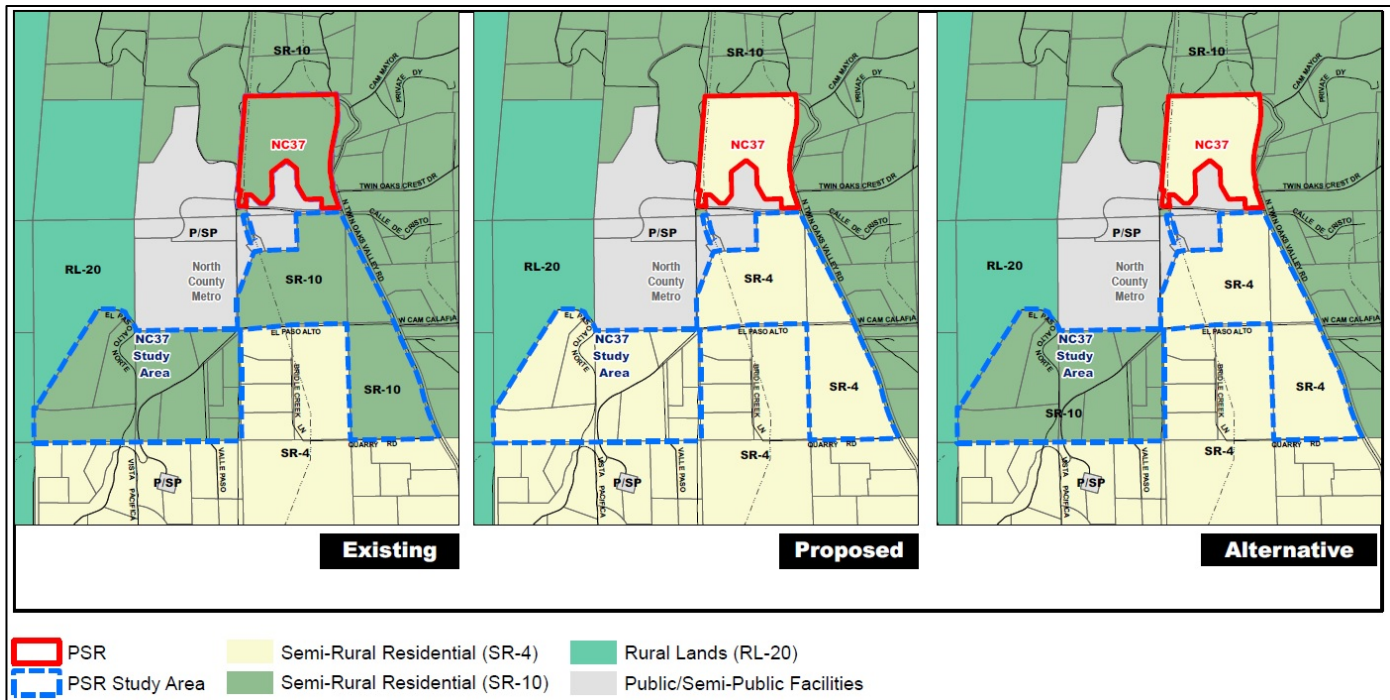


Figure 1: NC37 Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review



is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable North County Metro Subregional Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 4 miles from the geographic center of Vista and 8.5 miles from the geographic center of Carlsbad, with an estimated 33,290 jobs and 67,713 jobs, respectively. The proposed density would not be out of line with the distance to jobs. Water service is available from the Vallecitos Municipal Water District. There is no sewer service available. Fire protection service is split between the Deer Springs Fire Protection District (PSR parcel on the north), the San Marcos Fire Protection District (eastern Study Area parcels), and the Vista Fire Protection District (western Study Area parcels). Current estimates show most of the Analysis Area would be within the 5-10 minute emergency response travel time standard for SR-4; however, most of the western leg is estimated to be beyond the 10-minute travel time, as discussed further in the review of Policy S-6.4. Current public road access is limited to Twin Oaks Valley Road, which is adjacent to the eastern end of the Analysis Area, so it is adjacent to each of the parcels except those in the western leg of the area.

*The Analysis Area is currently within the Semi-Rural Regional Category, which is not proposed to change. Though it is not on the outer edge of the community, it is in a transition area of lower Semi-Rural densities in the transition from the higher densities surrounding the North County Metro North Village and Buena Creek Sprinter Station to the lower Semi-Rural densities and Rural Lands “greenbelt” buffers of the San Marcos Mountains and Merriam Mountains. These mountain ranges are Resource Conservation Areas (RCAs), as discussed in the North County Metro Subregional Plan. The western leg of the Analysis Area is within the San Marcos Mountains RCA and consists of mostly coastal sage scrub on hillsides. These mountainous areas of the CPA have a lower level of infrastructure and services than the rest of the CPA, particularly the road infrastructure, with few roads built to fire access standards. They serve as buffer from the City of Vista to the west and the Bonsall CPA to the north, to strengthen community identity and serve as natural barrier to higher density development. **Therefore, the western leg of the Analysis Area is better suited for the current SR-10 in consideration of the CDM parameters, and the Proposed Project Map has been found to be inconsistent with Policy LU-1.1.***



- LU-1.2 Leapfrog Development.** Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See *applicable community plan for possible relevant policies.*]

This policy is not applicable to the NC37 proposals (Proposed or Alternative Map) because no Village designations are proposed.

- LU-1.3 Development Patterns.** Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

*The current mapping pattern of the CPA (consistent with General Plan Update mapping patterns), considers existing parcelization and development patterns, proximity to Village areas, and also level of habitat constraints and preservation of agriculture. The eastern portion has a high level of existing development footprint, mostly for agriculture, and research shows the proposed SR-4 designation can support continued agricultural operations. A change for the western leg presents issues with consistency with the current mapping pattern, as that area contains high quality coastal sage scrub on hillsides, is mostly undeveloped and is mostly within a mountainous area that buffers the Twin Oaks Valley from higher density development in the City of Vista to the west. **Therefore, the Proposed Project Map change for the western leg of the Analysis Area has been found to be inconsistent with Policy LU-1.3.***

- LU-1.4 Village Expansion.** Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the NC37 proposals (Proposed or Alternative Map) because no Village designations are proposed.

- LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions.** Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.



The western edge of the Analysis Area is approximately ½ mile from an eastern edge of Vista (further via road distance), and the southern edge is approximately 1.5 miles from a northern border of the City of San Marcos. Land use patterns in adjacent and nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with NC37.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-4 designation applies a 1 unit per 4 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that 31 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential).

A number of factors are considered in evaluating the feasibility of 31 potential lots within the Analysis Area. Based on current parcelization, only three of the parcels in the Analysis Area would have additional subdivision potential under the proposed SR-4. These include the PSR parcel on the northern end and the two largest Study Area parcels on the east. Each of these are adjacent to the public, Mobility Element road, Twin Oaks Valley Road. This road would be the starting point for measurement of dead end road lengths, which would be ¼ mile, though there are also likely options for secondary access if the maximum dead end road length is not met. The two Study Area parcels with additional density potential are almost 100% disturbed, so there is very little native vegetation that could limit feasibility. The northern PSR parcel is mostly disturbed in the eastern portion near Twin Oaks Valley Road, with substantial areas of undisturbed chaparral in the western and northern portion. With estimated DU potential of 6 in this PSR parcel and considering the proposed zoning minimum lot size of 2 acres, lots could be clustered in the eastern portion, providing reasonable assurance of feasibility. There are no floodplains or areas of estimated wetlands that would further limit access and housing pad options. In addition, these parcels with additional density potential are estimated to be within the 5-10 minute emergency response travel time standard for the proposed SR-4. In consideration of these factors, the Proposed Project Map has been found to be consistent with Policy LU-1.9.

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.



Parcel sizes range from ½ acre to 175 acres within a one mile radius. SR-10 designated properties are found to the north and east, while SR-4 designated properties are found to the south and RL-20 to the west. The Analysis Area includes extensive agricultural operations, and it is anticipated that an SR-4 designation would not inherently lead to a substantial loss of agriculture in the area and corresponding community character impacts, as discussed further in the review of Policy LU-7.1. Therefore, the Proposed Project Map for NC37 has been found to be consistent with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

The goals of the North County Metro Subregional Plan and the key community issues for North County Metro discussed in General Plan Update reports share some common themes. A Subregional Plan goal seeks to protect scenic rugged terrain and environmentally sensitive areas with Semi-Rural and Rural Lands designations. A goal related to agriculture notes the community seeks to promote agriculture by protecting Semi-Rural and Rural areas from urbanization and incompatible development. Expanding on this, a community issue noted in hearing reports for the General Plan Update was to ensure preservation of agriculture in areas adjacent to rapidly growing cities. As discussed in the review of Policy LU-7.1, research shows the proposed SR-4 designation can support continued agricultural operations. The eastern portion of the Analysis Area has a high level of existing ground disturbance and is adjacent to the public road. The western leg of the Analysis Area contains mostly steep hillsides of sensitive coastal sage scrub vegetation; however, this area is not estimated to have additional subdivision potential under SR-4. Considering these factors, the proposed change would not be anticipated to substantially impact community character, and has been found to be consistent with Policy LU-2.4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). Greenbelts (per the General Plan definition) are limited in the North County Metro Subregion, due to the Spheres of Influence for adjacent cities covering many of the edges of the Subregion. Therefore, the Proposed Project Map for NC37 is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

This Analysis Area contains extensive existing grading footprint for agricultural and residential uses. Areas of remaining vegetation include coastal sage scrub, chaparral, and non-native grasslands mostly in the western and northern portions. The most sensitive habitat area is the western leg of the Analysis Area, which is mostly undeveloped steep hillsides of sensitive coastal sage scrub vegetation. Based on existing parcelization, this portion does not have additional subdivision potential. Therefore, a consistency finding can be made.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.



Approximately half of the area is within the Moderate FHSZ, due to the agricultural operations. The other half is in the Very High FHSZ. Current estimates show that most of the Analysis Area would be within the 10-minute General Plan fire response travel time standard for SR-4. As with other issues, the western leg of the Analysis Area would be the most problematic from a fire protection standpoint, due to the native vegetation, slopes, and distance from the public road. As the parcels with additional density potential are located in the eastern and northern portions closer to the public road, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for NC37: The Analysis Area contains agricultural operations. Portions of the eastern end of the Analysis Area contain soils which meet the criteria for Farmland of Statewide Importance. The proposed SR-4 designation would not be anticipated to conflict with continued agricultural operations, so the proposal has been found to be consistent with Policy LU-7.1.



- LU-8.1 Density Relationship to Groundwater Sustainability.** Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the NC37 proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent.

- LU-9.2 Density Relationship to Environmental Setting.** Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the NC37 proposals (Proposed or Alternative Map) because no Village designations are proposed.

- LU-9.5 Village Uses.** Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the NC37 proposals (Proposed or Alternative Map) because no Village designations are proposed.

- LU-9.6 Town Center Uses.** Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the NC37 proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

- LU-9.9 Residential Development Pattern.** Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Towner Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

- LU-10.3 Village Boundaries.** Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Proposed Project Map would be consistent with LU-10.3 because a Semi-Rural designation is proposed in an area that is in a transition between higher density Semi-Rural designations outside the North County Metro North Village and Rural Lands designations in more mountainous areas that serve



as buffers between the community and the City of Vista on the west and the Bonsall CPA on the north. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-10.3.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the NC37 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the NC37 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The Analysis Area includes approximately 131 acres within MRZ-3 designated lands. The change to the SR-4 designation would not constitute a density low enough to facilitate future mining operations; however, the proximity of existing homes would preclude future mining operations in this area. Therefore, the Proposed Project Map for NC37 has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.



COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is approximately 1.5 miles away via roads, from the Village Boundary for the North County Metro-North Village. It is approximately 4 miles from the closest transit stop and 5 miles from the nearest park-and-ride facility. Twin Oaks Valley Road is a County Mobility Element road adjacent to the Analysis Area on the east. Most of the Analysis Area is within the Sphere of Influence for the City of San Marcos. The proposed SR-4 designation would be the same as the unincorporated parcels immediately adjacent to the south and consistent with the Agricultural/Residential designation of San Marcos for this SOI area. Considering the limited additional density potential associated with the proposal and the existing SR-4 on adjacent agricultural properties with similar levels of transportation infrastructure and Village proximity, the Proposed Project Map for NC37 has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The NC37 Analysis Area is not within a Village, is not within a sewer service area, and is not in an area of extensive transportation networks (not in close proximity to transit). Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. Approximately half of the area is within the Moderate FHSZ, due to the agricultural operations. The other half is in the Very High FHSZ. Current estimates show that most of the Analysis Area would be within the 10-minute General Plan fire response travel time standard for SR-4. As with other issues, the western leg of the Analysis Area would be the most problematic from a fire protection standpoint, due to the native



vegetation, slopes, and distance from the public road. As the parcels with additional density potential are located in the eastern and northern portions closer to the public road, a consistency finding can be made.

- S-6.4 Fire Protection Services for Development.** Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-4 designation is 10 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. Current estimates show most of the Analysis Area would be within the 5-10 minute emergency response travel time standard for SR-4; however, most of the western leg is estimated to be beyond the 10-minute travel time. This current problematic estimate for the western leg should be considered by decision-makers in light of the fire hazards; however, considering the standard requires review and consideration at the subdivision application stage, there is not a clear inconsistency with the policy at this stage.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.

- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements



required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

These policies are not applicable to the NC37 proposals (Proposed or Alternative Map) because there are no mapped floodways, floodplains, or dam inundations areas within the Analysis Area.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The NC37 Analysis Area is within the Twin Oaks CPA, which is part of the North County Metro Subregion. There is not currently a separate community plan for Twin Oaks, covering only that CPA. Therefore, the only applicable community plan is the North County Metro Subregional Plan. There are two policies of the North County Metro Subregional Plan that are considered during the review of a stand-alone GPA/Rezone. Land Use Policy 7 prohibits new subdivisions exceeding the one dwelling unit per acre density within the City of Escondido Sphere of Influence. Though the proposal would not exceed the one dwelling unit per acre density, the Analysis Area is not within the Escondido Sphere of Influence. Land Use Policy 8 calls for designating the Twin Oaks Valley outside the City of San Marcos Sphere of Influence under the Semi-Rural and Rural Lands Regional Categories. The PSR parcel on the northern end and the western leg of the Study Area are outside the Sphere of Influence for San Marcos and a Semi-Rural designation is proposed. Therefore, there are no policy inconsistency issues with the North County Metro Subregional Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 15 parcels covering approximately 158 acres in the northwestern portion of the Twin Oaks CPA. The proposed change from SR-10 to a combination of SR-1 and SR-10 is estimated to result in an increase of 12 potential dwelling units (estimated 19 potential units under the current designations and 31 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would maintain the current SR-10 in the western leg of the Analysis Area, which changing the rest to SR-4, also resulting in an estimated DU increase of 12 (total potential of 31 DU). The number of potential dwelling units for this alternative is the same as the Proposed Project due to existing parcelization patterns and extensive steep slopes in the portion proposed to remain within the slope-dependent SR-10 designation. Keeping the SR-10 in this portion provides a greater level of consistency in mapping patterns with consideration of constraints (more prevalent in this portion). In addition, if one owner were to consolidate ownership in this portion, an additional dwelling unit or two could be possible, as General Plan requires rounding down density calculations to the nearest whole number for any contiguous ownership area to be subdivided.

The NC37 Proposed Project Map was found to be inconsistent with General Plan policies LU-1.1 and LU-1.3, as discussed earlier in this report. These inconsistencies are related to the existing mapping pattern of SR-10 and RL-20 in the northern and western ends of the CPA, within the constrained areas of the San Marcos Mountains and Merriam Mountains. In addition to the habitat and slope constraints, these areas



have a lower level of existing road infrastructure, longer emergency response travel times, and serve as low density areas to buffer from the City of Vista to the west and the Bonsall CPA to the north. The western leg of the Analysis Area fits with these characteristics and changing that portion to SR-4 is the component that would pose inconsistency issues with these two policies. Therefore, with the Alternative Map maintaining the current SR-10 in that portion, no inconsistencies have been found with that option.

The Proposed Project Map was not found to be inconsistent with any other applicable General Plan policies or applicable policies of the North County Metro Subregional Plan. The same would hold true for the Alternative Map, as it would reduce the area proposed to change to SR-4.



NC38+ General Plan and Community Plan Conformance

The NC38+ Analysis Area covers 8 parcels over approximately 77 acres in the southeastern portion of the Twin Oaks Community Planning Area (CPA), which is part of the North County Metro Subregion. It is located approximately 1.5 miles west of I-15 and 2.5 miles north of SR-78, adjacent to Olive Street. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the Analysis Area would change from SR-1 to SR-2. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 38 (total potential of 75 DU). An Alternative Map is also available for consideration, which would maintain the current SR-2 designation in the area of the mapped FEMA floodplain, which changing the remainder of the area to SR-1. Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 4 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

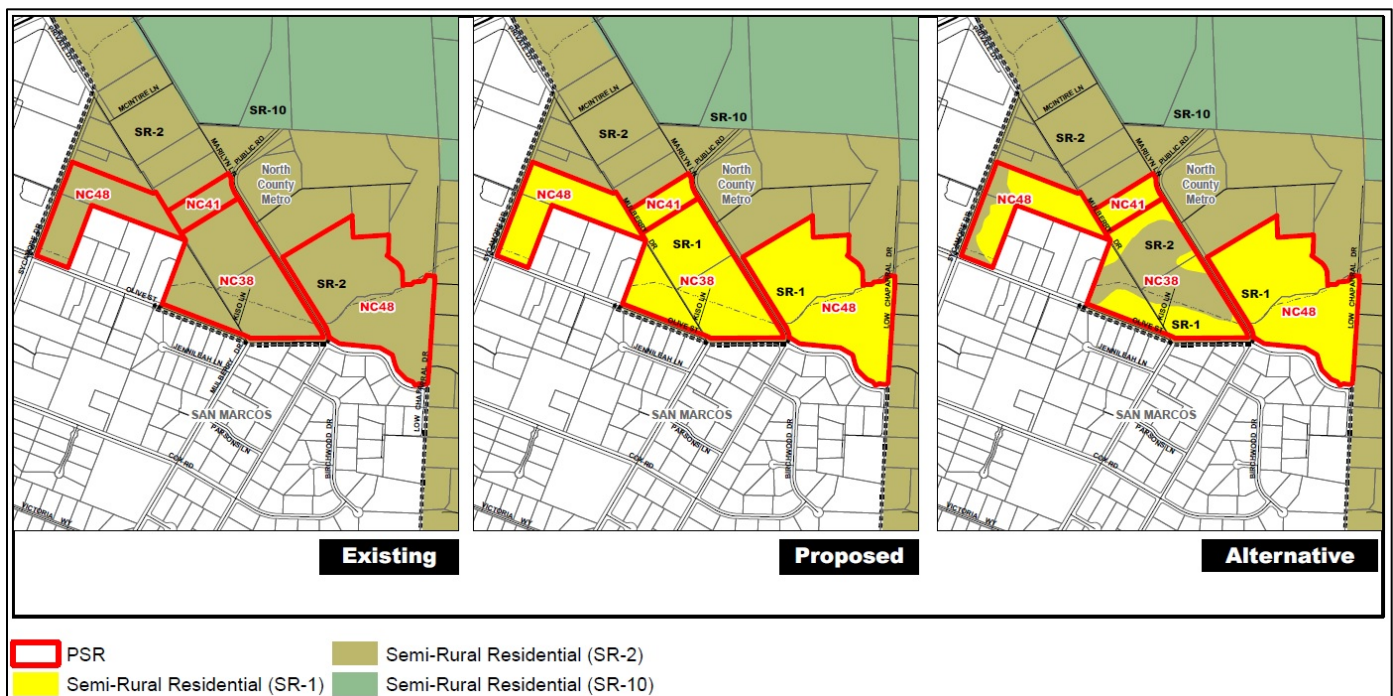


Figure 1: NC38+ Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable North County Metro Subregional Plan policies is



provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 3.5 miles from the geographic center of San Marcos (though adjacent to the northern border of San Marcos) and 8.5 miles from the geographic center of Carlsbad, with an estimated 34,576 jobs and 67,713 jobs, respectively. The proposed density would not be out of line with the distance to jobs. Water service is available from the Vallecitos Municipal Water District (western portion NC48 and western parcel of NC38) and the Vista Irrigation District (remainder of the Analysis Area). The properties in the western portion that are within the Vallecitos MWD are also in their sewer service area. No sewer service is currently available to the rest of the parcels in the Analysis Area. Fire protection service is provided by the San Marcos Fire Protection District. Current estimates show only the western end of the Analysis Area would be within the 0-5 minute emergency response travel time for the proposed SR-1 and the most of the Analysis Area is estimated to be within the 5-10 minute travel time range, as discussed further in the review of Policy S-6.4. Sycamore Drive (adjacent to the western portion) and Olive Street (adjacent to the southern portion) are public roads providing access. Segments of these roads adjacent to the Analysis Area are maintained by the County; however, other portions are maintained by the City of San Marcos.

The Analysis Area is currently within the Semi-Rural Regional Category, which is not proposed to change. While it is not on the outer edge of an unincorporated County Village, it is adjacent to higher densities within the City of San Marcos, in addition to nearby jobs and commercial in San Marcos. Considering the extent of existing public roads, water infrastructure, and sewer infrastructure (covering the western portion), the proposal would not be out of line with the CDM. Therefore, a consistency finding can be made.

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-



Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the NC38+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

The current mapping pattern of the CPA (consistent with General Plan Update mapping patterns), considers existing parcelization and development patterns, proximity to Village areas, and also level of habitat constraints and preservation of agriculture. Proximity to existing infrastructure and services was also taken into consideration. Within the North County Metro Subregion, there are numerous precedents of SR-1 in areas adjacent to incorporated cities. The Analysis Area is within the Sphere of Influence for the City of San Marcos and the San Marcos General Plan has a Sphere of Influence designation for this area that is the equivalent of the proposed SR-1. The Analysis Area is mostly disturbed with very little native vegetation remaining, which reduced wildlife corridor potential. Considering the location adjacent to San Marcos, the level of infrastructure and services available, a consistency finding can be made.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the NC38+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The southern edge of the Analysis Area is adjacent to the City of San Marcos and the eastern edge is adjacent to the City of Escondido. Land use patterns in adjacent and nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with NC38+.



LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-1 designation applies a 1 unit per acre density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that 75 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential).

*A number of factors are considered in evaluating the feasibility of 75 potential lots within the Analysis Area. Additional subdivision potential would be found throughout the Analysis Area. There is a good network of surrounding roads that are estimated to be built to fire access standards. Slope constraints are almost non-existent, and almost the entire Analysis Area was previously disturbed for agriculture and residential uses, limiting the potential to host sensitive species and need to set aside biological open space. Agricultural preservation or mitigation may be required, dependent on the results of agricultural resources analysis at the development application stage. The factor anticipated to most impact feasibility is the presence of a FEMA mapped floodplain and floodway, covering approximately 20 acres and 7 acres, respectively. These flood hazard constraints will limit potential locations of habitable structures, other development footprint, and access options. In addition, as more than half of the Analysis Area is not within a sewer service area, clustering possibilities will be limited where no sewer service is available. **There, the Proposed Project Map has been found to be inconsistent with Policy LU-1.9.***

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

There is a wide range of parcel sizes within a one mile radius, from ¼ acre to 115 acres. Smaller minimum lot sizes (half-acre within sewer service portion; one acre outside sewer service area) would be necessary in order to meet the density potential. SR-10 and SR-2 designated properties are prevalent to the north and west, while adjacent lands within the City of San Marcos are higher density. Smaller lots exist to the south, east, and west of the Analysis Area, including sizes consistent with SR-1. Considering the location within a Sphere of Influence for the City of San Marcos, higher densities adjacent to the south, and the



sewer availability in part of the area, the NC38+ Proposed Project Map does not present a clear inconsistency with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

*The goals of the North County Metro Subregional Plan and the key community issues for North County Metro discussed in General Plan Update reports share some common themes. A Subregional Plan goal seeks to protect scenic rugged terrain and environmentally sensitive areas with Semi-Rural and Rural Lands designations. A goal related to agriculture notes the community seeks to promote agriculture by protecting Semi-Rural and Rural areas from urbanization and incompatible development. Expanding on this, a community issue noted in hearing reports for the General Plan Update was to ensure preservation of agriculture in areas adjacent to rapidly growing cities. See the review of Policy LU-7.1 for a discussion of research of County reports and guidelines that outline limitations in agricultural preservation and agriculture/residential compatibility issues where densities move into SR-1 and higher. With the number of potential units allowed over the whole Analysis Area under the Proposed Project Map and the limited potential development footprint locations with the mapped FEMA floodway/floodplain and more than half of the Analysis Area currently requiring septic for wastewater disposal, it would be difficult to reach the development potential (see the review of Policy LU-1.9) without substantial loss of agriculture. Most areas outside floodplains/floodways would likely be needed for new housing and access development footprint. Thus, preservation of agricultural uses becomes less likely. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.***

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density (Rural Lands). Greenbelts (per the General Plan definition) are limited in the North County Metro Subregion, due to the Spheres of Influence for adjacent cities covering many of the edges of the Subregion. Therefore, the Proposed Project Map for NC38+ is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

Habitat constraints within the Analysis Area are limited to a small drainage area which includes some riparian vegetation and a small patch of oaks near a road, both in the eastern portion. These areas cover approximately 4 acres of the 77 total acres, so this is not an area substantially constrained by sensitive natural resources and a consistency finding can be made.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The entire Analysis Area is within the Moderate FHSZ, due to the agricultural uses. Wildfire risks are minimized here by the extent of surrounding development (including higher density residential adjacent



to the south in San Marcos), the lack of large areas of native habitat in close proximity, and the large proportion of the Analysis Area planted with irrigated crops or developed with homes and/or greenhouses. Current estimates show only the westernmost portion of the Analysis Area would meet the 5-minute General Plan standard for fire response travel time. This would be evaluated at the subdivision application stage, with consideration of additional access proposed. Therefore, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define 'lower-density land use designations that support continued agricultural operations' or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County's CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County's unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include 'rural residential lands,' which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for NC38+: Most of the Analysis Area is used for agricultural operations and contains prime agricultural soils and soils which meet the criteria for Farmland of Statewide Importance. The surrounding unincorporated areas also contain several agricultural operations. This pattern transitions into a more suburban residential character in adjacent properties within the City of San Marcos to the south. Based on the research noted above, a switch from the SR-2 to SR-1 designation for the 77 acres would not be in line with a 'lower density land use designation that supports continued agricultural



operations' due to the increased edge effects associated with homes in such close proximity. **Therefore, the Proposed Project Map for NC38+ has been found to be inconsistent with Policy LU-7.1.**

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the NC38+ proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the NC38+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the NC38+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the NC38+ proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Town Center. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.



The Proposed Project Map would be consistent with LU-10.3 because a Semi-Rural designation is proposed in an area adjacent to higher densities within the City of San Marcos. As discussed in the review of Policy LU-2.5, the North County Metro Subregion has a development pattern that doesn't lend itself to extensive application of Rural Lands on the edges of the Subregion, as many of these areas (including NC38+) are in Spheres of Influence of adjacent cities and adjacent to substantially higher densities.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the NC38+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the NC38+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulation. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

Approximately 4 acres along the northern end of the Analysis Area is within MRZ-3 designated lands. The existing density of SR-2 would already preclude future mining operations, due to the proximity of homes associated with that density. Therefore, the Proposed Project Map for NC38+ has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.



COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed and there are no steep hillsides.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is approximately four miles away via roads from the North County Metro-North Village. It is approximately three miles from the closest transit stop and just over three miles from the closest park-and-ride facility. The entire Analysis Area is within the Sphere of Influence for San Marcos, it is adjacent to higher densities within the City of San Marcos, and it is within 2 miles of substantial job centers in San Marcos and Escondido. Considering the language of the Policy, the Proposed Project Map for NC38+ has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The NC37 Analysis Area is not within a Village, less than half of it is within a sewer service area, and is not in an area of extensive transportation networks (not in close proximity to transit). Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

*There are no dam inundation zones or fault zones within the Analysis Area. The entire Analysis Area is within the Moderate FHSZ, due to the agricultural uses. Wildfire risks are minimized here by the extent of surrounding development (including higher density residential adjacent to the south in San Marcos), the lack of large areas of native habitat in close proximity, and the large proportion of the Analysis Area planted with irrigated crops or developed with homes or greenhouses. Current estimates show only the westernmost portion of the Analysis Area would meet the 5-minute General Plan standard for fire response travel time. Approximately 20 acres of the Analysis Area is within a FEMA floodplain. Of that, approximately 7 acres is also in the FEMA floodway. **Considering the extent of the floodplain and***



floodway within the Analysis Area and the lack of SR-1 (Proposed Project Map designation for NC38+) areas nearby with a similar level of flood constraints, the NC38+ Proposed Project Map has been determined to be inconsistent with Policy S-1.1.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-1 designation is 5 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. Current estimates show only the western end of the Analysis Area would be within the 0-5 minute emergency response travel time, and the majority of the Analysis Area is estimated to be within the 5-10 minute range. This current problematic estimate should be considered by decision-makers in light of the fire hazards; however, considering the standard requires review and consideration at the subdivision application stage, there is not a clear inconsistency with the policy at this stage.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.

S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements



required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

*A FEMA-mapped floodplain covers approximately 20 acres in the western and central portions of the Analysis Area and approximately 7 acres of this floodplain is also a FEMA-mapped floodway. The size of this floodplain/floodway area in relation to the overall size of the area of the PSR NC38 ownership could pose feasibility issues for achieving the SR-1 (Proposed Project Map) density for that area. It is anticipated that the floodway area could be avoided, but also avoiding the 20-acre floodplain area could limit feasibility. **Considering the extent of the floodplain and floodway within the Analysis Area and the lack of SR-1 (Proposed Project Map designation for NC38+) areas nearby with a similar level of flood constraints, the NC38+ Proposed Project Map has been determined to be inconsistent with Policies S-9.2 and S-9.5. Increasing the density in these floodplain areas would not be in line with the parameters of these policies.***

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The NC38+ Analysis Area is within the Twin Oaks CPA, which is part of the North County Metro Subregion. There is not currently a separate community plan for Twin Oaks, covering only that CPA. Therefore, the only applicable community plan is the North County Metro Subregional Plan. There are two policies of the North County Metro Subregional Plan that are considered during the review of a stand-alone GPA/Rezone. Land Use Policy 7 prohibits new subdivisions exceeding the one dwelling unit per acre density within the City of Escondido Sphere of Influence. Though the proposal would not exceed the one dwelling unit per acre density, the Analysis Area is not within the Escondido Sphere of Influence. Land Use Policy 8 calls for designating the Twin Oaks Valley outside the City of San Marcos Sphere of Influence under the Semi-Rural and Rural Lands Regional Categories. Even though a Semi-Rural designation is proposed, the Analysis Area is completely within the San Marcos Sphere of Influence. Therefore, there are no policy inconsistency issues with the North County Metro Subregional Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 8 parcels covering approximately 77 acres in the southeastern portion of the Twin Oaks CPA. The proposed change from SR-2 to SR-1 is estimated to result in an increase of 38 potential dwelling units (estimated 37 potential units under the current designations and 75 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would maintain the current SR-2 in the floodplain (including the floodway portion), while changing the rest to SR-1, resulting in an estimated DU increase of 27 (total potential of 64 DU).

The NC37 Proposed Project Map was found to be inconsistent with General Plan policies LU-1.9, LU-2.4, LU-7.1, S-1.1, S-9.2, and S-9.5, as discussed earlier in this report. The inconsistencies with Policies LU-1.9, S-1.1, S-9.2, and S-9.5 are related to the mapped FEMA floodplain and floodway in the Analysis Area affecting the feasibility of the density potential, and in the context of General Plan policies and other



existing regulations that restrict development in these flood hazard areas. The inconsistencies with policies LU-2.4 and S-7.1 considered the research on impacts to agricultural preservation when densities get into SR-1 and higher. Preserving agricultural areas is a common theme discussed in the goals section of the Subregional Plan and in community issues for this area noted in General Plan Update reports. Given the flood constraints, getting near the potential density associated with the Proposed Map would necessitate substantial loss of agriculture. The Alternative Map would maintain the current SR-2 in the area of the floodplain, which also contains prime agricultural soils. In consideration of existing floodplain/floodway regulations and research on designations in relation to agricultural preservation, the Alternative Map would be anticipated to facilitate a higher level of agricultural preservation. In consideration of these factors, the Alternative Map was found to be consistent with policies LU-1.9, LU-2.4, LU-7.1, S-1.1, S-9.2, and S-9.5.

The Proposed Project Map was not found to be inconsistent with any other applicable General Plan policies or applicable policies of the North County Metro Subregional Plan. The same would hold true for the Alternative Map, as it would reduce the area proposed to change to SR-1.



PP30 General Plan and Community Plan Conformance

The PP30 Analysis Area covers 11 parcels over approximately 518 acres in the western portion of the Pala/Pauma Subregional Planning Area. The Analysis Area is located near the intersection of SR-76 and Valley Center Road, just south of the Pauma Rural Village and just west of the Rincon Reservation. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the portion of the Analysis Area east of the San Luis Rey River floodplain would change from RL-40 to SR-2, while the rest of the Analysis Area would remain RL-40. The Proposed Project Map would be estimated to increase overall dwelling unit (DU) potential by 122 (total potential of 134 DU). An Alternative Map is also available for consideration, which would instead apply SR-10 in the area proposed for SR-2 in the Proposed Project Map and also maintain RL-40 in the rest of the Analysis Area, resulting in an estimated DU increase of 19 (total potential of 31 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

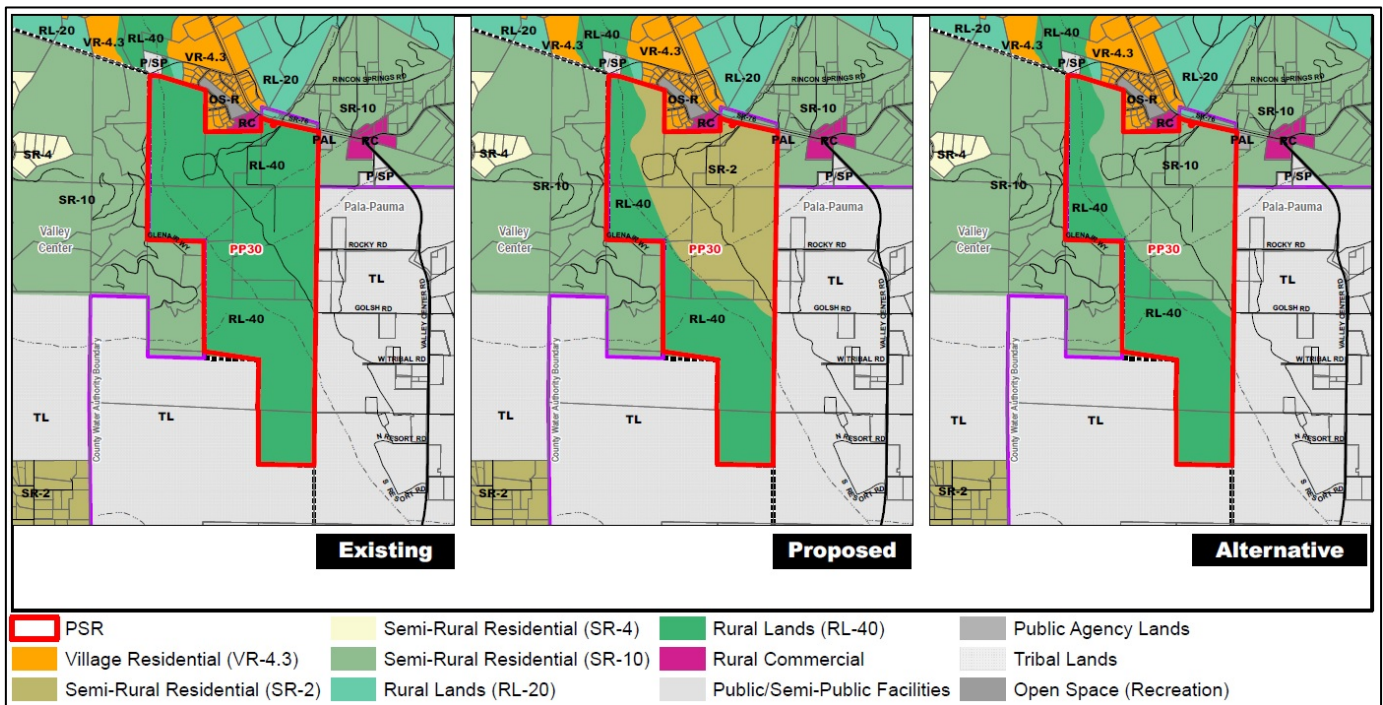


Figure 1: PP30 Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review



is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Pala/Pauma Subregional Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 12 miles from the geographic center of Escondido and adjacent to the Rincon Reservation, with an estimated 44,289 jobs and 1,823 jobs, respectively. The Pauma Rural Village (across SR-76 to the north) would constitute a much smaller job center with only an estimated 74 jobs. Residents would have to travel a fairly long distance on mostly 2-lane roads to get to major job centers. The Analysis Area is outside the County Water Authority Boundary and is groundwater dependent, with no sewer service. Though it is within the Pauma Municipal Water District (PMWD), this district serves to manage water rights protection efforts (along with providing other services), but does not deliver water. Fire protection service is provided by CAL FIRE (contracted through PMWD) and the closest station is the Rincon Station, which is adjacent to the northeast portion of the Analysis Area. Due to this proximity, it is estimated that the emergency response travel time standard of 10 minutes for the proposed SR-2 could be achieved. The Analysis Area is near the intersection of Valley Center Road and SR-76, which are both public roads.

*The Analysis Area is currently within the Rural Lands Regional Category, which covers the majority of private lands in the Subregion. With the exception of approximately 110 acres of SR-1 and VR-4.3 just outside the Village boundary, the entire Subregional Planning Area outside the Village Boundary is designated SR-10 or lower. This is reflective of General Plan and CDM themes of directing density toward existing infrastructure, services, and jobs; and maintaining lower densities in areas of extensive constraints and limited infrastructure. The Analysis Area is in an area of limited infrastructure, contains a high level of constraints, and is on the edge of the community. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.1.***

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-



Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See *applicable community plan for possible relevant policies.*]

This policy is not applicable to the PP30 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

*There is a pattern of mapping low density designations outside the Rural Village boundary in Pala/Pauma. With the exception of approximately 110 acres of SR-1 and VR-4.3 just outside the Village boundary, the entire Subregional Planning Area outside the Village Boundary is designated SR-10 or lower. The higher-density designations within the adjacent Village are reflective of a higher level of infrastructure and services available (including water service and sewer service available in a portion of the Village), in addition to pre-existing (pre-GP Update) development patterns, particularly in the area of the Pauma Valley Country Club. The low density pattern of development outside the Village is reflective of limited infrastructure, sensitive habitats, extensive public lands (majority in conservation), and extensive agricultural uses, including many Williamson Act contract lands. Considering these factors, the proposed SR-2 designation on the eastern portion would not be in line with the land use designation pattern of the Subregional Planning Area. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.3.***

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the PP30 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.



The Analysis Area is adjacent to the Rincon Reservation and approximately eight miles from northeastern border of the City of Escondido (further via road distance). Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with PP30.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-2 designation (proposed for the eastern portion) applies a 1 unit per 2 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that the proposed change would increase potential lots by 122, and a total of 134 lots would be possible under the Proposed Project (includes existing lots and additional subdivision potential).

*A number of factors are considered in evaluating the feasibility of 134 potential lots within the Analysis Area. Though it is adjacent to SR-76 and near the intersection with Valley Center Road, providing internal access to fire protection standards could be problematic. Though the San Luis Rey River floodplain area would remain RL-40, Potrero Creek and Yuima Creek come in from the northeast, crossing through the SR-2 proposed area to connect to the river. The locations of these creek areas could make access to the southern portion of the SR-2 proposed area difficult, depending on surveys and delineations at the development review stage. If the maximum dead end road lengths cannot be met, secondary access may also pose some hurdles, as the reservation is on the east and crossing the San Luis Rey River would be required to the south and west. In addition to the creek corridors and riparian vegetation, the SR-2 proposed area contains areas of coastal sage scrub and oak woodlands. With the exception of the 41-acre parcel in the northeastern corner, the entire Analysis Area is within the Draft MSCP Pre-Approved Mitigation Area (PAMA), which will would (if adopted) require preservation of critical wildlife corridors and the most sensitive habitats. Even more of a prohibitive factor from the feasibility standpoint is the Groundwater Ordinance minimum lot size. The site is in an area that would require a minimum lot size of 5 acres per the Groundwater Ordinance, rendering the SR-2 density infeasible. In addition, the area may be subject to further restrictions, associated with the adoption and implementation of a Groundwater Sustainability Plan forthcoming for this area, addressing requirements of the Sustainable Groundwater Management Act (SGMA). **In consideration of these factors, the Proposed Project Map has been found to be inconsistent with Policy LU-1.9.***



Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

This portion of the planning area includes a small area of higher densities in the nearby Village, and Rural Lands and SR-10 designations are prevalent in the sensitive habitat areas, steep slope areas, and agricultural areas. With the exception of approximately 110 acres of VR-4.3 and SR-1 just outside the Village, the entire Subregional Planning Area outside the Village boundary is SR-10 or lower density. There is a high prevalence of sensitive habitats within the Analysis Area, as the San Luis Rey River passes through the Analysis Area. Though the Proposed Project Map would present feasibility issues, issues of consistency with development objectives for the community, and necessary infrastructure/services are limited, applying SR-2 in the northeastern part of the Analysis Area would not present a clear inconsistency with existing community character, as that area is adjacent to the Village and a State Highway. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

*Land Use Goal 5 of the Pala/Pauma Subregional Plan notes, “Orderly, planned growth is provided as needs arise and essential services such as water, sewer, fire protection, and schools are made available.” The Analysis Area is not within an area where water or sewer service is available and the Groundwater Ordinance would render the proposed density infeasible. Other key objectives from the Subregional Plan and General Plan Update community-specific rationales include preservation of agricultural uses and areas of high quality habitats. The Analysis Area contains both and is within the San Luis Rey Resource Conservation Area (RCA), with the Subregional Plan seeking to maintain low density designations in RCAs. Considering these factors, the proposed SR-2 in the eastern portion would not reflect the unique issues and development objectives for the Subregional Planning Area. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.***

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.



The Analysis Area is currently designated RL-40, so it could be considered a greenbelt of very low density. The portion of the Analysis Area that is on the edge of the community would remain RL-40 in the Proposed Project Map. Therefore, the Proposed Project Map for PP30 has been found to be consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

*With the exception of the northeastern parcel planted with citrus trees, the entire Analysis Area is within a PAMA area for the draft North County MSCP. It is within an important wildlife corridor with the San Luis Rey River running southeast to northwest through the Analysis Area, connecting with Yuima Creek and Potrero Creek near the center of the Analysis Area. PP30 is also adjacent to approximately 1,800 acres of undeveloped native habitat to the south and west. These riparian areas within PP30 are part of federal Critical Habitat Areas for the endangered arroyo toad and southwestern willow flycatcher, and the Critical Habitat Area for the endangered least Bell's vireo is approximately 10 miles downstream. Outside of the riparian areas, substantial acreages (estimated through GIS vegetation mapping) of other sensitive habitats are found in the Analysis Area, including coastal sage scrub, coastal sage-chaparral transition, montane buckwheat scrub and coast live oak woodland. With the range of connected riparian/wetland and upland habitats, several species covered in the draft North County MSCP have the potential to occur on the site. The Analysis Area is also within the San Luis Rey River Resource Conservation Area of the Pala/Pauma Subregional Plan. The Proposed Project Map would change approximately half of the Analysis Area (portion east of the floodplain) to SR-2, resulting in a substantial increase in potential density, from 12 to 134, and the removal of the Conservation Subdivision requirement in the area proposed for SR-2. **Consideration of the extent of sensitive habitats throughout the Analysis Area results in a finding of inconsistency with Policy LU-6.2***

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

With the exception of the northeast portion (approximately 100 acres, including citrus groves, a house, and accessory structures), the entire Analysis Area is within the Very High FHSZ. Fire protection service is provided by CAL FIRE via a contract with the Pauma Municipal Water District, and the closest station is on SR-76 adjacent to the northeast portion of PP30. Meeting the General Plan standard for fire response travel time (10 minutes for the SR-2 portion in the Proposed Project Map) is anticipated to be feasible; however, developing internal access roads to fire standards could be difficult, depending on the location of homes, due to the riparian areas discussed above. Given the close proximity to the fire station and the presence of irrigated agriculture in some of the areas proposed for SR-2, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.



As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for PP30: The Analysis Area contains agricultural operations in the area east of the San Luis Rey River that runs through the site. Approximately half of the areas used for agriculture also contain prime agricultural soils. Agriculture is widespread throughout the Pala-Pauma community. The research tends to support SR-2 as a designation that facilitates agricultural preservation; however, smaller lot agricultural operations (consistent with SR-2 typical lot sizes) are more common in communities like Fallbrook and Valley Center. Decision makers will consider this in combination with other policies in determining the likelihood of agricultural preservation under the proposed change. At this programmatic level, a consistency finding can be made, considering the research on density thresholds and the ability to continue the type of agricultural operations on the property when in closer proximity to residences.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This Analysis Area is outside the County Water Authority Boundary and is groundwater dependent. The average annual precipitation for this area is 18 to 21 inches. Per the County’s Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 5 acres. The SR-2 component (proposed for the eastern portion) of the Proposed Project Map for PP30 would not be consistent with this requirement and the SR-2 density would not be feasible. In addition, the area may be subject to further restrictions, associated with the adoption and implementation of a Groundwater Sustainability Plan forthcoming for



this area, addressing requirements of the Sustainable Groundwater Management Act (SGMA). Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-8.1.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the PP30 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the PP30 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the PP30 proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Town Center Centers. The Proposed Project Map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

Under the Proposed Project Map, a combination of Rural Lands (RL-40) and Semi-Rural (SR-2) would be adjacent to the Village and RL-40 would remain on the western and southern ends of the Analysis Area, which are at the edge of the Subregional Planning Area. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-10.3.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.



This policy is not applicable to the PP30 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the PP30 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

*Most of the Analysis Area (approximately 418 acres of the 518 total acres) is within MRZ-2 designated lands, with the 1,300-foot buffer from MRZ-2 extending south from this area to cover another approximately 83 acres. The SR-2 designation proposed for the eastern portion of the Analysis Area would preclude future mining operations. In determining whether this would constitute an 'incompatible land use' or whether mining would already be precluded here (due to existing incompatible land uses), consideration is given to adjacent uses on the Rincon Reservation, which is adjacent on the east. In this area, the Reservation contains a large hotel/casino (Harrah's Rincon) and associated facilities adjacent to the southeastern portion of the Analysis Area, with larger lot residential development and other uses adjacent to the northeast. The northern portion of the Analysis Area contains a residence and is adjacent to several residences. There is a relatively small area (approximately 20-30 acres) that would be within the area proposed for SR-2, is within MRZ-2, and is also at least 1,300 feet from these residences and other uses. **This portion of the Analysis Area would be considered as having mining potential and therefore, the Proposed Project Map for PP30 has been found to be inconsistent with COS-10.2.***



COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a combination of Semi-Rural and Rural Lands designations are proposed. There are steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

*The Analysis Area is adjacent to the Pauma Village, but this community lacks the range of commercial uses and jobs that other Villages have, and it lacks a substantial buffer of Semi-Rural between the Village and the Rural Lands of low density and agriculture. The Pala-Pauma Subregion is one of the more rural areas of the County, with a prevalence of large lot agriculture and open space. With the exception of approximately 110 acres of VR-4.3 and SR-1 just outside the Village, the entire Subregional Planning Area outside the Village boundary is SR-10 or lower density. Village densities and the higher densities of the Semi-Rural Regional Category are generally limited to areas with existing parcelization that is consistent with these densities, and/or water and sewer service availability (which is not available in the Analysis Area). The Analysis Area is approximately one mile from the nearest transit stop and 15 road miles from the nearest park-and-ride facility. **Considering the rural nature of the community and the limited availability of jobs and commercial services in the Subregion, the proposed jump from RL-40 to SR-2 for the eastern portion of large lots has been found to be inconsistent with COS-14.1.***

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The PP30 Analysis Area is not within a Village, is not within a water service area, and is not within a sewer service area. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

Approximately 170 acres of the Analysis Area are within a floodplain and 235 acres are within a dam inundation zone; however, almost all of the area within these two hazard zones is in the portion



proposed to remain RL-40 in the Proposed Project Map. There are no fault zones within the Analysis Area. With the exception of the northeast portion (approximately 100 acres, including citrus groves, a house, and accessory structures), the entire Analysis Area is within the Very High FHSZ. Fire protection service is provided by CAL FIRE via a contract with the Pauma Municipal Water District, and the closest station is on SR-76 adjacent to the northeast portion of PP30. Meeting the General Plan standard for fire response travel time (10 minutes for the SR-2 portion in the Proposed Project map) is anticipated to be feasible; however, developing internal access roads to fire standards could be difficult, depending on the location of homes, due to the riparian areas discussed above. Given the close proximity to the fire station, the presence of irrigated agriculture in some of the areas proposed for SR-2, and other (non-fire) hazard areas being almost completely consolidated in the area proposed to remain unchanged at RL-40, a consistency finding can be made.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-2 designation is 10 minutes. This standard will require verification during the subdivision application process, based on existing and proposed access at that time. The northern portion and majority of the Analysis Area is currently estimated to be within the 0-5 minute emergency response travel time and the rest is estimated to be within the 5-10 minute travel time. Therefore, the Proposed Project Map has been found to be consistent with Policy S-6.4 at this programmatic land use mapping stage.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.



S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

The western portion of the Analysis Area is within a FEMA and County-mapped floodplain, with part of the floodplain also in a County-mapped floodway. This area is proposed to remain RL-40. The line between the area proposed to change to SR-2 and the area proposed to remain RL-40 was developed to follow the edge of the floodplain. A small portion of the dam inundation zone encroaches into the area proposed to change to SR-2 and that portion could be avoided during the development design and review process without substantially impacting density feasibility (though other constraints in the proposed SR-2 area could affect feasibility, as discussed above). Considering the locations of these constraints in relation to the area proposed to change designations, consistency findings can be made for each of these policies.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

*As mentioned above, the PP30 Analysis Area is within the Pala/Pauma Subregional Planning Area (CPA). There are a few policies of the Subregional Plan to be considered for review of a stand-alone GPA/Rezone. Land Use Policy 4 and Conservation Policy 1 both call for applying low density plan designations and zoning to Resource Conservation Areas (RCAs). Conservation Policy 1 refers to applying “very low density” plan designations and zoning to RCAs. The Analysis Area is within the San Luis Rey River RCA of the Subregional Plan, with the San Luis Rey River running through the area proposed to remain RL-40. Potrero Creek and Yuima Creek (tributaries to the San Luis Rey River) run through the area proposed to change to SR-2, with sensitive riparian habitats and upland habitats surrounding these areas. The SR-2 designation proposed in the eastern portion of the Analysis Area would not be considered a “very low density” plan designation for this RCA. **Therefore, the PP30 Proposed Project Map has been determined to be inconsistent with Pala-Pauma Subregional Plan policies Land Use 4 and Conservation 1.***

*Land Use Policy 5 of the Subregional Plan states, “Designate existing agricultural areas under the Rural Lands Regional Category, when consistent with parcel sizes, to limit the intrusion of incompatible land uses into existing agricultural areas.” As shown in the Proposed Project Map, the western portion within the San Luis Rey River floodplain (and portions south of the floodplain) would remain RL-40 under the proposal. The eastern portion proposed to change to SR-2 contains some agricultural uses and varying parcel sizes, with a few under 20 acres and a few over 20 acres. **The Proposed Project Map for PP30 has been determined to be inconsistent with this policy.***



REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 11 parcels covering approximately 518 acres on the northern edge of the CPA. The proposed change from RL-40 to a combination of SR-2 and RL-40 is estimated to result in an increase of 122 potential dwelling units (estimated 12 potential units under the current designations and 134 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would instead apply SR-10 in the area proposed for SR-2 in the Proposed Project, resulting in an estimated DU increase of 19 (total potential of 31 DU).

The PP30 Proposed Project Map was found to be inconsistent with General Plan Policies LU-1.1, LU-1.3, LU-1.9, LU-2.4, LU-6.2, LU-8.1, COS-10.2, COS-14.1, and Pala/Pauma Subregional Plan policies Land Use 4, Land Use 5, and Conservation 1, as discussed earlier in this report. The inconsistencies with Policies LU-1.1, LU-1.3, LU-2.4, , LU-6.2, COS-14.1, and the noted Subregional Plan policies are related to the limited infrastructure and services in the Subregion and distance to job centers, in addition to inconsistencies with existing mapping patterns and community objectives, supporting low densities outside the Village, particularly in areas of sensitive habitats and agricultural operations. The Alternative Map would be consistent with these policies as it would instead apply SR-10 in the eastern portion, which would provide consistency with the mapping pattern outside the Village, and in areas of important agricultural resources and sensitive habitats. In addition, the SR-10 designation would maintain the Conservation Subdivision requirement throughout the Analysis Area, requiring 75% avoidance of biological and agricultural resources. The inconsistencies with Policies LU-1.9 and LU-8.1 were related to feasibility issues associated with the proposed SR-2 density, particularly with regard to the Groundwater Ordinance minimum lot size of 5 acres for this area. The SR-10 designation would be not be inconsistent with the Groundwater Ordinance limitation, and substantially reduces the potential density, providing greater assurance of feasibility in consideration of all other constraints. The inconsistency with Policy COS-10.2 is related to establishment of an incompatible land use density in Mineral Resource Zone 2 (MRZ-2) areas. There is a relatively small area of the MRZ-2 within PP30 that would be a sufficient distance from existing incompatible uses. The Reduced Density Alternative Map for PP30 would be consistent with this policy, as the SR-10 designation proposed (in the area proposed for SR-2 in the Proposed Project Map) in this alternative would be a low enough density to not be inconsistent with potential future mining operations.

The Proposed Project Map for PP30 was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Pala/Pauma Subregional Plan. The Alternative Map for PP30 would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Subregional Plan, as it would include a substantially lower potential density.



SD15 General Plan and Community Plan Conformance

The SD15 Analysis Area covers one 69-acre parcel located in a 550-acre unincorporated County “island” in the San Dieguito Community Planning Area (CPA) just west of the main portion of the CPA. It is adjacent to San Elijo Road, ¼ mile west of the San Elijo Hills community, and is within the Sphere of Influence (SOI) for San Marcos. The Board direction was a change to General Commercial with no additional density (so 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 former 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 (“2012 Board Letter Alternative” shown below).

Under the Proposed Project Map (“PSR Owner Request” map below), the Analysis Area would change from SR-1 to General Commercial (with a mixed use zoning density of 2 units per acre), VR-10.9 and SR-0.5, which would be estimated to increase overall dwelling unit (DU) potential by 301 (total potential of 362 DU). The 2012 Board Letter Alternative Map would apply General Commercial throughout the site with a mixed use density consistent with the current SR-1. An additional Alternative Map (shown in the far right below) is also available for consideration, which would apply General Commercial (with a mixed use zoning density of 2 units per acre) in the northern portion and SR-10 in the southern portion, which would be estimated to increase overall dwelling unit potential by 19 (total potential of 80 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 6 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

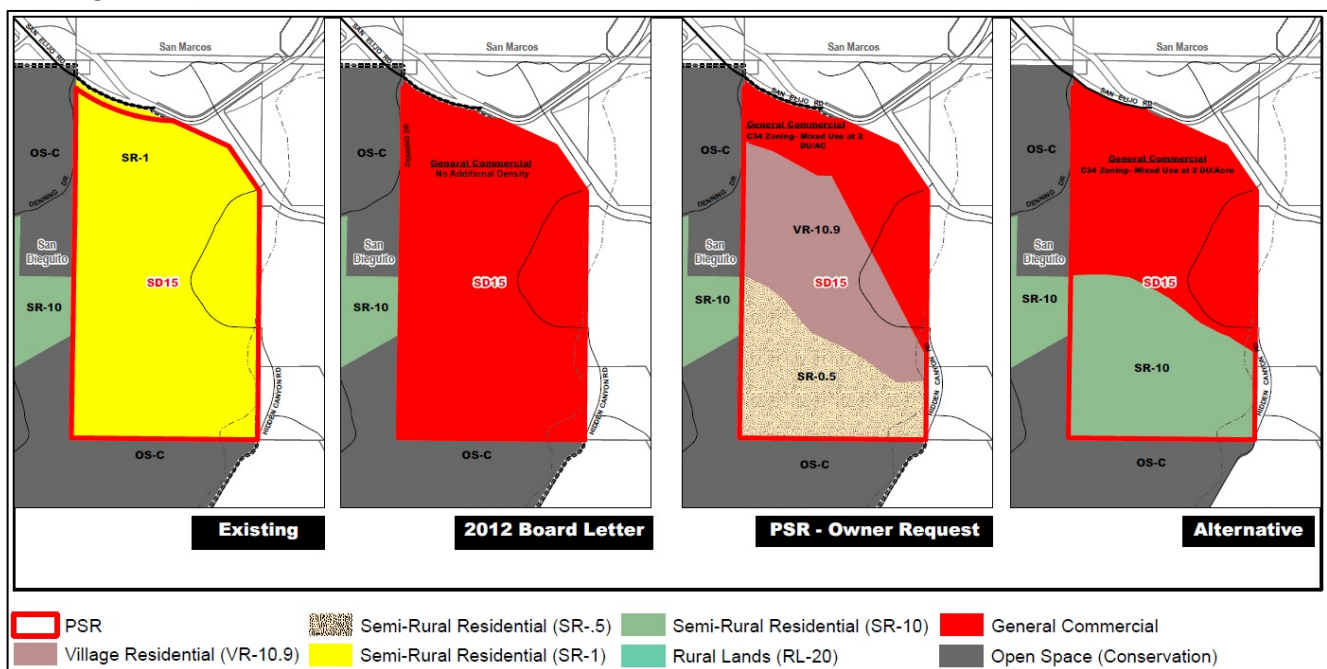


Figure 1: SD15 Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable San Dieguito Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Maps.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 3 miles from the geographic center of San Marcos and 5 miles from the geographic center of Carlsbad, with an estimated 34,576 jobs and 67,713 jobs respectively. Though these are the distances to the geographic centers, the Analysis Area is within the Sphere of Influence for, and adjacent to the jurisdictional boundary of San Marcos; and it is a half mile from the jurisdictional boundary for Carlsbad. Substantial job centers within these city are in close proximity. The proposed density would not be out of line with the distance to jobs. Fire service is available from the Rancho Santa Fe Fire Protection District, with the northern 1/3 of the property currently estimated to be within the 0-5 minute emergency response travel time and the southern 2/3 currently estimated to be within 5-10 minute travel time (see the review of Policy S-6.4). Water service is available from the Olivenhain Municipal Water District and sewer service is available from the Vallecitos Water District. An existing water line runs along the eastern side of the property and the sewer line runs along the adjacent San Elijo Road, but there is no active service to the property, as it is currently undeveloped. The adjacent San Elijo Road is a public, 4-lane Major Road, with bike lanes and sidewalks. The site is a half mile from a grocery store and public elementary and middle schools within the San Elijo Hills community.

The Analysis Area is currently within the Semi-Rural Regional Category, except the southern portion, which has a mapping error of No Jurisdiction Regional Category (to be corrected under this project). The Proposed Project would change the portions proposed for General Commercial and VR-10.9 to the Village Regional Category. The majority of the CPA is in the Semi-Rural Regional Category. However, there are multiple areas of Village Regional Categories and designations adjacent to incorporated cities in this portion of the



County covering the San Dieguito CPA and North County Metro Subregion. Due to the surrounding cities of higher densities and numerous County islands in these planning areas, it is not always practical to have a concentric CDM covering the whole community. The Proposed Project Map would be consistent with densities and uses along this section of San Elijo Road. Considering the level of infrastructure and services available, and proximity to jobs, the Proposed Project Map has been found to be consistent with Policy LU-1.1 at this programmatic land use mapping stage.

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

The VR-10.9 aspect of the Proposed Project map would constitute Village densities and would require a change in the Regional Category from Semi-Rural to Village. Though the General Commercial portion could be in either the Village or Semi-Rural Regional Categories, it is proposed for the Village Regional Category so that the entire northern portion would be in the same Regional Category, through the connection to San Elijo Road. The SD15 site lies within a 550-acre County island of the San Dieguito community, with open space preserves and low density residential outside the site in the unincorporated areas. Village densities are found in the City of San Marcos jurisdiction within ¼ mile of the north side of the site, and within ¼ mile of the west side of the site. The closest village within the unincorporated County jurisdiction is approximately 2 miles north via roads and 1.5 miles via a straight-line distance. The VR-10.9 component would meet the Policy LU-1.2 definition of leapfrog development as it would constitute a new village density located away from established villages. Under LU-1.2, the leapfrog development prohibition does not apply to new villages that are consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent.

The Community Development Model is outlined within the discussion of Guiding Principle 2 of the General Plan. Guiding Principle 2 states, “Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.” The discussion of this Guiding Principle further elaborates on the advantages of this type of development pattern in reducing the number and length of automobile trips, increasing the efficiency of providing public services, and reducing the costs of infrastructure expansion. These concepts form the basis of the General Plan’s Community Development Model and the ideas on location of villages, with surrounding layers of Semi-Rural and Rural Lands designations. The limited area of unincorporated County jurisdiction in this County island of San Dieguito, in addition to the existing development pattern with large open space preserves, makes the realization of a typical concentric Community Development Model unrealistic (particularly if only the unincorporated area is considered). Guiding Principle 2 fully acknowledges the limitations of providing an ideal Community Development Model in the unincorporated County, with consideration of pre-existing development patterns and the limited transit network available.

Evaluation of the SD15 Proposed Project map in the context of Guiding Principle 2 and the Community Development should take into account the location and the proximity to infrastructure, services, and jobs.



This consideration also addresses the feasibility of future development (under the proposed land use designations) to provide necessary services and facilities, as discussed in the Policy LU-1.2 requirements. The site is within the Olivenhain water service area and within the Vallecitos sewer service area, with existing water and sewer lines running adjacent to the property. Though internal access improvements would be required concurrent with development, SD15 fronts on San Elijo Road, which is a 4-lane Major Road with bike lanes and sidewalks. It is within the Sphere of Influence for the City of San Marcos and adjacent to the City jurisdiction on the north and east. San Marcos is a major job center in North County, with an estimated jobs total of 34,576, including the La Costa Meadows commercial/industrial complex less than one mile away. SD15 is also only a half mile from the City of Carlsbad jurisdiction, which is the largest job center of North County cities, with an estimated jobs total of 67,713. Public elementary and middle schools are found a half mile away within the San Elijo Hills development of San Marcos. The site is within the Rancho Santa Fe Fire Protection District, with the closest station approximately 2.5 miles away. Though part of the portion proposed for VR-10.9 is currently estimated to be just outside the 5-minute emergency response travel time standard for the designation, confirmation of that travel time is required at the development review stage, and access improvements to meet that standard have not been determined to be infeasible at this stage. The site is adjacent to open space preserves to the southeast, south and west, and development could be designed to cluster in the north, in order to preserve a viable wildlife corridor in the more constrained land on the south end of the site, and establish a level of compatibility with these adjacent preserves. In consideration of these factors, including the Sphere of Influence location, the proposal has been determined to be compatible with the Community Development Model, as discussed in Guiding Principle 2 of the General Plan.

As a “stand-alone” GPA/Rezone, with no development proposals, this project does not offer an opportunity for evaluation of a development design in meeting the LEED-Neighborhood Development Certification or an equivalent, as discussed in Policy LU-1.2. A “D” Special Area Zoning Designator (D Designator) is proposed to be applied to the property if the Proposed Project Map for SD15 is approved by the Board of Supervisors (as part of the Form of Ordinance associated with such an approval). The text of this proposed D Designator is provided in Attachment E of the staff report, and it would require that future development within the area of a Village Regional Category (including the proposed VR-10.9 density area and the proposed General Commercial area) be designed to meet the LEED-Neighborhood Development Certification or an equivalent, as discussed in Policy LU-1.2. With the application of this D Designator associated with potential approval of the Proposed Project Map, and in consideration of the other factors discussed above, the Proposed Project map for SD15 has been determined to be consistent with Policy LU-1.2.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

The Analysis Area is located with a 550-acre unincorporated County island, with the unincorporated area surrounded by the cities of San Marcos, Carlsbad, and Encinitas. The other private properties in this County island are under SR-2 or SR-10 designations; however, they share little in common with the Analysis Area, in that they lack sufficient paved access (to fire protection standards) to the parcels and lack current infrastructure availability to support substantial development. The Analysis Area has more connection to higher density/intensity existing uses along San Elijo Road, which are in adjacent cities. SD15 provides a rare site that is undeveloped, but has access to sewer, water, a 4-lane road, and is in close proximity to jobs and services. Considering these factors, the Proposed Project has been found to be consistent with Policy LU-1.3.



LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

Policy LU-1.4 has been interpreted as applying only to Village expansions, per the title of the policy. Policy LU-1.2 applies to proposals like the SD15 Proposed Project Map where a new Village is proposed away from an existing unincorporated County Village, and is reviewed above.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is located adjacent to the City of San Marcos and approximately ½ mile from Carlsbad and Encinitas. While, the location of SD15 requires consideration of the context of areas along San Elijo Road within adjacent/nearby city jurisdiction, these are not the primary considerations in review of the proposal. Proximity to infrastructure and services provide more substantial considerations in evaluating the proposal.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The Proposed Project Map would apply a mixed use residential density of 2 units per acre (not slope dependent) in the area proposed for the General Commercial land use designation. The area proposed for VR-10.9 would allow 10.9 units per acre (not slope dependent). The proposed SR-0.5 designation applies a 1 unit per ½ acre density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope in the SR-0.5 proposed area, it is estimated that the proposed change would increase potential DU by 301, and a total of 362 DU would be possible under the Proposed Project Map.

A number of factors are considered in evaluating the feasibility of 362 potential DU within the Analysis Area. There are no floodplains/floodways, dam inundation zones, or fault hazard zones within the Analysis Area. There are no mapped wetlands; however, there is a small drainage area in the southeast corner of the property that would likely qualify as a wetland. Current vegetation mapping shows approximately 8 acres of coastal sage scrub, which is an upper tier vegetation category with stringent mitigation



requirements that encourage preservation. Most of the steep slope areas on the property are north-facing, thus, the dominant vegetation in the undisturbed areas is mapped as southern mixed chaparral, which is not as restrictive as coastal sage scrub. GIS modeling shows approximately 16 acres of steep slope, which is mostly in the southern portion. The entire property is in the draft Pre-Approved Mitigation Area (PAMA) of the draft North County MSCP. If the PAMA is adopted for this area, mitigation ratios will encourage developing outside the PAMA and preservation within the PAMA. Preservation of effective wildlife corridors will be sought during the development stage. Over 1,000 acres of open space preserves are adjacent to the south, southeast, and southwest. Considering this and the higher level of sensitive habitats and slope constraints in the southern portion, this portion would require open space preservation under PAMA designation. General Plan Policy LU-1.8 (applicable at the development stage) 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/General Commercial portion, with open space in the southern portion.

Fire hazards and access would also need to be addressed in development review. Consolidating development in the northern portion would also provide some reasonable assurance of fire clearing feasibility, though the narrow strip of coastal sage scrub near the northern edge would likely be preserved. Based on the proposed minimum lot sizes, the maximum dead-end road length would be 800 feet, requiring secondary access if lengths are beyond this. Currently access is available to San Elijo Road via an existing private road easement on the east and secondary access is likely feasible on the western side via another existing private road easement. The area currently estimated to be within the required 0-5 minute emergency response travel time does not quite extend through the area proposed for VR-10.9. This would be reviewed at the development stage and may require further consolidation of development in the northern portion. The availability of sewer service, the access options, the building type flexibility, and the potential to transfer all allowed density into the northern portion would provide some reasonable assurance of density feasibility. Considering these factors, a consistency finding can be made at this programmatic land use mapping level.

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.



SD15 is located in a 550-acre County island which is surrounded by the cities of San Marcos, Carlsbad, and Encinitas. There is a wide range of parcel sizes in this area, due to the adjacent open space preserves and nearby higher density developments in San Marcos and Carlsbad. Unincorporated County parcel sizes range from ¼ acre to 150 acres within a one mile radius. This County island contains a majority of open space lands and other undisturbed habitat. The closest unincorporated area to this County island is the western portion of Elfin Forest (part of the San Dieguito CPA), which contains mostly SR-4, RL-20, and open space preserves. Outside of some adjacent undeveloped areas within the jurisdiction of adjacent cities, there are some existing higher density developments nearby in Carlsbad and San Marcos (La Costa Oaks, University Commons, and San Elijo Hills, among others). Considering the fact that this County island has as much or more of a connection to the adjacent areas of San Marcos as it does to the Elfin Forest portion of the San Dieguito community, it can be considered a transition area. Higher densities are found nearby (within ½ mile) in San Marcos than proposed with the SD15 Proposed Project map. Nearby incorporated areas also contain several commercial uses. Considering these factors, the Proposed Project map has been found to be consistent with LU-2.3.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

This 550-acre County island, that includes SD15 receives little attention in neighborhood discussions in the San Dieguito Community Plan, while there are portions devoting discussion to other neighborhoods within the community, including Del Dios, Mount Israel, Rancho Santa Fe, Fairbanks Ranch, 4S Ranch, Sun Valley, and Rancho Cielo. In addition, Elfin Forest and Harmony Grove have a Community Plan, which is considered part of the San Dieguito Community Plan. There is limited development potential in this County island outside of the SD15 property, as open space preserves cover most of it and other private properties have infrastructure limitations. The Land Use Goal of the Community Plan calls for a distribution of land uses that is compatible with the existing character of the community and preserves the rural nature as it transitions to surrounding jurisdictions. As discussed above, the SD15 site is adjacent to San Elijo Road and the northern portion would maintain a stronger connection to nearby higher density/intensity developments along this corridor. The building type flexibility discussed above would allow for preservation in the southern portion to be compatible with adjacent and nearby open space preserves in that end, while providing needed housing in the northern end. Commercial Policy 5 of the Community Plan calls for providing neighborhood shopping and service centers to satisfy the daily needs of adjacent neighborhoods and locate them in areas with easy, safe pedestrian and bicycle access. Commercial uses would be possible in the northern end of the SD15 site, where San Elijo Road includes a sidewalk and bike lane connecting to nearby neighborhoods of higher densities. Considering these factors, the Proposed Project Map has been found to be consistent with Policy LU-2.4 at this programmatic land use mapping stage.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density Rural Lands. Therefore, the Proposed Project Map for SD15 is consistent with Policy LU-2.5.



LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

The entire Analysis Area is within a draft PAMA area for the draft North County MSCP and potential wildlife corridors are abundant within the southern portion of the currently vacant property. Adjacent to the southwest, south and southeast are open space preserves covering over 1,000 acres, in addition to areas of low density SR-10 nearby. Most of the site consists of coastal sage scrub and southern mixed chaparral, with a riparian area starting at a storm drain outfall near the southeast boundary. With the location of connected open space, steep slopes, and sensitive habitat in the southern end of the PSR, that area should, in accordance with this policy, have a designation/density that reflects the sensitive habitats in that area and the need for maintaining a wildlife corridor. As discussed previously, the Proposed Project Map includes SR-0.5 for the southern end. In the review of this policy, consideration is given to the fact that the Analysis Area is just one parcel under one ownership. Under the General Plan (Policy LU-1.8, applicable to development projects), transfer of density within a parcel with multiple designations is allowed with a Major Use Permit or Specific Plan. Therefore, the area proposed for SR-0.5 in the Proposed Project map could be preserved, with the potential units transferred into the northern portion. If the PAMA designation is approved for this site, this preservation of a viable wildlife corridor in the south would likely be required, regardless of designation. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-6.2 at this programmatic land use mapping stage.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The entire Analysis Area is within the Very High Fire Hazard Severity Zone. The site is currently vacant with adjacent open space preserves, so adjacent fire clearing is limited. Current estimates show the northern 1/3 of the site is within the 5-minute fire response travel time, which is the General Plan standard for each of the designations in the Proposed Project Map. Approximately 2/3 of the site is within the 5-10 minute travel time range. Fire response time, internal access, and sufficient clearing will need to be addressed during the development review stage. Consolidating development in the northern portion would also provide some reasonable assurance of fire clearing feasibility, though the narrow strip of coastal sage scrub near the northern edge would likely be preserved. Based on the proposed minimum lot sizes, the maximum dead end road length would be 800 feet. Currently access is available to San Elijo Road via an existing private road easement on the east and secondary access is likely feasible on the western side via another existing private road easement. Considering the nearby high-density developments along San Elijo Road, a consistency finding can be made in reviewing at this programmatic land use mapping level.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

The Analysis Area does not contain any agricultural operations or a recent history of agriculture. Therefore, there are no inconsistency issues.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.



This policy is not applicable to the SD15 proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent. Water service is available from the Olivenhain Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

See the review of Policy LU-1.2 above for a discussion of the proposal for assigning a Village land use designation (VR-10.9) over a portion and the Village Regional Category over the proposed VR-10.9 portion and the proposed General Commercial portion. That policy review covers the parameters of Policy LU-9.2 and the Proposed Project Map has been found to be consistent with Policy LU-9.2.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

The zoning building type proposed in the area of the proposed Village Regional Category would allow for a mix of housing types. A mix of uses would be allowed within the area proposed for General Commercial. Therefore, a consistency finding can be made at this programmatic land use mapping level.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

SD15 is located along a section of San Elijo Road that includes several areas of established higher-density residential uses, commercial uses and office uses. Therefore, a consistency finding can be made for the Proposed Project Map.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

As discussed in the review of Policy LU-1.1 and LU-1.2 above, the General Plan's Guiding Principles and Community Development Model discuss directing growth toward existing infrastructure and services. The Analysis Area is adjacent to a 4-lane Major Road with bike lanes and sidewalks, it is in close proximity to substantial job centers, schools, and commercial goods/services, and is within a sewer service area and water service area. Though the southern portion will require preservation of an effective wildlife corridor, the northern portion could be considered an area where growth could be directed. Therefore, a consistency finding can be made.



LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Proposed Project Map would include a Semi-Rural designation at the edge of the area proposed for a Village designation. The CPA only includes Rural Lands buffers on relatively small portions of the northern end and western end. Most of the edges of the CPA are not in Rural Lands. Therefore, a consistency finding can be made.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

The proposed area of General Commercial on the northern end would be in the Village Regional Category. See the review of Policy LU-1.2 for a discussion of the rationale for changing a portion to the Village Regional Category. Considering these factors, a consistency finding can be made.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

Commercial and office uses would be possible in the northern end of the site proposed for General Commercial. The Analysis Area is on a 4-lane Major Road (San Elijo Road) with sidewalks and bike lanes on both sides, connecting to higher-density residential neighborhoods along San Elijo Road. Several existing residential neighborhoods are found within a mile of the site. Therefore, a consistency finding can be made.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.



The entire Analysis Area is within MRZ-3 designated lands. The existing density of SR-1 would already preclude future mining operations, due to the proximity of homes associated with that density. Therefore, the Proposed Project Map for SD15 has been found to be consistent with Policy COS-10.2, as it would not constitute a change affecting mining site availability.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

There is an undeveloped ridgeline in the southern end in the area proposes for SR-0.5, and areas of estimated steep slope are also almost all consolidated in the area proposed for SR-0.5. Therefore, a consistency finding can be made.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is on a 4-lane Major Road with bike lanes and sidewalks connecting to areas of relatively high residential density less than a half mile to the west and east. In addition, a grocery store, and public elementary and middle schools are located a half mile away in the San Elijo Hills community. Substantial job centers are in close proximity within the cities of San Marcos and Carlsbad. Providing additional density along this corridor of existing higher density/intensity uses and high levels of infrastructure and services available reduces the need for additional housing in areas further out. Considering these factors, the Proposed Project Map has been found to be consistent with Policy COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The northern portion of the Analysis Area is proposed to be included in a Village Regional Category. As discussed previously, it is adjacent to a 4-lane Major Road with bike lanes and sidewalks, it is in close proximity to other public roads, it is in close proximity to job centers, and sewer service and water service are available. There are very few undeveloped areas in the unincorporated County that are within sewer service areas. Therefore, a consistency finding can be made.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.



There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The entire Analysis Area is within the Very High Fire Hazard Severity Zone. The site is currently vacant with adjacent open space preserves, so adjacent fire clearing is limited. Current estimates show the northern 1/3 of the site is within the 5-minute fire response travel time, which is the General Plan standard for each of the designations in the Proposed Project Map. Approximately 2/3 of the site is within the 5-10 minute travel time range. Fire response time, internal access, and sufficient clearing will need to be addressed during the development review stage. Consolidating development in the northern portion would also provide some reasonable assurance of fire clearing feasibility, though the narrow strip of coastal sage scrub near the northern edge would likely be preserved. Based on the proposed minimum lot sizes, the maximum dead end road length would be 800 feet. Currently access is available to San Elijo Road via an existing private road easement on the east and secondary access is likely feasible on the western side via another existing private road easement. Considering the nearby high-density developments along San Elijo Road, a consistency finding can be made in reviewing at this programmatic land use mapping level.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed designations is 5 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that approximately 1/3 of the site (northern portion) is in the 0-5 minute travel time range and approximately 2/3 of it is in the 5-10 minute travel time range. This current problematic estimate should be considered by decision-makers in light of the fire hazards; however, considering the standard requires review and consideration at the development application stage, there is not a clear inconsistency with the policy at this stage.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a



single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County’s emergency response and evacuation plans.

S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

The dam inundation and floodplain/floodway policies are not applicable because the Analysis Area does not contain any dam inundation zones, or FEMA or County-designated floodways or floodplains.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The SD15 Analysis Area is within the San Dieguito CPA. While most of the policies of the Community Plan apply to projects with a development component (development design to review), there are a few that are applicable to the proposal. Land Use Policy 1 calls for prohibiting ‘leap frog’ development, as it will unnecessarily increase the costs of providing public services and facilities. This Policy and the overall Community Plan do not provide a definition of ‘leap frog’ as it pertains to this policy. See the review of General Plan Policy LU-1.2 for SD15 in the County General Plan consistency review within this Section for a discussion of the ‘leap frog’ policy, which provides a definition of the term as it pertains to this Policy. Conservation Policy 2 looks to ensure that land adjacent to recreation areas, natural preserves, and agricultural areas has the appropriate, compatible land use designation. The entire Analysis Area is within a draft PAMA area for the draft North County MSCP and potential wildlife corridors are abundant within the southern portion of the currently vacant property. Adjacent to the southwest, south and southeast are open space preserves covering over 1,000 acres, in addition to areas of low density SR-10 nearby. Most of the site consists of coastal sage scrub and southern mixed chaparral, with a riparian area starting at a storm drain outfall near the southeast boundary. With the location of connected open space, steep slopes, and sensitive habitat in the southern end of the PSR, that area should, in accordance with this policy, have a designation/density that reflects the sensitive habitats in that area and the need for maintaining a wildlife corridor. As discussed previously, the Proposed Project map includes SR-0.5 for the southern end. In the review of this policy, consideration is given to the fact that the Analysis Area is just one parcel under one ownership. Under the General Plan (Policy LU-1.8, applicable to development projects), transfer of density within a parcel with multiple designations is allowed with a Major Use Permit or Specific Plan. Therefore, the area proposed for SR-0.5 in the Proposed Project map could be preserved, with the potential units transferred into the northern portion. If the PAMA designation is approved for this site, this preservation of a viable wildlife corridor in the south would likely be required, regardless of designation. A clear inconsistency under the Proposed Project map has not been found, due to the likelihood of preservation in the southern portion, as discussed above.



Commercial Policies 10 and 11 consider underutilized commercial areas in the CPA along with commercial uses in adjacent cities when determining the need for additional commercial uses in the community. Based on available information, there are only four properties in San Dieguito that are designated/zoned for commercial that are undeveloped, and three of those are currently going through the permit review process for commercial development. There are a couple nearby commercial nodes within the City of San Marcos, within the San Elijo Hills development to the east, and in the Melrose Drive/Rancho Santa Fe Road area to the northwest. Considering the growing population within San Marcos in this area and the four-lane road with sidewalks and bike lanes connecting these populations to the Analysis Area, adding commercial area to the property would be consistent with this Policy. Commercial Policy 5 of the Community Plan calls for providing neighborhood shopping and service centers to satisfy the daily needs of adjacent neighborhoods and locate them in areas with easy, safe pedestrian and bicycle access. Considering the characteristics discussed above, providing some commercial would meet the intent of this policy.

The Land Use Goal of the Community Plan calls for a distribution of land uses that is compatible with the existing character of the community and preserves the rural nature as it transitions to surrounding jurisdictions. As discussed above, the SD15 site is adjacent to San Elijo Road and the northern portion would maintain a stronger connection to nearby higher density/intensity developments along this corridor. The building type flexibility discussed above would allow for preservation in the southern portion to be compatible with adjacent and nearby open space preserves in that end, while providing needed housing in the northern end. The CPA only includes Rural Lands buffers on relatively small portions of the northern end and western end. Most of the edges of the CPA are not in Rural Lands, and there are numerous areas of higher densities at and near the transition to surrounding jurisdictions. No inconsistency issues have been found with the San Dieguito Community Plan.

REVIEW OF THE ALTERNATIVE MAPS – GENERAL PLAN AND COMMUNITY PLAN

The SD15 Analysis Area covers one 69-acre parcel located in a 550-acre unincorporated County island in the San Dieguito Community Planning Area (CPA) just west of the main portion of the CPA. Under the Proposed Project Map (“PSR Owner Request” map on page 1), the Analysis Area would change from SR-1 to General Commercial (with a mixed use zoning density of 2 units per acre), VR-10.9 and SR-0.5, which would be estimated to increase overall dwelling unit (DU) potential by 301 (total potential of 362 DU). The 2012 Board Letter Alternative Map would apply General Commercial throughout the site with a mixed use density consistent with the current SR-1. An additional Alternative Map (shown in the far right below) is also available for consideration, which would apply General Commercial (with a mixed use zoning density of 2 units per acre) in the northern portion and SR-10 in the southern portion, which would be estimated to increase overall dwelling unit potential by 19 (total potential of 80 DU).

The SD15 Proposed Project Map was found to be consistent with the applicable policies of the General Plan and the San Dieguito Community Plan in evaluating at this programmatic land use mapping stage. The Alternative Map applying a combination of General Commercial and SR-10 was also found to be consistent with each applicable policy, as there is infrastructure, services, and nearby higher densities available to support the General Commercial with mixed use zoning in the northern portion. The SR-10 in the southern



*portion would facilitate wildlife corridor preservation. **The 2012 Board Letter option that would apply General Commercial throughout the entire Analysis Area has been found to be inconsistent with Policies LU-2.3, LU-2.4, LU-6.2, LU-10.4, and Community Plan Conservation Policy 2. These inconsistencies are related to community character impacts of applying General Commercial throughout the entire site as opposed to limiting it to the northern portion.** A Semi-Rural designation is more compatible in the southern portion with the adjacency to open space preserves. As discussed above, if the draft PAMA designation is adopted as part of the North County MSCP, it would likely require utilizing General Plan Policy LU-1.8 at the development stage to transfer the SR-0.5 density within the projects site to the northern portion, in order to preserve the southern portion. General Commercial would not be appropriate in the southern portion of steep slopes and sensitive habitats.*



VC7+ General Plan and Community Plan Conformance

The VC7+ Analysis Area covers 233 parcels over approximately 1,465 acres in the northwestern portion of the Valley Center Community Planning Area (CPA). The Analysis Area is approximately ½ mile east of I-15 and 2.5 miles south of SR-76. Public road access is limited to West Lilac Road on the northern and eastern ends of the Analysis Area. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the entire Analysis Area would change from SR-4 to SR-2, which would be estimated to increase overall dwelling unit (DU) potential by 253 (total potential of 619 DU). An Alternative Map is also available for consideration, which would maintain the existing SR-4 in more constrained areas on the northern and southern ends of the Analysis Area, resulting in an estimated DU increase of 141 (total potential of 507 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 4 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

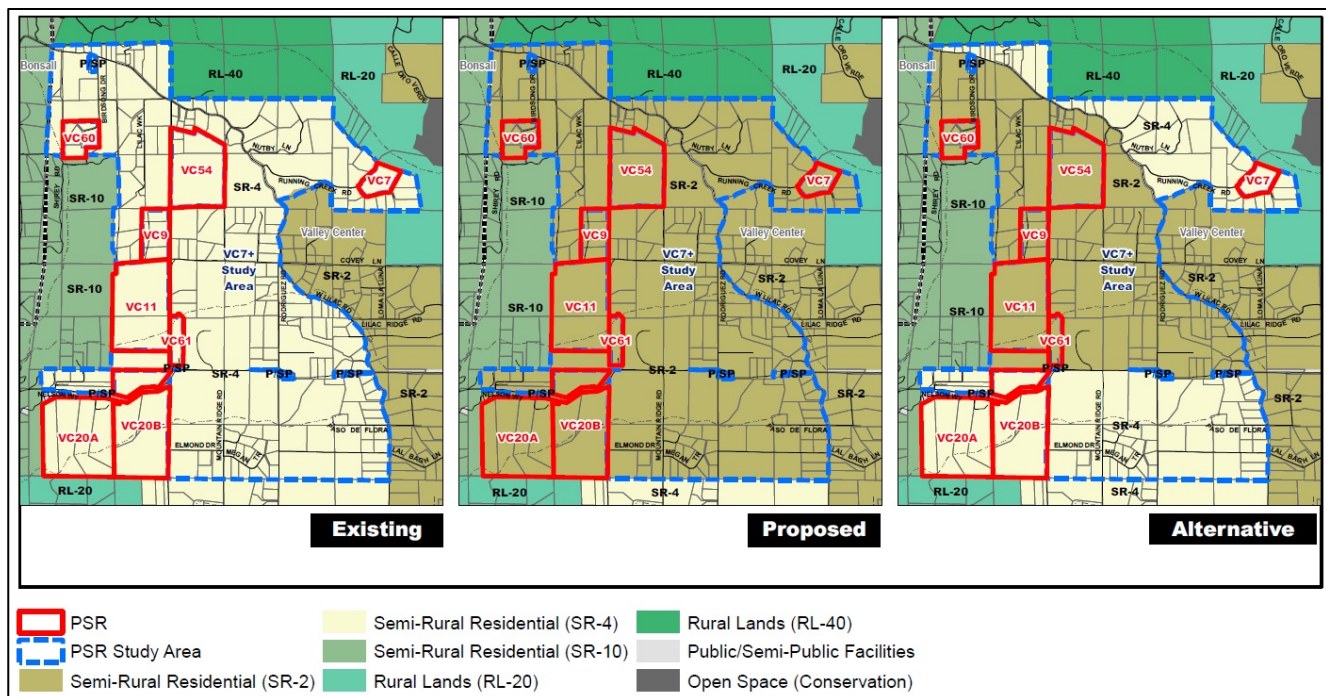


Figure 1: VC7+ Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for



the Proposed Project map, a discussion of applicable Valley Center Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 10 miles from the geographic center of Escondido and 14 miles from the geographic center of Carlsbad, with an estimated 44,289 jobs and 67,713 jobs respectively. A much smaller job center is approximately 6 miles away at the Pala Reservation Casino, with an estimated 1,854 jobs. The proposed density would not be out of line with the distance to jobs. Fire service is available from the Deer Springs Fire Protection District, with the 5-10 minute estimated travel time for most of the Analysis Area being consistent with the proposed SR-2 designation (per General Plan standards). Water service is available from the Valley Center Municipal Water District with 149 of the 233 parcels having current water service or access to an on-site or adjacent water line. Sewer service is not available in the Analysis Area.

*The Analysis Area is currently within the Semi-Rural Regional Category, which covers most of the CPA. Surrounding designations include Rural Lands (RL-40 and RL-20) to the north, SR-2 and RL-20 to the east, SR-4 and RL-20 to the south, and SR-10 to the west. Most of the Analysis Area is near a western edge of the CPA and part of the northwestern edge of the Analysis Area is on the border of the CPA. The portion of the Analysis Area that is closest to the Village (closest Village is the northern Village) is the southeastern edge, which is approximately 6 miles away from the Village via roads. Though the Analysis Area is in close proximity to the I-15, it is considered part of the outer layer of Semi-Rural. West Lilac Road on the northern and eastern ends is the only public road access and it traverses steep slopes through much of the segments. Many of the current access roads are private, dead end roads. Though SR-2 is very widespread in the CPA, covering the majority of private lands, increasing density on such a large area (1,465 acres) near the edge of the community, with infrastructure limitations, would pose issues with CDM consistency. The northern and southern ends of the Analysis Area are the most constrained, with riparian habitats and surrounding areas of steep slope with native vegetation. Expanding roads and other infrastructure would be more difficult in these areas, and they would remain SR-4 in the Alternative Map. **Considering these issues, expansion of SR-2 throughout the full 1,465 acres has been found to be inconsistent with the CDM, resulting in a finding of the Proposed Project Map being inconsistent with Policy LU-1.1.***



- LU-1.2 Leapfrog Development.** Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. *[See applicable community plan for possible relevant policies.]*

This policy is not applicable to the VC7+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

- LU-1.3 Development Patterns.** Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

*The proposed SR-2 designation is very widespread in the CPA, covering a majority of the private lands. The mapping pattern during the General Plan Update included applying Semi-Rural designations based on existing parcelization and development patterns, while also considering distances to the Villages and constraints. The Analysis Area has a varying range of parcel sizes, with many larger and smaller parcels, making the task of reflecting existing parcelization difficult for this area. Just over half of the parcels are less than four acres; however, several large parcels remain, with 48 parcels larger than 10 acres. Considering the existing parcelization and development patterns and distance from the Villages, such a widespread density increase at this programmatic land use mapping stage (prior to infrastructure expansion commitments) would not be line with mapping patterns in this area. **Therefore, the Proposed Project Map has been found to be consistent with Policy LU-1.3.***

- LU-1.4 Village Expansion.** Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the VC7+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

- LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions.** Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands.



Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is located approximately 8 miles from a border of the City of Escondido, approximately 9 miles from a border of the County of Riverside and approximately 2.5 miles from a border of the Pala Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with VC7+.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-2 designation applies a 1 unit per 2 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that the proposed change would increase potential lots by 253, and a total of 619 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential).

A number of factors are considered in evaluating the feasibility of 619 potential lots within the Analysis Area. As noted above, the only public road access is West Lilac Road on the northern end. However, there are portions of private roads built to fire access standards. Extensive access improvements would be required throughout all portions of the Analysis Area, but with the existing extent of ground disturbance (agricultural and residential uses), road improvements are anticipated to be generally feasible. The maximum dead end road length would be 1,320 feet, though it is anticipated there would be multiple options for constructing secondary access if needed. The extensive existing development footprint for agricultural and residential uses would also provide some assurance of meeting fire clearing standards at the development stage. The northern and southern portions of the Analysis Area would be the most challenging to develop (would remain SR-4 in the Alternative), but the 1-acre minimum lot size would provide some clustering flexibility. Considering these factors, a consistency finding can be made at this programmatic land use mapping level.

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands



LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

Designations adjacent to the Analysis Area include SR-10 to the west, RL-40 and RL-20 to the north, SR-2 and RL-20 to the east and SR-4 and RL-20 to the south. There is a wide range of parcel sizes in this area of mainly residential and agricultural uses.

In looking at compatibility of the proposed SR-2 designation, a comparison can be made to a large area of existing SR-2 to the east (approximately 3,500 acres that is north of Old Castle Road, south of the 900-acre open space preserve to the east, and west of the 'leg' of RL-20 in this area). The Analysis Area is part of the 'outer ring' of Semi-Rural as it is located further away from the Villages than the adjacent area of SR-2; however, it is closer to the I-15. The adjacent area of SR-2 has a higher prevalence of 2-acre and smaller parcels. The adjacent area of SR-2 is served by four public roads (Old Castle Road, Circle R Drive, Lilac Road, and West Lilac Road), while the Analysis Area is only served by one (West Lilac Road). Both areas are within water service areas, but not within a sewer service area. The Analysis Area has a higher prevalence of large agricultural operations, but remaining native vegetation is not as prevalent as it is in the adjacent SR-2 area. Both areas include portions with extensive steep slope constraints. In consideration of these factors and the high prevalence of SR-2 designated lands in Valley Center, a Policy LU-2.3 consistency finding can be made.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

The Community Character Goal of the Valley Center Community Plan discusses the three Regional Categories, with regard to preserving and enhancing the character of Valley Center. For Semi-Rural areas, the Plan seeks to maintain the overall rural and agricultural character. As discussed in the review of Policy LU-7.1 below, research shows the SR-2 designation can preserve agricultural uses, considering the small farm economy prevalent in the unincorporated County. Agricultural uses are prevalent in current SR-2 areas of Valley Center. Though the Alternative Map would provide a greater level of compatibility with the character and development objectives of the CPA by limiting the area of increased density in this portion of the CPA, a consistency finding can be made for the Proposed Project Map at this programmatic land use mapping level, in consideration of the ability to preserve agriculture in SR-2.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density Rural Lands. Therefore, the Proposed Project Map for VC7+ is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

Much of this 1,465-acre Analysis Area consists of agricultural uses and single family residential uses. Current vegetation mapping shows sensitive habitats covering just over 120 acres, including riparian



scrub/forest, coastal sage scrub, southern mixed chaparral and a small area of oak woodlands. Considering the estimated acreage of sensitive habitats in relation to the overall Analysis Area acreage, it is anticipated that most of the sensitive habitats could be preserved. Approximately 90 acres on the northern end are within a Pre-Approved Mitigation Area (PAMA) of the draft North County MSCP. This PAMA area would serve to protect the wildlife corridor associated with Keys Creek, its tributaries, and adjacent undeveloped upland habitats. While this Alternative Map would facilitate a greater level of sensitive habitat, a consistency finding can be made for the Proposed Project Map, given the acreage of sensitive habitats in relation to the overall Analysis Area acreage.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The majority of the Analysis Area is within the Moderate FHSZ, due to the prevalence of agricultural operations, in addition to approximately 365 acres in the Very High FHSZ. Current estimates show most of the Analysis Area would be within the 10-minute General Plan fire response travel time standard for the proposed SR-2. The closest station of the Deer Springs FPD (applicable district) is approximately 2 miles from the southern end of the Analysis Area. Access improvements would be necessary throughout the Analysis Area, as the only public road is West Lilac Road, which is adjacent to the northern and eastern end; however, a policy consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.



Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for VC7+: The Analysis Area is within a productive agricultural area in western Valley Center. There are several agricultural operations of varying types within the Analysis Area and in surrounding areas. Prime agricultural soils are not widespread throughout the Analysis Area, but many viable agricultural operations common in San Diego County do not require this. The proposed change from SR-4 to SR-2 will be considered in light of the potential loss of agriculture, based on the research noted above. The research tends to support SR-2 as a designation that can facilitate agricultural preservation. Therefore, the Proposed Project Map for VC7+ has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the VC7+ proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent. Water service is available from the Valley Center Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the VC7+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the VC7+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.



This policy is not applicable to the VC7+ proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center and does not include proposals for commercial, office, civic, or high density residential uses.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Town Center. The Proposed Project map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The proposal would not change the current Semi-Rural Regional Category. Therefore, it has not been determined to pose inconsistencies with this Policy.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the VC7+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the VC7+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

There is a relatively small industrial area on Nelson Way, just under a half mile west of the southwestern edge of the Analysis Area; however there are steep slopes and existing residences between that southwestern portion and the Industrial area. As such, there is plenty of existing buffering and the Analysis Area would not be impacted by the Industrial area on Nelson Way. Therefore, there are no policy inconsistency issues.



APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

This policy is not applicable because there are no MRZ-2 or MRZ-3 zones within the Analysis Area.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are some steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is approximately six miles from the Valley Center North Village, two miles from the nearest transit stop, and two miles from the nearest park-and-ride facility. It is in close proximity to an interchange for I-15 (½ mile away), but public roads in the Analysis Area are limited to West Lilac Road, adjacent on the north and east. Considering the language of the Policy, the Proposed Project Map for VC7+ has been found to be consistent with COS-14.1 in reviewing at this programmatic land use mapping stage.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The Analysis Area is not within a Village, is not within a sewer service area, and public road access is limited to West Lilac Road, adjacent to the northern and eastern portions. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized



APPLICABLE SAFETY ELEMENT POLICIES

- S-1.1 Minimize Exposure to Hazards.** Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The majority of the Analysis Area is within the Moderate FHSZ, due to the prevalence of agricultural operations. Approximately 365 acres of the Analysis Area is in the Very High FHSZ. Current estimates show most of the Analysis Area would be within the 10-minute General Plan fire response travel time standard for the proposed SR-2. The closest station of the Deer Springs FPD (applicable district) is approximately 2 miles from the southern end of the Analysis Area. Access improvements would be necessary throughout the Analysis Area, as the only public road is West Lilac Road, which is adjacent to the northern and eastern end; however, a policy consistency finding can be made at this programmatic level.

- S-6.4 Fire Protection Services for Development.** Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-2 designation is 10 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that most of the Analysis Area would be within the 5-10 minute travel time range. Though substantial access improvements would be required for subdivisions in most portions of the Analysis Area, a consistency finding can be made at this programmatic land use designation mapping stage, given the current estimates for travel time.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.



- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County’s emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

The floodplain/floodway policies are not applicable because the Analysis Area does not contain any dam inundation zones, or FEMA or County-designated floodways or floodplains.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The VC7+ Analysis Area is within the Valley Center CPA. While most of the policies of the Community Plan apply to projects with a development component (development design to review), there are a few that are applicable to the proposal. Residential Policy 2 requires, “...preservation of unique features such as oak woodlands, riparian habitats, steep slopes, archaeological sites, and ecologically sensitive areas.” Though this policy is more geared toward development projects, it can be considered with regard to proposed density feasibility and avoidance of these resources. A finding of consistency can be made at this programmatic land use mapping stage as it is anticipated that future projects could be designed to avoid these resources without rendering the proposed density infeasible. Agricultural Policy 1 states, “Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center.” Most of the CPA contains designations and zones that would facilitate agricultural uses, along with combined residential and agricultural uses. As discussed in the review of General Plan Policy LU-7.1 earlier in this report, the proposed SR-2 designation would be anticipated to support continued agricultural uses, based on research of the County’s Guidelines for Determining Significance, the 2011 PEIR, and other County documents. Additional policies of the Community Plan that are applicable to a stand-alone GPA/Rezone are related to commercial or industrial uses. Considering no changes are proposed to zoning use regulations in the Analysis Area, there are no consistency issues with those policies. In consideration of the applicable policies and the factors noted above, there are no policy inconsistency issues with the Valley Center Community Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 233 parcels totaling approximately 1,465 acres in the northwestern portion of Valley Center. Considering existing parcelization, the proposed change from SR-4 to SR-2 is anticipated to increase potential dwelling units by 253 (estimated 366 potential units under the current



designations and 619 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would maintain the current SR-4 designation on the northern (north of West Lilac Road) and southern portions, and change the rest to SR-2. This change is estimated to result in an increase of 141 potential dwelling units (estimated 366 potential units under the current designation and 507 under the Alternative Map).

The VC7+ Proposed Project Map was found to be inconsistent with General Plan Policies LU-1.1 and LU-1.3, which address the parameters of the Community Development Model and land use mapping in patterns. The inconsistencies are related to the proposed change to SR-2 for such a large area near the edge of the community with a limited public road network. The Alternative Map has been found to be consistent with these policies, as it would substantially reduce the area changing to SR-2 by maintaining the current SR-4 in the northern and southern portions of the Analysis Area. These portions are more constrained by steep slopes and sensitive habitats than other portions, and thus maintaining SR-4 there would demonstrate consistency with the Community Development Model and mapping patterns.

The Proposed Project Map for VC7+ was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Valley Center Community Plan. The Alternative Map for VC7+ would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Valley Center Community Plan, as it would include a smaller area of proposed land use designation change, in comparison to the Proposed Project Map.



VC51 General Plan and Community Plan Conformance

The VC51 Analysis Area covers 14 parcels over approximately 166 acres in the northwestern portion of the Valley Center Community Planning Area (CPA). The Analysis Area is approximately 3.5 miles east of I-15, 4 miles south of SR-76, and lies mostly between Lilac Road and Couser Canyon Road. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the entire Analysis Area would change from RL-20 to SR-4, which would be estimated to increase overall dwelling unit (DU) potential by 13 (total potential of 27 DU). An Alternative Map is also available for consideration, which would only change three parcels on the northern end to SR-4, while maintaining RL-20 on the remainder of the Analysis Area, resulting in an estimated DU increase of 3 (total potential of 17 DU). Five of the properties in the Analysis Area are currently under Williamson Act contracts for preservation of agricultural uses. While in effect, these contracts would not allow further subdivision on the properties under contract. Therefore, while the Williamson Act contracts are in effect, the additional density potential of the Proposed Project Map would be 6 and the additional density potential of the Alternative Map would be 1. Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

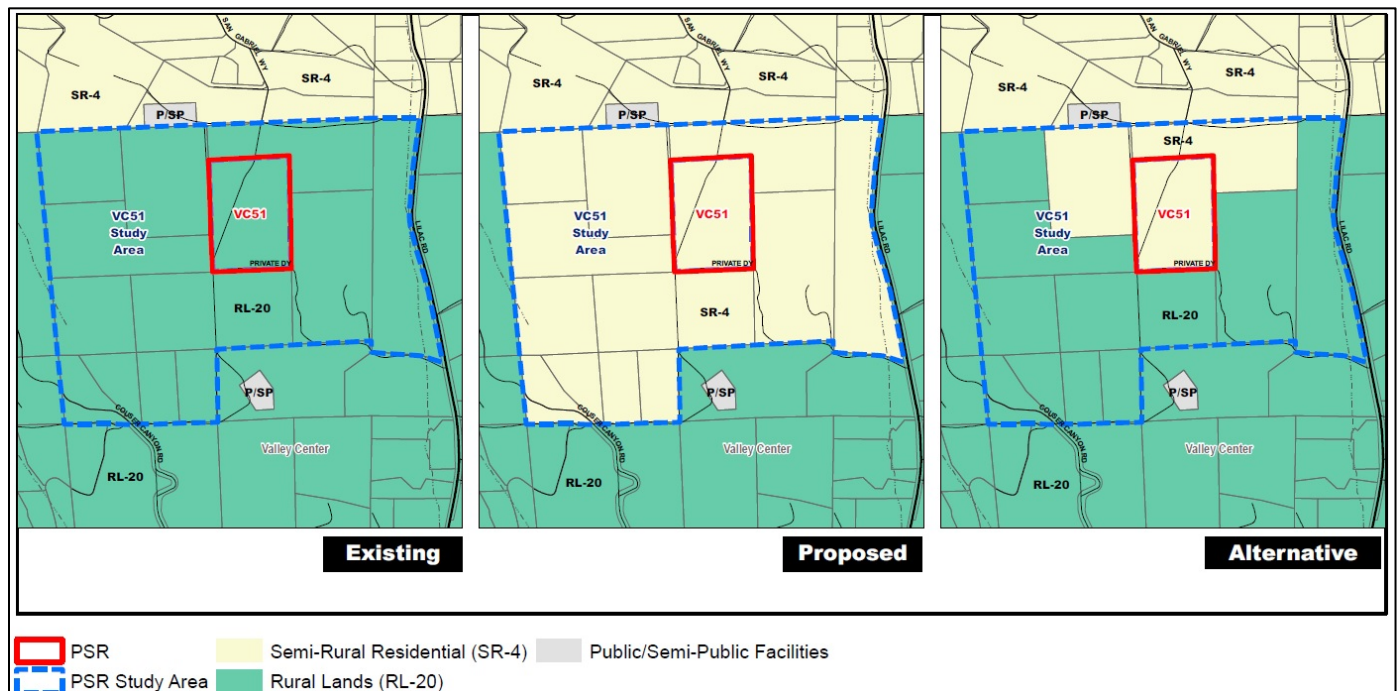


Figure 1: VC51 Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project Map, a discussion of applicable Valley Center Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 13 miles from the geographic center of Escondido and 17 miles from the geographic center of Carlsbad, with an estimated 44,289 jobs and 67,713 jobs respectively. A much smaller job center is approximately 3.5 miles away at the Pala Reservation Casino, with an estimated 1,854 jobs. The proposed density would not be out of line with the distance to job centers. Fire service is available from the Valley Center Fire Protection District, with the entire Analysis Area currently estimated to be within the 10-20 minute emergency response travel time, which is beyond the General Plan standard of 10 minutes for the proposed SR-4. However, the entire Analysis Area is within the Moderate Fire Hazard Severity Zone (FHSZ), due to the prevalence of agricultural operations and travel time standards require confirmation at the development application stage (see the review of Policy S-6.4). Water service is available from the Valley Center Municipal Water District with 10 of the 14 parcels having current water service or access to an on-site or adjacent water line. Sewer service is not available in the Analysis Area. Lilac Road and Couser Canyon Road provide public road access, with Lilac Road running along the eastern border of the Analysis Area and Couser Canyon Road crossing through the southwest corner.

The Analysis Area is currently within the Rural Lands Regional Category, which covers much of the northwestern portion of the CPA. An exception to this mapping pattern would be an area of approximately 820 acres adjacent to the north, which is currently designated SR-4. Surrounding designations include this noted SR-4 area to the north, and RL-20 to the east, south, and west. The adjacent area of SR-4 shares some similarities with the Analysis Area, in that it also contains some larger parcels (with additional subdivision potential under SR-4), an extensive agricultural footprint, and more



*limited habitat constraints in comparison to other areas in the Semi-Rural/Rural Lands transition. Exceptions within the VC51 Analysis Area include the eastern portion of oak woodlands (and potential wetland areas) near Lilac Road and the southwestern portion with a riparian corridor and areas of coastal sage scrub on hillsides where there is more limited agricultural footprint. The more limited additional density potential over the 166-acre Analysis Area is due to the prevalence of steep slopes and the proposed SR-4 applying a slope-dependent density as described above and as shown in Figure 2. Considering the distance to the Village, the topography constraints, and current internal road network limitations, a change to SR-4 for the entire Analysis Area would not be in line with the parameters of the CDM. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.1.***

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. *[See applicable community plan for possible relevant policies.]*

This policy is not applicable to the VC51 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

The mapping pattern during the General Plan Update included applying Semi-Rural designations based on existing parcelization and development patterns, while also considering distances to the Villages and constraints. The proposed SR-4 designation is found on and near the outer edges of the CPA in this northwestern portion, along with the western portion, northeastern portion and southeastern portion of the CPA. An approximately 820-acre area of SR-4 separates the Analysis Area from the edge of the CPA. Though this 820-acre area contains several small parcels that would not have subdivision potential under the SR-4, it also contains more large parcels (with subdivision potential under SR-4) than the VC51 Analysis Area. Like the VC51 Analysis Area, this adjacent area of existing SR-4, has a large portion of the area devoted to agriculture, with habitat constraints more limited than most Rural Lands areas. Though the Analysis Area exhibits characteristics of Semi-Rural and Rural Lands categories, the Proposed Project Map is not out of line with existing mapping patterns, in consideration of the adjacent area of SR-4 on the outer edge of the CPA. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-1.3 when evaluated at this programmatic land use mapping stage.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network



Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the VC51 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is located approximately 9 miles from a border of the City of Escondido, approximately 8 miles from a border of the County of Riverside and less than one mile from a border of the Pala Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with VC51.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-4 designation applies a 1 unit per 4 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that the proposed change would increase potential lots by 13, and a total of 27 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential). See the introduction section for a discussion of properties in the Analysis Area that are subject to Williamson Act contracts for preservation of agricultural uses, and the more limited additional subdivision potential while those are still in place.

A number of factors are considered in evaluating the feasibility of 27 potential lots within the Analysis Area. Most of the additional density potential would be found in the three large parcels that take up most of the southern end and all of the eastern end of the Analysis Area. These are the only parcels that would have the potential for more than just a two-lot split. The locations of existing public road infrastructure provide a starting point for measuring any new dead end road lengths for consistency with the maximum dead end road length of 1,320 feet, which would be applied under the proposed SR-4. The public roads include Lilac Road, along the eastern edge and Couser Canyon road, which runs through the southwest corner. The largest parcel (with a 4-lot potential) under SR-4 has frontage on Lilac, but new access points could be problematic, due to the oak woodlands along much of the frontage and some areas that could qualify as wetlands. These areas of habitat constraints could also limit new home placement, due to fire clearing requirements. In the other two large parcels west of that (with more than a 2-lot potential) steep slopes are prevalent, with the Resource Protection Ordinance (RPO) limiting steep slope encroachment to 10%. The prevalence of steep slopes and some rock outcroppings in the Analysis



Area could pose feasibility issues for new septic systems, depending on placement. There is no sewer service available. The steep slopes could also limit the feasibility of certain access options, in terms of building new roads to fire protection standards.

*There is less feasibility concern with the few properties that would only have the potential for two-lot splits, as they could likely provide the necessary road infrastructure and development footprint with improvements to existing access and limited expansion of the infrastructure and development footprint. **Considering the constraints within the properties with estimated subdivision potential of three or four lots, the Proposed Project Map has been found to be inconsistent with Policy LU-1.9.***

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The Analysis Area is adjacent to RL-20 properties on the west, south, and east, and SR-4 properties to the north. The adjacent SR-4 to the north is approximately 820 acres and would be considered the one exception to the “greenbelt” of very low density (Rural Lands) in this northwestern portion of the CPA. Though this 820-acre area contains several small parcels that would not have subdivision potential under SR-4, it also contains more large parcels (with subdivision potential under SR-4) than the VC51 Analysis Area. Five of the 13 parcels in the Analysis Area are under Williamson Act contracts for preservation of agricultural uses. These properties would not have subdivision potential under the change until/if Williamson Act contracts are removed (typically a 10-year non-renewal process), thus limiting potential community character impacts. Considering the adjacent area of SR-4 to the north and the multiple Williamson Act contracts in place within the Analysis Area, a finding of consistency with Policy LU-2.3 can be made.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

The Community Character Goal of the Valley Center Community Plan discusses the three Regional Categories, with regard to preserving and enhancing the character of Valley Center. For Semi-Rural areas, the Plan seeks to maintain the overall rural and agricultural character. As discussed in the review



of Policy LU-7.1 below, research shows the proposed SR-4 designation can preserve agricultural uses, considering the small farm economy prevalent in the unincorporated County. Agricultural uses are prevalent in current SR-4 areas of Valley Center. Though the Alternative Map would provide a greater level of compatibility with the character and development objectives of the CPA by limiting the area of increased density in this portion of the CPA, a consistency finding can be made for the Proposed Project Map at this programmatic land use mapping level, in consideration of the ability to preserve agriculture in SR-4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area could be considered part of a greenbelt per the General Plan definition because it is within an area of very low density Rural Lands near the outer edge of the community. However, there is an 820-acre area of SR-4 separating the Analysis Area from the edge of the community, so it would not be considered a greenbelt that separates the community from the Pala/Pauma Subregion further north. Therefore, the Proposed Project Map for VC51 is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

While most of the Analysis Area is used for agriculture and single family residential, there are some areas of mostly undisturbed sensitive habitats, particularly in the eastern and southwestern ends. These include some remaining coastal sage scrub and southern mixed chaparral on hillsides and a corridor of oak woodlands (which includes areas that could qualify as wetlands) along Lilac Road. The Analysis Area is not within the Pre-Approved Mitigation Area PAMA for the draft North County MSCP, as the sensitive habitat is dispersed and most areas have been graded for agricultural or residential uses, thus limiting wildlife corridor opportunities. A consistency finding can be made for the Proposed Project Map, given the acreage of sensitive habitats in relation to the overall Analysis Area acreage.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The Analysis Area is completely within the Moderate Fire Hazard Severity Zone, due to the extensive agricultural operations. With the closest Valley Center FPD fire station being approximately 8 miles away, estimates show the Analysis Area is currently beyond the 10-minute fire response time General Plan standard for the proposed SR-4. Approximately half of the additional density potential associated with the proposed SR-4 is on properties under Williamson Act contracts for agricultural preservation, where owners would not be able to apply for subdivisions until/if a non-renewal process is completed, which typically takes 10 years. As such, even if the Proposed Project change is approved for VC51, it may be many years before subdivision applications come forward, when travel time will need to be evaluated, based on existing and proposed access at that time. Considering the proposed designation in relation to the mapped FHSZ, a consistency finding can be made at this programmatic stage.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.



This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County’s unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for VC51: The VC51 Analysis Area is within the agriculturally productive western Valley Center and multiple agricultural operations are found within VC51, including orchards and vineyards. Statewide significance soils are found in the eastern end of the Analysis Area. The proposed SR-4 designation would not be anticipated to conflict with continued agricultural operations. Therefore, the Proposed Project Map for VC51 has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the VC51 proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent. Water service is available from the Valley Center Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general,



areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the VC51 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the VC51 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the VC51 proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center, does not include proposals for high density residential uses, and would not change the zoning use regulation (so allowed use types would not change).

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Town Center Centers. The Proposed Project map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Analysis Area is currently in the Rural Lands Regional Category and proposed to change to SR-4, but there is an approximately 820-acre area of SR-4 between the Analysis Area and the edge of the community. Therefore, it has not been determined to pose inconsistencies with this Policy.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the VC51 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.



LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the VC51 proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

This policy is not applicable because there are no MRZ-2 or MRZ-3 zones within the Analysis Area.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are some steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is approximately six miles from the Valley Center North Village, and five miles from the nearest transit stop and park-and-ride facility. An existing area of SR-4 is north of the Analysis Area and thus slightly farther away from the Village. Additional density potential in the VC51 Analysis Area would be limited due to the prevalence of steep slopes with the proposed SR-4 designation being slope-dependent. Additional density potential is further restricted by the Williamson Act contracts within some of the parcels, which would limit additional density potential to six dwelling units while the contracts are



in place. Considering the language of the Policy, the Proposed Project Map for VC51 has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The Analysis Area is not within a Village, is not within a sewer service area, and is not in close proximity to major job centers. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

There are no floodplains, dam inundation zones, or fault zones in the Analysis Area. The Analysis Area is completely within the Moderate Fire Hazard Severity Zone, due to the prevalence of agricultural operations. With the closest Valley Center FPD fire station being approximately 8 miles away, estimates show the Analysis Area is currently beyond the 10-minute fire response time General Plan standard for the proposed SR-4. Approximately half of the additional density potential associated with the proposed SR-4 is on properties under Williamson Act contracts for agricultural preservation, where owners would not be able to apply for subdivisions until/if a non-renewal process is completed, which typically takes 10 years. As such, even if the Proposed Project change is approved for VC51, it may be many years before subdivision applications come forward, when travel time will need to be evaluated, based on existing and proposed access at that time. Considering the proposed designation in relation to the mapped FHSZ, and the lack of additional significant hazards, a consistency finding can be made.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-4 designation is 10 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that the Analysis Area would be within the 10-20 minute travel time range. This current problematic estimate for part of the Analysis Area should be considered by decision-makers in light of the fire hazards;



however, considering the standard requires review and consideration at the subdivision application stage, there is not a clear inconsistency with the policy at this stage.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.
- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

These policies are not applicable because the Analysis Area does not contain any dam inundation zones, or FEMA or County-designated floodways or floodplains.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The VC51 Analysis Area is within the Valley Center CPA. While most of the policies of the Community Plan apply to projects with a development component (development design to review), there are a few that are applicable to the proposal. Residential Policy 2 requires, "...preservation of unique features such as oak woodlands, riparian habitats, steep slopes, archaeological sites, and ecologically sensitive areas." Though this policy is more geared toward development projects, it can be considered with regard to



proposed density feasibility and avoidance of these resources. A finding of consistency can be made at this programmatic land use mapping stage as it is anticipated that future projects could be designed to avoid these resources without rendering the proposed density infeasible. Steep slopes would not be considered unique features in this area, and the Resource Protection Ordinance limits steep slope encroachment to 10% for these properties. Agricultural Policy 1 states, “Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center.” Most of the CPA contains designations and zones that would facilitate agricultural uses, along with combined residential and agricultural uses. As discussed in the review of General Plan Policy LU-7.1 earlier in this report, the proposed SR-4 designation would be anticipated to support continued agricultural uses, based on research of the County’s Guidelines for Determining Significance, the 2011 PEIR, and other County documents. Additional policies of the Community Plan that are applicable to a stand-alone GPA/Rezone are related to commercial or industrial uses. Considering no changes are proposed to zoning use regulations in the Analysis Area, there are no consistency issues with those policies. In consideration of the applicable policies and the factors noted above, there are no policy inconsistency issues with the Valley Center Community Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 14 parcels totaling approximately 166 acres in the northwestern portion of Valley Center. Considering existing parcelization, the proposed change from RL-20 to SR-4 is anticipated to increase potential dwelling units by 13 (estimated 14 potential units under the current designations and 27 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would only change 3 parcels on the northern end of the Analysis Area to SR-4. This change is estimated to result in an increase of 3 potential dwelling units (estimated 14 potential units under the current designation and 17 under the Alternative Map).

The VC51 Proposed Project Map was found to be inconsistent with General Plan Policy LU-1.1, which addresses maintaining consistency with the parameters of the Community Development Model. This inconsistency is related to changing the designation throughout the entire Analysis Area. Though it is adjacent to a large area of SR-4, it is near the outer ring of the CPA, with limited existing access infrastructure. The adjacent area of SR-4 was applied partially in consideration of a number of smaller parcels without subdivision potential under SR-4, though this adjacent area also contains larger parcels with subdivision potential. Though additional density potential is minimal in VC51, most of the parcels would have subdivision potential (though some have Williamson Act contracts in effect, as discussed above). The Alternative Map would maintain the RL-20 designation in the properties with the highest level of habitat constraints, and those that would have the potential for 3 or 4-lot subdivisions under SR-4. The three properties proposed to change to SR-4 in the Alternative Map would each only have potential for one additional lot under SR-4 and are adjacent to the existing SR-4 area. Therefore, the Alternative Map would better reflect the parameters of the CDM and has been determined to be consistent with LU-1.1.

The Proposed Project Map was also found to be inconsistent with Policy LU-1.9, which is related to feasibility factors. The inconsistency was due to the level of constraints and access challenges on the



properties that would have the potential for 3 or 4-lot subdivisions. As discussed above, these properties would remain RL-20 in the Alternative Map, and therefore, a consistency finding can be made for that option.

The Proposed Project Map for VC51 was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Valley Center Community Plan. The Alternative Map for VC51 would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Valley Center Community Plan, as it would include a smaller area of proposed land use designation change, in comparison to the Proposed Project Map.



VC57+ General Plan and Community Plan Conformance

The VC57+ Analysis Area covers 217 parcels over approximately 1,337 acres in the eastern portion of the Valley Center Community Planning Area (CPA). The Analysis Area is just east of the North Village of Valley Center (western edge is adjacent to the Village boundary), and is bisected by Valley Center Road. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the entire Analysis Area would change from SR-4 to SR-2, which would be estimated to increase overall dwelling unit (DU) potential by 231 (total potential of 605 DU). An Alternative Map is also available for consideration, which would maintain the existing SR-4 in the southwestern portion (areas constrained by wetlands, floodplain, or steep slopes) and easternmost portion. Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 4 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

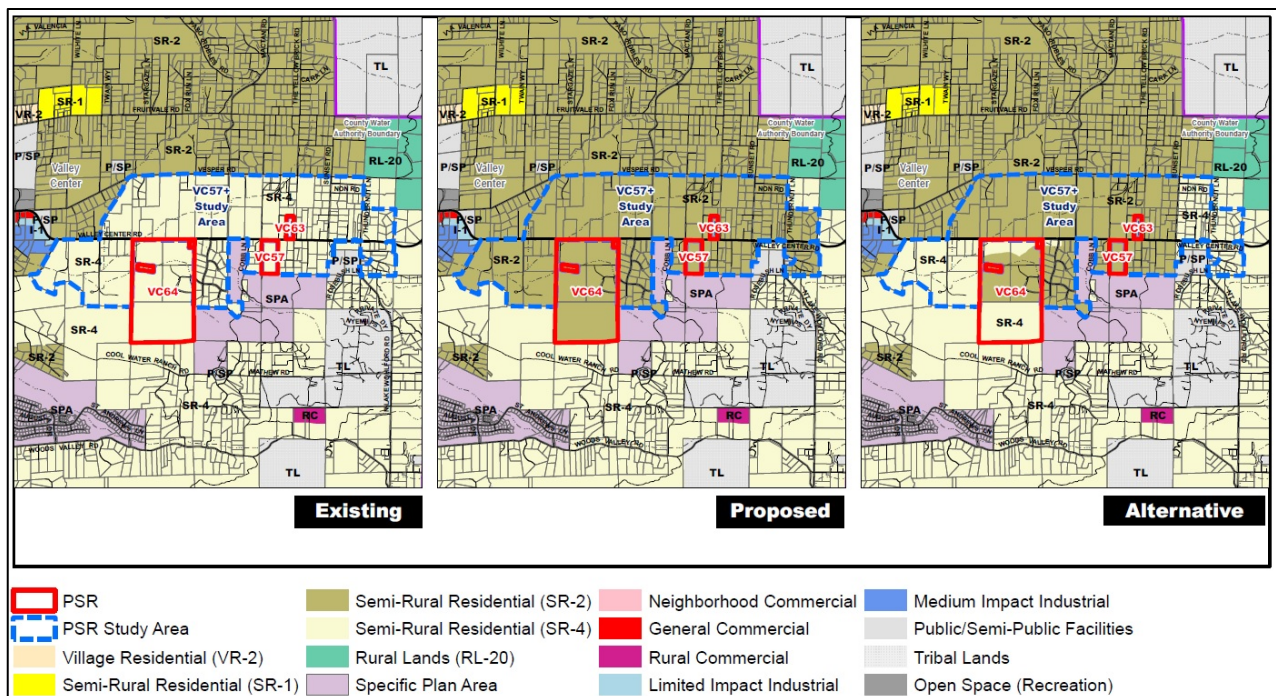


Figure 1: VC57+ Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for



the Proposed Project map, a discussion of applicable Valley Center Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 8 miles from the geographic center of Escondido and 18 miles from the geographic center of Carlsbad, with an estimated 44,289 jobs and 67,713 jobs respectively. A much smaller job center is approximately one mile away at the Valley View Casino, with an estimated 1,112 jobs. The proposed density would not be out of line with the distance to job centers. Fire service is available from the Valley Center Fire Protection District, with the entire Analysis Area currently estimated to be under the 10-minute emergency response travel time standard for the proposed SR-2. Water service is available from the Valley Center Municipal Water District with 155 of the 217 parcels having current water service or access to an on-site or adjacent water line. Sewer service is not available in the Analysis Area. There is a good network of public roads, with Valley Center Road running east-west through the middle, Vesper Road running east-west along the northern border, Mactan Road and Sunset Road running north-south through the central and eastern portion, and Lake Wohlford Road coming in from the south to end at Valley Center Road in the southeastern portion.

*The Analysis Area is currently within the Semi-Rural Regional Category, which covers most of the CPA. Surrounding designations include SR-2 to the north; SR-4, RL-20 and open space to the east; SR-4 and Specific Plan Area to the south; and SR-2 and Village designations to the west. The Analysis Area spans a width of almost three miles; so while the western end is adjacent to the North Village boundary, the eastern end is only a mile from a border of the CPA. On this eastern end, there is a gradual transition from more existing development (agricultural and residential footprint) outside the Village to constrained areas and open space just east of the Analysis Area. Thus, the eastern end of VC57+ should provide an appropriate transition of lower density. In addition, the southeastern end is constrained by areas of wetlands and floodplain (and steep slope on the southernmost portion), which provide an opportunity for a lower density transition to the SR-4 of Draft NCMSCP Pre-Approved Mitigation Area (PAMA) lands adjacent to the southwest. Though the level of existing infrastructure is appropriate for the proposed designation, the Proposed Project Map lacks appropriate CDM lower density transitions for such a large Analysis Area. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy LU-1.1.***



LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See *applicable community plan for possible relevant policies.*]

This policy is not applicable to the VC57+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

The proposed SR-2 designation is very widespread in the CPA, covering a majority of the private lands. The mapping pattern during the General Plan Update included applying Semi-Rural designations based on existing parcelization and development patterns, while also considering distances to the Villages and constraints. The Analysis Area has a varying range of parcel sizes. Though there are several large parcels (27 over 10 acres), over 70% are less than 4 acres. While these smaller parcels outnumber the larger parcels by a lot, the total acreage covered by those over 10 acres and those under 4 acres is quite similar. As such, the task of reflecting existing parcelization has limitations in this area.

A few mapping pattern factors can be considered in comparing the Analysis Area to a similar acreage of properties currently designated SR-2, adjacent to the north. The distances to the Village, available services, extent of existing agricultural operations, and extent of remaining native vegetation would be similar when comparing the two areas. Though the adjacent SR-2 area does not have the level of floodplain constraints found in VC57+ (southwest portion), the public road network in VC57+ is more extensive. Considering these factors, a consistency finding can be made, at this programmatic land use mapping stage.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the VC57+ proposals (Proposed or Alternative Map) because no Village designations are proposed.



- LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions.** Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is located approximately 4 miles from a border of the City of Escondido, approximately 14 miles from a border of the County of Riverside and less than one mile from a border of the San Pasqual Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with VC57+.

- LU-1.9 Achievement of Planned Densities.** Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-2 designation applies a 1 unit per 2 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that the proposed change would increase potential lots by 231, and a total of 605 lots would be possible under the Proposed Project Map (includes existing lots and additional subdivision potential).

A number of factors are considered in evaluating the feasibility of 605 potential lots within the Analysis Area. The locations of existing public road infrastructure (as discussed in the review of Policy LU-1.1) will limit the lengths of new access roads needed. The applicable maximum dead end road length of 1,320 feet would not be anticipated to hinder feasibility. The limited steep slope and habitat constraints provide some assurance of the feasibility of new development footprint and meeting fire clearing requirements. There are areas of high groundwater within the Analysis Area, which could necessitate the use of alternative septic systems. While these are costlier, they wouldn't necessarily be infeasible. The southwestern portion of the Analysis Area would be the most challenging to develop (would remain SR-4 in the Alternative) given the floodplain and estimated wetland constraints, but the 1-acre minimum lot size would provide some clustering flexibility. Considering these factors, a consistency finding can be made at this programmatic land use mapping level.

Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.

du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands



LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

Designations adjacent to the Analysis Area include SR-2 to the north; SR-4, RL-20 and open space to the east; SR-4 and Specific Plan Area to the south; and SR-2 and Village designations to the west. There is a wide range of parcel sizes in this area of mainly residential and agricultural uses, with higher density/intensity uses in the Village to the west, and a transition to lower density and open space to the east.

In looking at compatibility of the proposed SR-2 designation, a comparison can be made to a large area of existing SR-2 to the north (existing SR-2 acreage to the north is similar to the Analysis Area acreage). The proximity to the North Village would be similar, with the western ends of both areas being adjacent to the Village boundary. Available services would also be similar with water service available to both areas, but not sewer service. The VC57+ area has a more extensive public road network than this adjacent SR-2 area, but also has a higher level of floodplain constraints (southwestern portion). The extents of native vegetation and existing agricultural operations are similar for both areas. In consideration of these factors and the high prevalence of SR-2 designated lands in Valley Center, a Policy LU-2.3 consistency finding can be made.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

The Community Character Goal of the Valley Center Community Plan discusses the three Regional Categories, with regard to preserving and enhancing the character of Valley Center. For Semi-Rural areas, the Plan seeks to maintain the overall rural and agricultural character. As discussed in the review of Policy LU-7.1 below, research shows the proposed SR-2 designation can preserve agricultural uses, considering the small farm economy prevalent in the unincorporated County. Agricultural uses are prevalent in current SR-2 areas of Valley Center. Though the Alternative Map would provide a greater level of compatibility with the character and development objectives of the CPA by limiting the area of increased density in this portion of the CPA, a consistency finding can be made for the Proposed Project Map at this programmatic land use mapping level, in consideration of the ability to preserve agriculture in SR-2.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density Rural Lands. Therefore, the Proposed Project Map for VC57+ is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.



As with the VC7+ and VC51 Analysis Areas, most of VC57+ contains existing agricultural uses and single family residential uses and sensitive habitats are more dispersed. No portions are in the PAMA of the draft North County MSCP. The largest concentration of sensitive habitat areas is found in the areas in and around the floodplain in the southwestern portion, which contains wetlands and riparian habitats in the portions not previously developed. An Alternative Map has been developed and analyzed (see page 1) which would exclude the floodplain area south of Valley Center Road from the proposed change to SR-2. While this Alternative Map would demonstrate a greater level of policy consistency, a consistency finding can be made for the Proposed Project Map, given the acreage of sensitive habitats in relation to the overall Analysis Area acreage.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The Analysis Area is mostly split between the High and Moderate FHSZs, with the eastern end being within the Very High FHSZ. With the closest Valley Center FPD station being adjacent to the southeastern portion of the Analysis Area, most of the area is estimated to be within the 5-minute fire response travel time, and some of the areas in the western portion that are furthest from Valley Center Road are within the 5-10 minute estimate, which is consistent with the General Plan standard of 10 minutes for the proposed SR-2. In addition, the Analysis Area has a good public road network for fire protection, with Valley Center Road and Vesper Road running east-west, and Mactan Road, Sunset Road, and Lake Wohlford Road running north-south. Therefore, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define 'lower-density land use designations that support continued agricultural operations' or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County's CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County's unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible



with agricultural uses include ‘rural residential lands,’ which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for VC57+: The Analysis Area has a variety of agricultural operations throughout, and ideal conditions for agriculture. Prime agricultural soils and statewide significance soils cover most of the Analysis Area and steep slopes are generally limited to the southernmost leg (approximately 70 acres) of the Analysis Area. The proposed change from SR-4 to SR-2 will be considered in light of the potential loss of agriculture, based on the research noted above. The research tends to support SR-2 as a designation that can be consistent with agricultural preservation. Therefore, the Proposed Project Map for VC57+ has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the VC57+ proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent. Water service is available from the Valley Center Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the VC57+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the VC57+ proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.



This policy is not applicable to the VC57+ proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center, does not include proposals for high density residential uses, and would not change the zoning use regulation (so allowed use types would not change).

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Town Center. The Proposed Project map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The proposal would not change the current Semi-Rural Regional Category. Therefore, it has not been determined to pose inconsistencies with this Policy.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

This policy is not applicable to the VC57+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial or industrial uses.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

This policy is not applicable to the VC57+ proposals (Proposed or Alternative Map) because neither proposal would change the existing zoning use regulations. Therefore, there would be no new allowances for commercial, office or industrial uses.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change to SR-2 for VC57+ would increase the potential dwelling units for the area. A small portion of the furthest western end of the Analysis Area is adjacent to an existing Medium Impact Industrial area. The proposed minimum lot size of one acre would allow clustering housing pads away from the industrial area, and provision of effective buffering. In addition, the portion adjacent to the Medium Impact Industrial is part of a 38-acre parcel which has the northern portion (adjacent to industrial) within the floodplain. As such, a subdivision of that property would cluster housing pads to the



south, away from the floodplain and away from the adjacent industrial land use. Therefore, the Proposed Project Map for VC57+ has been found to be consistent with Policy LU-11.10.

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

This policy is not applicable because there are no MRZ-2 or MRZ-3 zones within the Analysis Area.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because a Semi-Rural designation is proposed. There are some steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The western portion of the Analysis Area is adjacent to the Village boundary for the Valley Center North Village. There are transit (bus) stops along Valley Center Road within the Analysis Area, and this road also includes a Class II bike lane for connecting to the two Villages. The closest park-and-ride facility is over 10 miles away via roads. Considering the language of the Policy, the Proposed Project Map for VC57+ has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The Analysis Area is not within a Village, is not within a sewer service area, and is not in close proximity to major job centers. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized



APPLICABLE SAFETY ELEMENT POLICIES

- S-1.1 Minimize Exposure to Hazards.** Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

The Analysis Area is mostly split between the High and Moderate FHSZs, with the eastern end being within the Very High FHSZ. With the closest Valley Center FPD station being adjacent to the southeastern portion of the Analysis Area, most of the area is estimated to be within the 5-minute fire response travel time, and some of the areas in the western portion that are furthest from Valley Center Road are within the 5-10 minute estimate, which is consistent with the General Plan standard of 10 minutes for the proposed SR-2. In addition, the Analysis Area has a good public road network for fire protection, with Valley Center Road and Vesper Road running east-west, and Mactan Road, Sunset Road, and Lake Wohlford Road running north-south. As mentioned above, the Analysis Area is within a County and FEMA floodplain covering approximately 170 acres, of which, approximately 100 acres is also in a County floodway. There are no dam inundation zones or fault zones within the Analysis Area. Considering the extent of hazards and the emergency infrastructure available, a consistency finding can be made.

- S-6.4 Fire Protection Services for Development.** Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed SR-2 designation is 10 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that most of the Analysis Area would be within the 0-5 minute travel time range, with portions in the southwestern end estimated to be within the 5-10 minute travel time range. Though access improvements would be required for subdivisions in most portions of the Analysis Area, a consistency finding can be made at this programmatic land use designation mapping stage, given the current estimates for travel time.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.



- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

Approximately 143 acres in the western portion of the Analysis Area is within a FEMA and County-mapped floodplain, with about half of that also in a County-mapped floodway. As the floodplain area is spread out among ownerships within this portion of the Analysis Area, it is anticipated that the placement of development pads could be planned outside floodplain/floodway areas in accordance with these policies during the development review process. Given the size of the Analysis Area (1,337 acres) in relation to the size of the floodplain area, policy review at this programmatic level can consider adjacent areas with similar constraints. This floodplain (including a floodway within) includes approximately 85 acres to the west of the Analysis Area and 35 acres to the north of the Analysis Area with SR-2 or higher densities in these adjacent areas. Considering each of these factors, a finding of consistency can be made for this review at a programmatic level with no development design.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The VC57+ Analysis Area is within the Valley Center CPA. While most of the policies of the Community Plan apply to projects with a development component (development design to review), there are a few that are applicable to the proposal. Residential Policy 2 requires, "...preservation of unique features such as oak woodlands, riparian habitats, steep slopes, archaeological sites, and ecologically sensitive areas." Though this policy is more geared toward development projects, it can be considered with regard to proposed density feasibility and avoidance of these resources. A finding of consistency can be made at this programmatic land use mapping stage as it is anticipated that future projects could be designed to avoid these resources without rendering the proposed density infeasible. Agricultural Policy 1 states, "Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center." Most of the CPA contains designations and zones that would facilitate agricultural uses, along with combined residential and agricultural uses. As discussed in the review of General Plan Policy LU-7.1 earlier in this report, the proposed SR-2 designation would be anticipated to support continued agricultural uses, based on research of the County's Guidelines for Determining Significance, the 2011 PEIR, and other County documents. Additional policies of the Community Plan that are applicable to a stand-alone GPA/Rezone



are related to commercial or industrial uses. Considering no changes are proposed to zoning use regulations in the Analysis Area, there are no consistency issues with those policies. In consideration of the applicable policies and the factors noted above, there are no policy inconsistency issues with the Valley Center Community Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 217 parcels totaling approximately 1,337 acres in the eastern portion of Valley Center. Considering existing parcelization, the proposed change from SR-4 to SR-2 is anticipated to increase potential dwelling units by 231 (estimated 374 potential units under the current designations and 605 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report) would maintain the current SR-4 designation in the southwestern portion (areas constrained by wetlands, floodplain, or steep slopes) and easternmost portion. This change is estimated to result in an increase of 150 potential dwelling units (estimated 374 potential units under the current designation and 524 under the Alternative Map).

The VC57+ Proposed Project Map was found to be inconsistent with General Plan Policy LU-1.1, which addresses maintaining consistency with the parameters of the Community Development Model. This inconsistency is related to changing the designation on such a large Analysis Area, and the lack of lower density transitions in the eastern portion near the community edge of open space preserves, and in the more constrained southwestern portion. The Alternative Map has been found to be consistent with these policies, as it would maintain the existing SR-4 in the eastern end and southwestern portion of the Analysis Area.

The Proposed Project Map for VC57+ was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Valley Center Community Plan. The Alternative Map for VC57+ would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Valley Center Community Plan, as it would include a smaller area of proposed land use designation change, in comparison to the Proposed Project Map.



VC67 General Plan and Community Plan Conformance

The VC67 Analysis Area covers 6 parcels over approximately 13 acres in the central portion of the Valley Center Community Planning Area (CPA). The Analysis Area is on a private segment of Cole Grade Road, approximately ¼ mile south of Valley Center Road and is adjacent to the Village boundary for the Valley Center North Village. Under the 2012 Board of Supervisors (Board) direction for analysis (“Proposed Project” Map), the entire Analysis Area would change from SR-2 to Medium Impact Industrial (I-2). An Alternative Map is also available for consideration, which would only change the northern half of the Analysis Area to I-2. Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps.

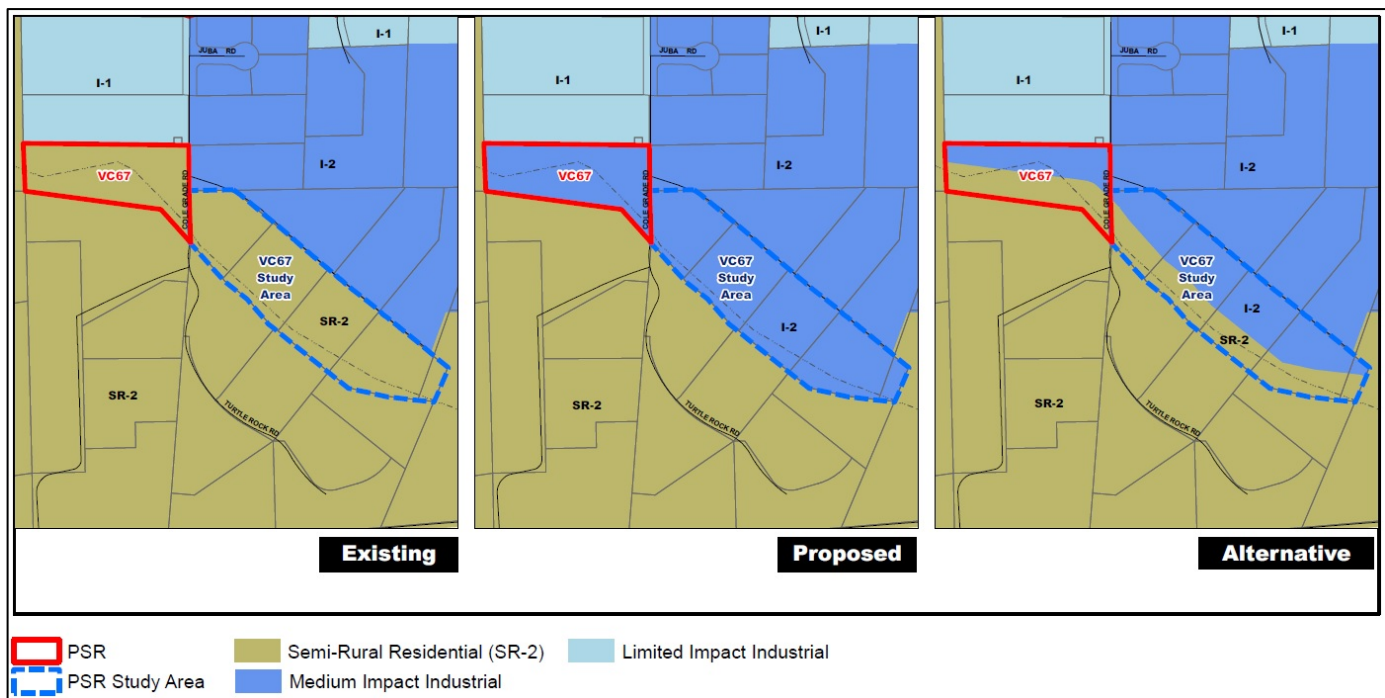


Figure 1: VC67 Existing, Proposed, and Alternative Land Use Maps

REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project Map, a discussion of applicable Valley Center Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.



Findings of policy inconsistency should not be interpreted to conclude that any development project under the proposed designation in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. While the proposed change to an Industrial designation would not entail residential growth, industrial uses can provide goods and services relied upon by residents and businesses in areas of concentrated residential density and commercial centers. As noted above, the Analysis Area is just outside the Valley Center North Village, where there is a concentration of commercial uses and higher density residential (by unincorporated County standards) is planned. Fire service is available from the Valley Center Fire Protection District, with the entire Analysis Area currently estimated to be within the 0-5 minute emergency response travel time, which would satisfy the General Plan standard of 10 minutes for an Industrial designation outside the Village. Water service is available from the Valley Center Municipal Water District. Sewer service is not available. The Analysis Area is accessed via a privately maintained segment of Cole Grade Road, with the public portion of this road starting approximately ¼ mile north of the Analysis Area, at the intersection with Valley Center Road.

The Analysis Area is currently within the Semi-Rural Regional Category (not proposed to change), which covers most of the CPA. This Semi-Rural location, adjacent to the Village boundary allows for close proximity to many residences and commercial operations that may rely on goods and services associated with industrial operations. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-1.1.

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the VC67 proposals (Proposed or Alternative Map) because no Village designations are proposed.



LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

The mapping pattern for industrial areas during the General Plan Update took into consideration areas with a history of industrial uses. Application of industrial designations in areas without pre-existing industrial uses considered market analysis of additional industrial areas needed, ideal locations for industrial, and the potential for buffering from non-compatible uses. The Analysis Area is adjacent to an area of just over 60 acres of properties with Industrial designations and zoning, and the Analysis Area was designated Limited Impact Industrial in the former General Plan. Though there are multiple policies that prescribe much lower impact use types for floodway areas, there is not a clear inconsistency, given the existing pattern of this area.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the VC67 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is located approximately 4 miles from a border of the City of Escondido, approximately 14 miles from a border of the County of Riverside and less than one mile from a border of the San Pasqual Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with VC67.

LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

This policy is not applicable because the proposed Medium Impact Industrial designation applies a residential density of 0.



- LU-2.3 Development Densities and Lot Sizes.** Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The Analysis Area has a history of industrial uses, particularly outdoor storage of vehicles and equipment. There are properties with existing industrial designations and zoning adjacent to the north, and the Analysis Area was designated and zoned for industrial prior to the 2011 General Plan Update. Therefore, a finding of consistency with Policy LU-2.3 can be made.

- LU-2.4 Relationship of Land Uses to Community Character.** Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

*In the Industrial section of the Valley Center Community Plan, this Analysis Area is discussed in the Issue statement, which was developed during the General Plan Update as a solution to this situation of pre-existing industrial uses in a mapped floodway. The Issue statement discusses how this area was designated as SR-2 under the General Plan Update, consistent with General Plan policies related to floodways and floodway restrictions. It goes on to state the intention of returning the Industrial designation to this area if revised FEMA mapping shows these areas being outside the floodway. No revised FEMA or County floodplain/floodway mapping process has been done since the policy was adopted. Industrial Policy 3 of the Community Plan requires industrial development to adhere to floodplain preservation criteria outlined in the Design Guidelines for Valley Center, which refer to allowable land uses outlined in the Resource Protection Ordinance, including agricultural, residential, and other such low intensity uses. **Considering these issues and this area being specifically addressed in the Community Plan, the Proposed Project Map has been found to be inconsistent with Policy LU-2.4.***

- LU-2.5 Greenbelts to Define Communities.** Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a greenbelt per the General Plan definition because it is not within a Rural Lands area. Therefore, the Proposed Project Map for VC67 is consistent with Policy LU-2.5.

- LU-6.2 Reducing Development Pressures.** Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

Most of the Analysis Area was previously cleared (in addition to grading and/or fill in some portions) for the existing storage uses and other uses. Outside of these development footprints, there are some small portions of the riparian habitats of Keys Creek that encroach into the southern edge of the properties. The Analysis Area is completely outside of the Pre-Approved Mitigation Area (PAMA) for the draft North County MSCP. Given the limits of the riparian habitats, these areas could be avoided during development and a consistency finding can be made.

- LU-6.11 Protection from Wildfires and Unmitigable Hazards.** Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.



With the exception of the easternmost parcel (in the Moderate FHSZ), the entire Analysis Area is within the Very High FHSZ. The closest Valley Center FPD station is approximately 1.5 miles away and the entire Analysis Area is currently estimated to be within the 5-minute fire response time. A 10-minute maximum travel time is the standard for the proposed Medium Impact Industrial (based on the Semi-Rural Regional Category, existing and proposed). Therefore, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

The Analysis Area does not contain any agricultural operations, nor a recent history of agricultural operations. Therefore, there are no policy inconsistency issues.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the VC67 proposals (Proposed or Alternative Map) because the Analysis Area is not groundwater dependent. Water service is available from the Valley Center Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the VC67 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the VC67 proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

This policy is not applicable to the VC67 proposals (Proposed or Alternative Map) because the Analysis Area is not within a Town Center, and an Industrial designation is proposed.



LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Townner Centers. The Proposed Project map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

The Analysis Area is just outside the Village boundary for the Valley Center North Village, and would remain in the Semi-Rural Regional Category under the proposal. Therefore, it has not been determined to pose inconsistencies with this Policy.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

As discussed above, the Analysis Area is just outside the North Village of Valley Center, and has a history of industrial uses, in addition to having an Industrial designation in the former General Plan. It is adjacent to just over 60 acres of properties currently designated for Industrial, which are within the Village. Though there are certain policy inconsistency issues (discussed in this report) related to applying Industrial designations in mapped floodways, the Proposed Project Map would not pose an inconsistency with LU-10.4, considering the parameters of this policy.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

See the review of Policy LU-10.4 above, covering a similar guideline. Though there are certain policy inconsistency issues (discussed in this report) related to applying Industrial designations in mapped floodways, the Proposed Project Map would not pose an inconsistency with LU-11.1, considering the parameters of this policy.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because the proposal is a change to Industrial in an area that has industrial uses and an Industrial designation in the former General Plan.



APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

This policy is not applicable because there are no MRZ-2 or MRZ-3 zones within the Analysis Area.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

Though the Analysis Area would remain in the Semi-Rural Regional Category under the proposal, it does not contain ridgelines or steep hillsides.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

Medium Impact Industrial is proposed for this Analysis Area, which would not allow residential. It is adjacent to the Village boundary for the Valley Center North Village, so it is in close proximity to transportation networks, other industrial uses, and commercial uses. Considering the language of the Policy, the Proposed Project Map for VC67 has been found to be consistent with COS-14.1.

APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The Analysis Area is not within a Village, is not within a sewer service area, and is not in close proximity to major job centers. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.



*With the exception of the easternmost parcel (in the Moderate FHSZ), the entire Analysis Area is within the Very High FHSZ. The closest Valley Center FPD station is approximately 1.5 miles away and the entire Analysis Area is currently estimated to be within the 5-minute emergency response travel time. A 10-minute maximum travel time is the standard for the proposed Medium Impact Industrial (based on the Semi-Rural Regional Category, existing and proposed). A FEMA and County-mapped floodplain covers the entire Analysis Area and a County-mapped floodway covers the entire PSR parcel and approximately 80% of the Study Area. Considering almost the entire Analysis Area is within a floodway, it has been determined that a change to Medium Impact Industrial would not be in line with assigning a land use designation that is reflective of site specific constraints and hazards. **Therefore, the Proposed Project Map has been found to be inconsistent with Policy S-1.1.***

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for an Industrial designation in the Semi-Rural Regional Category is 10 minutes. This standard will require verification during the development application process, based existing and proposed roads at the time. Available estimates from GIS models show that the Analysis Area would be within the 0-5 minute travel time range. Therefore, a consistency finding can be made at this programmatic land use mapping stage.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.

S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.



S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

*The entire Analysis Area is within a FEMA and County-mapped floodplain, and the County-mapped floodway covers all of the Analysis Area with the exception of approximately one acre in the northern end of the Study Area. Both the noted applicable General Plan floodway policy (S-10.1) and the County's Resource Protection Ordinance require that uses in a floodway shall be limited to agricultural, recreational, and other such low intensity uses. Medium Impact Industrial uses would not be considered agricultural, recreational, or similarly low intensity. The proposed designation and corresponding zoning allow some of the highest intensity uses of any zone, which can severely impair the environmental values of the floodway, even if flood hazards could be adequately mitigated or avoided. Changing from an SR-2 designation (appropriate for agriculture) to Medium Impact Industrial would not be in line with limiting development in floodplains as discussed in Policy S-9.2. Similarly, such a change would not be in line with the restrictions noted in Policy S-9.5, which prohibits floodplain development in the Semi-Rural Regional Category, with limited exceptions. **Therefore, the Proposed Project Map has been found to be inconsistent with Policies S-9.2, S-9.5, and S-10.1.***

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The VC67 Analysis Area is within the Valley Center CPA. While most of the policies of the Community Plan apply to projects with a development component (development design to review), there are a few that are applicable to the proposal. Residential Policy 2 requires, "...preservation of unique features such as oak woodlands, riparian habitats, steep slopes, archaeological sites, and ecologically sensitive areas." Though this policy is more geared toward development projects, it can be considered with regard to feasibility and avoidance of these resources. A finding of consistency can be made at this programmatic land use mapping stage as the remaining riparian vegetation is limited to a narrow strip along the southern end of each of the properties. Agricultural Policy 1 states, "Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center." There are no agricultural operations within the Analysis Area, so there would not be inconsistency issues with this policy.

*The Community Plan includes a group of industrial policies, with a couple that apply to a stand-alone GPA/Rezone. The VC67 Proposed Project Map includes a proposed change from SR-2 to Medium Impact Industrial (I-2) for a group of properties almost completely within the floodway. Industrial Policy 3 requires that industrial development adhere to floodplain preservation criteria outlined in the Design Guidelines for Valley Center. The Design Guidelines require that the floodway be kept as close as possible to its natural condition and mimics the language of the Resource Protection Ordinance and General Plan Policy S-10.1, by noting that uses shall be limited to agricultural, recreational, and other such low-intensity uses. **Therefore, the Proposed Project Map has been found to be inconsistent with Industrial Policy 3 of the Community Plan.** Another Community Plan Industrial Policy to consider is Industrial Policy 5. This Policy specifically references the area of the VC67 Analysis Area, following up on the Issue*



statement in this section of the Community Plan, calling for this area to be re-designated to Industrial if new floodplain/floodway mapping is completed and shows this area to be outside the floodway. New floodway mapping has not been undertaken since the adoption of this Policy in 2011.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 6 parcels totaling approximately 13 acres in the central portion of Valley Center. The Proposed Project Map would change the entire Analysis Area to Medium Impact Industrial. The Alternative Map (shown on Page 1 of this report) would only change approximately half of the Analysis Area to Medium Impact Industrial, with the southern portion remaining SR-2.

*The VC67 Proposed Project Map was found to be inconsistent with General Plan Policy LU-2.4, which addresses mapping land use designations that reflect the unique issues, character, and development objectives for a CPA. This inconsistency is related to the discussion of this area during the General Plan Update and the resulting Issue statement and policies included in the Community Plan adopted with the General Plan Update. Even changing half of the area to Industrial would not be in line with the issues and development objectives. **Therefore, the Alternative Map has also been found to be inconsistent with Policy LU-2.4.***

*The Proposed Project Map was also found to be inconsistent with General Plan Policies S-1.1, S-9.2, S-9.5, S-10.1, and Valley Center Community Plan Industrial Policy 3, which address land use mapping with consideration of hazards and limitations on the types of uses in floodways and floodplains. **The Alternative Map would also be inconsistent with each of these policies, as it would also place an Industrial designation in the floodway.***

The Proposed Project Map for VC67 was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any other applicable policies of the Valley Center Community Plan. The Alternative Map for VC67 would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Valley Center Community Plan, as it would include a smaller area of proposed land use designation change, in comparison to the Proposed Project Map.



Western Champagne Gardens General Plan and Community Plan Conformance

The Western Champagne Gardens (WCG) Analysis Area covers 8 parcels over approximately 44 acres in the eastern portion of the Bonsall Community Planning Area (CPA). The Analysis Area is situated between the I-15 corridor and Champagne Boulevard, just north of Lawrence Welk Lane and south of Gopher Canyon Road. The Proposed Project Map (also known as the Referral Map here) and the Alternative Map (also known as the Staff Recommended Alternative) are the same for this Analysis Area. Either would apply SR-10 over most of the area, and would apply Rural Commercial over a total of 6 acres (2.5 acres in the central portion and 3.5 acres in the southern portion). This would be estimated to increase overall dwelling unit (DU) by 7 (total potential of 8 DU). There is currently a 0 density on the Land Use Map for the areas under the Specific Plan Area designation, which currently covers all of WCG except Subarea 7. For the Champagne Gardens Analysis Areas, there is also an Environmentally Superior Alternative, which would apply SR-10 over the entire area. For WCG, that option would be estimated to increase overall dwelling unit potential by 6 (total potential of 7 DU), but would not have any commercial areas. Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

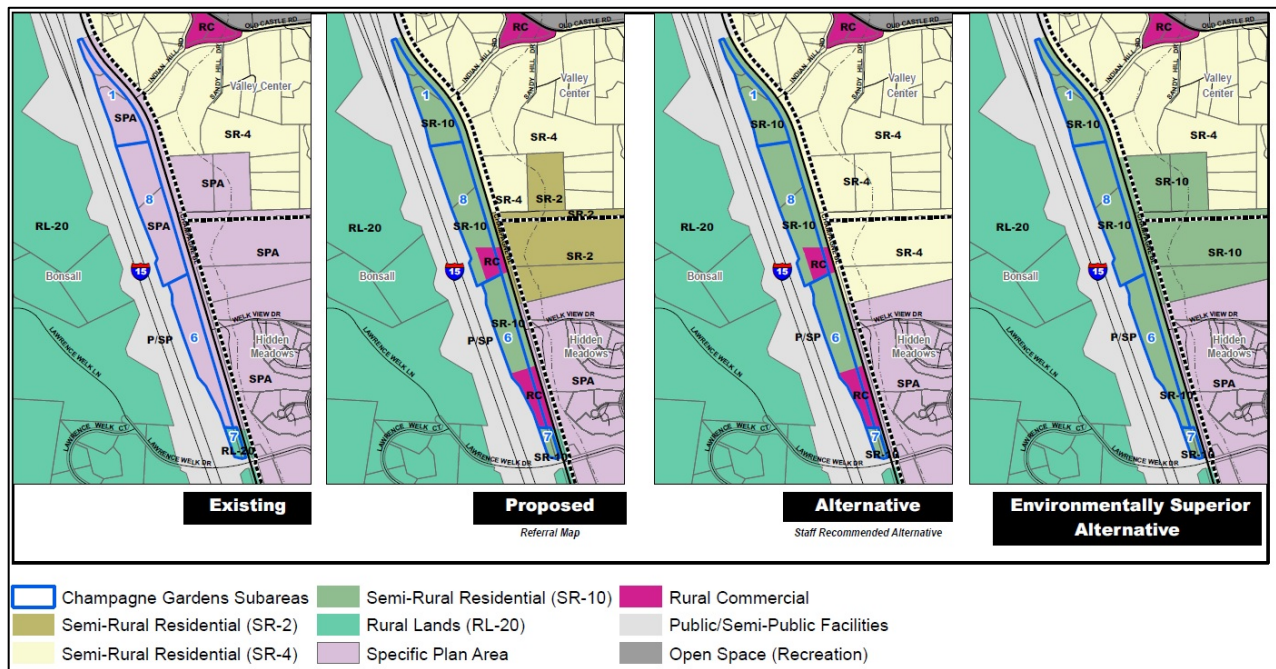


Figure 1: Western Champagne Gardens Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Bonsall Community Plan policies is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Map.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 6 miles from the geographic center of Vista and 11 miles from the geographic center of Carlsbad (largest job center of North County), with an estimated 33,290 jobs and 67,713 jobs respectively. Substantial job centers are also found in Escondido and San Marcos, which are in closer proximity to the Analysis Area than Carlsbad. The proposed density would not be out of line with the distance to job centers. Fire service is available from the Deer Springs Fire Protection District, with the entire Analysis Area currently estimated to be in the 0-5 minute emergency response travel time, which would be well within the standard of 10 minutes for the proposed designations. Water service is available from the Rainbow Municipal Water District for each of the properties except Subarea 7, which is in the Vallecitos Water District. Though none of the properties currently have meter service, there are existing water lines on, or adjacent to the properties. Sewer service is not available in the Analysis Area. There is a good network of public roads, with Champagne Boulevard (Mobility Element Road) adjacent to the properties on the east, Lawrence Welk Lane adjacent to Subarea 7 on the south, and Old Castle Road and Gopher Canyon Road connecting to Champagne Boulevard less than a quarter mile to the north. There is an I-15 on-ramp and park-and-ride near the intersection of Gopher Canyon Road and Champagne Boulevard.

The Semi-Rural Regional Category is proposed for the Analysis Area, which covers the majority of the eastern portion of Bonsall. Surrounding designations include SR-4 to the north, Specific Plan Area and RL-20 to the south, RL-20 across I-15 to the west, and Eastern Champagne Gardens to the east, which is proposed for SR-2 in the Proposed Project Map of this project (though there are lower density Semi-Rural alternatives that will also be considered). The Welk Specific Plan Area is to the southeast. This is an area of mixed designations, reflective of the proximity to the freeway and being at the border between three



CPAs. The Proposed Project Map would fit the parameters of the CDM, as it would apply a lower density Semi-Rural designation throughout most of the area, reflecting air quality and noise constraints of extensive residential adjacent to a freeway corridor; and the two small areas of Rural Commercial (2.5 acres and 3.5 acres) would serve higher densities in nearby Specific Plan Areas. Available infrastructure and services could support this limited commercial. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-1.1.

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the WCG proposals (Proposed or Alternative Maps) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

There are two relatively small Village areas located in the vicinity of the Analysis Area. One is in the area of the Welk Resort (Specific Plan Area [SPA]), adjacent to the southeast and another in the area of the Hidden Meadows Specific Plan, approximately 2 miles away. Most of the areas surrounding these Villages are in Semi-Rural designations, with specific designations/densities applied with consideration of existing parcelization, level of environmental constraints, and availability of/proximity to infrastructure and services. Other than the SPA designation adjacent to this area to the southeast and Eastern Champagne Gardens to the east (proposed for SR-2, with lower density Semi-Rural alternative options) the only other designation adjacent to these Subareas is an area of SR-4 adjacent to the northeast, that is approximately 750 acres. The Proposed Project Map would not be out of line with mapping patterns and has been found to be consistent with Policy LU-1.3.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding

Potential Village development would be accommodated by the General Plan road network

Public facilities and services can support the expansion without a reduction of services to other County residents

The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the WCG proposals (Proposed or Alternative Maps) because no Village designations are proposed.



- LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions.** Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is located approximately 3.5 miles from a border of the City of Vista, approximately 13 miles from a border of the County of Riverside and approximately 8 miles from a border of the San Pasqual Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with WCG.

- LU-1.9 Achievement of Planned Densities.** Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-10 designation applies a 1 unit per 2 acres density only in the areas of less than 25% slope, and applies a 1 unit per 20 acres density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Density calculations in this area reflect the ability to apply for a house on a legal lot, regardless of General Plan density. A density of 0.5 is proposed with the area of Rural Commercial (C42 Visitor Serving Commercial zoning), so that one dwelling unit as accessory to a commercial use would be possible within that proposed 2.5-acre area of Rural Commercial. The total dwelling unit potential in the Analysis Area would be 8 units.

A number of factors are considered in evaluating the density feasibility within the Analysis Area. Fire service availability and emergency response travel times are not anticipated to impact feasibility, considering the close proximity to the Deer Springs FPD station only a half mile away, and the good network of nearby/adjacent public roads. Subarea 7 is built out with a mini-storage facility and the construction of one residence would be anticipated to require discontinuation of that use. As there is no sewer service in this area, septic would be required, and it is anticipated there are sufficient areas available to support septic systems. Subarea 1 contains three legal lots, where three units would be possible. That area has some challenges with slopes, habitat constraints, and sight distance at Champagne Boulevard. Meeting access and setback standards could be difficult, particularly on the two narrow northern parcels of that Subarea. However, the applied residential density would not make a difference in potential lots, as property owners are able to apply for a residence on a legal lot, regardless of density (though they would still have to meet all standards for building permit approval). Considering these factors, a consistency finding can be made at this programmatic land use mapping level.



Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

The Analysis Area is surrounded by SR-4 to the north, Specific Plan Area and RL-20 to the south, RL-20 across I-15 to the west, and Eastern Champagne Gardens to the east, which is proposed for SR-2 in the Proposed Project Map of this project (though there are lower density Semi-Rural alternatives that will also be considered). The Welk Specific Plan Area is to the southeast. This area of the I-15 includes extensive mapping of SR-10 and RL-20 in close proximity to the freeway, reflecting steep slopes and agricultural uses. The western portion of the former CGSP area includes some flat areas where limited commercial would not be anticipated to impact community character, considering the mini-storage and winery already located in two of the Subareas. Therefore, a finding of consistency with Policy LU-2.3 can be made.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

Community-specific planning rationales (discussed in reports during the General Plan Update) and goals of the Bonsall Community Plan discuss maintaining the character of estate lot residential development and agricultural uses in the community and maintaining low density buffers at the edges of the community. The Analysis Area is separated from most of the rest of the community by I-15, but would still maintain a low density SR-10 designation through most of the Analysis Area, which is a similar designation to other areas of the community adjacent to the I-15 corridor. There are no current agricultural uses, but potential future agricultural uses would be supported by the SR-10 designation. The two small areas (2.5 acres and 3.5 acres) proposed for Rural Commercial would constitute a much smaller commercial footprint than the former Champagne Gardens Specific Plan and could be supported by the nearby higher densities in Specific Plan Areas of Hidden Meadows. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-2.4.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.



The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density Rural Lands. Therefore, the Proposed Project Map for WCG is consistent with Policy LU-2.5.

LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

The majority of the Analysis Area contains coastal sage scrub vegetation, and also includes smaller areas of non-native grasslands, southern mixed chaparral and some oaks. The areas proposed for Rural Commercial (total of 6 acres) are comprised of non-native grasslands and an area of transition between non-native grasslands and coastal sage scrub. Outside of the areas proposed for Rural Commercial, SR-10 is proposed throughout, which would limit additional density as much as a Rural Lands designation would (considering existing parcelization). Therefore, the land use designation mapping proposed here reflects the levels of sensitive resources and the areas of more limited constraints, and a consistency finding can be made.

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The entire Analysis Area is within the Very High Fire Hazard Severity Zone (FHSZ); however, the area is in a location with a greater level of fire protection services and infrastructure available, in comparison to most Semi-Rural Areas. The Deer Springs FPD fire station is ½ mile away, resulting in an estimated emergency response travel time in the 0-5 minute range. The Analysis Area lies between the I-15 corridor and Champagne Boulevard, a County-maintained Mobility Element Road. Additional public roads are in close proximity, including Lawrence Welk Lane adjacent to Subarea 7 on the south, and Old Castle Road and Gopher Canyon Road connecting to Champagne Boulevard less than a quarter mile to the north. There is an I-15 on-ramp near the intersection of Gopher Canyon Road and Champagne Boulevard. Considering the proximity to the fire station, the surrounding development, and the extensive public road network, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define 'lower-density land use designations that support continued agricultural operations' or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County's CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.



Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County's unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include 'rural residential lands,' which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for WCG: The Analysis Area does not contain any existing agricultural operations or a recent history of agricultural operations. Therefore, the Proposed Project Map for WCG has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the WCG proposals (Proposed or Alternative Maps) because the Analysis Area is not groundwater dependent. Water service is available from the Rainbow Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the WCG proposals (Proposed or Alternative Map) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the WCG proposals (Proposed or Alternative Maps) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this



pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

The Proposed Project Map includes two small areas (2.5 acres and 3.5 acres) of Rural Commercial designations. This area of Champagne Boulevard could be considered a secondary commercial corridor with mix of residential and commercial uses, as there are existing commercial uses within Subarea 7 (mini-storage), within the Welk Resort on the other side of Champagne Boulevard (retail and deli/café uses), within the Deer Park Winery also on the other side of Champagne Boulevard (winery, deli, and auto museum), and the Pointed Roof Deli near the intersection of Old Castle Road and Champagne Boulevard, approximately ¼ mile away. Therefore, a consistency finding can be made.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Towner Centers. The Proposed Project map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

Land use designations under the Semi-Rural Regional Category are proposed in this area near the Village associated with the Welk Resort. Therefore, a consistency finding can be made.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

The Proposed Project Map includes two small areas (2.5 acres and 3.5 acres) of Rural Commercial designations. This area of Champagne Boulevard could be considered a secondary commercial corridor with mix of residential and commercial uses, as there are existing commercial uses within Subarea 7 (mini-storage), within the Welk Resort on the other side of Champagne Boulevard (retail and deli/café uses), within the Deer Park Winery also on the other side of Champagne Boulevard (winery, deli, and auto museum), and the Pointed Roof Deli near the intersection of Old Castle Road and Champagne Boulevard, approximately ¼ mile away. Therefore, a consistency finding can be made.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

The Proposed Project Map includes two small areas (2.5 acres and 3.5 acres) of Rural Commercial designations. This area of Champagne Boulevard could be considered a secondary commercial corridor with mix of residential and commercial uses, as there are existing commercial uses within Subarea 7 (mini-storage), within the Welk Resort on the other side of Champagne Boulevard (retail and deli/café uses), within the Deer Park Winery also on the other side of Champagne Boulevard (winery, deli, and auto



museum), and the Pointed Roof Deli near the intersection of Old Castle Road and Champagne Boulevard, approximately ¼ mile away. Therefore, a consistency finding can be made.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

The entire Analysis Area is within the MRZ-3 zone. The proposed SR-10 designation would constitute a density low enough to be compatible with future mining operations, but the Rural Commercial would not be compatible. However, WCG is in close proximity to existing single family residences and existing higher Village densities within portions of the Welk Resort to the south, which would preclude future mining operations. Therefore, the Proposed Project Map has been found to be consistent with COS-10.2 at this programmatic land use mapping stage.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because Semi-Rural designations are proposed. There are some steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is adjacent to the Village associated with the Welk Resort. There is a good network of public roads in the vicinity, as discussed in the review of Policy LU-1.1, and it is ¼ mile from a park-and-ride facility and I-15 on-ramp near the intersection of Gopher Canyon Road and Champagne Boulevard. A class II bike lane is available along Champagne Boulevard, adjacent to the Analysis Area. Considering these factors, the Proposed Project Map has been found to be consistent with Policy COS-14.1 at this programmatic land use mapping stage.



APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The Analysis Area is not within a sewer service area, is not in close proximity to transit, and the existing Village Regional Category is part of the mapping error of carrying forward the Specific Plan Area designation in the General Plan Update, in this area of an expired Specific Plan. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

The Analysis Area is within the Very High FHSZ; however, the area is in an optimal location for fire protection services. The Deer Springs FPD station is less than a mile away, there is a good network of public roads, and all Subareas are adjacent to Champagne Boulevard, which is classified as a Major Road in the Mobility Element. The entire area would be estimated to be within the five minute fire response travel time. A County-mapped floodplain encroaches into Subarea 7 (built-out with a mini-storage) and a small portion of Subarea 6, where it could be avoided without rending the Proposed Project Map for that Subarea infeasible. There are no dam inundation zones or fault hazard zones in the Analysis Area. Therefore, a consistency finding can be made.

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed designations is 10 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that the Analysis Area would be within the 0-5 minute travel time range. Therefore, a consistency finding can be made at this programmatic land use designation mapping stage.

S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.



- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

A County-mapped floodplain encroaches into Subarea 7 (built-out with a mini-storage) and a small portion of Subarea 6, where it could be avoided without rendering the Proposed Project Map for that Subarea infeasible. There are no dam inundation zones or fault hazard zones in the Analysis Area. Therefore, a consistency finding can be made.

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The WCG Analysis Area is within the Bonsall Community Planning Area (CPA). While most of the policies of the Community Plan apply to projects with a development component (development design to review), there are a few that are applicable to the proposals. Policy LU-1.1.2 seeks to, "Maintain the existing rural lifestyle by continuing the existing pattern of residential, equestrian, and agricultural uses within the CPA." Similarly, Policy LU-4.1.7 notes, "Discourage incompatible land uses on areas of agricultural use and land suitable for agricultural usage." There are no agricultural uses in the Analysis Area and the Proposed Project Map would constitute much lower intensity development than the former Champagne Garden Specific Plan. Policy LU-5.2.1 is most directly related to a stand-alone GPA/Rezone like the Proposed Project, as it states, "Require lot sizes, except through planned development, lot area averaging or specific plan projects, to be no smaller than 50 percent of the density indicated on the Land Use Map, without clustering or lot averaging, for Semi-Rural 4 and higher densities, or four acres for Semi-Rural 10 and lower densities." The zoning minimum lot sizes associated with the Proposed Project would be consistent with



this policy. In consideration of the applicable policies and the factors noted above, there are no policy inconsistency issues with the Bonsall Community Plan.

REVIEW OF THE ALTERNATIVE MAPS – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 8 parcels over approximately 44 acres in the eastern portion of the Bonsall Community Planning Area (CPA). Considering existing parcelization, the proposed change from the Specific Plan Area designation (with a 0 density on the Land Use Map) and RL-20 on Subarea 7 to mostly SR-10 with a couple small areas (2.5 acre and 3.5 acres) of Rural Commercial is anticipated to increase potential dwelling units by 7 (estimated 1 potential units under the current designations and 8 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report; also referred to as the Staff Recommended Alternative) is the same as the Proposed Project Map for this Analysis Area. For the Champagne Gardens Analysis Areas, there is also an Environmentally Superior Alternative, which would apply SR-10 over the entire area. For WCG, that option would be estimated to increase overall dwelling unit potential by 6 (total potential of 7 DU), but would not have any commercial areas.

The WCG Proposed Project Map was not found to be inconsistent with any applicable policies of the General Plan or the Bonsall Community Plan, so the same would hold true for the identical Staff Recommended Alternative. The Environmentally Superior Alternative would also not present any inconsistencies as it would constitute a lower intensity option.



Eastern Champagne Gardens General Plan and Community Plan Conformance

The Eastern Champagne Gardens (ECG) Analysis Area covers 6 parcels over approximately 71 acres, split between the Valley Center Community Planning Area (CPA) and the Hidden Meadows CPA (part of the North County Metro Subregion). The Analysis Area is situated on the east side of Champagne Boulevard, just north of the Welk Resort, south of Gopher Canyon Road, and less than ¼ mile east of I-15. The Proposed Project Map (also known as the Referral Map here) would apply SR-2 over the all of the Subareas in the Analysis Area except Subarea 2 (mostly in the floodplain), which would be SR-4 under this option. This option would be estimated to increase overall dwelling unit potential by 24 (total potential of 24). There is currently a 0 density on the Land Use Map for entire Analysis Area under the Specific Plan Area designation. The Alternative Map (also known as the Staff Recommended Alternative) would apply SR-4 over the entire Analysis Area, which would be estimated to increase overall dwelling unit potential by 12 (total potential of 12). For the Champagne Gardens Analysis Areas, there is also an Environmentally Superior Alternative, which would apply SR-10 over the entire area. For ECG, that option would be estimated to increase overall dwelling unit potential by 5 (total potential of 5 DU). Figure 1 below shows the Existing, Proposed, and Alternative General Plan land use designation maps. See Figure 2 on page 5 for a table showing the density formula for slope-dependent lands (Semi-Rural [SR] designations).

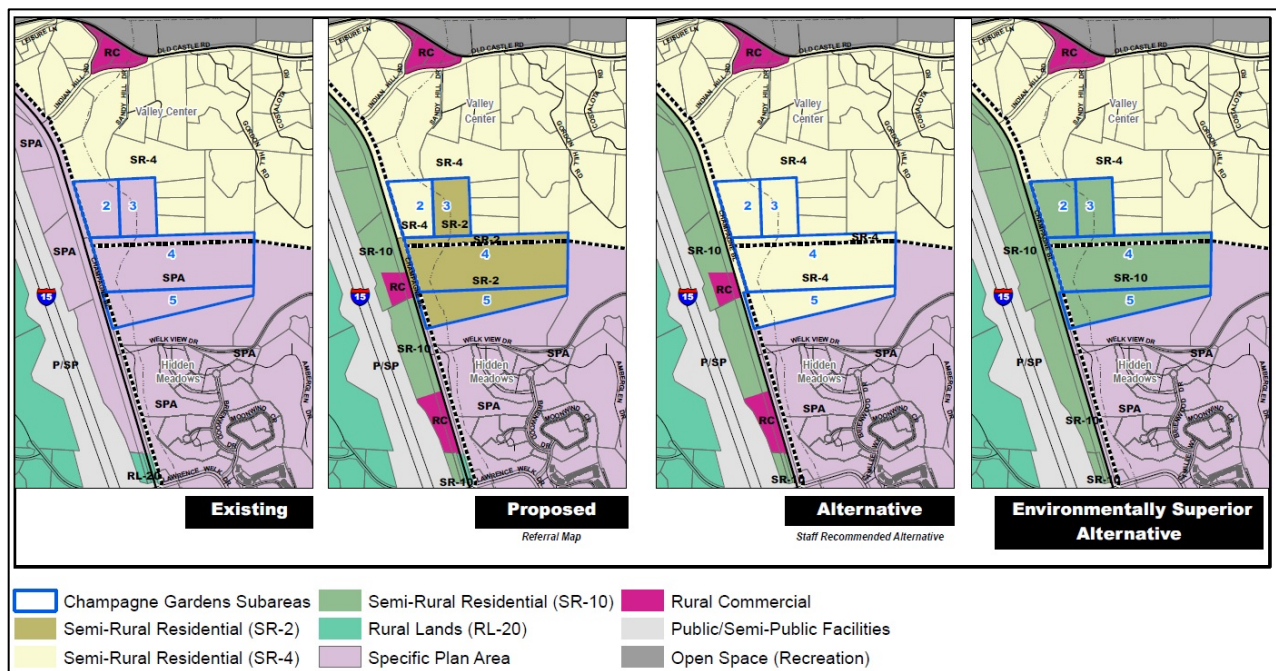


Figure 1: Eastern Champagne Gardens Existing, Proposed, and Alternative Land Use Maps



REVIEW OF THE PROPOSED PROJECT MAP – GENERAL PLAN

Provided below is a review of the General Plan policies that are applicable to a “stand-alone” General Plan Amendment (GPA)/Rezone with no associated development applications or proposals. This review is associated with the Proposed Project Map. Following the review of applicable General Plan policies for the Proposed Project map, a discussion of applicable Valley Center Community Plan policies and North County Metro Subregional Plan (applicable community plan for Hidden Meadows) is provided, and then a discussion of General Plan and Community Plan consistency for the Alternative Maps.

Findings of policy inconsistency should not be interpreted to conclude that any development project at the proposed designation density in the subject area would be inconsistent with the policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, the policy consistency evaluations consider the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

APPLICABLE LAND USE ELEMENT POLICIES

LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

Refer to Guiding Principle 2 for an explanation of the Community Development Model.

In addition to addressing development patterns and Regional Categories, the Community Development Model (CDM) addresses locating growth near existing and planned infrastructure, services and jobs. The Analysis Area is approximately 6 miles from the geographic center of Vista and 11 miles from the geographic center of Carlsbad (largest job center of North County), with an estimated 33,290 jobs and 67,713 jobs respectively. Substantial job centers are also found in Escondido and San Marcos, which are in closer proximity to the Analysis Area than Carlsbad. The proposed density would not be out of line with the distance to job centers. Fire service is available from the Deer Springs Fire Protection District, with the entire Analysis Area currently estimated to be in the 0-5 minute emergency response travel time, which would be well within the standard of 10 minutes for the proposed designations. Water service is available from the Valley Center Municipal Water District (VCMWD). Only Subarea 5 (Deer Park Winery) has current meter service, but each property has access to an existing water line. The Analysis Area is also within the sewer service area for the VCMWD. Only Subarea 5 (Deer Park Winery) has current meter service, but there is an existing sewer line under each property. There is a good network of public roads, with Champagne Boulevard (Mobility Element Road) adjacent to the properties on the west, Lawrence Welk Lane less than a half mile to the south, and Old Castle Road and Gopher Canyon Road connecting to Champagne Boulevard a half mile to the north. There is an I-15 on-ramp and park-and-ride near the intersection of Gopher Canyon Road and Champagne Boulevard.

The Semi-Rural Regional Category is proposed for the Analysis Area, which covers the majority of Valley Center and Hidden Meadows communities in this area, though most of Welk Resort adjacent to the south in Hidden Meadows is within the Village Regional Category, reflecting Specific Plan densities in that area near Champagne Boulevard. Surrounding designations include SR-4 to the north, SR-4 and Specific Plan Area to the east, Specific Plan Area to the south, and Western Champagne Gardens to the west, which is



proposed to be mostly SR-10 with a couple small areas of Rural Commercial. The Proposed Project Map would not be out of line with the CDM parameters, as it would apply Semi-Rural designations just outside a Village and existing available infrastructure and services could support the proposed density. Therefore, the Proposed Project Map has been found to be consistent with Policy LU-1.1.

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the ECG proposals (Proposed or Alternative Maps) because no Village designations are proposed.

LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.

There are two relatively small Village areas located in the vicinity of the Analysis Area. One is in the area of the Welk Resort (Specific Plan Area [SPA]), adjacent to the south and another in the area of the Hidden Meadows Specific Plan, approximately 2 miles away. Most of the areas surrounding these Villages are in Semi-Rural designations, with specific designations/densities applied with consideration of existing parcelization, level of environmental constraints, and availability of/proximity to infrastructure and services. Other than the SPA designation adjacent to this area to the south and Western Champagne Gardens to the west (mostly proposed for SR-10, with two small areas of Rural Commercial), the only other designation adjacent to these Subareas is an area of SR-4 adjacent to the north, that is approximately 750 acres. The Proposed Project Map would not be out of line with mapping patterns and has been found to be consistent with Policy LU-1.3.

LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:

- Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding
- Potential Village development would be accommodated by the General Plan road network
- Public facilities and services can support the expansion without a reduction of services to other County residents
- The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area

This policy is not applicable to the ECG proposals (Proposed or Alternative Maps) because no Village designations are proposed.



- LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions.** Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

The Analysis Area is located approximately 3.5 miles from a border of the City of Vista, approximately 13 miles from a border of the County of Riverside and approximately 8 miles from a border of the San Pasqual Reservation. Land use patterns in nearby jurisdictions are not used as a primary precedent or justification in evaluating the proposals associated with ECG.

- LU-1.9 Achievement of Planned Densities.** Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.

The proposed SR-2 designation applies a 1 unit per 2 acres density only in the areas of less than 25% slope, and applies a lower density in the areas of steep slopes, per General Plan Table LU-2, shown below in Figure 2. Using a GIS slope model for mapping areas of steep slope, it is estimated that the proposed change would increase potential lots by 24, and this would also be the total lots possible under the Proposed Project Map (includes existing lots and additional subdivision potential).

A number of factors are considered in evaluating the feasibility of 24 potential lots within the Analysis Area. The Analysis Area includes a FEMA and County-mapped floodplain with floodway in the western portion. The floodplain area contains riparian vegetation and estimated wetlands. East of the floodplain/riparian area, there are sections of oak woodlands and coastal sage scrub on hillsides in the eastern portions of steep slopes. Outside of these highly constrained portions, there are only approximately 2.2 acres in Subarea 2, 8-10 acres in Subareas 3 and 4 (common ownership), and 8-10 acres in Subarea 5, which could be considered relatively developable areas. A revision is proposed to Residential Policy 8 of the Valley Center Community Plan, which addresses clustering minimum lot sizes, with a stipulation of sewer service availability. Attachment A of the staff report provides the text of this revision. The inclusion of this policy revision was the result of the outreach process for ECG. Under the revision, ½ acre lots would be possible in the SR-2 designation of the Proposed Project Map. As discussed above, sewer service is available in this area. Allowing ½ acre lots in this area would provide a reasonable level of assurance of the feasibility of the density associated with the Proposed Project Map, in consideration of all the constraints. Though the constraints of the land limit the available area for development, the ability to utilize sewer and clustering lots (to consolidate open space easement requirements mostly outside of lots with houses) will help facilitate the proposed densities. As discussed above, there is a good network of public roads and other infrastructure and services to support development. Considering these factors, a consistency finding can be made at this programmatic land use mapping level.



Table LU-2 Density Formula for Slope-Dependent Lands			
Land Use Designation	Slope less than 25%	Slope 25% to less than 50%	Slope 50% or greater
Semi-Rural 0.5	2 du/gross acre	1 du/gross acre	1 du/2 gross acres
Semi-Rural 1	1 du/gross acre	1 du/2 gross acres	1 du/4 gross acres
Semi-Rural 2	1 du/2 gross acres	1 du/4 gross acres	1 du/8 gross acres
Semi-Rural 4	1 du/4 gross acres	1 du/8 gross acres	1 du/16 gross acres
Semi-Rural 10	1 du/10 gross acres	1 du/20 gross acres	1 du/20 gross acres

Density calculations shall be based on a topographic map with 10-foot contour intervals or less. To calculate maximum density for a property the acreage of the property should be divided into the above three categories (<25%, 25–50%, >50%), each total should be multiplied by the associated density, and then the resulting yields combined.
du = dwelling unit

Figure 2: General Plan Table LU-2 - Density Formula for Slope-Dependent Lands

LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.

Surrounding designations include SR-4 to the north, SR-4 and Specific Plan Area to the east, Specific Plan Area to the south, and Western Champagne Gardens to the west, which is proposed to be mostly SR-10 with a couple small areas of Rural Commercial. Considering the location between the Village densities of the Welk Resort to the south and the SR-4 to the north, the Proposed Project Map would not be out of line with the character of the communities in this transition area between Valley Center and Hidden Meadows. Therefore, a consistency finding can be made at this programmatic land use mapping level.

LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

One of the recurring key community issues discussed during the General Plan Update for both Valley Center and the North County Metro Subregion (includes Hidden Meadows) was focused on applying densities in accordance with the level of infrastructure and services available. The level of constraints limits the level of density that would be feasible and appropriate, but there is a relatively high level of infrastructure and services available here, in comparison to other Semi-Rural areas in these communities. The Valley Center Community Plan specifically references preserving unique features like oak woodlands, riparian habitats, steep slopes, and ecologically sensitive areas. While the Alternative Map (all SR-4) would provide a greater level of preservation and consideration of the sensitive resources, the clustering capabilities would allow development under the Proposed Project Map to be consolidated in the least constrained portions. A consistency finding can be made for LU-2.4 at this programmatic land use mapping stage.

LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.

The Analysis Area is not within a greenbelt per the General Plan definition because it is not within an area of very low density Rural Lands. Therefore, the Proposed Project Map for ECG is consistent with Policy LU-2.5.



LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

*As discussed above, the Analysis Area contains a high level of sensitive resources/habitats. These include a FEMA and County-mapped floodway/floodplain in the western portion, riparian habitats and estimated wetlands within the floodplain area, areas of oak woodlands east of that portion, mostly coastal sage scrub on the hillsides in the easternmost portion, and an additional area of coastal sage scrub on the western end (outside the floodplain) of Subarea 4. **Considering the widespread extent of high quality habitats in the Analysis Area, in comparison to slightly less constrained adjacent areas mapped SR-4, the proposed SR-2 designation in Subareas 3, 4, and 5, per the Proposed Project Map leads to a conclusion of Policy LU-6.2 inconsistency.***

LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

The entire Analysis Area is within the Very High Fire Hazard Severity Zone (FHSZ); however, the area is in a location with a greater level of fire protection services and infrastructure available, in comparison to most Semi-Rural Areas. The Deer Springs FPD fire station is ½ mile away, resulting in an estimated emergency response travel time in the 0-5 minute range. There is a good network of public roads, with Champagne Boulevard (Mobility Element Road) adjacent to the properties on the west, Lawrence Welk Lane less than a half mile to the south, and Old Castle Road and Gopher Canyon Road connecting to Champagne Boulevard a half mile to the north. There is an I-15 on-ramp and park-and-ride near the intersection of Gopher Canyon Road and Champagne Boulevard. Considering the proximity to the fire station, the surrounding development, and the extensive public road network, a consistency finding can be made.

LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

This policy requires consideration of how changes in designations and corresponding allowed density could affect agricultural areas. High concentrations of homes around agricultural operations can exacerbate edge effects of agriculture, leading to land use conflicts and affecting community character.

As the General Plan does not define ‘lower-density land use designations that support continued agricultural operations’ or list applicable designations, some research and judgement is necessary in determining policy consistency, with consideration of various factors.

Based on research found in County documents, including the Agricultural Resources section of the General Plan EIR and the County’s CEQA Guidelines for Determining Significance for Agricultural Resources, an SR-2 density (1 unit per 2 acres, slope-dependent) could be considered as a possible threshold for a lower-density land use designation that supports continued agricultural operations.

Consideration of an SR-2 threshold is based on research on available analysis of lot sizes in relation to successful agricultural operations in the County. The County Agricultural Commissioner provided input on this issue in a 1997 letter to the Department of Planning and Land Use that affirmed the commercial



viability of small farms and specifically, two-acre parcels for agricultural use in June 1997. The high cost of land and difficulties farmers face in starting operations on large parcels led to the establishment of San Diego County's unique small-farm economy. The Guidelines for Determining Significance for Agricultural Resources contains language that supports an SR-2 threshold and states lands compatible with agricultural uses include 'rural residential lands,' which is defined in these Guidelines as parcel sizes of two acres or greater.

Analysis included in the 2011 PEIR provides additional justification for the use of an SR-2 threshold for supporting the continuation of agricultural operations. In the Agricultural Resources – Conversion of Agricultural Resources to Non-Agricultural Land Uses section, the analysis assumes that areas allowing one dwelling unit per acre (SR-1) would not support continued agricultural operations. This assumption considers the typical zoning minimum lot sizes and overall residential density associated with SR-1, with many homes in close proximity to each other.

Review for ECG: There is an existing small vineyard associated with the Deer Park Winery within Subarea 5, and there is a history of agricultural operations within Subareas 2 and 3. The highest density proposed is SR-2. The research tends to support SR-2 as a designation that can be consistent with agricultural preservation. Therefore, the Proposed Project Map for ECG has been found to be consistent with Policy LU-7.1.

LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

This policy is not applicable to the ECG proposals (Proposed or Alternative Maps) because the Analysis Area is not groundwater dependent. Water service is available from the Valley Center Municipal Water District.

LU-9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with community character, and environmental constraints. In general, areas that contain more steep slopes or other environmental constraints should receive lower density designations. [See applicable community plan for possible relevant policies.]

This policy is not applicable to the ECG proposals (Proposed or Alternative Maps) because no Village designations are proposed.

LU-9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

This policy is not applicable to the VC57+ proposals (Proposed or Alternative Maps) because no Village designations are proposed.

LU-9.6 Town Center Uses. Locate commercial, office, civic, and higher-density residential land uses in the Town Centers of Villages or Rural Villages at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.



The Proposed Project Map does not include any commercial land use designations, but a Residential/Commercial zone is proposed on Subarea 5, where the existing Deer Park Winery, deli, and auto museum is located and these uses are governed under an existing Major Use Permit. This area of Champagne Boulevard could be considered a secondary commercial corridor with mix of residential and commercial uses, as there are existing commercial uses including a mini-storage on the other side of Champagne Boulevard, within the Welk Resort adjacent to the south (retail and deli/café uses), and the Pointed Roof Deli near the intersection of Old Castle Road and Champagne Boulevard, approximately ½ mile away. Therefore, a consistency finding can be made.

LU-9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

Policy LU-9.9 is under Goal LU-9, which discusses well-defined, well-planned Villages and Towner Centers. The Proposed Project map would not include Village densities or expand the Village boundary; therefore, this policy has not been determined to be applicable to the proposal.

LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.

Land use designations under the Semi-Rural Regional Category are proposed in this area near the Village associated with the Welk Resort. Therefore, a consistency finding can be made.

LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

The Proposed Project Map does not include any commercial land use designations, but a Residential/Commercial zone is proposed on Subarea 5, where the existing Deer Park Winery, deli, and auto museum is located and these uses are governed under an existing Major Use Permit. This area of Champagne Boulevard could be considered a secondary commercial corridor with mix of residential and commercial uses, as there are existing commercial uses including a mini-storage on the other side of Champagne Boulevard, within the Welk Resort adjacent to the south (retail and deli/café uses), and the Pointed Roof Deli near the intersection of Old Castle Road and Champagne Boulevard, approximately ½ mile away. Therefore, a consistency finding can be made.

LU-11.1 Location and Connectivity. Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.

The Proposed Project Map does not include any commercial land use designations, but a Residential/Commercial zone is proposed on Subarea 5, where the existing Deer Park Winery, deli, and auto museum is located and these uses are governed under an existing Major Use Permit. This area of Champagne Boulevard could be considered a secondary commercial corridor with mix of residential and commercial uses, as there are existing commercial uses including a mini-storage on the other side of Champagne Boulevard, within the Welk Resort adjacent to the south (retail and deli/café uses), and the



Pointed Roof Deli near the intersection of Old Castle Road and Champagne Boulevard, approximately ½ mile away. Therefore, a consistency finding can be made.

LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

The proposed change would be consistent with this policy because there are no Medium or High Impact Industrial areas in the vicinity of the Analysis Area (none within ½ mile).

APPLICABLE CONSERVATION AND OPEN SPACE ELEMENT POLICIES

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

Most of the Analysis Area is within the MRZ-3 zone. The proposed designations would not be compatible with mining operations. However, ECG is in close proximity to existing single family residences and existing higher Village densities within portions of the Welk Resort to the south, which would preclude future mining operations. Therefore, the Proposed Project Map has been found to be consistent with COS-10.2 at this programmatic land use mapping stage.

COS-12.1 Hillside and Ridgeline Development Density. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

The proposed change would be consistent with this policy because Semi-Rural designations are proposed. There are some steep hillsides within the Analysis Area.

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

The Analysis Area is adjacent to the Village associated with the Welk Resort. There is a good network of public roads in the vicinity, as discussed in the review of Policy LU-1.1, and it is ½ mile from a park-and-ride facility and I-15 on-ramp near the intersection of Gopher Canyon Road and Champagne Boulevard. A class II bike lane is available along Champagne Boulevard, adjacent to the Analysis Area. Considering these factors, the Proposed Project Map has been found to be consistent with Policy COS-14.1 at this programmatic land use mapping stage.



APPLICABLE HOUSING ELEMENT POLICIES

H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

Goal H-1 and associated policies (including the applicable H-1.3) were developed to facilitate a variety of housing options to meet the needs of the varied household types and income groups in the unincorporated County. The policy lacks clear, mandatory requirements; however, based on the general parameters described in the policy, it is seeking to maximize housing in Village areas. Analysis Areas outside Villages typically lack either sewer service or a range of transportation networks/options (or lack both). The Analysis Area is not in close proximity to transit, contains a high level of development constraints, and the existing Village Regional Category is part of the mapping error of carrying forward the Specific Plan Area designation in the General Plan Update, in this area of an expired Specific Plan. Therefore, the Analysis Area would not fit the policy description of an area where housing should be maximized.

APPLICABLE SAFETY ELEMENT POLICIES

S-1.1 Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

*The Analysis Area is within the Very High FHSZ; however, the area is in an optimal location for fire protection services. The Deer Springs FPD station is less than a mile away, there is a good network of public roads, and all Subareas are adjacent to Champagne Boulevard, which is classified as a Major Road in the Mobility Element. The entire area would be estimated to be within the five minute fire response travel time. There are no dam inundation zones or fault hazard zones in the Analysis Area. A FEMA and County-mapped floodplain covers approximately 23 acres, with the floodway covering approximately 8 acres of that in the FEMA map, and approximately 18 acres of that in the County map. With adoption of the proposed Valley Center Community Plan Policy 8 revision (allowing additional clustering capability within SR-2 or SR-4 designations in the sewer service area), more lot size flexibility will be possible, which would make the proposed density more feasible with avoidance of the floodplains and most sensitive habitat areas. Policy review at this programmatic level can benefit from consideration of adjacent areas with similar constraints. This particular floodplain/floodway, associated with the Moosa Creek corridor continues to properties to the north, which are SR-4; and to the south, which is the Welk Specific Plan of higher overall density (though most of the habitable structures are away from the floodplain there). As such, the mapping of SR-2 in Subareas 3, 4, and 5 per the Proposed Project Map (Referral Map) would not be in line with the land use designations through most of this floodplain area. In addition, most of this floodplain area, through the Subareas mentioned, is constrained by highly sensitive riparian habitats. **Therefore, the Proposed Project Map has been determined to be inconsistent with Policy S-1.1.***

S-6.4 Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

Per General Plan Table S-1, the maximum allowable emergency response travel time for the proposed designations is 10 minutes. This standard will require verification during the subdivision application process, based existing and proposed roads at the time. Available estimates from GIS models show that



the Analysis Area would be within the 0-5 minute travel time range. Therefore, a consistency finding can be made at this programmatic land use designation mapping stage.

- S-9.2 Development in Floodplains.** Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.
- S-9.4 Development in Villages.** Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.
- S-9.5 Development in the Floodplain Fringe.** Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.
- S-9.6 Development in Dam Inundation Areas.** Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.
- S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

There are no dam inundation zones or fault hazard zones in the Analysis Area. A FEMA and County-mapped floodplain covers approximately 23 acres, with the floodway covering approximately 8 acres of that in the FEMA map, and approximately 18 acres of that in the County map. With adoption of the proposed Valley Center Community Plan Policy 8 revision (allowing additional clustering capability within SR-2 or SR-4 designations in the sewer service area), more lot size flexibility will be possible, which would make the proposed density more feasible with avoidance of the floodplains and most sensitive habitat areas. Policy review at this programmatic level can benefit from consideration of adjacent areas with similar constraints. This particular floodplain/floodway, associated with the Moosa Creek corridor continues to properties to the north, which are SR-4; and to the south, which is the Welk Specific Plan of higher overall density (though most of the habitable structures are away from the floodplain there). As such, the mapping of SR-2 in Subareas 3, 4, and 5 per the Proposed Project Map (Referral Map) would not be in line with the



land use designations through most of this floodplain area. In addition, most of this floodplain area, through the Subareas mentioned, is constrained by highly sensitive riparian habitats. **Therefore, the Proposed Project Map has been determined to be inconsistent with Policies S-9.2 and S-9.5.**

REVIEW OF THE PROPOSED PROJECT MAP – COMMUNITY PLAN

The northern portion of the ECG Analysis Area is within the Valley Center CPA. While most of the policies of the Community Plan apply to projects with a development component (development design to review), there are a few that are applicable to the proposal. Residential Policy 2 requires, "...preservation of unique features such as oak woodlands, riparian habitats, steep slopes, archaeological sites, and ecologically sensitive areas." Though this policy is more geared toward development projects, it can be considered with regard to proposed designation feasibility and avoidance of these resources. A finding of consistency can be made at this programmatic land use mapping stage as it is anticipated that future projects could be designed to avoid these resources without rendering the proposed designations infeasible. Agricultural Policy 1 states, "Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center." Most of the CPA contains designations and zones that would facilitate agricultural uses, along with combined residential and agricultural uses. As discussed in the review of General Plan Policy LU-7.1 earlier in this report, the proposed SR-2 designation would be anticipated to support continued agricultural uses, based on research of the County's Guidelines for Determining Significance, the 2011 PEIR, and other County documents. Additional policies of the Community Plan that are applicable to a stand-alone GPA/Rezone are related to commercial or industrial uses. No commercial zones are proposed within the Valley Center portion of ECG. Therefore, there are no policy inconsistency issues with the Valley Center Community Plan.

The southern portion of the ECG Analysis Area is within the Hidden Meadows CPA, which is part of the North County Metro Subregion. There is not currently a separate community plan for Hidden Meadows, covering only that CPA. Therefore, the only applicable community plan is the North County Metro Subregional Plan. There are two policies of the North County Metro Subregional Plan that are considered during the review of a stand-alone GPA/Rezone. Land Use Policy 7 prohibits new subdivisions exceeding the one dwelling unit per acre density within the City of Escondido Sphere of Influence. Though the proposal would not exceed the one dwelling unit per acre density, the Analysis Area is not within the Escondido Sphere of Influence. Land Use Policy 8 calls for designating the Twin Oaks Valley outside the City of San Marcos Sphere of Influence under the Semi-Rural and Rural Lands Regional Categories. Even though a Semi-Rural designation is proposed, the Analysis Area is not within the Twin Oaks Valley. Therefore, there are no policy inconsistency issues with the North County Metro Subregional Plan.

REVIEW OF THE ALTERNATIVE MAP – GENERAL PLAN AND COMMUNITY PLAN

The Analysis Area is comprised of 6 parcels over approximately 71 acres, split between the Valley Center Community Planning Area (CPA) and the Hidden Meadows CPA (part of the North County Metro Subregion). Considering existing parcelization, the proposed change from the Specific Plan Area designation (with a 0 density on the Land Use Map) to SR-2 and SR-4 (SR-4 only on Subarea 2) is anticipated to increase potential dwelling units by 24 (estimated 0 potential units under the current designations and



24 under the Proposed Project Map). The Alternative Map (shown on Page 1 of this report; also referred to as the Staff Recommended Alternative) would apply SR-4 throughout the Analysis Area. This change is estimated to result in an increase of 12 potential dwelling units (estimated 0 potential units under the current designation and 12 under the Alternative Map). There is also an Environmentally Superior Alternative, which would apply SR-10 over the entire area, which would be estimated to increase overall dwelling unit potential by 5 (total potential of 5 DU).

The ECG Proposed Project Map was found to be inconsistent with General Plan Policy LU-6.2, which addresses lower density designations in areas with sensitive natural resources. This inconsistency is related to the proposed SR-2 designation in an area with extensive sensitive habitats (riparian wetlands, oak woodlands, coastal sage scrub) in comparison to a large adjacent area of SR-4 which is slightly less constrained. The SR-4 of the Staff Recommended Alternative Map would cut the potential density in half, providing greater assurance of limited impact to sensitive habitats, and has been found to be consistent with LU-6.2. The Proposed Project Map was also found to be inconsistent with Policies S-1.1, S-9.2, and S-9.5, in consideration of the area of mapped floodplain and floodway in relation to other constraints, and the limited development capabilities in floodplains; requiring consideration in designation mapping. As the Staff Recommended Alternative Map would cut the potential density in half, it has been determined to be better reflective of the floodplain constraints and has been found to be consistent with these policies. The same would hold true for the Environmentally Superior Alternative.

The Proposed Project Map for ECG was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Valley Center Community Plan or the North County Metro Subregional Plan. The Staff Recommended Alternative Map and Environmentally Superior Alternative Map for ECG would also not present any inconsistencies with the remainder of the applicable policies, as they would constitute substantially lower densities, in comparison to the Proposed Project Map.