

# Ocean Breeze Ranch Project

## Resource Protection Study Focused Steep Slopes Analysis

PDS2016-TM-5615  
PDS2016-MUP-16-012  
PDS2016-MUP-16-013  
PDS2016-ER-16-02-006

August 2019 | OBR-01

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# EXECUTIVE SUMMARY

This Steep Slope Resource Protection Study Request for Steep Slope Exemption and Allowance for Additional Encroachment was prepared by HELIX Environmental Planning, Inc. (HELIX) based on the technical RPO steep slope analysis dated July 8, 2019 and prepared by Project Design Consultants (PDC) as well as visual resources review for the Ocean Breeze Ranch Project (Project). It evaluates on-site steep slopes of the Project pursuant to Sections 86.604(e)(2), with focus on subparts (aa), (bb)(i) through (bb)(iii), and (cc) of the County's Resource Protection Ordinance (RPO).

## PROJECT LOCATION

The Project site is located in the unincorporated community of Bonsall in northern San Diego County, approximately 0.3 mile west of Interstate 15 (I-15) and 0.4 mile south of State Route (SR) 76 at its closest points, immediately north of portions of West Lilac Road and south of the San Luis Rey River. The Project is adjacent to the Ocean Breeze Ranch equestrian facility to the north, as well as lands to the north owned by the County of San Diego and Caltrans. The site is adjacent to private properties to the east and south. Among properties to the east and south, as well as on site, existing residences have been built on steep slopes.

## PROJECT DESCRIPTION

The overall Project property totals approximately 1,402.5 acres. Approximately 30.2 acres consists of a designated remainder parcel that is proposed to be sold to the Bonsall School District. It does not contain steep slopes, would not be developed as part of the proposed Project, and is not further addressed. The Project therefore addresses a total of approximately 1,372.3 acres. It proposes two primary objectives: (1) approval for a new, residential development project, and (2) formal approvals for an existing equestrian facility which has operated on portions of the property in excess of 35 years.

Implementation of the Proposed Project would rely on General Plan Land Use Policy LU 1.8, which allows densities from the existing land use designation categories to be reallocated within a project footprint in a more compact footprint without a General Plan Amendment. Furthermore, pursuant to Section 81.401(r) of the County's Subdivision Ordinance, projects such as Ocean Breeze Ranch, containing SR-10 and any of the Rural Lands (RL) land use designations, are required to design a project as a Conservation Subdivision, which consolidates a project's allowable density into a smaller footprint, in order to preserve sensitive valuable resources. The proposed land use plan includes four primary categories of land use: residential, equestrian, parks/trails/recreation and preserved open space (OS). Approximately 61 percent of the Project site would be preserved as permanent biological open space (BOS) through dedication of one or more easements, including substantial portions of the eastern, south-central, and southwestern Project site.

The residential portions of the Project would contain a total of 396 single-family residential units within three distinct planning areas in the western and middle portions of the site, along with one Hillside Estate parcel located in the southeastern site corner. All land uses associated with the residential development for Planning Areas 1, 2, and 3 (lots, roads, utilities, HOA open space, parks, landscaping, etc.) would total approximately 21.0 percent of the Project site. Seven proposed parks are included within the residential PAs. The Hillside Estate lot would occupy 1.8 percent. In addition to the foregoing, West Lilac Road and associated slopes would require 0.7 percent and utility easements total 1.0 percent. Other proposed easements include (1) a limited use easement over existing equestrian uses, and (2) a 15-foot-wide trail

easement through BOS, connecting PA 1 with HOA Lot DD. An approximately 28-acre HOA lot is located in the southeastern portion of the site, directly west of Sullivan Middle School. This triangular-shaped area was an avocado orchard that burned in December 2017; no agriculture or other active use is proposed for this area as part of the Project.

Existing equestrian uses encompass approximately 204 acres (14.8 percent) of the Project site including pastures, barns, stables, exercise and veterinary facilities, and a small office. The activities taking place within the equestrian facility would continue to be the breeding and raising, boarding, training, care and maintenance of horses. These activities will take place within a collection of existing or new barns, covered and uncovered pens, paddocks and pastures, and employee residences.

In addition to the on-site uses listed above, the Proposed Project would require the construction of on- and off-site infrastructure improvements associated with roads, water, and sewer. Off-site improvement areas do not affect RPO-protected steep slopes.

Implementation of the Proposed Project would require approval of the following discretionary actions by the County: (1) a Tentative Map (TM) to accommodate the proposed residential development; (2) a Major Use Permit (MUP) for the proposed residential areas; (3) an MUP for the equestrian facility; and (4) additional various and subordinate permits and approvals related to the noted TM and MUPs.

## **RESOURCE PROTECTION ORDINANCE CONFORMANCE**

There are approximately 511.8 acres (37.3 percent of the property) containing hillsides meeting or exceeding 25 percent slope. Of those slopes, acreage that meets the requirements to both meet/exceed 25 percent slope and contain a minimum 50-foot rise within that slope, totals approximately 402.3 acres, or 29.3 percent of the site. These slopes are considered steep slopes under the County RPO that merit consideration for protection.

The great majority of on-site steep slopes would be completely avoided. This would occur through three Project design elements: (1) set-aside into preserved open space; (2) strict compliance with percentages of allowable lot encroachment for two specified large lots; and (3) locating lots in non-steep slope areas.

Although Project design would successfully avoid the great majority of areas with steep slopes, it is not possible to completely avoid all areas. Within the Project's areas classified as steep slopes, the proposed site plan would require grading of 16.8 acres (1.2 percent of the property). Categories of avoidance, roadway element encroachment and lot conformance/encroachment within this small Project percentage, are additionally discussed below.

### **Open Space Set Aside**

The majority of the Project's proposed development would be located outside areas containing RPO protected slopes, which are generally concentrated in the southern half and eastern third of the property. Of the approximately 402.3 acres of steep slope area on site, approximately 385.6 acres (95.8 percent of the on-site steep slopes) would be avoided through lot design and/or in open space set aside.

## **Equestrian Uses**

The equestrian MUP complies with the RPO.

## **Lot Encroachment Compliance**

In addition to the set-aside into BOS, the Project proposes strict compliance with percentages of allowable lot encroachment for two specified large lots. In these two lots (Lots 387 and 396), consistent with RPO Section 86.604(e)(2) the Project would place conservation easements over steep slope areas. As a Project Condition, pad placement would receive review and approval as part of the TM process, resulting in protection of a minimum of 90 percent of the steep slopes on those lots. Those lots would, therefore, strictly comply with the RPO.

The remainder of conforming lots (330 out of the total of 396) would be located in non-steep slope areas. In these areas, lot placement results in no encroachment at all.

The Project therefore proposes 332 residential lots that strictly comply with the RPO, including all lots in PA 2, 3, and the Hillside Estate parcel. The remainder (64 lots) are all located within a total of 4.8 acres within PA 1, as described below.

Areas for which the Project does not strictly conform to avoidance requirements total 16.76 acres. This represents 4.2 percent of the on-site RPO steep slopes, and includes areas associated with road/utility placement and residential lots. Together, these areas represent approximately 1.2 percent of the site overall. This very small encroachment percent provides context for the analysis that follows. It is also noted that to some extent, it also includes and replaces area of steep slope encroachment that had previously occurred during construction of the primary on-site residence at top of slope.

## **Exemption for Roads and Utilities**

Areas for which the Project does not strictly conform would include areas associated with road/utility placement (10.4 acres), or approximately 0.8 percent of the site overall, and 2.6 percent of all on-site steep slopes.

Roadways required to access the site also provide for much of the Project utility siting, and have been designed in a manner for which no less damaging alternative is available. Roadways have been sited to be aligned with existing dirt or paved facilities, be as short as appropriately possible, and directly abut other development areas (thereby minimizing fragmentation). As a result of consolidating development within certain areas of the Project, including the roads required to access them, approximately 833 acres of sensitive BOS (approximately 61 percent of the site) would be retained in the southern and eastern portions of the site, along with associated sensitive cultural resources and notable topographic forms. Thus, the Project's compact design would result in the most efficient use of environmentally sensitive lands rather than standard design that could develop additional non-steep slope land to the detriment of other on-site resources.

For purposes of visual evaluation, the areas exempted from slope protection for purposes of roadway construction and associated utility installation are overall limited in extent. Scattered throughout developed portions of PA 1 and aligned along a primary existing entrance road in PA 2 and the eastern extent of the Project, they would often be visually obscured by other Project elements such as structures. It

is also noted that 62 percent of the slope impacts (those due to roadway construction) would undergo remedial grading and landscaping, resulting in ultimate retention of these (not notable, but certainly noticeable) slopes as visual features.

It is therefore concluded that the encroachments into steep slopes for these roadways and utilities qualify for the exemption provided within RPO Section 86.604(e)(2)(bb)(ii) and (iii). A determination of qualification of exemption is made by the Director of Planning and Development Services (PDS) based upon analysis of the Project site. This report constitutes that analysis, and it has been provided to the Director for review.

## **ADDITIONAL ENCROACHMENT REQUEST**

The area for which additional encroachment is requested totals 6.4 acres, or less than one percent of the site overall (0.5 percent). This represents 1.6 percent of the on-site RPO steep slopes. The residential lot encroachment of 6.4 acres, includes both the residential lots themselves (4.8 acres) and HOA planted slope lots located between Project roads and residential lots (1.6 acres). RPO Section 86.604(e)(2)(cc) provides that encroachments greater than the percentages defined by the RPO may be permitted, "provided no other less environmentally damaging alternative exists."

In order for Project grading to provide correct drainage for both PA 1 and PA 2, and only to the extent necessary in order to provide proper surface street and sewer drainage throughout PA 2, it is necessary to propose raised pad grades within this planning area. PA 1 was identified as the locale resulting in the fewest and least associated potential environmental impacts. The steep slope areas within PA 1 are partially or entirely located within 64 residential lots. The lots with steep slopes areas are located within a larger area of non-steep slope, and from which the areas of RPO steep slope are visually indistinguishable. They do not comprise "unique" landforms that would draw the eye.

Avoidance of these areas within the development bubble (including creation of 2:1 slopes to merge developed and retained isolated areas), would result in a large, visual "donut hole" in the middle of the planning area. This would result in one of two scenarios. One would be loss of the 64 lots, together with the lots surrounding them, totaling 71 percent of the PA 1 housing. The reduced cut quantity produced within PA 1 would be expected to directly translate to a reduced fill quantity available for PA 2. The corresponding effect would be a reduction of at least as many lots within PA 2. Although PA 3 was preliminarily reviewed for potential as a source for the soil required for PA 1, taking soil from there was rejected due to the more visible nature of the PA 3 slopes (greater number of viewers and from more locations) than PA 1, which is far more restricted in terms of numbers and locations of viewers. In addition, this area contains biological and cultural resources that the Project preserves in place.

The second option would be to distribute these homes elsewhere on site. This is considered less environmentally preferred as it would increase the development footprint. This could additionally encroach into areas currently set aside for permanent open space, and is therefore anticipated to result in greater potential impacts to biological, cultural and visual resources. Since September 2016, the Project team has met with County PDS and Wildlife Agency staff, and has incorporated recommended revisions to minimize impacts to sensitive resources, including the following:

- Reducing the number of PAs from five to three, including removing the PA that was previously proposed east of the eastern riparian corridor at the base of the eastern hills and the PA that was previously proposed in the southwestern portion of the site;

- Reconfiguring PA 2;
- Decreasing the lot sizes in PA 3;
- Preserving known cultural resources in place with protection of a BOS easement;
- Decreasing impacts to sensitive habitats by 18 percent (from approximately 88 acres to approximately 72 acres);
- Decreasing impacts to coastal sage scrub by 39 percent (from 52.9 acres to 32.5 acres); and
- Proposing large areas of habitat restoration for the benefit of native species.

While the overall number of lots has only decreased from 400 to 396, several lots have been reduced in size, reconfigured, and/or relocated to minimize impacts to biological resources. The proposed site plan avoids sensitive biological resources along the property's southwestern perimeter, and in the eastern mountainous portions of the site. The current configuration of the PAs and proposed Project design additionally avoids or reduces impacts to sensitive cultural resources and the San Luis Rey River floodplain. Similarly, the site's most visible and prominent areas of steep slopes occur within the Project's eastern areas, and those areas are avoided by the site plan, which retains them in open space.

Specific to steep slopes, Project design previously included a manufactured berm at top of slope along the northern edge of PA 1. This berm was designed with the intent of shielding views of built elements from the equestrian facility in the valley below and from off-site viewers to the north of the Project site. Constructing this berm would have required placing fill to raise grades, and this fill would have extended downhill, north of PA 1. The fill extending downhill would have impacted steep slope areas, such that the Project would not have been in conformance with RPO requirements to impact steep slope resources to the minimal extent possible. In response to input from County reviewers, the Project design has been modified to remove the earthen berm (and associated impacts) to the northeast facing steep slope north of and downhill from PA 1. The resulting site plan for PA 1, in conjunction with the extensive previous reductions in Project footprint for other areas of the Project, has resulted in the least impactful design option compared to the previously considered alternatives.

The PA 1 area is aesthetically pleasing, but the steep slopes are neither notable nor topographically unique since the majority are somewhat separated from contiguous reaches of steep slope, do not include prominent or visually interesting peaks or skylining elements, and generally "fade" into their surroundings. There are other more prominent and memorable ridgelines and steep slope areas within the Project viewshed that contribute to the overall visual setting. As such, preservation would not attain the RPO goal of preserving unique landforms, and avoidance would result in greater adverse effects to biological and visual resources relative to encroachment into/loss of BOS set aside by the Project.

These substantial impacts to Project design and associated resources are contrasted with loss of 6.4 acres of indistinguishable "steep slopes" (approximately 1.6 percent of all on-site steep slopes).

The Project overall has been designed to restrict the Project's development footprint to limited and compact areas, in order to preserve the maximum possible open space, separate the Project from the San Luis Rey River drainage, and retain existing equestrian uses. Therefore, the current proposed site plan represents the best viable site plan and no less environmentally impactful version exists. As for the

roadway exemption addressed above, a determination of qualification for additional encroachment is made by the Director of PDS based upon analysis of the Project site. This report constitutes that analysis, and it has been provided to the Director for review.

## CONCLUSION

The Project has taken a conservative approach to the analysis of RPO-protected slopes, as it has assumed that all apparent prior modification of RPO steep slopes constituted less than “substantial” grading and was only surficial in nature, thereby allowing retention of these areas as slopes meriting consideration for RPO-protection.

Next, as part of the planning process, County development standards mandated consolidation of lots into a conservation project. This resulted in homes being largely clustered into three general areas, with two areas (PA 1 and PA 2) containing the majority of the homes. These homes were sited on lower elevations within the Project, are largely obscured from close-in views by intervening topography (both PA 1 and PA 2) and by vegetative screening of the San Luis Rey riparian habitat (PA 1). The great benefit of this development pattern was to restrict development footprint—as opposed to placing larger lot residential uses everywhere possible throughout the site—and to avoid 385.6 acres of steep slopes—the vast majority of on-site steep slopes—though lot design or placement into permanently protected open space.

The Project also strictly complies with RPO slope encroachment criteria for 322 lots (81.3 percent of residential lots). Approximately 10.4 acres of access road effects are also identified as allowable under the RPO Section 6.604(e)(2)(bb)(i)-(iii) exemption.

This results in 6.4 acres, or less than 0.5 percent of the Project, for which additional encroachment is being sought in accordance with Section RPO Section 86.604(e)(2)(cc). Opening “holes” in the center of PA 1 design to avoid the irregular and disconnected areas of steep slope would result in extending development footprint into other more visible portions of the site, and result in a loss of acreage currently allocated to BOS. As noted above, a number of design changes have been implemented since September 2016 in consultation with County PDS and Wildlife Agency staff in order to preserve sensitive biological resources and open space areas for wildlife movement, in addition to protecting significant cultural resources.

Balancing these issues, and noting the disconnected and small nature of the areas of steep slope impacted in PA 1 combined with their less than notable visual effect, it is found that the Project is appropriate as designed, and qualifies for both the noted exemption as well as allowance of additional encroachment, as determined by the Director of PDS.



# 1.0 INTRODUCTION

The County of San Diego Code of Regulatory Ordinances Title 8, Division 6, Chapter 6, presents the County's Resource Protection Ordinance (RPO), which provides special regulations applicable to certain types of discretionary applications, including tentative maps (County 2012). The RPO is intended to protect the integrity of sensitive lands including wetlands, wetland buffers, floodplains/floodways, sensitive habitats, cultural resources, and specified steep slopes, while allowing for the reasonable use of private property. Specifically related to topography, the RPO states that the purpose and intent is to focus on the preservation and protection of the County's *unique topography* (Section 86.601).

This analysis is focused on the lands within the Project site which meet the RPO definition of steep slopes. As described in Section 86.603(c), where such slopes are identified, one or more of the following actions may be required as a condition of approval for the discretionary permit:

1. Apply open space easements to portions of the project site that contain sensitive lands;
2. Rezone the entire project site through the application of a special area designator for sensitive lands; or
3. Other actions as determined by the decision-making body.

As indicated above, the reason RPO steep slopes are considered for protection by the County is because (separate and distinct from engineering issues related to slope addressed in building and safety codes) steep slopes can be elements of "unique topography," which in turn can provide an important component of an area's visual character. As such, steep slopes that provide important components to a particular view are provided protection.

The RPO sets up detailed requirements for identification of protected steep slopes, and allowances for encroachment into those slopes, including types of development that are specifically allowed to additionally encroach in accordance with certain ordinance specifications.

## 1.1 PROJECT LOCATION

The Project site is located in the unincorporated community of Bonsall in northern San Diego County, approximately 0.3 mile west of Interstate 15 (I-15) and 0.4 mile south of State Route (SR) 76 at the closest points. It is located immediately north of portions of West Lilac Road and south of the San Luis Rey River, and consists of three legal parcels totaling approximately 1,402.5 acres. The site has a primary address of 5820 West Lilac Road. Principal site access is from I-15, SR 76, and/or Old Highway 395, and then West Lilac Road.

The site includes the following Assessor's Parcel Numbers (APNs): 124-150-28-00, 124-150-34-00, 124-150-35-00, 125-080-21-00, 125-131-48-00, 125-131-49-00, 125-131-54-00, 126-060-78-00, 127-191-20-00, 127-230-59-00, 127-271-01-00, and 127-271-02-00.

Figure 1, *Regional Location*, indicates general site location within the County overall. Figure 2, *Project Vicinity (USGS Topography)*, illustrates topographic variation on site and in the immediate vicinity, and provides the setting relative to the steepness of on-site and adjacent slopes contrasted with the river valley portions of the area. Figure 3, *Project Vicinity (Aerial Photograph)*, illustrates current on-site uses,

as well as surrounding levels of development and open space associated with the San Luis Rey River. Each of these figures is located at the back of this report.

The Project site is part of the San Luis Rey River valley. The river generally trends northeast to southwest adjacent to the site. Hills surround the site to the east and south, as well as to the north on the opposite side of SR 76. Elevations on the Project site range from approximately 190 feet above mean sea level (amsl) to 960 feet amsl. The property includes a variety of terrain, from relatively flat alluvial plain near the San Luis Rey River along the northern site boundary, to ridges and hillsides near the property's southern boundary. Elevation generally increases from north to south and west to east across the site, with the lowest elevations occurring in the westernmost northern pastures, and the highest elevations in the easternmost southern hills. The hills that provide visual context to areas surrounding the San Luis Rey River in this part of the County are part of a topographic continuum that generally continues to rise to higher levels east and south of the site. For viewers looking southerly, toward the Project, hills further south continue to rise south of West Lilac Road to over 1,500 feet amsl west of I-15 and south of Gopher Canyon Road.

## 1.2 PROJECT DESCRIPTION

The overall Project property totals approximately 1,402.5 acres. Approximately 30.2 acres consists of a designated remainder parcel per the County's Subdivision Ordinance that is proposed to be sold to the Bonsall School District. It does not contain steep slopes, would not be developed as part of the proposed Project, and is not further addressed. As noted above, the Project design addresses approximately 1,372.3 acres. The Project proposes two primary objectives: (1) approval for a new, residential development project, and (2) formal approvals for an existing equestrian facility which has operated on portions of the property in excess of 35 years.

The Project contains lands designated with the following land use categories in the County's adopted General Plan: Village Residential (VR), Semi-Rural (SR), and Rural Lands (RL) as well as Open Space (OS); with specific categories including VR 4.3, SR-4, SR-10, RL-20, RL-40, and OS. The residential designations allow village residential density, and single-family rural densities, with specific densities being 4.3 dwelling units (DUs) per acre for the VR-4.3 designation, and one DU per 4, 10, 20, and 40 gross acres, respectively, for the remaining designations (County 2011).

Implementation of the Proposed Project would rely on General Plan Land Use Policy LU 1.8, which allows densities from the existing land use designation categories to be reallocated within a project footprint in a more compact footprint without a General Plan Amendment. Furthermore, pursuant to Section 81.401(r) of the County's Subdivision Ordinance, projects containing the SR-10 and any of the RL land use designations are required to design a project as a Conservation Subdivision, which consolidates a project's allowable density into a smaller footprint, in order to preserve sensitive valuable resources (County 2018). Approximately 61 percent of the Project site would be preserved as permanent biological open space (BOS) through dedication of one or more easements, including substantial portions of the eastern, south-central, and southwestern Project site.

The proposed land use plan includes four primary categories of land use: residential, equestrian, parks/trails/recreation and preserved open space, as illustrated in Figure 4, *Project Site Plan*.

The residential portions of the Project would contain a total of 396 single-family residential units within three distinct planning areas in the western and middle portions of the site, along with one Hillside

Estate parcel located in the southeastern site corner. The focused areas with multiple residential lots), as well as the associated lot locations, configurations, and disturbance limits, are shown on Figures 5 through 7 (*Planning Areas 1, 2, and 3*, respectively). The proposed development also incorporates a number of related amenities and facilities, including access roads, landscape areas, parks and trails, and preserved open space.

All land uses associated with the residential development (lots, roads, utilities, HOA open space, parks, landscaping, etc.) would total approximately 21.0 percent of the Project site. A hillside estate lot would occupy 1.8 percent, and as noted above, approximately 61 percent of the site would be placed in BOS. In addition to the foregoing, West Lilac Road and associated slopes would require approximately 0.7 percent of the site and utility easements would total 1.0 percent. Other proposed easements include: (1) a limited use easement over existing equestrian uses; and (2) a 15-foot-wide trail easement through BOS, connecting PA 1 with HOA Lot DD. An approximately 28-acre HOA lot is located in the southeastern portion of the site, directly west of Sullivan Middle School. This triangular-shaped area was an avocado orchard that burned in December 2017; no agriculture or other active use is proposed for this area as part of the Project.

Existing equestrian uses encompass approximately 14.8 percent of the Project site including pastures, barns, stables, exercise and veterinary facilities, and a small office. The activities taking place within the equestrian facility would continue to be the breeding and raising, boarding, training, care and maintenance of horses. These activities will take place within a collection of existing or new barns, covered and uncovered pens, paddocks and pastures. In addition, a number of employees live at the equestrian facility, within six existing and one proposed employee residences.

In addition to the on-site uses listed above, the Proposed Project would require the construction of on- and off-site infrastructure improvements associated with roads, water, and sewer.

Implementation of the Proposed Project would require approval of the following discretionary actions by the County: (1) a Tentative Map (TM) to accommodate the proposed residential development; (2) a Major Use Permit (MUP) for the proposed residential areas; (3) an MUP for the equestrian facility; and (4) additional various and subordinate permits and approvals related to the noted TM and MUPs.

### **1.3 EXISTING STEEP SLOPES AT PROJECT SITE**

Project Design Consultants (PDC; Project civil engineer) and HELIX Environmental Planning (HELIX: Project environmental planning consultant) have performed an analysis of all lands within the Project site, relative to steep slopes as defined by the County's RPO. Consistent with the ordinance, PDC has mapped site topography broken into three categories: (1) less than 25 percent slope; (2) 25 to 50 percent slope; and (3) 50 percent and greater slope.

Acreage totals and percentages within these categories are quantified on Table 1, *Ocean Breeze Ranch Slope Classifications*.

**Table 1**  
**OCEAN BREEZE RANCH SLOPE CLASSIFICATIONS**

Slope Category	Acres	Percentage of Total Site
Less than 25%	860.49	62.70
25% or greater, and less than 50%	393.33	28.66
50% and greater	118.48	8.63
<b>TOTALS</b>	<b>1,372.30</b>	<b>100.0</b>

As can be seen, the Project contains approximately 1,372.3 acres. Of these acres, approximately 63 percent (approximately 860.5 acres) are of less than 25 percent slope. Figure 8, *Project Slope Analysis Exhibit*, depicts slope mapping for the Project site using these same categories.

While Figure 8 and Table 1 provide initial context, as stated in the introduction to this analysis, County RPO protections are not provided solely based on slope percentage. Pursuant to section 86.602(p) of the RPO, steep slopes are defined as lands having a ***natural gradient*** of 25 percent or greater and minimum vertical rise of more than 50 feet, ***unless it has been substantially disturbed by previous legal grading*** (emphasis added).

It is noted that some of the areas identified as containing over 25 percent slope in the portion of the Project south of the existing ranch residence and associated buildings (located at top of slope and visible from off-site locations from both the north and south of the Project) is likely to have been modified by earlier ranch grading. This area is also in the vicinity of the on-site barn visible from West Lilac Road east of Redondo Drive. Ranch activities here include the barn, dirt roads graded into slope, installation of a riding ring, previous orchard planting to the east, and vegetation clearance of the slope south of the house at a minimum. Because the ranch is a historic property, it is unclear how much of this was continuation of existing ranch activity in general, and what the precise level of disturbance was prior to permit requirements in the County. In other words, the question of “legal grading,” as well as whether it would be characterized as surficial or “substantial” is beyond the purview of this study. Therefore, the Project is taking the conservative approach that the existing level of disturbance is not reflective of prior substantial grading impacts, and is conservatively characterizing on-site slopes that are located outside clear existing pads identified for existing structures as “natural gradient.”

Therefore, within the Project, there are approximately 511.8 acres (approximately 37 percent of the site) with potential to be RPO-characterized steep slopes. As depicted on Figure 9, *Project RPO Steep Slope Analysis*, the acreage of slopes that meet the requirements to both meet/exceed 25 percent slope and contain a minimum 50 foot rise within that slope, total approximately 402.3 acres, or 29 percent of the site. The figure also superimposes the development footprint over the site. As can be seen, the majority of development elements would be located outside areas containing RPO protected slopes, which are generally concentrated in the southern half and eastern third of the property. Of the approximately 402.3 acres of steep slope area on site, approximately 385.6 acres (approximately 96 percent of the on-site steep slopes) would be avoided through lot design and/or set aside in OS.

## 2.0 PROJECT DESIGN APPROACH

The Project has been planned based on the provisions and requirements of the County's General Plan, Community Plan, RPO, Subdivision Ordinance, and Zoning Ordinance.

Specifically, the following County policies and regulations govern project design with regard to preservation of resources.

1. General Plan LU 6.3 (Conservation-oriented Design) supports reductions in lot sizes with corresponding requirements for preserved open space (Planned Residential Developments).
2. General Plan LU 6.4 (Sustainable Subdivision Design) mandates that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations (e.g., the equestrian ranch), increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities.

Zoning Ordinance 4230 (Conservation Subdivisions) supports retention of the same (here fewer) residential lots as assumed in the General Plan land use designations—thereby not exceeding overall density—while also avoiding environmental resources to a greater extent.

1. Subdivision Ordinance 81.401(r) (Protection of Sensitive Resources) states that projects containing lands with General Plan SR-10 and RL land use designations are expected to consolidate development to the maximum extent permitted, in order to minimize impacts to environmental resources.

The County's General Plan allows for a maximum of 402 housing units to be constructed on the Ocean Breeze Ranch site. As noted, the Project contains lands under GP designations SR-10, RL-20 and RL-40, and is required to conform to this requirement of the Subdivision Ordinance. The mandate is, therefore, clear. The Project is expected to consolidate development into the smallest feasible footprint consistent with preservation of sensitive resources.

At the commencement of Project land planning, an opportunities and constraints analysis was prepared to identify the most appropriate location to direct development. Factors evaluated included the physical features of the site, the location of environmental resources, Project access points to local roads, emergency vehicle access, and contiguous uses.

In addition to approvals needed from the County, the proposed removal of habitat for sensitive or endangered plant or animal species also requires approvals for the project from the U.S. Fish and Wildlife Service (USFWS), U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) (collectively referred to here as the "Resource Agencies"). The requirements of the Resource Agencies call for preservation of substantial portions and percentages of the existing natural habitat located at the Project site. During conceptual land planning efforts for Ocean Breeze Ranch, extensive project review took place over the course of one year between the Project Applicant, the County and the Resource Agencies, to ensure that the proposed site plan would meet their collective objectives.

The joint goals of the planning process were to design a site plan that would allow construction of the number of housing units allowed by the General Plan,<sup>1</sup> while protecting resources as required by the County and the Resource Agencies. The resulting site plan proposes consolidated, or clustered, development in order to accomplish these goals.

## 3.0 PROJECT AVOIDANCE OF STEEP SLOPES

As described previously in Section 1.2, the Project site includes approximately 402.3 on-site acres meeting the RPO definition of steep slopes.

It is noted that the equestrian MUP complies with the RPO. As shown on Table 2, *Steep Slope Analysis by Lot* (located at the back of this report), less than 0.5 percent of the lot would encroach into steep slope. The remainder of this discussion addresses the residential and related uses.

Project design efforts focused the footprint of proposed development primarily into areas which did not include valuable resources—primarily biological resources, but also cultural and visual resources—including steep slopes. This focus has largely been successful. Since September 2016, the Project team has met with County PDS and Wildlife Agency staff, and has incorporated recommended revisions to minimize impacts to sensitive resources, including the following:

- Reducing the number of PAs from five to three, including removing the PA that was previously proposed east of the eastern riparian corridor at the base of the eastern hills and the PA that was previously proposed in the southwestern portion of the site;
- Reconfiguring PA 2;
- Decreasing the lot sizes in PA 3;
- Preserving known cultural resources in place with protection of a BOS easement;
- Decreasing impacts to sensitive habitats by 18 percent (from approximately 88.2 acres to 72.1 acres);
- Decreasing impacts to coastal sage scrub by 39 percent (from 52.9 acres to 32.5 acres); and
- Proposing large areas of habitat restoration for the benefit of native species.

While the overall number of lots has only decreased from 400 to 396, several lots have been reduced in size, reconfigured, and/or relocated to minimize impacts to biological resources. The proposed site plan avoids sensitive biological resources along the property's southwestern perimeter, and in the eastern mountainous portions of the site. Sensitive cultural resources in the eastern area are also avoided. Similarly, the site's most visible and prominent areas of steep slopes occur within the Project's eastern areas, and those areas are avoided by the site plan, which retains them in open space.

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<sup>1</sup> It is noted that the 2017 San Diego Regional Chamber Housing Scorecard evaluated the number of homes assumed to be built by the County by 2020 in comparison with those for which permits had been pulled in 2016. Of the 22,412 units allocated to the County, only 5,904 of them were projected to be completed by 2020, resulting in a continuing substantial shortfall in County housing (San Diego Regional Chamber of Commerce Research Foundation 2017).

The Project design previously included a manufactured berm at top of slope along the northern edge of PA 1. This berm was designed with the intent of shielding views of built elements from the equestrian facility in the valley below and from off-site viewers to the north of the Project site. Constructing this berm would have required placing fill to raise grades, and this fill would have extended downhill, north of PA 1. The fill extending downhill would have impacted steep slope areas, such that the Project would not have been in conformance with RPO requirements to impact steep slope resources to the minimal extent possible. In response to input from County reviewers, the Project design has been modified to remove the earthen berm (and associated impacts) to the northeast-facing RPO steep slopes north of and downhill from PA 1. The resulting site plan for PA 1, in conjunction with the extensive previous reductions in Project footprint for other areas of the Project, has resulted in the least impactful design option compared to the previously considered alternatives.

Additionally specific to steep slopes, two features may be characterized as “unique” in the eastern one third of the Project site. These two landforms include steep slopes, and are highly visible from many points in that area of the valley.

The first land feature is a rock outcropping which ranges in elevation from 230 to 350 feet amsl. This lower peak contains extensive areas of steep exposed, granitic volcanic rock and visibly contrasts with surrounding steep vegetated hillsides. Due to the sharp nature of this landform rising from the valley floor, and its difference in appearance, this lower peak can be considered a valuable resource both in terms of the characteristic exposed rock as well as the steepness of the slopes, resulting in this being considered a significant visual resource.

The second land feature is a larger, taller feature which also commences at elevation 230 feet amsl, and climbs rapidly over 200 feet to a peak of 460 feet amsl. This larger land feature has massing and scale which is perceived as a “mountain rising” above the valley floor, and is visible from the Project site, from most nearby vantage points in this general area, from SR 76 and even from the I-15 corridor. This larger feature is also considered a significant visual resource.

Both of these significant landform features would be preserved, and would not be subject to grading. Both are located within area identified for permanent open space preservation.

In summary, the Project clusters development away from portions of the site documented to contain sensitive and valuable biological, archeological and/or visual resources. By focusing development within selected, concentrated portions of the site, the Project site plan allows for the preservation of 832.7 acres of lands as a permanent biological preserve. These same preserved areas also contain 15 of the 20 previously recorded cultural resources located within the Project site, as well as the majority of prominent steep slopes which occur on the overall site. This includes 385.6 acres, which represents approximately 96 percent of the steep slopes located within the Project site.

In addition to setting aside the majority of steep slopes within open space, 80 of the consolidated lots in PA 1 comply strictly with encroachment allowances identified in the matrix provided in Section 86.604(e)(2)(aa) (see Table 2). All of the lots in PA 2 and PA 3, as well as the Hillside Estate parcel, also comply. This includes two large lots (one in PA 3 and the Hillside Estate lot) containing areas defined as RPO-protected steep slopes. Pursuant to RPO Section 86.604(e)(2)(aa) any lots containing less than 75 percent of the lot area in steep slopes may encroach a maximum of 10 percent into those steep slopes (Table 3, *Large Lot Slope Encroachments*).

**Table 3**  
**LARGE LOT STEEP SLOPE ENCROACHMENTS**

Lot	Lot Area (acres)	In-lot Steep Slopes (sq ft)	Allowable Steep Slopes Encroachment (10% of steep slopes shown in sq ft)	Proposed Encroachment (sq ft)	Encroachment into Steep Slopes (%)
387	5.29	41,443	4,144	1,011	2.44
396	24.23	99,190	9,919	2,142	2.16

sq ft = square feet

For each of these lots, there would be less than 10 percent encroachment into steep slopes as a result of Project design. Consistent with Section 86.604(e)(2), conservation easements would be placed over all steep slope areas on these lots, highlighting the area into which grading would be restricted. As a Project Condition, pad placement would receive review and approval, resulting in protection of a minimum of 90 percent of the steep slopes on those lots. Those lots would therefore strictly comply with the RPO.

Again, the site has approximately 402.3 acres of RPO steep slopes. Approximately 385.6 acres, or 96 percent of those slopes would be completely avoided by Project development. This would occur through: (1) set-aside into BOS; (2) through strict compliance with percentages of allowable lot encroachment (as described for the two large lots above); or (3) through being located in non-steep slope areas, resulting in no encroachment at all (not even the amount per lot allowable under the ordinance) for the great majority of residential lots (332 of the 396 proposed lots).

Although Project design would successfully avoid the great majority of areas with steep slopes, it is not possible to completely avoid all areas. Within the Project's areas classified as steep slopes, the proposed site plan would require grading of 16.8 acres. This represents 4.2 percent of the on-site RPO steep slopes, and would include areas associated with road/utility placement (10.4 acres) and residential lot encroachment (6.4 acres, including both the residential lots themselves [4.8 acres] and HOA planted slope lots located between Project roads and residential lots [1.6 acres]).

## 4.0 EXEMPTION REQUEST

The RPO limits the extent to which development can encroach into steep slopes. It also contains exemptions which allow for encroachment into steep slopes under selected circumstances.

Pursuant to RPO Section 86.604(e)(2)(bb)(i)-(iii), encroachment into steep slope areas are allowed for roads either as illustrated in the General Plan Circulation Element, or for roads and utilities necessary for primary or secondary access to the portion of the site to be developed on lands of less than 25 percent provided no less environmentally damaging alternative exists. This is relevant to the Proposed Project, which contains selected areas of encroachment into steep slopes resulting from grading to construct roads and install utilities.

West Lilac Road is located along a portion of the Project's southern frontage. County policy requires that a new development project must construct Circulation Element road improvements located within owned property limits, where a project includes all or a portion of a Circulation Element road.



In order to comply with this mandate, and improve the abutting portion of West Lilac Road as required, a 0.5 acre encroachment into (combined) roadway and the steep slope trending down grade from the road, would be required. Realignment of the road to eliminate this small area of encroachment would result in greater (longer linear) footprint impacts along the road, as well as anticipated grading into private property on the south side of the road. This roadwork is required of the Project, and is the minimum necessary to respond to the policy. This encroachment therefore qualifies for an exemption under RPO Section 86.604(e)(2)(bb)(i).

The balance of other road and utility related encroachments are internal to the project and access PAs 1 and 2, or are located within Planning Areas 1 and 3, with one slope falling within the equestrian facility on a downslope from the residential project.

Each of these roads is necessary to provide access to the residential lots in less than 25 percent slope, and would support daily resident use as well as emergency response services to the proposed homes. In addition, water, sewer, electrical, gas and telephone utilities are planned within the roadways so as to serve the proposed residential lots. Construction related to these roads would impact a total of 10.4 acres of steep slope. Following construction, approximately 4.3 acres of that number would be in roadbed. The remainder (approximately 6.1 acres) would be revegetated/landscaped, and upon landscape maturity would be expected to not significantly visually differentiate from other on-site areas with vegetated slopes.

In general, Project roads have been planned to:

1. Replace existing on-site paved or dirt road disturbance where possible,
2. Take the shortest path with the smallest width of footprint elsewhere (e.g., in the short stretch from West Lilac Road to PA 1), and
3. Otherwise to “hug” the development perimeter.

Use of existing road/disturbed area applies along the western entrance road to PA 2, where the existing entrance road already crosses steep slope. It also applies in PA 1, where a new paved access road would be constructed west of the existing graded dirt road onto the property, and then follow a beltway around the residential uses as well as entering the PA 1 neighborhood. In/near PA 3, along the southern side of Dulin Road at the most eastern extent of the Project, incremental cuts into steep slopes would be required to construct the improved road and provide the necessary street amenities, while staying within Project boundaries. All of these would be less impactful routes than forging new primary roadbeds throughout the Project. Additionally, the alignment of the proposed pedestrian trail easement largely follows an existing dirt road with no mapped steep slopes. A short segment of the trail descends from the native terrain down to Road B and crosses over a manufactured cut slope; impacts to steep slopes at that cut slope are accounted for as part of the slope grading for Road B.

Designing the access to abut (or hug) the residential development footprint results in the roadway impact consolidating with lot impact, minimizing “spread” of impact into greater site area. It also means that roads and lots are not separated from each other by a band of open space that would be fragmented by the road. This allows for greater continuity of BOS and minimizes fragmentation, which makes this the least environmentally damaging design.

Taking all of the above into account, the roadways required to access the site have been designed in a manner for which no less damaging alternative is available. Roadways have been sited to be aligned with existing dirt or paved facilities, be as short as appropriately possible, and directly abut other development areas (thereby minimizing fragmentation). As a result of consolidating development within certain areas of the Project, including the roads required to access them, approximately 61 percent of the site containing open space and sensitive BOS would be retained in the southern and eastern portions of the site, along with associated sensitive cultural resources and notable topographic forms. Thus, the Project's compact design is consistent with General Plan policies, the RPO and the Subdivision Ordinance, resulting in the most efficient use of environmentally sensitive lands rather than standard design that could develop additional non-steep slope land to the detriment of other on-site resources.

For purposes of visual evaluation, the areas exempted from slope protection for purposes of roadway construction are overall limited in extent. Scattered throughout developed portions of PA 1 and aligned along a primary existing entrance road in PA 2 and the eastern extent of the Project, they would often be obscured by other Project elements such as structures. It is also noted that 62 percent of the slope impacts (those due to roadway construction) would undergo remedial grading and landscaping, resulting in ultimate retention of these (not notable, but certainly noticeable) slopes as visual features.

It is, therefore, concluded that the encroachments into steep slopes for these roadways and utilities qualify for the exemption provided within RPO Section 86.604(e)(2)(bb)(ii) and (iii). A determination of qualification of exemption is made by the Director of Planning and Development Services (PDS) based upon analysis of the Project site. This report constitutes that analysis, and it has been provided to the Director for review.

## **5.0 REQUEST FOR ADDITIONAL ENCROACHMENT**

As previously described in Section 1.3, the steep slope areas potentially affected by development of the project site plan are located primarily within PA 1. At the northern edge of PA 1, one of the affected slopes is located within the southern extent of the equestrian facility. The mapping of steep slopes indicates nine separate, non-contiguous areas totaling 6.4 acres.

RPO Section 86.604(e)(2)(cc) provides that encroachments greater than the percentages defined by the RPO may be permitted, "provided no other less environmentally damaging alternative exists."

In order for Project grading to provide correct drainage for both PA 1 and PA 2, and only to the extent necessary in order to provide proper surface street and sewer drainage throughout PA 2, it is necessary to propose raised pad grades within this planning area. This requires the import of fill material from elsewhere on site as opposed to obtaining off-site fill material, which would increase mobile-source air pollutant and greenhouse gas emissions and contribute to adverse off-site transportation noise impacts. To accomplish this, it is necessary to perform a cut grading operation within PA 1, which would generate export material that can be transported to PA 2. It is noted that PA 3 was preliminarily reviewed for potential as a source for the soil required for PA 1. Taking soil from there was rejected due to the more visible nature of the PA 3 slopes (greater number of viewers and from more locations) than PA 1, which is far more restricted in terms of numbers and locations of viewers. In addition, this area contains biological and cultural resources that the Project preserves in place.

As listed on Table 2, the steep slope areas within PA 1 are partially or entirely located within 64 residential lots. In this area, there are 4.7 acres overall located within a larger area of non-steep slope, and from which the areas of RPO steep slope are visually indistinguishable. The reason these slopes are considered for protection by the County is because, separate and distinct from engineering issues related to slope which are addressed in building and safety codes, RPO steep slopes can be important components of an area's visual character. In this context, land forms that are considered significant visual features include those slopes that meet the definition of RPO steep slope lands and are both visible and visually notable and interesting (i.e., unique) topographic features. Significant landforms draw the viewer's attention and provide primary elements in the viewer's memory of the viewshed. These are the elements noted as "vivid," or memorable, in the County Guidelines. These types of topographic features are therefore generally comprised of large rock outcrops, peaks and/or promontories. On the other hand, non-unique visual features may meet the RPO steep slope definition relative to gradient and minimum rise but can "fade" into their surroundings. The affected features are not the prominent, memorable or visually interesting peaks or ridgelines within the Project viewshed. These specific locales do not present as being memorable on their own, or comprise "unique" landforms that would draw the eye, since the majority are somewhat separated from contiguous reaches of steep slope and have no notable peaks or skylining elements.

Nonetheless, the potential for avoiding these areas was evaluated. Avoidance of these areas would result in creation of 2:1 cut slopes surrounding each avoided area. These individual areas are all in some level of proximity to one another, although not contiguous, and not visually notable. Avoiding two or more areas adjacent to each other would result in avoiding both the individual steep slope areas, as well as any lands separating them. The cumulative effect of taking such a design approach throughout PA 1 would be a land plan which expands the protection of individual, focused, steep slope areas into a plan that contains a large, visual "donut hole" in the middle of the planning area.

It would therefore result in one of two options. One would be loss of 64 lots in PA 1 due to the exceedance of 10 percent encroachment in such small lots, along with an additional 38 lots around them. The potential loss of developable area would translate to approximately 102 lots within the general footprint of PA 1, or approximately 71 percent of housing proposed within PA 1. The reduced cut quantity produced within PA 1 would directly translate to a reduced fill quantity available for PA 2 and reduction of at least as many lots within PA 2. This would result in loss of over half of the Project's total lot count.

It is noted that PA 3 was preliminarily reviewed for potential as a source for the soil required for PA 1. Taking soil from there was rejected due to the more visible nature of the PA 3 slopes (greater number of viewers and from more locations) than PA 1, which is far more restricted in terms of numbers and locations of viewers. In addition, this area contains biological and cultural resources that the Project preserves in place. No other locations would have been feasible to draw soil from, since the remainder of the site would either be maintained in equestrian use as existing pasture areas or the existing equestrian center or set aside as open space to preserve cultural resources, biological resources, and rock outcroppings.

The second option would be to distribute these homes elsewhere on site. This is considered less environmentally preferred as it would increase the development footprint. Similar to the discussion immediately above, this could additionally encroach into areas currently set aside for permanent open space, and is therefore anticipated to result in greater potential impacts to biological, cultural and visual resources. There are also emergency response issues associated with trying to move homes out of the

tightly clustered locale. Early Project planning identified that consolidated locales for Project homes needed to be sited in the western portion of the Project in order to comply with County requirements (General Plan Safety Element and the County's Consolidated Fire Code) for emergency vehicle access and dead-end road restrictions.

Pursuant to GP Policy S-6.4, for lot sizes under one acre, a maximum response time of five minutes is allowed. For the Ocean Breeze Ranch, this results in a line or outer limit of response time for smaller lots, which coincides with the eastern boundaries of PA 1 and PA 2. Lots located east of that line would need to be greater than one acre.

Additionally, since both the provision of visual open space and preference for lessened encroachment into steep slopes are considered for the same reasons (consistency with community character), the relative visual "weight" of the effect of development versus retention of untouched slope was considered. The value of additional on-site open space area is weighted more heavily in this evaluation. This is because the patches of south and west-facing PA 1 steep slopes that would be encroached upon are isolated and do not provide large expanses of steep slope area (such as south of PA 2, or in the eastern portion of the Project area). They cannot be visually differentiated from the areas of non-steep slopes within which they are located (see Figure 10, *Consistency of Slope View from West Lilac Road*).

Comparing the areas of steep slope sited within the south-facing slope in Figure 9 with the slopes depicted in this picture, it can be seen that the areas that model as steep based on pitch and height do not stand out as different from the rest of the non-steep portions of slope. The area is currently seen as a small basin that is more interesting for the equestrian elements it contains (an old barn, an old work arena) than the topography. Potential memorability relates more to the built elements than the slope. It is aesthetically pleasing, but this slope is neither notable nor topographically unique. As such, it does not attain the RPO goal of preserving unique landforms, and avoidance would result in greater adverse effects to biological and visual resources relative to encroachment into/loss of BOS set aside by the Project.

These substantial impacts to Project design and associated resources are contrasted with loss of 6.4 acres of indistinguishable "steep slopes" (approximately 1.6 percent of all on-site steep slopes). The Project overall has been designed to restrict the Project's development footprint to limited and compact areas, in order to preserve the maximum possible open space, separate the Project from the San Luis Rey River drainage, and retain existing equestrian uses. Therefore, the current proposed site plan represents the best viable site plan and no less environmentally impactful version exists. As for the roadway exemption addressed above, a determination of qualification for additional encroachment is made by the Director of PDS based upon analysis of the Project site. This report constitutes that analysis, and it has been provided to the Director for review.

## 6.0 CONCLUSION

In summary, the Project has taken a conservative approach to the analysis of RPO-protected slopes, as it has assumed that all apparent prior modification of RPO steep slopes constituted less than "substantial" grading and was only superficial in nature, thereby increasing the number of RPO-protected steep slopes on site. The Project equestrian uses comply with the RPO encroachment allowances per lot, focusing the analysis on residential and related uses.

As part of the Planning process, County development standards mandated consolidation of lots into a conservation project. This resulted in homes being largely clustered into three general areas, with two areas (PA 1 and PA 2) containing the majority of the homes. These homes were sited on lower elevations within the Project, are largely obscured from close-in views by intervening topography (both PA 1 and PA 2) and by vegetative screening of the San Luis Rey riparian habitat (PA 1). The great benefit of this development pattern was to restrict development footprint – as opposed to placing larger lot residential uses on every area where possible – and to enable placement of large portions of the site into permanently protected open space. Even with this consolidation, the Project still strictly complies with RPO slope encroachment criteria for 322 lots (81.3 percent of residential lots). Approximately 10.4 acres of access road effects are also identified as allowable under the RPO Section 6.604(e)(2)(bb)(i)-(iii) exemption.

This results in only 6.4 acres, or less than 0.5 percent of the Project, for which additional encroachment is being sought in accordance with Section RPO Section 86.604(e)(2)(cc). Opening “holes” in the center of PA 1 design to avoid the irregular and disconnected areas of steep slope would result in extending development footprint into other more visible portions of the site, and result in a loss of acreage currently allocated to BOS. As noted above, a number of design changes have been implemented since September 2016 in consultation with County PDS and Wildlife Agency staff in order to preserve sensitive biological resources and open space areas for wildlife movement, in addition to protecting significant cultural resources. The Project’s compact design is consistent with General Plan policies and the RPO, and the Subdivision Ordinance, resulting in the most efficient use of environmentally sensitive lands rather than standard design that could develop additional non-steep slope land to the detriment of other on-site resources.

Balancing these issues, and noting the disconnected and small nature of the areas of steep slope impacted in PA 1 combined with their less than notable visual effect, it is found that the Project is appropriate as designed, and qualifies for both the noted exemption as well as allowance of additional encroachment, as determined by the Director of PDS.

## 7.0 REFERENCES

### County of San Diego (County)

- 2018 County Subdivision Ordinance – San Diego County Code of Regulatory Ordinances, Title 8 Zoning and Land Use Regulations, Division 1 Subdivision of Land. Adopted May 18. Available at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/SubdivisionOrdinance.pdf>.
- 2012 County Resource Protection Ordinance – San Diego County Code of Regulatory Ordinances, Title 8 Zoning and Land Use Regulations, Division 6 Miscellaneous Land Use Regulations, Chapter 6 Resource Protection Ordinance. Adopted October 25. Available at: [https://www.sandiegocounty.gov/pds/docs/res\\_prot\\_ord.pdf](https://www.sandiegocounty.gov/pds/docs/res_prot_ord.pdf).
- 2011 General Plan. Land Use and Environmental Group, Department of Planning and Land Use, Department of Public Works. April. Available at: <http://www.sdcounty.ca.gov/dplu/gpupdate/draftgp.html>.

### San Diego Regional Chamber of Commerce Research Foundation

- 2017 San Diego Regional Chamber Housing Scorecard. Available at: <https://sdchamber.org/wp-content/uploads/2017/03/Housing-Score-Card.pdf>.

**Table 2**  
**STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 1 - RESIDENTIAL LOTS</b>					
1	23,369	0	0	0%	YES
2	8,626	0	0	0%	YES
3	10,778	0	0	0%	YES
4	11,880	0	0	0%	YES
5	6,973	0	0	0%	YES
6	6,826	0	0	0%	YES
7	7,451	0	0	0%	YES
8	10,609	0	0	0%	YES
9	8,343	1,503	1,503	100%	NO
10	5,670	1,013	1,013	100%	NO
11	5,523	4,905	4,905	100%	NO
12	5,313	5,063	5,063	100%	NO
13	5,271	1,041	1,041	100%	NO
14	5,442	0	0	0%	YES
15	5,620	0	0	0%	YES
16	5,833	0	0	0%	YES
17	5,922	0	0	0%	YES
18	5,922	0	0	0%	YES
19	5,922	0	0	0%	YES
20	5,902	0	0	0%	YES
21	5,806	0	0	0%	YES
22	5,775	0	0	0%	YES
23	5,775	0	0	0%	YES
24	5,775	0	0	0%	YES
25	5,754	0	0	0%	YES
26	5,754	0	0	0%	YES
27	6,276	0	0	0%	YES
28	7,940	0	0	0%	YES
29	7,244	0	0	0%	YES
30	6,637	0	0	0%	YES
31	6,171	0	0	0%	YES
32	6,146	0	0	0%	YES
33	6,032	0	0	0%	YES
34	5,912	0	0	0%	YES
35	5,794	0	0	0%	YES
36	5,639	0	0	0%	YES
37	5,702	0	0	0%	YES
38	5,792	0	0	0%	YES
39	5,696	0	0	0%	YES
40	5,867	0	0	0%	YES
41	6,286	104	104	100%	NO
42	6,712	0	0	0%	YES

**Table 2 (cont.)**  
**STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 1 - RESIDENTIAL LOTS (cont.)</b>					
43	7,100	2,018	2,018	100%	NO
44	7,050	2,130	2,130	100%	NO
45	6,938	907	907	100%	NO
46	5,990	0	0	0%	YES
47	6,117	0	0	0%	YES
48	6,137	0	0	0%	YES
49	5,880	0	0	0%	YES
50	7,045	0	0	0%	YES
51	8,532	0	0	0%	YES
52	7,656	2,118	2,118	100%	NO
53	8,524	2,240	2,240	100%	NO
54	8,699	903	903	100%	NO
55	7,656	4,173	4,173	100%	NO
56	7,494	4,828	4,828	100%	NO
57	7,072	0	0	0%	YES
58	8,797	0	0	0%	YES
59	6,228	0	0	0%	YES
60	6,567	1,624	1,624	100%	NO
61	8,879	377	377	4%	NO
62	7,025	2,492	2,492	100%	NO
63	6,525	4,775	4,775	100%	NO
64	6,206	4,556	4,556	100%	NO
65	6,030	185	185	100%	NO
66	6,167	0	0	0%	YES
67	6,562	0	0	0%	YES
68	6,107	0	0	0%	YES
69	5,948	0	0	0%	YES
70	6,049	0	0	0%	YES
71	6,265	372	372	100%	NO
72	6,540	2,991	2,991	100%	NO
73	6,897	1,622	1,622	100%	NO
74	7,279	6,550	6,550	100%	NO
75	7,573	6,376	6,376	100%	NO
76	8,343	1,625	1,625	100%	NO
77	7,557	7,557	7,557	100%	NO
78	7,147	7,147	7,147	100%	NO
79	8,648	4,201	4,201	100%	NO
80	7,807	5,161	5,161	100%	NO
81	7,186	7,186	7,186	100%	NO
82	7,019	6,846	6,846	100%	NO
83	6,989	672	672	100%	NO
84	6,748	0	0	0%	YES
85	6,724	0	0	0%	YES



**Table 2 (cont.)  
STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 1 - RESIDENTIAL LOTS (cont.)</b>					
86	6,835	1,661	1,661	100%	NO
87	6,748	6,719	6,719	100%	NO
88	6,341	6,341	6,341	100%	NO
89	6,253	6,211	6,211	100%	NO
90	6,258	6,254	6,254	100%	NO
91	6,375	6,375	6,375	100%	NO
92	6,550	6,318	6,318	100%	NO
93	7,052	423	423	100%	NO
94	7,277	0	0	0%	YES
95	7,236	0	0	0%	YES
96	7,177	0	0	0%	YES
97	7,300	0	0	0%	YES
98	8,986	5,320	5,320	100%	NO
99	8,388	1,059	1,059	100%	NO
100	7,682	0	0	0%	YES
101	7,459	0	0	0%	YES
102	7,104	0	0	0%	YES
103	6,848	0	0	0%	YES
104	6,353	1,191	1,191	100%	NO
105	6,212	3,727	3,727	100%	NO
106	6,362	973	973	100%	NO
107	6,606	948	948	100%	NO
108	6,483	32	32	100%	NO
109	6,351	0	0	0%	YES
110	6,399	0	0	0%	YES
111	6,845	0	0	0%	YES
112	6,191	1,581	1,581	100%	NO
113	7,277	7,277	7,277	100%	NO
114	8,391	8,391	8,391	100%	NO
115	11,328	11,328	11,328	100%	NO
116	7,620	0	0	0%	YES
117	8,461	0	0	0%	YES
118	9,078	0	0	0%	YES
119	10,252	0	0	0%	YES
120	11,783	0	0	0%	YES
121	10,870	0	0	0%	YES
122	10,195	0	0	0%	YES
123	10,232	0	0	0%	YES
124	9,234	0	0	0%	YES
125	8,865	0	0	0%	YES
126	11,257	760	760	100%	NO
127	8,808	20	20	100%	NO
128	9,998	0	0	0%	YES

**Table 2 (cont.)**  
**STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 1 - RESIDENTIAL LOTS (cont.)</b>					
129	10,224	0	0	0%	YES
130	9,609	0	0	0%	YES
131	8,865	29	29	100%	NO
132	6,909	1,698	1,698	100%	NO
133	6,343	999	999	100%	NO
134	6,096	0	0	0%	YES
135	6,010	0	0	0%	YES
136	6,020	0	0	0%	YES
137	6,370	0	0	0%	YES
138	6,541	907	907	100%	NO
139	6,482	4,109	4,109	100%	NO
140	8,334	2,153	2,153	100%	NO
141	10,421	208	208	100%	NO
142	11,580	614	614	100%	NO
143	11,502	114	114	100%	NO
144	9,563	3,849	3,849	100%	NO
ROADS PA 1	713,745	159,802	159,802	100%	YES
HOA LOTS PA 1	1,157,126	69,942	69,942	100%	NO
<b>PLANNING AREA 2 - RESIDENTIAL LOTS</b>					
145	5,220	0	0	0%	YES
146	5,149	0	0	0%	YES
147	4,996	0	0	0%	YES
148	4,975	0	0	0%	YES
149	4,954	0	0	0%	YES
150	4,933	0	0	0%	YES
151	4,912	0	0	0%	YES
152	4,891	0	0	0%	YES
153	4,871	0	0	0%	YES
154	4,850	0	0	0%	YES
155	4,829	0	0	0%	YES
156	4,808	0	0	0%	YES
157	5,192	0	0	0%	YES
158	5,435	0	0	0%	YES
159	5,027	0	0	0%	YES
160	5,218	0	0	0%	YES
161	5,383	0	0	0%	YES
162	5,351	0	0	0%	YES
163	5,478	0	0	0%	YES
164	5,606	0	0	0%	YES
165	5,733	0	0	0%	YES
166	6,036	0	0	0%	YES

**Table 2 (cont.)**  
**STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 2 - RESIDENTIAL LOTS (cont.)</b>					
167	6,035	0	0	0%	YES
168	6,047	0	0	0%	YES
169	6,045	0	0	0%	YES
170	6,028	0	0	0%	YES
171	5,996	0	0	0%	YES
172	5,823	0	0	0%	YES
173	5,763	0	0	0%	YES
174	5,689	0	0	0%	YES
175	5,609	0	0	0%	YES
176	6,655	0	0	0%	YES
177	6,227	0	0	0%	YES
178	5,520	0	0	0%	YES
179	5,520	0	0	0%	YES
180	5,520	0	0	0%	YES
181	5,520	0	0	0%	YES
182	5,520	0	0	0%	YES
183	5,412	0	0	0%	YES
184	5,346	0	0	0%	YES
185	5,821	0	0	0%	YES
186	5,783	0	0	0%	YES
187	5,770	0	0	0%	YES
188	5,735	0	0	0%	YES
189	5,655	0	0	0%	YES
190	6,066	0	0	0%	YES
191	6,900	0	0	0%	YES
192	4,800	0	0	0%	YES
193	4,800	0	0	0%	YES
194	7,103	0	0	0%	YES
195	5,107	0	0	0%	YES
196	5,069	0	0	0%	YES
197	5,421	0	0	0%	YES
198	6,611	0	0	0%	YES
199	7,056	0	0	0%	YES
200	6,012	0	0	0%	YES
201	5,517	0	0	0%	YES
202	4,818	0	0	0%	YES
203	4,702	0	0	0%	YES
204	4,792	0	0	0%	YES
205	4,999	0	0	0%	YES
206	5,206	0	0	0%	YES
207	5,256	0	0	0%	YES
208	6,393	0	0	0%	YES
209	5,977	0	0	0%	YES

**Table 2 (cont.)**  
**STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 2 - RESIDENTIAL LOTS (cont.)</b>					
210	5,970	0	0	0%	YES
211	6,282	0	0	0%	YES
212	5,347	0	0	0%	YES
213	5,038	0	0	0%	YES
214	4,905	0	0	0%	YES
215	4,905	0	0	0%	YES
216	4,905	0	0	0%	YES
217	4,959	0	0	0%	YES
218	4,960	0	0	0%	YES
219	5,419	0	0	0%	YES
220	6,925	0	0	0%	YES
221	6,028	0	0	0%	YES
222	6,030	0	0	0%	YES
223	6,027	0	0	0%	YES
224	6,023	0	0	0%	YES
225	6,026	0	0	0%	YES
226	6,027	0	0	0%	YES
227	5,675	0	0	0%	YES
228	5,292	0	0	0%	YES
229	5,198	0	0	0%	YES
230	5,058	0	0	0%	YES
231	4,962	0	0	0%	YES
232	4,824	0	0	0%	YES
233	4,797	0	0	0%	YES
234	4,819	0	0	0%	YES
235	4,819	0	0	0%	YES
236	5,334	0	0	0%	YES
237	5,569	0	0	0%	YES
238	5,095	0	0	0%	YES
239	5,115	0	0	0%	YES
240	5,136	0	0	0%	YES
241	5,157	0	0	0%	YES
242	5,178	0	0	0%	YES
243	5,199	0	0	0%	YES
244	5,220	0	0	0%	YES
245	5,241	0	0	0%	YES
246	5,262	0	0	0%	YES
247	5,282	0	0	0%	YES
248	5,158	0	0	0%	YES
249	4,871	0	0	0%	YES
250	4,692	0	0	0%	YES
251	4,692	0	0	0%	YES
252	4,702	0	0	0%	YES

**Table 2 (cont.)  
STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 2 - RESIDENTIAL LOTS (cont.)</b>					
253	5,282	0	0	0%	YES
254	6,671	0	0	0%	YES
255	5,876	0	0	0%	YES
256	5,410	0	0	0%	YES
257	5,290	0	0	0%	YES
258	5,291	0	0	0%	YES
259	5,289	0	0	0%	YES
260	5,290	0	0	0%	YES
261	5,290	0	0	0%	YES
262	5,290	0	0	0%	YES
263	5,290	0	0	0%	YES
264	5,290	0	0	0%	YES
265	5,290	0	0	0%	YES
266	5,290	0	0	0%	YES
267	5,290	0	0	0%	YES
268	5,899	0	0	0%	YES
269	6,199	0	0	0%	YES
270	5,130	0	0	0%	YES
271	5,076	0	0	0%	YES
272	5,076	0	0	0%	YES
273	5,076	0	0	0%	YES
274	5,077	0	0	0%	YES
275	5,097	0	0	0%	YES
276	5,174	0	0	0%	YES
277	5,554	0	0	0%	YES
278	6,189	0	0	0%	YES
279	6,326	0	0	0%	YES
280	6,363	0	0	0%	YES
281	6,332	0	0	0%	YES
282	6,162	0	0	0%	YES
283	6,043	0	0	0%	YES
284	5,430	0	0	0%	YES
285	5,354	0	0	0%	YES
286	5,252	0	0	0%	YES
287	5,130	0	0	0%	YES
288	5,962	0	0	0%	YES
289	6,831	0	0	0%	YES
290	5,791	0	0	0%	YES
291	5,983	0	0	0%	YES
292	6,112	0	0	0%	YES
293	6,674	0	0	0%	YES
294	7,088	0	0	0%	YES
295	7,348	0	0	0%	YES

**Table 2 (cont.)**  
**STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 2 - RESIDENTIAL LOTS (cont.)</b>					
296	7,057	0	0	0%	YES
297	7,000	0	0	0%	YES
298	6,444	0	0	0%	YES
299	6,028	0	0	0%	YES
300	6,056	0	0	0%	YES
301	6,078	0	0	0%	YES
302	6,099	0	0	0%	YES
303	6,014	0	0	0%	YES
304	7,060	0	0	0%	YES
305	6,269	0	0	0%	YES
306	5,783	0	0	0%	YES
307	5,777	0	0	0%	YES
308	5,772	0	0	0%	YES
309	5,768	0	0	0%	YES
310	5,763	0	0	0%	YES
311	5,758	0	0	0%	YES
312	5,753	0	0	0%	YES
313	5,748	0	0	0%	YES
314	5,893	0	0	0%	YES
315	6,009	0	0	0%	YES
316	6,026	0	0	0%	YES
317	6,025	0	0	0%	YES
318	6,653	0	0	0%	YES
319	5,151	0	0	0%	YES
320	5,190	0	0	0%	YES
321	6,289	0	0	0%	YES
322	8,206	0	0	0%	YES
323	8,378	0	0	0%	YES
324	10,994	0	0	0%	YES
325	9,901	0	0	0%	YES
326	7,382	0	0	0%	YES
327	6,842	0	0	0%	YES
328	5,996	0	0	0%	YES
329	7,865	0	0	0%	YES
330	6,512	0	0	0%	YES
331	6,949	0	0	0%	YES
332	5,946	0	0	0%	YES
333	6,772	0	0	0%	YES
334	6,916	0	0	0%	YES
335	6,998	0	0	0%	YES
336	6,581	0	0	0%	YES
337	6,278	0	0	0%	YES
338	6,431	0	0	0%	YES

**Table 2 (cont.)**  
**STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 2 - RESIDENTIAL LOTS (cont.)</b>					
339	6,486	0	0	0%	YES
340	6,152	0	0	0%	YES
341	5,973	0	0	0%	YES
342	6,166	0	0	0%	YES
343	6,535	0	0	0%	YES
344	5,368	0	0	0%	YES
345	5,538	0	0	0%	YES
346	5,966	0	0	0%	YES
347	5,628	0	0	0%	YES
348	5,660	0	0	0%	YES
349	6,130	0	0	0%	YES
350	6,331	0	0	0%	YES
351	7,583	0	0	0%	YES
352	6,460	0	0	0%	YES
353	6,543	0	0	0%	YES
354	5,501	0	0	0%	YES
355	5,614	0	0	0%	YES
356	6,111	0	0	0%	YES
357	6,736	0	0	0%	YES
358	6,009	0	0	0%	YES
359	6,219	0	0	0%	YES
360	6,166	0	0	0%	YES
361	5,743	0	0	0%	YES
362	5,920	0	0	0%	YES
363	6,111	0	0	0%	YES
364	6,303	0	0	0%	YES
365	6,814	0	0	0%	YES
366	7,669	0	0	0%	YES
367	7,184	0	0	0%	YES
368	6,115	0	0	0%	YES
369	5,976	0	0	0%	YES
370	5,838	0	0	0%	YES
371	5,704	0	0	0%	YES
372	6,061	0	0	0%	YES
373	6,020	0	0	0%	YES
374	6,055	0	0	0%	YES
375	7,659	0	0	0%	YES
376	7,218	0	0	0%	YES
377	6,557	0	0	0%	YES
378	6,066	0	0	0%	YES
379	5,815	0	0	0%	YES
380	6,587	0	0	0%	YES
381	6,785	0	0	0%	YES

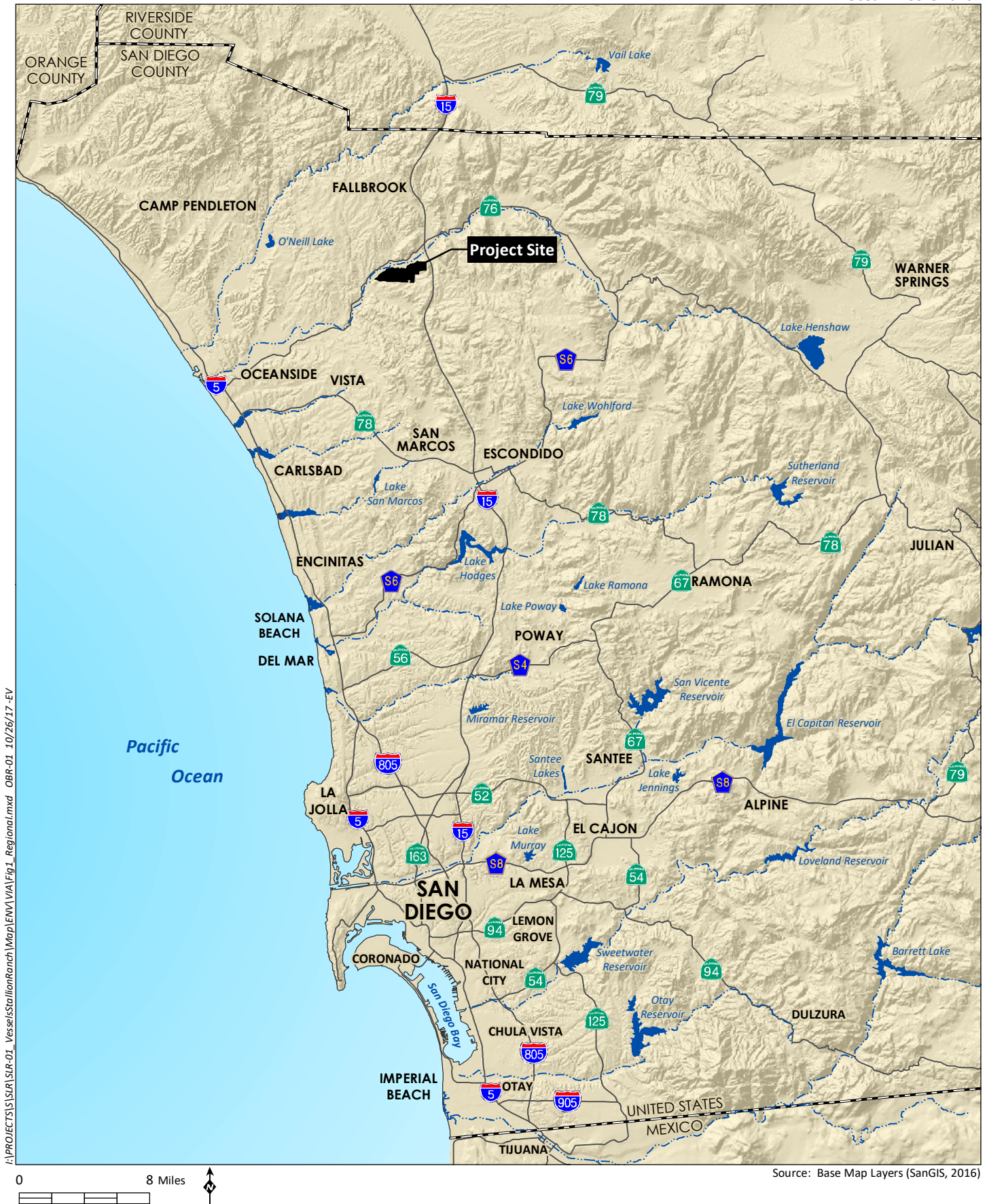
**Table 2 (cont.)  
STEEP SLOPE ANALYSIS BY LOT**

Lot	Gross Area (SF)	Steep Slope SF on Lot	Steep Slope Encroachment (SF)	Encroachment into Steep Slope Areas (%)	Complies
<b>PLANNING AREA 2 - RESIDENTIAL LOTS (cont.)</b>					
ROADS PA 2	734,843	11,747	11,747	2%	YES
HOA LOTS PA 2	779,288	26,101	26,101	3%	YES
<b>PLANNING AREA 3 - RESIDENTIAL LOTS</b>					
382	269,224	0	0	0%	YES
383	259,606	0	0	0%	YES
384	262,178	0	0	0%	YES
385	235,724	0	0	0%	YES
386	217,896	0	0	0%	YES
387	230,362	41,438	1,919	4.6%	YES
388	240,113	0	0	0%	YES
389	229,879	0	0	0%	YES
390	250,356	0	0	0%	YES
391	294,589	0	0	0%	YES
392	267,764	0	0	0%	YES
393	269,518	0	0	0%	YES
394	315,202	0	0	0%	YES
395	831,710	0	0	0%	YES
ROADS PA 3	359,935	77,656	77,656	22%	YES
HOA LOTS PA 3	2,151,041	0	0	0%	YES
<b>HILLSIDE ESTATE - RESIDENTIAL LOT</b>					
396	1,055,734	99,190	2,142	2.2%	YES
<b>EQUESTRIAN MUP</b>					
E	8,869,463	269,554	1,239	0.5%	YES
<b>ROADS/ UTILITIES</b>		<b>ROAD-RELATED IMPACTS (ADJACENT SLOPES)</b>		<b>TOTAL ROADS AND RELATED IMPACTS</b>	
PA 1	156,006	PA-1	139,420	PA-1	295,426
PA 2	11,746	PA-2	28,652	PA-2	40,398
PA 3	17,238	PA-3	78,305	PA-3	95,546
WEST LILAC	3,564	WEST LILAC	18,302	WEST LILAC	21,866
<b>TOTAL</b>	<b>188,554</b>	<b>TOTAL</b>	<b>264,679</b>	<b>TOTAL</b>	<b>453,233</b>
Acres:					10.4

NOTE 1: Table analyzes portions of lots with steep slopes as defined by RPO Section 86.602 (p) and compliance pursuant to Section 86.604 (e)(2)(aa)

NOTE 2: Encroachments into Steep Slopes are allowed for roads and utilities per Section 86.604 (e)(2)(bb)(ii) and (iii)

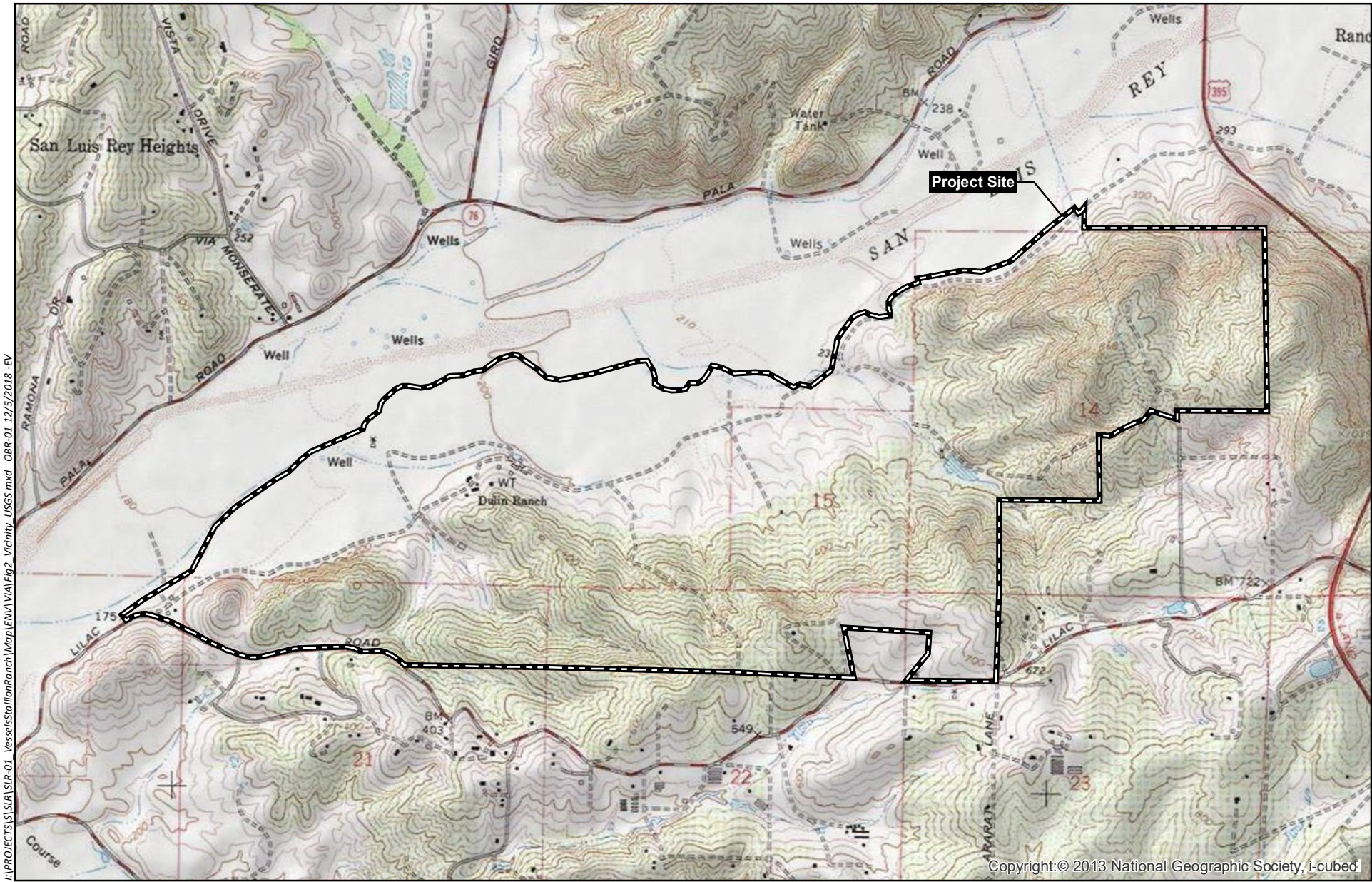




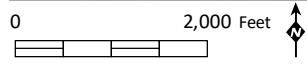
## Regional Location

Figure 1

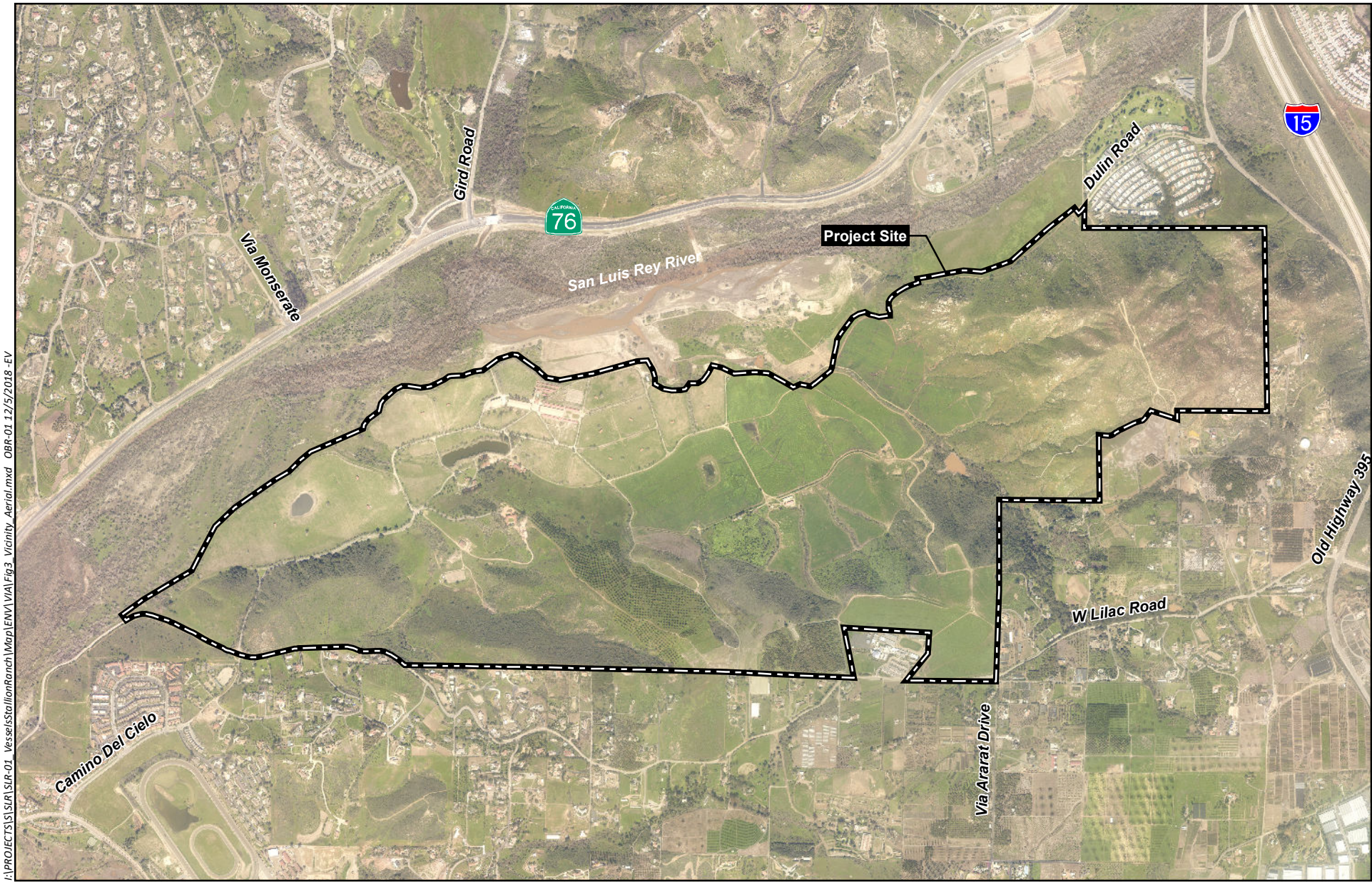




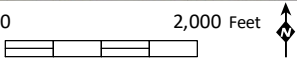
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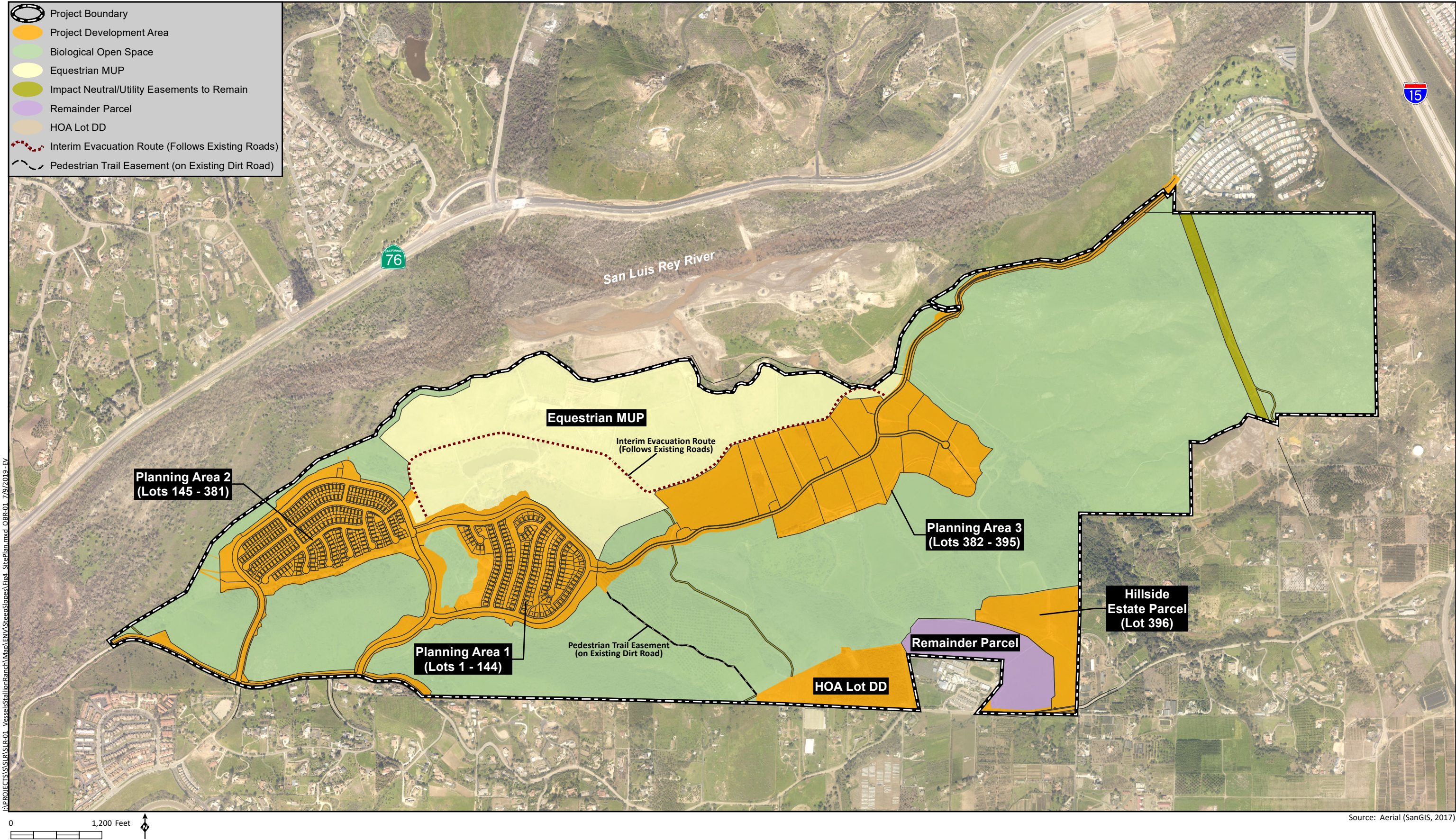


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Source: Base Map Layers (SanGIS, 2016)









**HELIX**  
Environmental Planning

## Figure 5








**HELIX**  
Environmental Planning

## Figure 6

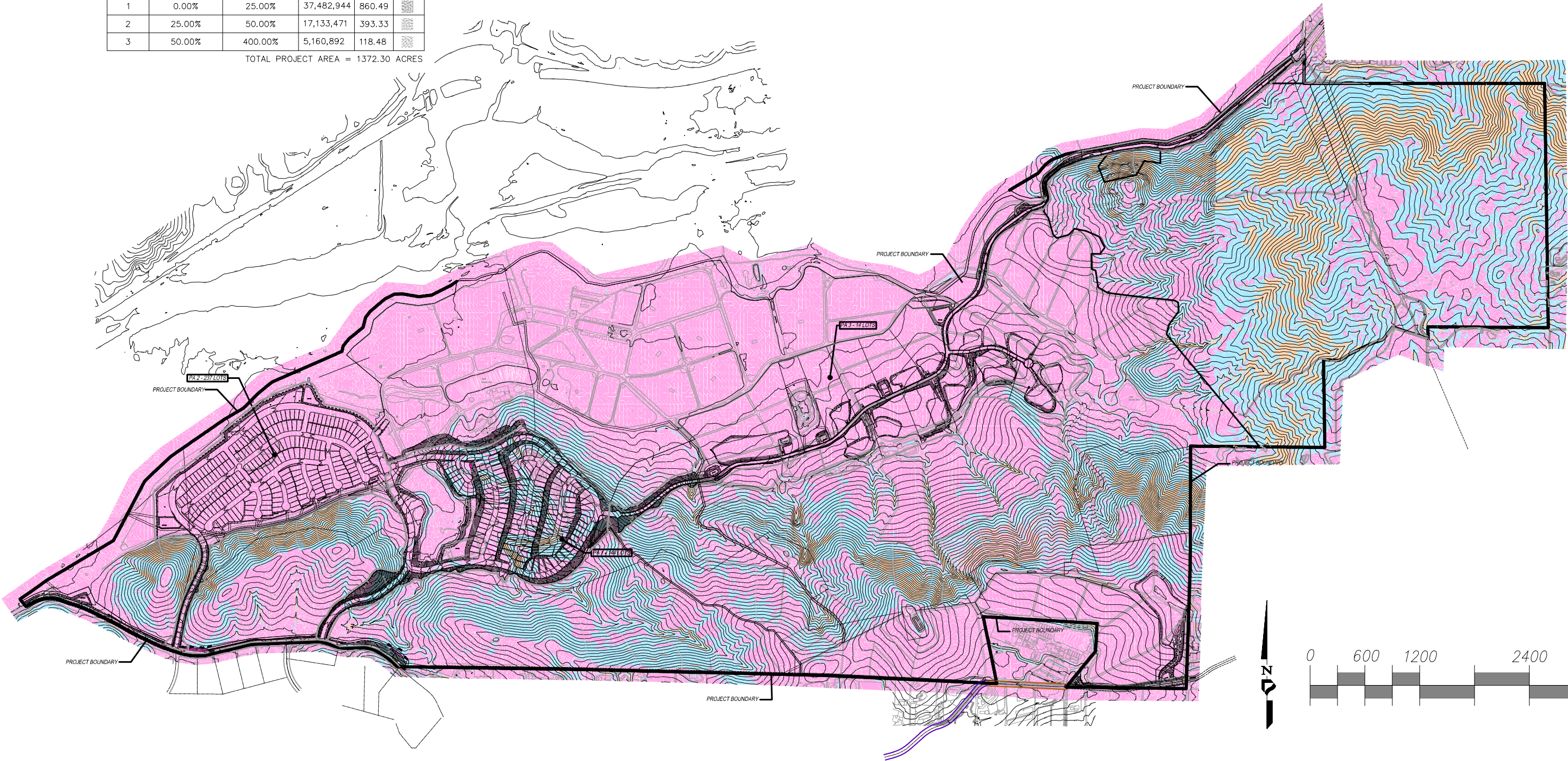






Slopes Table					
Number	Minimum Slope	Maximum Slope	Area	Acres	Color
1	0.00%	25.00%	37,482,944	860.49	
2	25.00%	50.00%	17,133,471	393.33	
3	50.00%	400.00%	5,160,892	118.48	

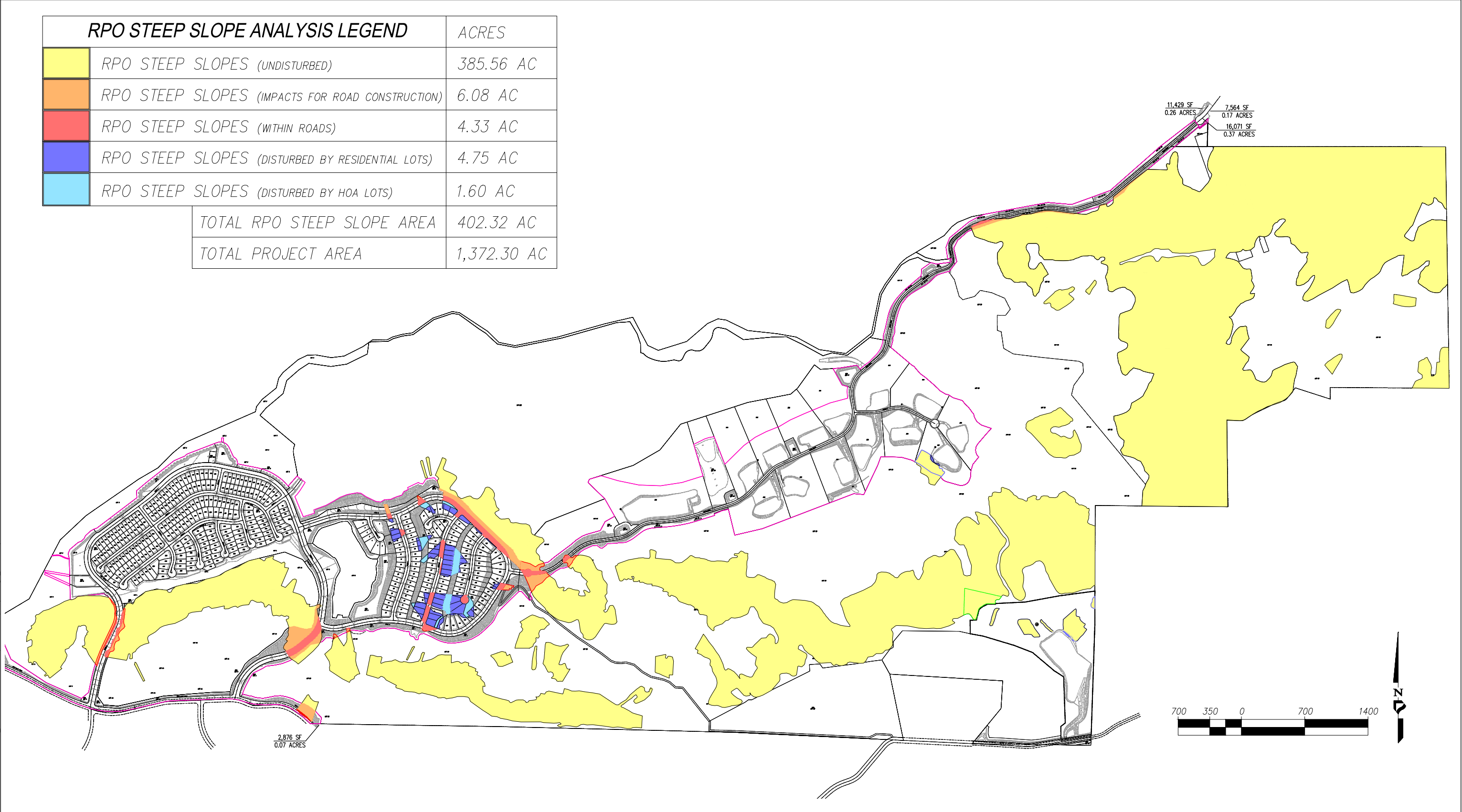
TOTAL PROJECT AREA = 1372.30 ACRES



Source: Project Design Consultants 2019



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Source: Project Design Consultants 2019

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Source: Digital Preview 2019