

# **APPENDIX H**

## *City of Escondido General Plan Policy Consistency Analysis Table*



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The following table provides a Project consistency analysis with applicable standards, goals, policies, and guidelines of the City of Escondido General Plan and the Downtown Specific Plan. Specifically, as provided in Appendix G of the California Environmental Quality Act Guidelines, the following consistency analysis focuses on applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

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Goal/Policy Number	Policy Text	Consistency Analysis	Consistency
<i>City of Escondido General Plan</i>			
<i>Quality of Life Standards</i>			
Standard 1: Traffic and Transportation	Circulation Element streets and intersections shall be planned and developed to achieve a minimum level of service “C” defined by the Highway Capacity Manual as amended or updated, or such other national standard as deemed appropriate by the city. In addition, the city shall support public transportation facilities through such measures as requiring right-of-way for commuter rail or park-and-ride facilities, transit stops or facilities, or for other transportation needs.	The project is located in the General Plan Downtown Specific Plan Area (SPA) where level of service (LOS) D is acceptable. LOS D is used as one of the thresholds during analysis of impacts in Chapter 4.6, Transportation, of the Environmental Impact Report (EIR). As indicated in Chapter 4.6, the Project would include compliance measures ( <b>CM-TR-1</b> and <b>CM-TR-2</b> ; see EIR Section 2.3.4, Project Design Features and Compliance Measures) to provide consistency with the LOS D operational standards. In addition, the Project would include complete street improvements consistent with the City’s vision for the Downtown SPA.	Consistent
Standard 2: Public Schools	The community shall have sufficient classroom space to meet state mandated space requirements and teacher/student ratios, with student attendance calculated on prescribed state and/or local school board standards. Implementation of this standard shall be the responsibility of the school districts and other appropriate agencies.	The Project would not cause classroom space to fall below state-mandated space requirements and teacher/student ratios. Additionally, as explained in Section 5.2.10, Public Services, payment of residential impact fees set forth by California Government Code Section 65995 would be required of the Project.	Consistent
Standard 3: Fire Service	In urbanized areas of the city, an initial response time of seven and one-half (7½) minutes for all structure fire and emergency Paramedic Assessment Unit (PAU) calls and a maximum response time of ten (10) minutes for supporting companies shall be maintained. A minimum of seven (7) total fire stations each staffed with a PSU engine company shall be in place prior to General Plan build-out. For outlying areas beyond a five (5) minute travel time or further than three (3) miles from the nearest fire station, all new structures shall be protected by fire sprinkler systems or an equivalent system as approved by the Fire Chief.	The Project is located in an urbanized area where the Escondido Fire Department (EFD) already provides service. The closest station to the Project site is Fire Station 1, located on 310 N. Quince Street, which is approximately 1.2 miles southwest of the Project site. Furthermore, the City’s General Plan indicates that new developments would be required to contribute fees to maintain fire protection service levels without adversely affecting service levels for existing development. This is enforced in Article 18B of Chapter 6 of the Escondido Municipal Code, which states that all new residential or nonresidential development shall pay a fee for the purpose of ensuring that the public facility standards established by the City are met with respect to the additional needs created by such development. Therefore, EFD would adequately serve the Project.	Consistent

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Standard 4: Police Service	The city shall maintain personnel staffing levels based on community generated workloads and officer availability.	The Project would not alter the City's ability to maintain personnel staffing levels based on community-generated workloads and officer availability. Additionally, as discussed in Section 5.2.10, Public Services, the Project would be required by the City to pay a fee of \$3,740.14 per dwelling unit for the purpose of ensuring that police response services standards are met with the respect to the additional needs created by such development.	Consistent
Standard 5: Wastewater System	The city wastewater system shall have adequate conveyance pipelines, pumping, outfall, and secondary treatment capacities to meet both normal and peak demands to avoid wastewater spills affecting stream courses and reservoirs.	The Project would require adequate conveyance pipelines, pumping, outfall, and secondary treatment capacities to meet both normal and peak demands to avoid wastewater spills affecting stream courses and reservoirs. As discussed in Section 5.2.12, Utilities and Service Systems, the Project would be located in an urbanized area with existing wastewater infrastructure. The Project would including construction of new on-site wastewater connections to existing infrastructure, which would adequately serve Project demand.	Consistent
Standard 6: Parks Systems	The city shall provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. This parkland acreage shall involve a minimum of 5.9 acres of developed active neighborhood and community parks in addition to 5.9 acres of passive park land and/or open space for habitat preservation per 1,000 dwelling units.	The Project would ensure provision of a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units, including a minimum of 5.9 acres of developed active neighborhood and community parks and 5.9 acres of passive parkland and/or open space for habitat preservation per 1,000 dwelling units. As stated in Table 2-1, Proposed Uses, the Project would provide a total of approximately 33,709 square feet of usable recreational and open space amenities, with major features including a dog park located in the eastern portion of the Project site and a centrally located pool/spa and community pavilion. An additional 131,045 square feet of passive open space would be provided as walkways, trails, and courtyards. Balconies and patios would be provided, totaling 45,375 square feet of private open space. Additionally, the developer would pay the City's park fee of \$4,655.40 per dwelling unit as applicable, ensuring that these standards established by the City are met. The Project would meet or exceed the minimum of 300 square feet per	Consistent

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		residential unit for mixed-use developments required by the Downtown Specific Plan.	
Standard 7: Library Service	The public library system shall maintain a stock and staffing of two (2) collection items per capita and three (3) public library staff per 8,000 residents of the City of Escondido. The city shall provide appropriate library facilities with a minimum of 1.6 square feet of library facility floor area per dwelling unit of the city prior to buildout of the General Plan where feasible.	The Project would maintain the required three public library staff members per 8,000 residents and would ensure provision of appropriate library facilities with a minimum of 1.6 square feet of library facility floor area per dwelling unit of the City prior to build-out of the General Plan where feasible. As discussed in Section 5.2.10, Public Services, the Project would be required by the City to pay the appropriate fee per dwelling unit to ensure public facility standards such as this are met with respect to the additional needs created by such development.	Consistent
Standard 8: Open Space System	A system of open space corridors, easements, acquisition programs and trails shall be established in the Resource Conservation Element. Sensitive lands including permanent bodies of water, floodways, wetlands, riparian and woodland areas, and slopes over 35 percent inclination shall be preserved.	Refer to Standard 6. The Project site is located in the Downtown Specific Plan Area (SPA) and consists of the existing Palomar Health Downtown Campus (Hospital Campus). The redevelopment of this site would not impede the City's ability to provide a City-wide system of open space corridors, easements, and trails.	Consistent
Standard 9: Air Quality	The city shall establish a Climate Action Plan with feasible and appropriate local policies and measures aimed at reducing regional greenhouse gas emissions.	As discussed in Section 5.2.6, Greenhouse Gas Emissions, the Project would result in a net negative amount of greenhouse gas (GHG) emissions compared to the existing Palomar Health Downtown Campus. Additionally, the Project would be consistent with <i>San Diego Forward: The Regional Plan</i> and the <i>State Scoping Plan</i> GHG Emission Reduction Strategies.	Consistent
Standard 10: Water System	The city shall maintain provisions for an adequate water supply, pipeline capacity and storage capacity to meet normal and emergency situations and shall have the capacity to provide a minimum of 540 gallons per day per household or as established by the city's Water Master Plan. Federal and state drinking water quality standards shall be maintained.	The Project would maintain an adequate water supply, pipeline capacity, and storage capacity to meet normal and emergency situations and shall maintain drinking water quality standards. As discussed in Section 5.2.12, Utilities and Service Systems, the Project would be located in an urbanized area with existing wastewater infrastructure. The Project would construction new on-site wastewater connections to existing infrastructure, which would adequately serve Project demand. Additionally, as discussed in Section 5.2.7, Hydrology and Water Quality, best management	Consistent

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		practices (BMPs) and state-mandated measures would ensure that short-term impacts from construction-related activities and long-term operation would not violate any water quality standards.	
Standard 11: Economic Prosperity	The city shall implement programs and support efforts to increase Escondido's median household income and per capita wage. Programs shall focus on actively fostering entrepreneurial opportunities, recruiting new businesses, and encouraging expansion of existing businesses to increase employment densities.	The Project would not impact the City's implementation of programs and support efforts to increase the City's median household income and per capita wage. The Project would implement the overall strategic goals of the Downtown Specific Plan by revitalizing an underutilized site, increasing the population base and economic viability of the growing Downtown SPA.	Consistent
<i>Land Use and Community Form Element</i>			
Goal 1	A community composed of distinct residential neighborhoods, business districts, and employment centers, whose urban form reflects the natural environmental setting	The Project would be consistent with the underlying General Plan and zoning designations and would implement development consistent with the requirements of the Downtown Specific Plan. The proposed development of the Project site would be consistent with the allowable uses of the Historic Downtown District of Downtown Specific Plan (Figures II-2 and II-3 of the Downtown Specific Plan), General Plan, and Zoning Ordinance. The Project would reflect the land use setting and the natural environmental setting of the area.	Consistent
Policy 1.1	New development should serve to reinforce the city's present development pattern of higher-intensity development within the downtown area and lower-intensity development in outlying areas. As a guide toward accomplishing this objective, new development projects shall be at an appropriate density or clustered intensity based upon their compatibility with the majority of the existing surrounding land uses. This policy shall limit density transfers from constrained portions of a property as defined in the land use and open space goals.	Under the Downtown Specific Plan, the majority of the Project site has an allowable residential density of up to 100 dwelling units per acre (du/ac), while the western portion across Valley Boulevard has an allowable residential density of up to 75 du/ac. The General Plan Housing Element indicates a maximum development of 45 du/ac, with a recommended 30 du/ac density. The Project's overall density would be approximately 37 du/ac, consistent with the Downtown Specific Plan and General Plan Housing Element. Surrounding land use designations beyond the Downtown SPA the immediate commercial areas include Urban II and Urban III, which allow for densities up to 12 and 18 du/ac, respectively. These adjacent land use designations allow	Consistent

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		<p>residential development that is less dense than the proposed 37 du/ac. The proposed density within the Project site would allow for a transition from the allowable higher residential densities of the Downtown SPA to the west, to the lower density residential and commercial uses just beyond the Downtown SPA boundary to the north, east, and south. The Project would provide a transfer of density consistent with the Density Transfer Program. Therefore, while the Project site has a much higher allowable density under the Downtown Specific Plan, the proposed density would be compatible with the surrounding residential land uses while still achieving consistency with the Downtown Specific Plan and General Plan.</p>	
Policy 1.3	<p>Focus development into areas where land use changes achieve the community's long term goals. Facilitate development that is consistent with the build out vision for each area through incentive programs and efficient administrative and discretionary approval processes for plot plans, Planned Developments, Area Plans, Specific Plans, and Zoning Overlays.</p>	<p>Refer to Land Use and Community Form Policy 1.1 as well as the consistency analysis with the Downtown Specific Plan Strategic Goals. The Project would result in development consistent with the Downtown Specific Plan and the General Plan Housing Element. The Project's proposed densities and housing product types would be consistent with the surrounding area and, with a Specific Plan Amendment, would be consistent with the Downtown Specific Plan, General Plan, and Zoning Ordinance upon Project approval. The proposed Project includes senior apartments, apartments, villas, rowhomes, and commercial uses. The Project would have a unified modern architectural style, with a subset of styles for each area of the site. The proposed structures would range from one to five stories, with heights ranging from 36 feet to 75 feet. Proposed residential and commercial development within the Project incorporates a design that reflects the requirements of the Downtown Specific Plan, which includes step-back building facades for upper floors at the corner of E. Grand Avenue, variation of the roofline heights, and articulation of facades to create a pedestrian and street orientation. While the Project includes amendments to allow residential units on the ground floor within the Project site, it would not</p>	Consistent

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		<p>preclude the overall goals of the Downtown Specific Plan or General Plan to provide pedestrian-oriented ground-floor commercial uses within the Retail Core Area or within other areas identified in the Downtown Specific Plan that are required to provide ground floor retail or office. The proposed ground-floor commercial uses would be located at the intersection of Valley Boulevard and E. Grand Avenue. These commercial uses would be located nearest the Retail Core Area of the Downtown SPA along Grand Avenue to the west of the Project site (refer to Figure II-1 of the Downtown Specific Plan). The provision of ground-floor residential within the Project site would be more consistent with the surrounding residential uses in the immediate surrounding area outside the Downtown SPA.</p> <p>The Project would not exceed the height limits of the Downtown Specific Plan, would be lower than the existing McCleod Tower, and would not interfere with implementation of the goals and policies of the Downtown Specific Plan or General Plan.</p> <p>The proposed Valley Boulevard improvements would add pedestrian and bicycle connectivity within the Downtown SPA (refer to Chapter 2, Project Description). In addition, the Project would include a bulb-out at the intersection of Valley Boulevard and E. Grand Avenue in order to reduce the pedestrian crossing width and calm traffic conditions. These proposed improvements would increase pedestrian connections from the Project site to the rest of the Downtown SPA, including the core area. This improvement would support the overall goals of the Downtown Specific Plan (discussed below).</p> <p>The project would include half-width frontage improvements to E. Grand Avenue along the project frontage to Collector standards per the City's adopted Circulation Element of the General Plan. The proposed frontage improvement to E. Grand Avenue would include widening the two west-bound vehicular lanes adjacent to the Project site to 32 feet total and</p>	

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		improving the sidewalk. The sidewalk improvements along E. Grand Avenue would result in a widened pedestrian corridor. Overall, the proposed improvements are provided to improve multi-modal transportation and promote pedestrian and bikeway connections to the other areas of the Downtown SPA, including the Retail Core Area, which would promote long-term viability of the SPA.	
Policy 1.4	Consider the appropriateness of alternative methodologies to define project objectives, determine thresholds of significance, and assess the environmental impacts of projects that further Escondido's smart growth objectives for downtown infill, mixed-use, pedestrian-oriented, and transit-oriented development, consistent with the requirements of the California Environmental Quality Act (CEQA).	The Project objectives reflect the goals to provide downtown infill development that would promote a pedestrian-oriented site to encourage multi-modal transportation. Refer to Section 2.2, Objectives.	Consistent
Policy 1.5	The city should maintain its single-family residential development pattern, except in locations such as the downtown, along major transportation corridors, and around commercial and public activity centers, where higher densities are more appropriate.	Refer to Land Use and Community Form Policies 1.1 and 1.3.	Consistent
Policy 1.6	Residential Categories are established for purposes of providing the city with a range of building intensities to address various site constraints and opportunities. Proposed development shall not exceed the densities shown on the Land Use Plan and outlined in Figure II-6.	Refer to Land Use and Community Form Policy 1.1.	Consistent
Policy 1.8	Require development projects to locate and design buildings, construct energy and water efficient infrastructure, reduce greenhouse gas emissions, enhance community livability and economic vitality, and implement other practices contributing to sustainable resources.	The Project would be required to meet the current California Building Energy Efficiency Standards (24 CCR, Parts 6 and 11), which improve the energy efficiency of residential and non-residential buildings, at the time of building construction. The Title 24 standards are updated every 3 years. Furthermore, the Project would result in a net reduction in electricity use compared to the existing site. Default electricity generation rates in CalEEMod were used (based on the proposed land use and climate zone) based on compliance with 2016 Title 24. According to these estimations, the existing site would consume approximately 7,841,360 kilowatt-hours (kWh) per year. Note	Consistent

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		that this figure may underestimate energy usage, as many of the Hospital Campus buildings are older structures that do not meet 2016 energy standards. The Project would consume an estimated 2,393,598 kWh per year, for a net consumption of - 5,447,762 kWh per year.	
Policy 1.9	Promote development in downtown, at transit stations, and other key districts to accommodate a mix of land uses and configure uses to promote walkability, bicycling, and transit uses, reducing the need for the automobile.	The Project would result in the redevelopment of an underutilized site within the Downtown SPA. The proposed development would include pedestrian-oriented structures and improvements to increase alternative forms of transportation, such as transit and walkability.	Consistent
Policy 1.10	Reduce light pollution and preserve views of the night sky through the design and siting of light fixtures to minimize light spill-over onto adjacent properties.	The Project site currently contains the Palomar Health Downtown Campus, which is currently operational; therefore, lighting is used on site. Nighttime exterior lighting would be provided at the Project site for safety, security, and circulation purposes. Consistent with Article 35 of the Zoning Ordinance, all exterior lighting fixtures, with the exception of street lamps, would be aimed or shielded so that unnecessary nighttime lighting and glare would be reduced for the benefit of City residents and astronomical research at Palomar Mountain Observatory. Any proposed lighting within the tower would also be consistent with the City's lighting requirements.	Consistent
Policy 1.11	Encourage new development to minimize the creation of incompatible glare through development design features (e.g., minimizing use of certain types of exterior building materials).	In accordance with Zoning Ordinance Section 33-713, street lighting installed on the private streets would comply with the City's Engineering Design Standards and Standard Drawings. Windows on the proposed residences and associated cars have the potential to create new sources of glare. However, these uses and glare sources would not be inconsistent with the surrounding land uses, as the Project site is surrounded by residential development to the north, south, east, and west. Overall, the light and glare conditions on the Project site would not substantially change, and would likely be reduced, as the scale of the proposed development would be smaller than what currently exists on site.	Consistent
Goal 2	Regulations that clearly and effectively implement land use development goals and objectives.	The Project would be consistent with the underlying General Plan and zoning designations and would implement	Consistent

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		development consistent with the requirements of the Downtown Specific Plan. The proposed development of the Project site would be consistent with the allowable uses of the Historic Downtown District of Downtown Specific Plan (Figures II-2 and II-3 of the Downtown Specific Plan), General Plan, and Zoning Ordinance. The Project would reflect the land use setting and the natural environmental setting of the area. Further, as discussed below, the Project would be consistent with the goals of the Downtown Specific Plan.	
Policy 2.2	Apply zoning overlays to implement specific standards, regulations and guidelines that further advance General Plan policies and city programs for development within Land Use Area Plans and Specific Plans	The Project site does not contain any additional zoning overlays. As discussed in this table and in Section 4.4, Land Use and Planning, the Project would be consistent with the Downtown Specific Plan upon approval of concurrently proposed Specific Plan Amendments.	Consistent
Goal 3	Neighborhoods that provide a variety of housing types, densities, and design, and a mix of uses and services that support resident needs.	Refer to Land Use and Community Form Policies 1.1 and 1.3.	Consistent
Policy 3.9	Promote new residential subdivisions, multi-family Projects, and development in Mixed Use Overlay areas to incorporate smart growth principles such as: a) Walkways, shade trees, seating areas and other pedestrian activity, and enhance resident quality of life; b) Features that promote the use of alternative transportation options; c) Opportunities for residents to conduct routine errands close to their residence; d) Maximum connectivity with surrounding uses to become a part of the area rather than an isolated Project; e) Architectural elements or themes from the surrounding neighborhood; and, f) Appropriate transitions between land use designations to minimize compatibility conflicts.	The Project would be consistent with these principles as follows: a) The usable recreational and open space amenities include a dog park located in the eastern portion of the Project site, a gym, and a centrally located pool/spa and community pavilion. Passive open space would be provided as walkways, trails, and courtyards. Streetscape trees would be incorporated along Valley Boulevard, E. Grand Avenue, and E. Valley Parkway. b) The Project would provide a public transit bus turn-out, a ride-share area, and improved pedestrian circulation to support alternative modes of transportation. c) The Project would locate residential uses within a short distance to locally serving commercial uses in the Downtown SPA. d) Refer to item b, above. Additionally, the Project site would link the existing circulation system and would connect to existing infrastructure and utilities. The Project would make improvements to Valley Boulevard	Consistent

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		<p>and E. Grand Avenue to accommodate and connect the increased number of people at the Project site to the surrounding areas. Internal pedestrian connectivity would also be provided, as shown in Figure 2-9, Connectivity Plan.</p> <p>e) The building design would be in accordance with the Downtown Specific Plan, which includes step-back building facades for upper floors, variation of the roofline heights, and articulation of facades to create a pedestrian and street orientation.</p> <p>f) Refer to Land Use and Community Form Policies 1.1 and 1.3.</p>	
Goal 4	Residential neighborhoods that are well maintained and enduring, and continue to be great places to live for multiple generations.	Refer to Land Use and Community Form Policies 1.1 and 1.3.	Consistent
Policy 4.3	Integrate pedestrian-friendly features, promote walkability, and work with residents to enhance existing neighborhood character and aesthetics.	Refer to Land Use and Community Form Policies 1.3 and 3.9.	Consistent
Goal 6	Large scale, multi-use projects that are designed to create distinct districts that complement the existing community and urban form.	Refer to Land Use and Community Form Policies 1.3 and 3.9.	Consistent
Policy 6.3	<p>Development proposals involving Planned Developments shall address and/or include, if applicable:</p> <ul style="list-style-type: none"> <li>a) Visual impacts of the development from the Valley floor and from adjoining properties;</li> <li>b) Preservation of the natural setting by minimizing earth movement and removal of native vegetation and by using compatible building materials, textures and colors;</li> <li>c) Grading, erosion control and revegetation/ landscaping requirements;</li> <li>d) Preservation of the creeks and their adjoining vegetation in natural state and the use of buffering techniques to control undesired access;</li> <li>e) Implementation of appropriate management techniques in areas of rare and endangered plant and animal</li> </ul>	<p>The Project would be consistent with these principles as follows:</p> <ul style="list-style-type: none"> <li>a) Section 5.2.1, Aesthetics, of the Project Environmental Impact Report (EIR) addresses potential aesthetics and visual resources impacts associated with the Project. The impact analysis is based on applicable laws, regulations, and guidelines, which is inclusive of the City's General Plan. Thus, visual impacts have been addressed as required by this policy.</li> <li>b) As the site is not located within a "natural setting", this policy is not applicable. None-the less, it is noted that the Project would use varying shades of gray, off-white, and tan. Surfaces would be primarily stucco and glass, with accents of white corrugated metal, black</li> </ul>	Consistent

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	<p>species;</p> <p>f) Adequate buffers and separations from adjacent properties;</p> <p>g) Superlative architectural design features of all structures;</p> <p>h) Adequate separation between structures and attention to the bulk and scale to avoid a monotonous streetscape; and</p> <p>i) Preservation / maintenance of common open space or community area.</p> <p>The Planned Development zoning ordinance may require further detailed information to achieve General Plan goals and objectives.</p>	<p>metal, stone veneer, and varying types of wood. The Project site is mostly developed with several areas of ornamental plantings and non-native vegetation; therefore, native vegetation removal would be minimal.</p> <p>c) Development would adhere to the City's Grading and Erosion Control Ordinance, as discussed in Section 4.1.1.2, Regulatory Setting. A landscaping plan would be provided as a Project component (Section 2.3.1, Project Components).</p> <p>d) No jurisdictional aquatic resources occur on site. The only habitat types identified on site is urban/developed and ornamental planting (Section 4.1.1.1). Therefore, this sub-policy is not applicable.</p> <p>e) Special-status plant and wildlife species that are known to the region were not found during surveys on the Project site due to general lack of suitable habitat. Therefore, this policy is not applicable.</p> <p>f) Building designs would be in accordance with the Escondido Downtown Specific Plan, as discussed in Section 2.3.1 of the EIR.</p> <p>g) Architecture and features of the Project are addressed in Section 2.3.1 of the EIR. Building designs would be in accordance with the Escondido Downtown Specific Plan, as discussed in Section 2.3.1 of the EIR.</p> <p>h) The Project would include HOA areas and alleyways to provide separation between buildings, and would comply with building height limits and setbacks. Appropriate separations between structures and attention to bulk and scale are addressed in Section 2.3.1 of the EIR.</p> <p>i) The creation and maintenance of Open Space is addressed in Section 2.3.1 of the EIR. The Project would include various open space areas, including active and passive areas. These areas would be maintained as open space by the Home Owners Association.</p>	

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Goal 11	Large-scale, multi-use Projects that create a sense of distinct identity, provide amenities, and are cohesively and comprehensively developed.	Refer to Land Use and Community Form Policies 1.1 and 1.3.	Consistent
Policy 11.3	Specific Plans shall not be utilized in a wide-spread manner to circumvent or modify the character or intent of ordinances, land use designations and/or city goals and objectives, but rather should be reserved for a limited number of proposals which, by nature, are ideally suited for the comprehensive planning efforts involved in the Specific Planning process.	The Project does not include a Specific Plan. Rather, the Project proposes an amendment to the existing Downtown Specific Plan. Currently the Downtown Specific Plan requires ground-floor commercial uses at the Project site, with residential uses permitted above. The Project would include an amendment to the Downtown Specific Plan to allow residential units on the ground floor through a Planned Development Permit process. Said amendment would be consistent with the guiding principles established by the General Plan for the Downtown Specific Plan area because the proposed amendment would amend the Downtown Specific Plan to allow residential units on the ground floor through approval of a Planned Development Permit. As such, the Project would be consistent with this policy.	Consistent
Policy 11.4	Specific Planning Areas (SPA's) shall be utilized to consider development proposals analyzing zoning regulations, development standards, land uses, densities, building intensities tailored to the need and unique characteristics of a particular area. Generally, SPAs should only be applied to larger areas and where community benefit can be demonstrated.	Refer to Land Use and Community Form Policies 1.1 and 1.3. The Project would include building housing and making improvements to streets, which demonstrates community benefit to the Downtown area.	Consistent
Policy 11.6	No Specific Plan shall be adopted by the City Council until the Council has reviewed the proposed Plan for compliance with the following requirements which are in addition to requirements imposed by State Government Code Sections 65450, et seq.: <ul style="list-style-type: none"> <li>a) Residential, industrial and commercial structures built within the Specific Plan area shall be constructed under rigorous quality control programs and safeguards (e.g., appropriate restrictive covenants running with the land);</li> <li>b) Appropriate protection against soil erosion, particularly where hillside development is involved, shall be assured;</li> </ul>	The Project does not include a new Specific Plan. Rather, it would amend the existing Downtown Specific Plan with the inclusion of a Specific Plan Amendment, as discussed in the analysis of Policy 11.3 above.	Consistent

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	<ul style="list-style-type: none"> <li>c) Assurance shall be provided that any hillside cutting will be minimized or appropriately landscaped so that visible scarring will be mitigated to the extent feasible;</li> <li>d) All open space areas shall be identified and appropriate measures providing for their preservation shall be included;</li> <li>e) Design criteria, development regulations and building standards shall be provided sufficient to ensure that residential, industrial and commercial structures are compatible with the surrounding environment;</li> <li>f) Adequate assurance shall be provided that the circulation and access needs of the project residents and the surrounding community are properly addressed;</li> <li>g) Appropriate arrangements to ensure that public facilities and services needs of the project residents are available shall be described; and</li> <li>h) The Specific Plan demonstrates implementation of the goal and objectives of the General Plan and furthers the interests of the community.</li> </ul>		
Goal 15	Shared public and private commitments for large scale, multi-year, and multi-use projects to assure conformance with community development objectives.	<p>The Development Agreement would include a transfer of density from the Project area east of Valley Boulevard into the Project area west of Valley Boulevard to the proposed senior housing in order to allow a density greater than 75 du/ac west of Valley Boulevard. This density transfer would be in accordance with the City's Downtown Density Transfer Program and would allow for a higher density to be achieved on a portion of the Project site consistent with the City's Downtown Specific Plan.</p> <p>A draft Development Agreement has been proposed as part of this Project, which results in the provision of overall benefits to the City and adequate development controls in exchange for vested rights in Project approvals. The Development Agreement would be vetted by the City to ensure public and private commitments meet the needs and goals of the Downtown Specific Plan.</p>	Consistent

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Goal/Policy Number	Policy Text	Consistency Analysis	Consistency
Goal 17	A dynamic General Plan that is responsive to community values, visions, needs, economic conditions, resource availability, and state and federal legislation.	Considering the current and future anticipated traffic volumes along N. Fig Street as well as the function of this roadway, the Project includes a General Plan Amendment to change the classification of Fig Street from a Collector Street to a Local Collector. The Project would otherwise be consistent with the General Plan.	Consistent
Policy 17.5	<p>Substantiate the need for General Plan Amendments with written findings submitted by the applicant that considered the following criterion:</p> <ul style="list-style-type: none"> <li>- Identified physical, social, or city-wide economic factors or changes that have made the General Plan designation, policy statement goal, or intent in question inappropriate from the standpoint of the general public welfare.</li> </ul> <p>Unless the applicant provides substantial documentation that the changes have occurred, the GPA request shall be denied.</p>	<p>The Project includes an amendment to the General Plan Mobility Element. N. Fig Street between E. Valley Parkway and E. Grand Avenue is currently classified as a Collector Street in the City's General Plan Mobility and Infrastructure Element. Collector Streets are defined as four-lane roadways without medians, without curbside parking, and with bicycle lanes. While not prohibited, driveways to residences are discouraged along Collector Streets. Collector Streets are intended to handle approximately 34,200 vehicles per day. Currently Fig Street is a two-way roadway with a partial painted median. Three residences currently have driveways on this segment of Fig Street and street parking is provided along areas not near intersections. Based on the Traffic Impact Analysis prepared for this Project (Appendix J to the EIR), Fig Street between E. Valley Parkway to E. Grand Avenue currently has 5,660 average daily trips and would have 7,910 average daily trips in the Year 2035 with the Project. Considering the current and future anticipated traffic volumes along Fig Street as well as the function of this roadway, the Project includes a General Plan Amendment to change the classification of Fig Street from a Collector Street to a Local Collector.</p> <p>The Local Collector classification is defined as a two-lane roadway that may have a median, with direct residential driveway access permitted, and curbside parking is allowed except near intersections where turn lanes are provided. Local Collectors are intended to carry less than 10,000 vehicles per day. As such, the Local Collector classification is appropriate for N. Fig Street between E. Valley Parkway and E. Grand Avenue.</p>	Consistent

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Goal/Policy Number	Policy Text	Consistency Analysis	Consistency
Goal 18	Environmental quality regulations that mitigate for impacts associated with development to preserve and protect Escondido's unique environment.	The Project would mitigate impacts associated with development to preserve and protect the City's unique environment. As analyzed throughout this EIR, the Project would result in potentially significant impacts to biological resources, cultural resources, hazards and hazardous materials, noise, transportation, and tribal cultural resources. With the implementation of proposed mitigation measures identified in Chapter 2 of this EIR, the Project would result in less than significant impacts on the environment.	Consistent.
Policy 18.2	Require environmental review and mitigation of impacts, if necessary, consistent with city, state, and federal requirements for development projects the Planning Area.	The Project is currently undergoing environmental review as an EIR per the CEQA Guidelines.	Consistent.
Policy 18.4	Require all development to conform to the General Plan, Facilities Plans, Areas Plans, and Quality of Life Standards.	The Project would comply with all relevant laws, policies, and regulations, which is inclusive of the General Plan, Facilities Plans, Areas Plans, and Quality of Life Standards.	Consistent
<i>Mobility and Infrastructure</i>			
Goal 1	An accessible, safe, convenient, and integrated multimodal network that connects all users and moves goods and people within the community and region efficiently.	As discussed in Land Use and Community Form Policy 1.3, the Project would include multi-modal transportation improvements such as a public transit bus turn-out (and pick-up drop-off area for ride-share services such as Lyft and Uber) near the northeast corner of Valley Boulevard and E. Grand Avenue. Additionally, a bike lane and pedestrian sidewalks would be provided along Valley Boulevard. The proposed circulation improvements are provided to increase multi-modal transportation and promote pedestrian and bikeway connections within and around the Downtown SPA. Therefore, the Project would provide an accessible, safe, convenient, and integrated multi-modal network that connects all users within the community efficiently. Additionally, the proposed improvements to E. Grand Avenue would not preclude the City from implementing a future Class II bicycle lane in this roadway, as identified in the City's Bicycle Master Plan.	Consistent
Policy 2.1	Ensure that the existing and future transportation system is interconnected and serves multiple modes of travel, such as walking,	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent

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	biking, transit, and driving for safe and convenient travel.		
Policy 2.2	Provide a safe, efficient and accessible transportation network that meets the needs of users of all ages including seniors, children, disabled persons, and adults.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 2.4	Evaluate access, safety, and convenience of various transportation modes for every project involving the following eight use groups: pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, motorists, and goods and services.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 2.5	Design streets in a manner that is sensitive to the local context and recognizes the needs vary between mixed use, urban, suburban, and rural settings.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 2.6	Ensure that the entire right-of-way is designated to accommodate appropriate modes of transportation.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 2.7	Remove barriers, where feasible, to allow people of all abilities to access the mobility infrastructure serving the community.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 2.8	Promote the provision of multimodal access to activity centers such as commercial centers and corridors, employment centers, transit stops/stations, schools, parks, recreation areas, and tourist attractions.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 3.2	Develop and manage pedestrian facilities to maintain an acceptable Level of Service.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3. The proposed circulation improvements are provided to increase multi-modal transportation and promote pedestrian connections within and around the Downtown SPA.	Consistent
Policy 3.3	Maintain a pedestrian environment that is accessible to all and that is safe, attractive, and encourages walking.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 3.4	Preserve and enhance pedestrian connectivity within existing neighborhoods via the Escondido Creek trail, sidewalks, and trails, and require a pedestrian network in new developments that provides efficient and well-designed connections to adjacent land uses, commercial districts, schools, and parks.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 3.5	Promote walking and improve the pedestrian experience by requiring pedestrian facilities along all classified streets designated on the Circulation Plan; implementing streetscape	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent

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	improvements along pedestrian routes that incorporate such elements as shade trees, street furniture, and lighting; orienting development toward the street; employing traffic calming measures; and enforcing vehicle speeds on both residential and arterial streets.		
Policy 3.6	Enhance pedestrian visibility by enforcing parking restrictions at intersection approaches, improving street lighting, and identifying required clearances to minimize obstructions.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 3.10	Design and construct pedestrian-friendly streetscape improvements that reduce stormwater and pollutant runoff into the drainage system, using such techniques as urban bio-swales for the filtering of pollutants and permeable hardscapes.	As discussed in Section 5.2.7, Hydrology and Water Quality, the Project would include pedestrian-friendly streetscape improvements to reduce stormwater and pollutant runoff into the drainage system through the incorporation of operational stormwater BMPs and landscaping features.	Consistent
Policy 4.1	Maintain and implement a Bicycle Master Plan that enhances existing bicycle routes and facilities; defines gaps and needed improvements; prescribes an appropriate Level of Service; outlines standards for their design and safety; describes funding resources; and involves the community.	The City's Bicycle Master Plan indicates that a future Class II bicycle lane is contemplated along Grand Avenue. The proposed improvements to Grand Avenue would not preclude the City from implementing a future Class II bicycle lane in this roadway, as identified in the City's Bicycle Master Plan. The Project would otherwise not impede the City's ability to implement its Bicycle Master Plan.	Consistent
Policy 4.2	Develop and manage bicycle facilities to maintain an acceptable Level of Service.	The Project would not impact any bicycle facilities. Rather, it would provide additional bicycle infrastructure and connectivity within the Downtown SPA, which is described in Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 4.3	Promote bicycling as a common mode of transportation and recreation to help reduce traffic congestion.	The Project would not impact any bicycle facilities. Rather, it would provide additional bicycle infrastructure and connectivity within the Downtown SPA, which is described in Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 5.1	Collaborate with the North County Transit District (NCTD) to facilitate effective, convenient, and efficient transit modes to meet the needs of residents and visitors including seniors, disabled persons, and transit-dependent persons.	The Project would make improvements to existing NCTD bus stops. Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 5.3	Coordinate with the NCTD to establish transit stops in areas of	The Project would make improvements to existing NCTD bus	Consistent

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	concentrated activity such as near senior housing projects, medical facilities, major employment centers, and mixed use areas.	stops. Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	
Policy 5.8	Require that new developments incorporate transit-supporting facilities into the project design, where appropriate.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 5.9	Construct, when appropriate, transit facilities such as bus pullouts on Prime Arterials, Major Roads, and Collector streets.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 6.1	Develop and implement Transportation Demand Management (TDM) and complete street programs to reduce automobile travel demand that may include, but shall not be limited to: preparing site-specific peak-hour traffic-management plans; promoting ride-sharing and carpooling for residents and non-residents through preferential parking; providing park-and-ride facilities adjacent to the regional transit system; and supporting transit subsidies.	The Project would introduce a residential population and additional multi-modal transportation to the Downtown SPA that would reduce automobile travel demand. Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 7.1	Plan, design, and regulate roadways in accordance with the street classification in the Circulation Element Diagram.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 7.2	Allow Specific Alignment Plans for unique situations when standard widening is not adequate for future needs or when special conditions / constraints exist which require a detailed implementation plan.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 7.3	Strive to maintain LOS C or better throughout the city except for within the urban core. Establish LOS D as the threshold for determining significant impacts and appropriate mitigation. Due to physical design characteristics, implementation of pedestrian-oriented 'smart growth' and Complete Streets design improvements, high density infill areas, environmental resource considerations, existing development, freeway interchange impacts, and incomplete system improvements, alternative levels of service may be appropriate for isolated areas as determined by the city.	The project is located in the General Plan Downtown SPA where LOS D is acceptable. LOS D is used as one of the thresholds during analysis of impacts in Chapter 4.6, Transportation, of the EIR. As indicated in Chapter 4.6, the Project would include compliance measures ( <b>CM-TR-1</b> and <b>CM-TR-2</b> ; see EIR Section 2.3.4, Project Design Features and Compliance Measures) to provide consistency with the LOS D operational standards. In addition, the Project would include complete street improvements consistent with the City's vision for the Downtown SPA.	Consistent
Policy 7.4	Provide adequate traffic safety measures on all new roadways and strive to provide adequate traffic safety measures on existing roadways (subject to discale and environmental considerations). These measures may include, but not be limited to, appropriate levels of maintenance, proper street design, traffic control	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent

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	devices (signs, signals, striping), street lighting, and coordination with the school districts and other agencies.		
Policy 7.6	Ensure that identified mobility system improvements are developed in a timely manner to meet the needs of the community.	Proposed circulation system improvements incorporated as Project design and required as compliance measures would be developed in a timely manner concurrent with Project development.	Consistent
Policy 7.7	Require new development Projects to analyze local traffic impacts, and construct and implement the improvements required for that development.	The analysis completed in Section 4.6, Transportation, is consistent with this policy and the project includes compliance measure <b>CM-TR-1</b> , that includes a signalization improvement in accordance with this policy.	Consistent
Policy 7.8	Require new development Projects to analyze traffic impacts on the regional transportation system, and pay a fair-share contribution to regional transportation improvements.	The analysis completed in Section 4.6, Transportation, is consistent with this policy and the Project includes compliance measure CM-TR-2 (see EIR Section 2.3.4, Project Design Features and Compliance Measure), which requires a fair-share contribution toward a cumulative improvement in accordance with this policy.	Consistent
Policy 7.10	Implement street beautification programs to improve the visual quality and character of roadway corridors and provide a distinct identity for key gateways into the city.	Landscaping is proposed throughout the Project site. Streetscape trees would be incorporated along Valley Boulevard, E. Grand Avenue, and E. Valley Parkway. Defining landscaping at the corner of N. Hickory Street/E. Valley Parkway/Valley Boulevard would demarcate the area as the main Project entrance, and a variety of trees, shrubs, and groundcover would be appropriately incorporated throughout the interior of the site. All proposed landscaping would be drought tolerant.	Consistent
Policy 7.11	Enhance the safety and efficiency of accessing of the public street network from private properties by: <ul style="list-style-type: none"> <li>a) Controlling driveway access locations on Prime Arterials and Major Roads;</li> <li>b) Installing medians and access controls on Collector Roads and higher classifications;</li> <li>c) Maintaining minimum distances from intersections for accessing Prime Arterials, Major Roads, and Collector streets;</li> <li>d) Consolidating driveway access; and,</li> </ul>	The Project would include design improvements to the public right-of-way consistent with the City's engineering standards as it pertains to safety for all modes of travel.	Consistent

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	e) Encouraging interconnected parking lots.		
Policy 8.1	Ensure off-street and on-street parking is adequate, considering access to transit facilities and mix of uses in the surrounding area.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 8.2	Consider reducing parking requirements in the downtown and at transit stations as transit ridership increases over time due to increased development intensities and a broader mix of land uses.	The Project has been designed to reduce parking needs by the inclusion of commercial amenities on site, location of the Project a walkable distance to other commercial uses, location near transit and accommodation of a bus stop along Valley Boulevard, and the provision of a drop-off/pick-up area. Overall, the Project would provide 891 parking spaces via garage, standard, parallel, and accessible parking spaces. This would be reduced from the standard parking requirements, which would typically require 920 spaces for the Project. The Project has been designed to reduce the visibility of parking areas by maximizing the inclusion of parking within structures and within the interior of the site. Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 9.2	Encourage the use of innovative methods for traffic control (such as roundabouts, curb extensions, and traffic circles) that add character and create opportunity for improved aesthetics while effectively managing traffic.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 9.3	Protect residential neighborhoods from cut-through traffic and other traffic-related issues by implementing appropriate traffic calming measures.	The Project would include improvements to the surrounding roadways, including E. Valley Parkway, Valley Boulevard, and E. Grand Avenue. Due to the Project site location and design, motorists would likely travel only on these surrounding roadways and would not be incentivized to travel through the Project site or other residential communities.	Consistent
Goal 2	Adequate and sustainable infrastructure and water supply to serve a community that values and conserves water.	The Project would provide adequate and sustainable infrastructure and water supply to serve a community that values and conserves water. As discussed in Section 5.2.12, Utilities and Service Systems, the Project would be located in an urbanized area with existing water infrastructure. The Project would construction new on-site water connections to existing infrastructure, which would adequately serve Project	Consistent

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		demand. Additionally, a Water Supply Assessment and Water Verification is required for the Project because the Project is above the 500 residential unit threshold. The Water Supply Assessment is included as Appendix S to the EIR. All proposed landscaping would be drought tolerant.	
Policy 12.1	Regularly review and update a Water Master Plan that establishes service standards; defines needed improvements to systematically expand water distribution, delivery, treatment, and storage concurrent with planned growth; and incorporates best practices to sustain scarce water resources.	A Water Supply Assessment and Water Verification is required for the Project because the Project is above the 500 residential unit threshold. The Water Supply Assessment is included as Appendix S to the EIR. As indicated in the Water Supply Assessment, water demand generated by the Project site was planned for based on the Downtown Specific Plan development assumptions for the site and the Project would not increase demand beyond that already planned for.	Consistent
Policy 12.5	Require new development to provide adequate water facilities and/or finance the costs of improvements necessary to serve the demands created by the development and/or anticipated growth determined by the city, as appropriate. Establish a system for the reimbursement of construction costs for backbone water system improvements in master planned development Projects involving multiple phases and developers.	The Project would include all water improvements required to serve the Project.	Consistent
Policy 12.10	Implement federal and state water quality standards for public water infrastructure facilities and private development projects.	The Project would comply with the following water-conserving regulations: the Water Conservation Act of 2009, California Water Code, Executive Emergency Order B-29-15, Senate Bill (SB) 221, Urban Water Management Planning Act, California Water Plan, California Water Recycling Standards, California Green Building Standards Code, SB 244, and the City's Water Conservation Plan.	Consistent
Policy 12.11	Continue to implement water conservation programs, such as requirements for water efficient landscaping and enforcement of water wise regulations, and amend as appropriate to reflect evolving technologies and best practices.	The Project would incorporate water conservation techniques into building and site design incorporating such elements as water-efficient fixtures, drought-tolerant landscape, permeable hardscapes, and on-site stormwater capture and reuse facilities. New residences would be designed to minimize water usage for both interior and exterior facilities. Drought-tolerant plant materials and landscape design	Consistent

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Goal/Policy Number	Policy Text	Consistency Analysis	Consistency
Policy 12.12	Require new development to incorporate water conservation techniques into building and site design incorporating such elements as water efficient fixtures (e.g., low flow shower heads); drought-tolerant landscape, permeable hardscapes, and on-site stormwater capture and re-use facilities.	<p>concepts that minimize the use of water would also be used.</p> <p>The Project would incorporate water conservation techniques into building and site design, incorporating such elements as water-efficient fixtures, drought-tolerant landscape, permeable hardscapes, and on-site stormwater capture and reuse facilities. New residences would be designed to minimize water usage for both interior and exterior facilities. The Project would comply with the following water-conserving regulations: the Water Conservation Act of 2009, California Water Code, Executive Emergency Order B-29-15, SB 221, Urban Water Management Planning Act, California Water Plan, California Water Recycling Standards, California Green Building Standards Code, SB 244, CA Model Water Efficient Landscape Ordinance (MWEL0), and the City's Water Conservation Plan. Drought-tolerant plant materials and landscape design concepts that minimize the use of water would also be used.</p>	Consistent
Policy 12.13	Continue to use and explore opportunities to increase the use of recycled water in the City.	The Project would incorporate recycled water in landscape irrigation if determined available.	Consistent
Goal 3	Provision of adequate and sustainable wastewater infrastructure to serve residents, businesses and property.	The Project would provide adequate and sustainable wastewater infrastructure to serve residents and property. As discussed in Section 5.2.12, sewer service for the Project will be provided by the City. Wastewater generated by the Project would be treated at the Hale Avenue Resource Recovery Facility (HARRF).	Consistent.
Policy 13.1	Regularly review and update the Wastewater Master Plan to establish service standards, define needed improvements that systematically expand wastewater collection and treatment facilities concurrent with planned growth; and incorporate best practices that sustains and prevents pollution of water resources.	The HARRF is designed to treat a flow of 18 million gallons per day (mgd), and the Project's maximum contribution of wastewater flow at build-out is 0.85 gallons per day (gpd). Implementation of the Project would not require extensions or expansion of existing wastewater infrastructure systems in order to serve the Project. HARRF would have sufficient capacity to service wastewater generated by the proposed Project. In addition, the wastewater system is currently being enhanced to increase its storage and treatment capacity for recycled water.	Consistent.

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Policy 13.5	Require new development to provide adequate wastewater facilities and finance the costs of improvements necessary to serve the additional demands created by the development and /or anticipated growth determined by the city, as appropriate. Establish a system for the reimbursement of construction costs for backbone wastewater system improvements in master planned development Projects involving multiple phases and developers.	The Project would replace an existing hospital facility in an urbanized area with available infrastructure. No extensions or expansion of existing infrastructure systems would be necessary to serve the Project beyond connections to existing facilities located within roadways immediately adjacent to the Project site.	Consistent
Policy 13.7	Require any new wastewater system facilities be constructed to city standards.	New sewer infrastructure required to connect to existing infrastructure shall be constructed to City standards.	Consistent
Policy 13.9	Collect a “per-unit” wastewater connection fee for all new housing units required to be serviced by the city’s wastewater system.	The Project shall pay all required impact fees to the City.	Consistent
Goal 14	Provision of adequate and sustainable infrastructure that is environmentally sensitive to serve residents, businesses, and property.	A Drainage Study and Storm Water Quality Management Plan (SWQMP) have been prepared for the Project and are included as Appendices N and O to this EIR, respectively. These reports have been prepared in conjunction with City staff to ensure storm drainage and water quality requirements are met by the Project.	Consistent
Policy 14.3	Levy Drainage Fees for subdivided and developed land to finance drainage improvements. Periodically review and adjust for inflation, construction costs, and changes in land development intensities and timing.	The proposed drainage for the Project would maintain the existing condition drainage patterns. No extensions of expansions of existing infrastructure systems would be necessary to serve the Project beyond connections to existing facilities located within roadways immediately adjacent to the Project site. The Project would not include drainage improvements.	Consistent
Policy 14.4	Require new development to create a mechanism to finance and fund ongoing maintenance of stormwater facilities.	The Project would maintain any on-site stormwater facilities for the life of the Project. The Project does include the expansion of stormwater drainage in the public right-of-way, which would be constructed to City standards, as described in the SWQMP. Ongoing maintenance of any stormwater drainage in the public right-of-way would be the responsibility of the Project applicant or his/her successor in interest.	Consistent
Policy 14.5	Require new development to prepare drainage studies and improvement plans that demonstrate no net increase in	A Drainage Study and SWQMP have been prepared for the Project and are included as Appendices N and O to this EIR,	Consistent

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	stormwater runoff and compliance with adopted stormwater plans.	respectively. These reports have been prepared in conjunction with City staff to ensure storm drainage and water quality requirements are met by the Project. As shown in Appendix O, the Project would result in a decrease of impervious land area and would not increase runoff when compared to the existing hospital uses.	
Policy 14.6	Require new development to minimize alterations to natural landforms and the amount of impervious surfaces to minimize erosion, while encouraging implementation of low impact development measures and the maximum use of natural drainage ways, consistent with sound engineering and best management practices.	As discussed in Appendix N, the Project would maintain the existing drainage patterns of the site. As shown in Appendix O, the Project would result in a decrease of impervious land area when compared to the existing hospital uses.	Consistent
Policy 14.7	Require new development and redevelopment to minimize storm water runoff and contaminants entering drainage facilities by incorporating low impact development measures and other on-site design features such as bio-swales, retention ponds, and cisterns for storage and infiltration, treatment of flows, and appropriate best management practices (BMPs) consistent with the National [Pollutant] Discharge Elimination System (NPDES).	A Drainage Study and SWQMP have been prepared for the Project and are included as Appendices N and O to this EIR, respectively. These reports have been prepared in conjunction with City staff to ensure storm drainage and water quality requirements are met by the Project. The SQWMP has been prepared in accordance with the City of Escondido Storm Water Design Manual, and regional Municipal Separate Storm Sewer System (MS4) permit requirements for stormwater management, which include low impact development measures. Additionally, as shown in Appendix O, the Project would result in a decrease of impervious land area and increase in vegetated land area when compared to the existing hospital uses.	Consistent
Policy 14.8	Mitigate negative impacts to adjacent surrounding land uses from pertinent drainageway corridors by incorporating appropriate structural and non-structural best management practices (BMPs). BMP's may include the use of screening, landscaping, or open space setbacks.	As shown in Appendix O, the Project would result in a decrease of impervious land area and increase in vegetated land area when compared to the existing hospital uses. Non-structural BMPs include the proposed site design to increase pervious areas. Structural BMPs, such as biofiltration, would be provided by the Project.	Consistent
Policy 14.12	Design stormwater facilities to minimize the need for frequent maintenance.	A Drainage Study and SWQMP have been prepared for the Project and are included as Appendices N and O to this EIR, respectively. These reports have been prepared in conjunction with City staff to ensure storm drainage and water quality requirements are met by the Project.	Consistent

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Policy 14.13	Design and maintain detention facilities that are environmentally sustainable and compatible with surrounding uses to maximize vector control, manage flows, and maximize opportunities for conservation of water.	A Drainage Study and SWQMP have been prepared for the Project and are included as Appendices N and O to this EIR, respectively. These reports have been prepared in conjunction with City staff to ensure storm drainage and water quality requirements are met by the Project.	Consistent
Goal 5	Reduction in the generation and disposal of solid waste.	The Project would comply with all relevant regulatory framework such as the California Integrated Waste Management Act (AB 939) and the California Solid Waste Reuse and Recycling Access Act of 1991. Therefore, the Project would contribute to the reduction in generation and disposal of solid waste. Section 5.2.12 states that the Project would have a less than significant impact with regard to solid waste disposal. Solid waste disposal is available from private companies under contract with the City to provide integrated waste management services, including recycling services.	Consistent
Policy 15.2	Support efforts to maintain adequate solid waste facilities and services by working with local service providers of solid waste collection, disposal, and recycling.	The Project would result in a change in solid waste generation at the site due to the conversion of the existing hospital to residential and commercial uses. Solid waste from the area is presently taken to either the Sycamore Landfill or the Otay Mesa Landfill, where there is sufficient capacity. The Otay Mesa Landfill, located in the City of Chula Vista, has an approximate remaining capacity of 24,514,904 cubic yards and the Sycamore Landfill, located in the City of Santee, has an approximate remaining capacity of 39,608,998 cubic yards. Solid waste disposal for the Project would be provided by Escondido Disposal. Residents would be required to pay standard solid waste disposal fees for this service. Thus, adequate capacities would be maintained at these solid waste facilities.	Consistent
Policy 15.4	Continue to support the residential, commercial, industrial, and construction/ demolition recycling programs to minimize the solid waste streams to landfills.	Solid waste disposal for the Project would be provided by Escondido Disposal. Residential collection of solid waste by Escondido Disposal is transferred to the Escondido Disposal Transfer Station, where it is then taken to either the Sycamore Landfill or the Otay Mesa Landfill. Each of these facilities is regulated under federal, state, and local statutes, including Solid Waste and Recycling Policies 15.1 through 15.8 of the	Consistent

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		City's General Plan. Additionally, in compliance with AB 1826 Chesbro (Chapter 727, Statutes of 2014), organic waste generated by the Project would be diverted from landfill disposal in accordance with an organic waste recycling program.	
Policy 15.5	Encourage and consider requiring non-residential uses and businesses to participate in the city's recycling program.	The Project would incorporate waste recycling areas into the design, and all City recycling requirements would be met and/or exceeded. The project would comply with all applicable City waste and recycling regulations. In addition, organic waste would be recycled in accordance with AB 1826 Chesbro (Chapter 727, Statutes of 2014).	Consistent
Policy 15.6	Encourage, and consider requiring, recycling and reuse of construction wastes, including recycling materials generated by the demolition and remodel of buildings.	All construction wastes produced by the Project would be recycled in accordance with applicable federal, state, and local laws and policies.	Consistent
Policy 15.7	Continue to coordinate with approved services providers and businesses to recycle universal waste (electronic components, batteries, fluorescent lights, etc.) and to provide convenient collection and drop off locations in a manner that ensures safe and responsible collection, processing, and disposal.	Solid waste disposal for the Project would be provided by Escondido Disposal. Residential collection of solid waste by Escondido Disposal is transferred to the Escondido Disposal Transfer Station, where it is then taken to either the Sycamore Landfill or the Otay Mesa Landfill. Each of these facilities is regulated under federal, state, and local statutes, including Solid Waste and Recycling Policies 15.1 through 15.8 of the City's General Plan. The Project would be required to comply with applicable regulations for disposal of all different types of solid waste, including recycling of universal waste.	Consistent
Policy 15.8	Encourage and promote the use of recycled materials in residential and non-residential applications, including construction and building materials, office supplies, and equipment. Continue the city's purchase of recycled materials and supplies outlined in the Recycled Products Purchasing Policy.	As discussed in Section 5.2.12, Utilities and Service Systems, the Project would comply with all relevant regulatory framework such as the California Integrated Waste Management Act (AB 939) and the California Solid Waste Reuse and Recycling Access Act of 1991. Therefore, the Project would contribute to the reduction in generation and disposal of solid waste. Solid waste disposal is available from private companies under contract with the City to provide integrated waste management services, including recycling services.	Consistent
Policy 15.13	Continue to divert green waste from landfills and support the establishment of composting facilities that operate in a manner	Green waste is recyclable waste such as yard trimmings. The Project would incorporate waste recycling areas into the	Consistent

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	that assures safe and responsible collection, processing, and disposal practices.	design, and all City recycling requirements would be met and/or exceeded. Diversion of recyclable waste from the Project would reduce the amount of waste disposed in the Sycamore or Otay Mesa Landfills.	
Goal 16	An increased use of renewable energy sources, and improved energy conservation and efficiency.	As discussed in Section 5.2.4, Energy, the Project would result in an overall net decrease in energy use compare to the existing hospital use. Although electricity consumption would increase due to the implementation of the project, the building envelope; heating, ventilation, and air conditioning (HVAC); lighting; and other systems, such as electric motor equipment, shall be designed to maximize energy performance. The project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains voluntary energy measures that are applicable to the project under the California Green Building Standards Code. Prior to Project approval, the applicant would ensure that the Project would meet Title 24 requirements applicable at that time, as required by state regulations through their plan review process.	Consistent
Policy 16.3	Implement energy conserving land use practices that include compact development, provision of bikeways and pedestrian paths, and the incorporation of transit routes and facilities.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 16.4	Encourage site and building design that reduces exterior heat gain and heat island effects (tree planting, reflective paving materials, covered parking, cool roofs, etc.).	The Project would result in an increase in vegetated land cover when compared to the existing condition. A total of 1.6 acres of landscaping is proposed throughout the site. Streetscape trees would be incorporated along Valley Boulevard, E. Grand Avenue, and E. Valley Parkway. The Project has been designed to reduce the visibility of parking areas by maximizing the inclusion of parking within structures and within the interior of the site; therefore, covered parking would be included in the Project design. Additionally, building design shall be designed to maximize energy performance. Maximum energy-saving features and solar-energy-producing capabilities would be incorporated as required by the California Building Code and other laws and regulations.	Consistent

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Policy 16.5	Require, to the extent feasible, building orientations and landscaping that use natural lighting to reduce energy demands.	The Project design explores, to the extent feasible, building orientations and landscaping design to take advantage of natural light and reduce energy demands. The Project would comply with Title 24, Part 6, per state regulations. In accordance with Title 24 Part 6, the Project would have: <ul style="list-style-type: none"> <li>a) Sensor based lighting controls—fire fixtures located near windows, the lighting would be adjusted by taking advantage of available natural light; and</li> <li>b) Efficient process equipment—improved technology offers significant savings through more efficient processing equipment.</li> </ul>	Consistent
Policy 16.6	Evaluate and amend appropriate codes and ordinances in order to facilitate and encourage the installation of renewable energy systems and facilities (solar, wind, hydro-power, geothermal, and bio-mass), where appropriate, for all development.	The Project would encourage the installation of renewable energy systems and facilities, including solar energy, where appropriate.	Consistent
Policy 17.1	Work with service providers to ensure the access and availability of a wide range of state-of-the-art telecommunication systems and services for households, businesses, institutions, and public agencies throughout the community.	The Project site, which is a former hospital, would retain existing infrastructure. This includes water, sewer, drainage, and dry utilities that include gas, electrical, and telecommunications.	Consistent
Policy 17.5	Establish requirements for the installation of state-of-the-art internal telecommunications technologies in new large-scale planned communities, and office and commercial developments (e.g., wiring of all new housing and businesses).	Refer to Mobility and Infrastructure Policy 17.1.	Consistent
Policy 17.6	Encourage the installation of telecommunications systems (e.g., internet) in every city household to facilitate resident access to information about public services, transit, emergencies, and other information.	Refer to Mobility and Infrastructure Policy 17.1.	Consistent
<i>Housing</i>			
Goal 1	Plan for quality, managed, and sustainable growth.	Refer to Land Use and Community Form Policies 1.1 and 1.3, and the Downtown Specific Plan Strategic Goals. The Project site is located in the Historic Downtown District, as designated by the City's Downtown Specific Plan. The City's Downtown SPA would accommodate up to 5,275 dwelling units. Additionally, the Project site is zoned for a density of up to 100	Consistent

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		du/ac on the majority of the site and 75 du/ac on the westernmost portion. As discussed in Section 2.3.1, Project Components, the proposed Project would have a residential density of 37 du/ac, which complies with the City's Downtown Specific Plan and overall planned growth for the area.	
Policy 1.1	Expand the stock of all housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the city.	The Project would directly contribute to the planned expansion of the City's housing stock through redevelopment of the Hospital Campus within the Downtown SPA. The Project would introduce a new residential population within the Downtown SPA to contribute to the City's overall vision of the area.	Consistent
Policy 1.2	Pursue a balance of jobs to housing.	The Project would include 510 dwelling units and up to 10,000 square feet of commercial space by redeveloping an underutilized site in accordance with the Downtown Specific Plan vision. These uses would be compatible with the existing and planned development of the Downtown SPA and surrounding area.	Consistent
Policy 1.3	Channel residential growth to areas where the concurrent provision of services and facilities, including schools, parks, fire and police protection, and street improvements can be assured.	The Project would be an infill development constructed on previously developed land, surrounded by compatible uses that are already serviced by infrastructure, schools, improved streets, parks and public services. As such, the Project is located in an area where services and facilities can be adequately provided	Consistent
Policy 1.4	Encourage a compact, efficient urban form that conserves land and other natural and environmental resources, and that promotes transit, supports nearby commercial establishments, and takes advantage of infrastructure improvements installed to accommodate their intended intensities.	The Project would be an infill development constructed on previously developed land, surrounded by compatible uses that are already serviced by infrastructure. The Project would conserve land and other natural resources by redeveloping an underutilized site within the Downtown SPA. The intensity provided would be consistent with the General Plan Housing Element. Refer also to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Policy 1.5	Encourage creative residential development and partnerships that result in desirable amenities and contribute to infrastructure needs.	Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3. The Project would have residential uses that would be comprised of four multi-family residential unit types: senior apartments, apartments, villas,	Consistent

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		and rowhomes. The varying types of residential units in addition to the proposed infrastructure improvements, commercial spaces, and amenities would be in compliance with this policy.	
Policy 1.6	Incorporate smart growth principles in new residential subdivisions, multi-family Projects, and Mixed Use Overlay areas.	The underlying purpose of the Project is to revitalize an underutilized site in the Downtown SPA near existing and planned infrastructure, services, and jobs. The Project would not be categorized as sprawl, and would provide infrastructure only for the proposed development.	Consistent
Goal 2	Provide a range of housing opportunities for all income groups and households with special needs.	The Project would include 510 residential dwelling units, 90 of which would be senior apartments.	Consistent
Policy 2.1	Accommodate the regional share of housing for all income groups.	The Project would contribute 510 residential dwelling units to the regional housing stock and would provide a variety of multi-family housing types. The Project would have residential uses that would be composed of four multi-family residential unit types: senior apartments, apartments, villas, and rowhomes. The varying types of residential uses reflect the community's needs at different stages of life, which would be reflected in the housing prices. The proposed housing density would be consistent with the General Plan Housing Element 45 du/ac maximum allowed density for the site and inventory target of 30 du/ac.	Consistent
Policy 2.2	Increase homeownership in the city through education, availability, and affordability.	The Project would offer for-sale rowhome units. The provision of more affordable rowhome units (relative to single-family homes) would promote this goal to increase homeownership through availability and affordability.	Consistent
Goal 3	Enhance the quality of the city's housing stock and preserve the integrity of neighborhood character.	The Project would include 510 dwelling units and up to 10,000 square feet of commercial space by redeveloping an underutilized site in accordance with the Downtown Specific Plan vision. These uses would be compatible with the existing and planned development of the Downtown SPA and surrounding area.	Consistent
Policy 3.1	Maintain and enhance the existing housing stock as a source of low- and moderate-cost housing and as a conservation measure.	The Project would contribute 510 residential dwelling units to the regional housing stock. The Project would have residential uses that would be composed of four multi-family	Consistent

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		residential unit types: senior apartments, apartments, villas, and rowhomes. The varying types of residential uses reflect the community's needs at different stages of life, which would be reflected in the housing prices.	
<i>Community Health and Services</i>			
Goal 1	A healthy and livable Escondido complete with adequate and convenient access to community services and fresh food for all residents.	The Project would provide adequate and convenient access to community services and food options, specifically through providing housing within the Downtown SPA near locally serving retail, commercial uses, and other community services. The Project design also would emphasize walkability and alternative modes of transportation.	Consistent
Policy 1.11	Encourage the revitalization of existing urban areas to achieve improvements in overall public health by promoting a healthier living environment that includes walkable neighborhoods and access to recreation and open space, healthy foods, medical services, and transit.	The Project would be an infill development constructed on previously developed land, surrounded by compatible uses that are already serviced by infrastructure and surrounded by locally serving commercial uses, medical services, and other community services. The Project would conserve land and other natural resources by redeveloping an underutilized site within the Downtown SPA. Refer also to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Goal 2	A complete system of park and recreational facilities and programs to serve all users.	The Project includes recreational and open space amenities to support the proposed residential uses. The usable recreational and open space amenities include a dog park located in the eastern portion of the Project site, a gym, and a centrally located pool/spa and community pavilion. Passive open space would be provided as walkways, trails, and courtyards. Overall, the Project would meet or exceed the 300 square feet per unit minimum identified in the Downtown Specific Plan.	Consistent
Policy 2.3	Provide a minimum of 5.9 acres of developed active Neighborhood, Community, and Urban parks in addition to 5.9 acres of passive park land/open space for habitat preservation and additional recreational opportunities totaling 11.8 active and passive acres per 1,000 dwelling units. School playground areas can be included as park acreage if these facilities are approved	Refer to Community Health and Services Goal 2. The City's park system has approximately 6,600 acres of active and passive park spaces. Based on this policy, the City would have to accommodate a projected 48,510 dwelling units (approximately 48,000 total housing units, plus the proposed project's 510 dwelling units). The City's current park system	Consistent

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	by the school district(s) and open to the public as determined by the City Council.	acres fulfills this requirement. Pursuant to Article 18C, Chapter 6, of the City's Municipal Code, the City requires that all new residential developments pay a park fee to ensure that the parkland and recreational facility standards established by the City are met with respect to the additional needs of the development. The parks maintained by the City would be able to accommodate the potential population increase as a result of the Project, and any potential significant impacts would be mitigated through the payment of applicable park developer fees.	
Policy 2.4	Require new residential development to contribute fees to finance acquisition and development of park and recreational facilities in compliance with the standards stipulated by Parks and Recreation Policy 2.3. Allow credit for the on-site dedication of land or facilities to be used for public park purposes, consistent with city standards.	The Project would contribute required development impact fees for the provision and maintenance of parks and recreational facilities in the City.	Consistent
Policy 2.21	Evaluate all development proposals larger than 5 acres for appropriateness of public park land dedication.	Refer to Community Health and Services Goal 2. The City's park system has approximately 6,600 acres of active and passive park spaces. Based on this policy, the City would have to accommodate a projected 48,510 dwelling units (approximately 48,000 total housing units, plus the proposed project's 510 dwelling units). The City's current park system acreages fulfills this requirement. Therefore, no parkland dedication is required. Pursuant to Article 18C, Chapter 6, of the City's Municipal Code, the City requires that all new residential developments pay a park fee to ensure that the parkland and recreational facility standards established by the City are met with respect to the additional needs of the development. The parks maintained by the City would be able to accommodate the potential population increase as a result of the Project, and any potential significant impacts would be mitigated through the payment of applicable park developer fees.	Consistent
Policy 2.24	Consolidate new development onsite to accommodate parkland that is accessible to the public.	The Project would not include parks and open space available to the public. Pursuant to Article 18C, Chapter 6, of the City's Municipal Code, the City requires that all new	Consistent

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		residential developments pay a park fee to ensure that the parkland and recreational facility standards established by the City are met with respect to the additional needs of the development.	
Policy 2.25	Require park or recreation facilities constructed as part of a private development and intended solely for use by its residents to be considered a private park.	In addition to publicly available parks and open space, the Project would also provide private open space. Refer to Community Health and Services Goal 2.	Consistent
Policy 3.2	Provide and maintain the following library facilities and services standards, where feasible: <ul style="list-style-type: none"> <li>a) A floor area of 1.6 square feet of library facilities per dwelling unit or 0.6 square feet per capita of the City of Escondido;</li> <li>b) A ratio of three (3) public library staff per 8,000 residents or 2,300 dwelling units of the City of Escondido, including one librarian plus two paraprofessional staff within this staffing ratio;</li> <li>c) A ratio of total items in the Escondido library inventory of 2.0 items per capita of Escondido; and</li> <li>d) A ratio of one public access computer per 1,500 residents, or sufficient public access computers to meet an average wait time of no more than 15 minutes, whichever is less.</li> </ul>	As discussed in Section 5.2.10, Public Services, of the EIR, current library services and facilities do not meet the thresholds presented in Policy 3.2, even prior to the construction of the proposed Project. Library Director Dara Bradds stated that the proposed Project would not adversely impact library services and it would not warrant the construction or expansion of a library facility.	Consistent
Policy 4.1	Promote a wide range of styles, materials, and types of public art in municipal locations accessible to the public, as well as at key entrances to the city and downtown area to serve as suitable landmarks and entry features, and to reinforce municipal locations as focal points of social interaction and visual interest.	The Project would include public art within the public plaza areas located near the intersection of E. Grand Avenue and Valley Boulevard. In addition, the Project includes an architectural Tower element at the eastern corner of this intersection to serve as a visual landmark.	Consistent
Policy 4.4	Require developers to provide art pieces or pay fees that can embellish/maintain an individual project as well as contribute to the appearance and vitality of the community.	A focal point of the Project would be at the E. Grand Avenue/Valley Boulevard/Second Avenue intersection, where the proposed Tower would be located. This corner is intended to include a public plaza with art and an outdoor dining area associated with the commercial uses (refer to Figure 1-4, Elevations, and Figure 1-5, Renderings).	Consistent
Policy 5.2	Include school districts in review of residential development applications to determine if there will be changes in enrollment,	As discussed in Section 5.2.10, Public Services, relevant school districts were contacted regarding the Project and its	Consistent

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	and if these changes are consistent with districts' long-range master plans.	potential impacts. The two school districts that were contacted include Escondido Union School District (EUSD) and Escondido Union High School District (EUHSD).	
Policy 5.7	Inform school districts of growth plans and capital improvement projects when feasible to enable districts to accordingly plan for future growth.	Refer to Community Health and Services Policy 5.2.	Consistent
Goal 8	Adequate facilities and accessible services to meet the needs of older adults, disabled, and disadvantaged persons.	The Project would provide adequate facilities and accessible services to meet the needs of older adults and disabled and disadvantaged persons. All facilities within the Project will be handicap accessible and will conform to the State of California's and the City of Escondido's accessibility requirements. Additionally, a percentage of the residences will be age-targeted to seniors.	Consistent
<i>Community Protection</i>			
Policy 1.6	Require minimum road and driveway widths and clearances around structures consistent with local and State requirements to ensure emergency access.	The Project would be consistent with the minimum road and driveway widths and clearances around structures required by the City to maintain adequate emergency access.	Consistent
Policy 2.2	Provide Fire Department response times for no less than 90 percent of all emergency responses with engine companies by achieving the following service standard: <ul style="list-style-type: none"> <li>• Provide an initial response time of seven and one-half (7½) minutes for all structure fire and emergency Advanced Life Support (ALS) calls and a maximum response time of ten (10) minutes for supporting companies in urbanized areas of the city.</li> </ul>	The projected response times for the four closest fire stations are listed as follows: <ul style="list-style-type: none"> <li>• Fire Station 1: 5 minutes, 1 second</li> <li>• Fire Station 7: 5 minutes, 26 seconds</li> <li>• Fire Station 3: 5 minutes, 34 seconds</li> <li>• Fire Station 2: 5 minutes, 50 seconds</li> </ul> All of the projected response times are within the response time goal threshold. Additionally, the jurisdictional average response time for all calls is 6 minutes and 12 seconds, which is in compliance with the City's response time goals. The Project would likely result in increased emergency responses, primarily medical in nature; however, projected response times are currently well under the response time goal of seven and one-half minutes with payment of all applicable fees.	Consistent
Policy 2.4	Require new residential and non-residential development to be constructed consistent with the California Fire Code and the requirements set by the State.	The Project would be constructed in accordance with the California Fire Code.	Consistent

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Policy 2.5	Commit to the use of state-of-the-art equipment, technologies, and management techniques for fire prevention and suppression.	All new residential or nonresidential development shall pay a fee for the purpose of ensuring that the public facility standards established by the City are met with respect to the additional needs created by such development. Payment of the fee would allow public services to have higher quality equipment, technologies, and management techniques.	Consistent
Policy 2.6	Require new development to contribute fees to maintain fire protection service levels without adversely affecting service levels for existing development.	The Project would pay required development impact fees for the provision and maintenance of fire protection facilities. These fees would contribute to maintaining fire protection service levels without adversely affecting service levels for existing development.	Consistent
Policy 2.7	Continue to include the Fire Department in the review of development proposals to ensure that Projects adequately address safe design and on-site fire protection.	The Project consulted with EFD to ensure adequate design and on-site fire protection.	Consistent
Policy 2.8	Consider provisions for adequate emergency access, driveway widths, turning radii, fire hydrant locations, and Needed Fire Flow requirements in the review of all development applications to minimize fire hazards.	Existing access to the Project area for emergency service providers would be maintained during construction and operation. Also, it is important to note that emergency vehicles have the right-of-way and therefore are able to bypass traffic when driving to their destination when responding to a call for emergency services. The Project would provide adequate emergency access, driveway widths, turning radii, fire hydrant locations, and needed fire flow requirements, as required by the City.	Consistent
Policy 2.9	Require mid- and high-rise development to include sprinkler systems and on-site fire suppression equipment and materials, and be served by fire stations containing specialized equipment for fire and/or emergency incidents.	The Project would include sprinkler systems and on-site fire suppression equipment as deemed appropriate by EFD.	Consistent
Policy 2.10	Establish and maintain an adequate fire flow in relation to structure, size, design, and requirements for construction and/or built-in fire protection.	All new developments must adhere to the building standards designated in the California Health and Safety Code (Section 13000 et seq.). Additionally, the City's General Plan indicates that new developments would be required to contribute fees to maintain fire protection service levels without adversely affecting service levels for existing development. This is enforced in Article 18B of Chapter 6 of the Escondido Municipal Code, which states that all new residential or	Consistent

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		nonresidential development shall pay a fee for the purpose of ensuring that the public facility standards established by the City are met with respect to the additional needs created by such development.	
Policy 2.11	Maintain and enhance an emergency vehicle traffic signal activation system to improve fire station service area coverage in conjunction with planned improvements to the city's major circulation system.	Primary access would be provided by a newly proposed, fully signalized intersection at E. Valley Parkway/N. Hickory Street. Two minor-street-stop-controlled (MSSC) intersections would be provided at the east and west Project driveways. Access to the Project site would allow for emergency egress for residents in an emergency event as well as alternative ingress and egress for emergency responders. Emergency vehicles have the right-of-way and therefore are able to bypass traffic when driving to their destination when responding to a call for emergency services. Additionally, it should be noted that the traffic control plan required by the City for construction activities would outline all requirements to ensure that emergency access is maintained at all times and that Project construction would not impact acceptable response times.	Consistent
Policy 2.12	Maintain close coordination between planned roadway and other circulation improvements in the city to assure adequate levels of service and response times to all areas of the community.	Refer to Community Protection Policy 2.11.	Consistent
Policy 3.5	Require new development to contribute fees to maintain police facilities and equipment that meet the needs of the community.	The Project would pay required development impact fees for the provision and maintenance of police protection facilities. These fees would be contributed to maintain police facilities and equipment that meet the needs of the community.	Consistent
Policy 3.7	Require that defensible space practices that contribute to personal and property safety and crime prevention be incorporated into development projects, such as security and design features (e.g., site and building lighting, visual observation of areas, secured areas).	The Project would include security lighting in accordance with this policy.	Consistent
Goal 5	Protection of the community from excessive noise exposure.	The Project would implement <b>M-N-1</b> to ensure that the community is protected from excessive noise exposure; see Section 4.5, Noise, of the EIR for details.	Consistent
Policy 5.1	Require development to meet acceptable exterior noise level	The addition of Project traffic to the roadway network would	Consistent

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	standards as established in Figure VI-2, and use the future noise contour map (Figure VI-17) as a guide for evaluating the compatibility of new noise sensitive uses with Projected noise levels.	result in an increase in the community noise equivalent level (CNEL) of less than 3 decibels (dB), which is below the discernible level of change for the average healthy human ear. Thus, a less than significant impact is expected for Project-related off-site traffic noise increases affecting existing residences in the vicinity. The incorporation of new homes across the larger eastern portion of the Project area (i.e., east of Valley Boulevard) and the mix of commercial and senior living uses on the western portion attributed to development of the Project will add a variety of noise-producing mechanical equipment. HVAC equipment for both residential and commercial uses would not result in an exceedance of the City's noise thresholds. Therefore, once operational, the Project would not exceed the City's noise thresholds.	
Policy 5.2	Apply a CNEL of 60 dB or less for single family and 65 dB or less for multi-family as goals where outdoor use is a major consideration (back yards and single family housing developments, and recreation areas in multifamily housing developments) as discussed in Figure VI-13, and recognize that such levels may not necessarily be achievable in all residential areas.	Refer to Community Protection Policy 5.1. The Project would not result in an exceedance of exterior noise thresholds. See also Section 4.5, Noise.	Consistent
Policy 5.3	Require noise attenuation for outdoor spaces in all developments where Projected incremental exterior noise levels exceed those shown in Figure VI-14.	Refer to Community Protection Policy 5.1. The Project would not result in an exceedance of exterior noise thresholds. See also Section 4.5, Noise.	Consistent
Policy 5.4	Require noise attenuation for new noise-sensitive uses which include residential, daycare facilities, schools, churches, transient lodging, hotels, motels, hospitals, health care facilities, and libraries if the Projected interior noise standard of 45 dBA CNEL is exceeded.	The Project would require that all proposed dwelling units meet the state and City requirements of an interior noise standard of 45 A-weighted decibels (dBA) day/night average sound level ( $L_{dn}$ ) through implementation of <b>PDF-N-1</b> (see EIR Section 2.3.4).	Consistent
Policy 5.5	Require construction Projects and new development to ensure acceptable vibration levels at nearby noise-sensitive uses based on Federal Transit Administrator criteria.	As discussed in Section 4.5, Noise, the Project would not result in groundborne vibration level in exceedance of the Federal Transit Administration (FTA) and California Department of Transportation (Caltrans) guidance.	Consistent
Policy 5.6	Require the preparation of noise studies, as deemed necessary	A noise technical report was prepared for the Project by	Consistent

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	by the Planning Department, to analyze potential noise impacts associated with new development which could significantly alter existing noise levels in accordance with provisions outlined in Figure VI-14.	Dudek, which analyzes potential noise impacts associated with the Project; see Section 4.5, Noise, and Appendix I.	
Policy 5.7	Encourage use of site and building design, noise barriers, and construction methods as outlined in Figure VI-15 to minimize impacts on and from new development.	The City and the state require that interior noise levels not exceed a CNEL of 45 dBA within residences. The state Building Code recognizes this relationship and therefore requires interior noise studies when the exterior noise level is projected to exceed 60 dBA L <sub>dn</sub> . The Project will add a variety of noise-producing mechanical equipment that include those presented and discussed in the following paragraphs. Most of these noise-producing equipment or sound sources would be considered stationary, or limited in mobility to a defined area. Based on the placement of the HVAC system, impacts would be less than significant; see Section 4.5, Noise, for details. Implementation of <b>M-N-1</b> would ensure that noise impacts associated with the Project's construction would be less than significant; see Section 4.5, Noise, for details.	Consistent
Policy 5.8	Require that mixed use and multi-family residential developments demonstrate that the design of the structure will adequately isolate noise between adjacent uses (orientation, window insulation, separation of common walls, floors, and ceilings, etc.).	The Project would require that all proposed dwelling units would meet the state and City requirements of an interior noise standard of 45 dBA L <sub>dn</sub> through implementation of <b>PDF-N-1</b> (see EIR Section 2.3.4).	Consistent
Policy 5.9	Require new mixed use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noise sources away from the residential portion of the development, when physically feasible. Use construction standards to reduce noise between uses.	The Project would require that all proposed dwelling units meet the state and City requirements of an interior noise standard of 45 dBA L <sub>dn</sub> through implementation of <b>PDF-N-1</b> (see EIR Section 2.3.4). Refer to Community Protection Policy 5.1.	Consistent
Policy 5.10	Require development Projects that are subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.	Implementation of <b>M-N-1</b> would ensure that noise impacts associated with the Project's construction would be less than significant; see Section 4.5, Noise, for details.	Consistent
Policy 5.12	Limit "through truck traffic" to designated routes to minimize noise impacts to residential neighborhoods and other noise-sensitive uses (see Mobility and Infrastructure Element).	The Project would follow all appropriate and relevant laws, regulations, and policies enforced by the City, including hours of operation for parks and active recreation uses.	Consistent
Policy 5.13	Limit the hours of operation for parks and active recreation uses	The Project would follow all appropriate and relevant laws,	Consistent

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	in residential areas to minimize disturbance to residents.	regulations, and policies enforced by the City, including hours of operation for parks and active recreation uses.	
Policy 6.7	Require new development located in identified dam inundation areas to be designed to minimize potential flood damage from dam failure.	The Project site is not located in a dam inundation area. The Project site is located approximately 14 miles inland from the Pacific Ocean and would not be subject to inundation by tsunamis. Given that the Project site is not located near a large standing body of water (the nearest is Dixon Lake, approximately 3 miles northeast of the Project site), the risk of inundation by seiche (or standing wave) is considered negligible.	Consistent
Goal 7	Minimization of adverse effects to residents, property, and critical facilities caused by geologic and seismic hazards.	The Project would minimize adverse effects to residents, property, and critical facilities caused by geologic and seismic hazards. A geotechnical report was prepared for the Project, and no significant impacts were identified, with incorporation of <b>PDF-GE-1</b> (see EIR Section 2.3.4).	Consistent
Policy 7.1	Regularly review, adopt, and enforce seismic and geologic safety standards, including the Uniform Building Code, in site design and building construction methods to protect public health and safety.	The Project would be constructed in compliance with all Universal Building Code and California Building Code regulations and standards.	Consistent
Policy 7.4	Approve new development in areas identified with geologic or seismic hazards only after completion of a city-approved geotechnical report with appropriate mitigation of such hazards.	A geotechnical report has been prepared for the Project, and no significant impacts were identified, with incorporation of <b>PDF-GE-1</b> (see EIR Section 2.3.4).	Consistent
Policy 7.5	Avoid developing in areas that are susceptible to erosion and sediment loss. Where avoidance is not feasible, require the restoration of natural patterns of surface water runoff after grading to minimize erosion.	The Project would avoid development in areas that are susceptible to erosion and sediment loss; where avoidance is not feasible, the Project would require the restoration of natural patterns of surface water runoff after grading to minimize erosion.	Consistent
Policy 7.6	Encourage the upgrade, retrofitting, and/or relocation of existing critical facilities (hospitals, fire stations, police stations, etc.) that do not meet current building code standards and are within susceptible to seismic or geologic hazards.	The Project involves the closure of the remainder of the hospital uses on site. The majority of the hospital uses were already relocated to the Palomar Medical Center Escondido facility, as discussed in Section 3.1.2, Site Background. The closure of the remaining hospital uses would be consistent with this policy, considering the hospital structure does not currently meet hospital seismic and safety requirements.	Consistent
Goal 8	A safe and healthy community and environment that is protected	Project construction could result in the release of hazardous	Consistent

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	<p>from the use, storage and transport of hazardous materials.</p>	<p>materials from known and unknown underground storage tanks (USTs) and the presence of asbestos-containing materials and lead-based paint in the existing structures. <b>M-HZ-1</b> and <b>M-HZ-2</b> would reduce impacts to a level below significance (see EIR Section 4.5, Hazards and Hazardous Materials).</p> <p>Although the Project would introduce dwelling units and commercial uses, resulting in an increased use of commercially available potentially hazardous materials, the use of these substances is subject to relevant federal, state, and local health and safety laws that are intended to minimize health risk to the public associated with hazardous materials.</p>	
<p>Policy 8.2</p>	<p>Coordinate with relevant agencies to enforce applicable laws regulating the handling, use, production, storage, disposal, and transportation of hazardous materials, and notify the appropriate city, county, state, and federal agency in the event of a violation.</p>	<p>Construction, demolition, and operation of the Project would adhere to all applicable local standards set forth by the City, as well as state and federal health and safety requirements that are intended to minimize hazardous materials risk to the public, such as California Occupational Safety and Health Administration (Cal/OSHA) requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention (CalARP) Program, and the California Health and Safety Code. Refer also to Community Protection Goal 8. Hazardous materials associated with the residential dwellings, associated landscape, and facility maintenance would be limited to private use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Although the Project would introduce dwelling units to the site, resulting in an increased use of commercially available potentially hazardous materials, the use of these substances is subject to all applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials. The on-site cafés and restaurant would potentially use commercially available cleaning products, oil and grease, and other regulated materials commonly used in food service operations. To ensure compatibility of commercial operations</p>	<p>Consistent</p>

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		with residential uses, the Project would comply with all necessary commercial and residential standards and regulations defined by OSHA and the San Diego County Department of Environmental Health, which would guide the use of these materials so that a significant hazard to the public or the environment would not occur.	
Policy 8.3	Maintain regulations requiring proper handling, storage and disposal of hazardous materials to prevent leakage, potential explosion, fire, or the escape of harmful gases, and to prevent individually innocuous materials from combining to form hazardous substances.	Construction, demolition, and operation of the Project would adhere to all applicable local standards set forth by the City, as well as state and federal health and safety requirements that are intended to minimize hazardous materials risk to the public, such as Cal/OSHA requirements, the Hazardous Waste Control Act, the CalARP Program, and the California Health and Safety Code. Refer also to Community Protection Goal 8.	Consistent
Policy 8.4	Encourage businesses and residents to utilize practices and technologies that will reduce the use of hazardous materials and generation of hazardous wastes.	Hazardous materials would be limited to private and commercial use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. The use of these substances is subject to all applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.	Consistent
Policy 8.6	Cooperate with appropriate regional, state and federal agencies to mitigate impacts associated with hazardous contaminants discovered in the groundwater.	Due to the potential for soil and groundwater as a part of improper disposal of hazardous substances and petroleum products at the service station, the historical use of that portion of the Project site as a service station constitutes a recognized environmental condition (REC). However, Phase 2 soil surveying at the Project site identified no presence of soil contamination; therefore, the historical use of the Project site as a service station would not pose a significant threat to the public or the environment. Records from the Phase 1 Environmental Site Assessment (ESA) site visit indicate the presence of at least one former UST on the property, including one known 6,000-gallon UST that was abandoned in place. These former UST sites are considered to be a REC in connection with the property due to the potential that	Consistent

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		residual petroleum impacts to the subsurface may be discovered upon redevelopment of the site. Implementation of <b>M-HZ-1</b> would ensure that no USTs, underground utilities, water vaults, manholes, or storm drain valves would affect the Project site during construction by further assessing the site for their presence prior to ground-breaking activities. See EIR Section 4.3 for additional details.	
Policy 8.7	Maintain the City's Fire Department's programs to safely and effectively respond to hazardous materials incidents and releases.	The Project would be required to pay a development impact fee per dwelling unit, which would ensure that fire response times are adequately met throughout the City.	Consistent
Policy 8.10	Require proponents of projects in known contamination areas to perform comprehensive soil and groundwater contamination assessments, in accordance with applicable regulations. If contamination exceeds regulatory levels, require the proponent to undertake remediation procedures consistent with county, regional, and state regulations prior to grading and development of the site.	A Phase 1 ESA and a Phase 2 ESA were conducted to assess the potential hazards and hazardous materials on the site. This is inclusive of soil and groundwater contamination assessments measured against county, regional, and state regulations.	Consistent
Policy 8.11	Maintain strict land use controls, performance standards, and structure design standards for uses that generate, use, or store hazardous materials, including setbacks from sensitive uses (schools, residential homes, daycare facilities, etc.) to protect [the] health and safety of the community in concert with regional, state and federal requirements for existing and proposed uses.	Once the Project is operational, hazardous materials would be limited to private use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. The use of these substances is subject to all applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.	Consistent
<i>Resource Conservation</i>			
Goal 1	Preservation and enhancement of Escondido's open spaces and significant biological resources as components of a sustainable community.	The Project site is currently fully developed as the Hospital Campus. No sensitive or significant biological resources or open space exist on site.	Consistent
Policy 1.7	Require that a qualified professional conduct a survey for proposed development Projects located in areas potentially containing significant biological resources to determine their presence and significance. This shall address any flora or fauna of rare and/or endangered status, declining species, species and habitat types of unique or limited distribution, and/or visually prominent vegetation.	A Biological Site Assessment (Appendix B to this EIR) was conducted by a qualified professional for the Project. The report addressed any flora or fauna of rare and/or endangered status, declining species, species and habitat types of unique or limited distribution, and/or visually prominent vegetation.	Consistent

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Policy 1.8	Require that proposed development projects implement appropriate measures to minimize potential adverse impacts on sensitive habitat areas, such as buffering and setbacks. In the event that significant biological resources are adversely affected, consult with appropriate state and federal agencies to determine adequate mitigation or replacement of the resource.	The Project site is defined as urban and characterized by disturbed and developed land associated with the former Palomar Health Downtown Campus. Any native, naturalized, or riparian habitat is largely absent from the site and surrounding areas. Therefore, no sensitive habitat areas would be impacted as a result of the Project. Suitable nesting bird habitat would be potentially impacted as a result of the Project; therefore, appropriate mitigation measures for nesting bird and raptor avoidance would be implemented.	Consistent
Policy 1.9	Encourage proposed development Projects to minimize the removal of significant stands of trees unless needed to protect public safety and to limit tree removal to the minimum amount necessary to assure continuity and functionality of building spaces.	Per <b>CM-BI-1</b> (see EIR Section 2.3.4), the Project applicant shall replace impacted mature trees at a minimum 1:1 ratio, unless otherwise determined by the City.	Consistent
Policy 1.12	Promote the use of native plants for public and private landscaping purposes within the city.	The Project promotes the use of native plants for public and private landscaping. In particular, the Project would use drought-tolerant, native landscaping.	Consistent
Goal 2	A network of trails that connect the community and provide opportunities for recreation and alternative transportation use.	The Project would incorporate pedestrian improvements within and surrounding the Project site.	Consistent
Policy 2.4	Establish a continuous network of landscaped pedestrian and bicycle paths within urbanized areas that provides internal circulation and links Escondido's districts and neighborhoods.	The Project would incorporate pedestrian improvements within and surrounding the Project site. Refer to Mobility and Infrastructure Goal 1 and Land Use and Community Form Policy 1.3.	Consistent
Goal 3	Preservation of significant visual resources such as ridgelines, hillsides, and viewsheds that serve as a scenic amenity and contribute to the quality of life for residents.	The Project site is located on a small hill, which is characteristic of much of the surrounding topography. While the current Hospital Campus includes the nine-story McLeod Tower, the proposed structures would range from one to five stories, with heights ranging from 35 feet to 75 feet. The lower profile of the Project would be more consistent with the height and scale of surrounding developments. Considering the Project would be at a reduced elevation relative to the existing McLeod Tower, the Project would not substantially interrupt or obstruct available views from any scenic vistas. No designated scenic vistas would be impacted by the Project.	Consistent

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Policy 3.1	Preserve significant visual resources that include unique landforms (e.g., skyline ridges, intermediate ridges, hilltops, and rock outcrop-pings), creeks, lakes, and open space areas in a natural state, to the extent possible.	The Project would not directly or indirectly impact significant visual resources. Refer to Section 5.2.1, Aesthetics.	Consistent
Policy 3.2	Require new development to avoid obstructing views of, and to minimize impacts to, significant visual resources through the following: creative site planning; integration of natural features into the Project; appropriate scale, materials, and design to complement the surrounding natural landscape; clustering of development to preserve open space vistas and natural features; minimal disturbance of topography; and creation of contiguous open space networks	Refer to Resource Conservation Goal 3.	Consistent
Policy 3.3	Maintain density and development standards designed to protect significant visual resources such as existing terrain, steep slopes, floodways, habitat areas, and ridgelines, and to minimize visual impacts of grading and structures.	The Project would be designed to be similarly scaled as the residential development in the area. Refer to Resource Conservation Goal 3.	Consistent
Policy 3.5	Regulate development on intermediate ridges, hilltops, and hillsides to preserve the natural appearance and landform, and minimize impacts on terrain with a slope greater than 15 percent subject to the following requirements: <ol style="list-style-type: none"> <li>1 Intermediate Ridges and Hilltops <ol style="list-style-type: none"> <li>a) Prepare landscaping plans that minimize the visual impact of the development from adjoining properties and the valley floor;</li> <li>b) Concentrate development in subordinate or hidden locations, which shall not Project above the natural landform;</li> <li>c) Prepare grading plans that minimize disruption of the natural landform and vegetation; and</li> <li>d) Allow development on intermediate ridges only in association with the preservation of significant open space, habitat, cultural resources or agricultural uses within the same Project.</li> </ol> </li> <li>2 Slopes Greater than 15 Percent <ol style="list-style-type: none"> <li>a) Locate development to avoid potentially hazardous areas and environmentally sensitive areas, as well as</li> </ol> </li> </ol>	The Project would not be constructed on ridges, hilltops, or hillsides. Additionally, the Project site has been previously developed.	Consistent

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	<p>to avoid dislocation of any unusual rock formations or any other unique or unusual geographic features.</p> <p>b) Design development to minimize grading requirements by incorporating terracing, padding, and cut-and-fill grading that conforms to the natural contours of the site and protects the visual continuity of the hillsides.</p> <p>c) Cluster the overall development pattern in accordance with General Plan provisions to preserve the maximum amount of open spaces and natural setting and to reduce grading, erosion, and runoff potential.</p> <p>d) Landscape the site with existing trees and other natural vegetation, as much as possible, to stabilize slopes, reduce erosion, and enhance the visual appearance of the development.</p> <p>e) Minimize the visual impact of development on adjoining residential areas to the extent feasible.</p>		
Goal 5	Preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido.	<p>No significant archaeological resources have been identified within the Project site. The Project would implement mitigation to reduce impacts from potential encounters with previously unknown or unanticipated archaeological resources. The Project site is entirely developed, so the likelihood of encountering subsurface paleontological resources is greatest on sites that have been minimally excavated in the past. Due to the depth of the excavation during grading activities and previous known development of the Hospital Campus, it is unlikely that the presence of paleontological resources would occur.</p> <p>Refer to Section 4.2, Cultural Resources, for a complete discussion regarding potential impacts to historic structures. The 451–453 E. Valley Parkway, 555 E. Valley Parkway, 624 E. Grand Avenue, and 640–660 E. Grand Avenue buildings are not considered eligible historical resources pursuant to CEQA Guidelines Section 15064.5, and impacts to these structures would be less than significant.</p>	Consistent

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		<p>The 121–141 N. Fig Street building was designed by Russell Forester, a recognized architect, in the International style and it has not been modified since its completion in 1965. The building is characterized as a good representation of the International style designed by a recognized architect. Therefore, the 121–141 N. Fig Street building is eligible for listing on the California Register of Historical Resources (CRHR) under Criterion 3 and the City of Escondido Register under City of Escondido Criteria 2 and 5. Because the Project would require demolition of this structure as part of Project implementation, impacts are considered potentially significant (<b>Impact CR-1</b>). The impacts would be reduced to a level below significance by <b>M-CR-1</b> (requiring relocation of the 121-141 N. Fig Street building), <b>M-CR-2</b> (requiring preparation of Historic American Buildings Survey (HABS) standards as detailed by the National Park Service Heritage Documentation Programs), <b>M-CR-3</b> (requiring partial retention, salvage, and reuse of architectural features of the building onsite, or for the donation or sale of unused architectural features to museums), <b>M-CR-4</b> (requiring an architectural monitor of demolition and construction activity to ensure proper measures are taken to preserve and salvage any identified historic architectural features or fabric), or <b>M-CR-5</b> (implementation of an onsite interpretive program comprised of a public art piece and/or display designed to inform the public of the site’s history).</p>	
Policy 5.2	Preserve significant cultural and paleontological resources listed on the national, State, or local registers through: maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process.	Refer to Resource Conservation Goal 5.	Consistent
Policy 5.3	Consult with appropriate organizations and individuals (e.g., South Coastal Information Center of the California Historical Resources Information System, Native American Heritage Commission, Native American groups and individuals, and San Diego Natural History Museum) early in the development process	The Project applicant has consulted South Coastal Information Center (SCIC) staff and conducted a records search of the proposed development, including a 1-mile-radius buffer. As part of the process of identifying cultural resources within or near the Project site, Dudek contacted the	Consistent

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	to minimize potential impacts to cultural and paleontological resources.	<p>Native American Heritage Commission (NAHC) to request a review of the Sacred Lands Files. The Project requires tribal consultation pursuant to AB 52 as well as SB 18. The City provided AB 52 consultation notification to Rincon Band of Luiseño Indians, San Luis Rey Band of Mission Indians, Mesa Grande Band of Mission Indians, and Soboba Band of Luiseño Indians on August 2, 2019. The City received one request for consultation pursuant to AB 52. The request was formally made by the Rincon Band of Luiseño Indians and the City responded to the Tribe's request for consultation under AB 52.</p> <p>On August 2, 2019, the City provided SB 18 consultation notification to 25 tribes identified by the NAHC as having traditional lands or cultural places within the project boundary. The Agua Caliente Band of Cahuilla Indians submitted a letter in response to the SB 18 notification letter and indicated that the Project site is not located within the Tribe's Traditional Use Area. Therefore, they deferred to the other Tribes in the area. AB 52 consultation between the City and the Rincon Band of Luiseño Indians concluded on November 8, 2019. During the Draft EIR Public Review, it is noted that comments were provided by the Rincon Band of Luiseño Indians as well as the San Luis Rey Band of Mission Indians. Refer to the Final EIR Chapter 11, letters T1 and T2 for additional details.</p>	
Policy 5.4	Recognize the sensitivity of locally significant cultural resources and the need for more detailed assessments through the environmental review process.	The potential for cultural resources to be present in the Project vicinity was determined based on available reports and site-specific studies. Information provided in this section was incorporated from the following source: Negative Cultural Resources Letter Report for the Palomar Heights Project Cultural Resources Inventory, prepared by Dudek. The results of the analysis are included in this section, and a copy of the report is included as Appendix C of this EIR. No cultural resources have been identified within the Project site, nor have any been documented in previous studies. The potential for intact, unknown, subsurface prehistoric archaeological	Consistent

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		<p>materials to be present in the Project site is considered moderate. In the event that any previously undetected cultural resources are encountered, impacts to archaeological resources would be potentially significant (<b>Impact CR-1</b>). As indicated in Section 4.7.1, the City has received one request for consultation under AB 52 by the Rincon Band of Luiseño Indians. The Rincon Band of Luiseño Indians have identified a Luiseño Traditional Cultural Place (TCP), <i>Chaymay</i>, within 1 mile of the Project. Considering the site is already developed, along with the surrounding area, the Project is not anticipated to affect this TCP. As indicated in Section 4.7.1, there is a moderate potential for unknown subsurface tribal cultural resources to be present on site. Proposed grading activities have potential to result in potentially significant impacts (<b>Impact TC-1</b>) to unknown subsurface tribal cultural resources. Implementation of <b>M-CR-6</b> through <b>M-CR-15</b> would reduce impacts to less than significant. A historical study and associated addendum were also completed by Brian F. Smith Associates, and are included as Appendices D and D.1 to the Final EIR. As discussed under Goal 5, these reports identified mitigation that includes HABS documentation, and either relocation or salvage and an interpretive program. . Refer to Section 2.4, Cultural Resources, for additional details.</p>	
Policy 5.5	Preserve historic buildings, landscapes, and districts with special and recognized historic or architectural value in their original locations through preservation, rehabilitation (including adaptive reuse), and restoration where the use is compatible with the surrounding area.	Refer to Resource Conservation Goal 5.	Consistent
Policy 5.6	Review proposed new development and/or remodels for compatibility with the surrounding historic context.	Refer to Goal 5 and associated policies.	Consistent
Policy 5.7	Comply with appropriate local, State, or federal regulations governing historical resources.	As discussed in Section 4.2, Cultural Resources, the Project would be constructed and operated in compliance with all appropriate federal, state, or local regulations governing historical resources.	Consistent

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Goal 6	Preservation and protection of the City's surface water and groundwater quality and resources.	<p>The Project would preserve and protect the City's surface water and groundwater quality and resources. New residences will be designed to minimize water usage for both interior and exterior facilities. Drought-tolerant plant materials and landscape design concepts that minimize the use of water will also be used.</p> <p>The proposed on-site drainage would maintain the existing condition drainage patterns onto E. Valley Parkway and N. Fig Street. As described in the SWQMP prepared for the Project (Appendix O), 12 drainage management areas (DMAs) are proposed within the Project site. Flow generated by each of the DMAs on site would reach 1 of the 12 proprietary BMP biofiltration treatment areas prior to entering the on-site storm drain network. Under the NPDES permit program, BMPs are mandated for construction sites greater than 1 acre, through preparation of stormwater pollution prevention plans (SWPPPs) to reduce the occurrence of pollutants in surface water. SWPPPs are submitted to the Regional Water Quality Control Board prior to ground-disturbing activities and set forth the measures that would be employed during construction to avoid runoff into surface waters. A SWPPP is required for the Project. Both construction and operational BMPs for the Project will be outlined in the SWPPP being prepared for the Project.</p> <p>Typically, BMPs include street sweeping, waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, and proper handling and storage of hazardous materials. Typical erosion and sediment control BMPs include silt fences, fiber rolls, gravel bags, temporary desilting basins, velocity check dams, temporary ditches or swales, stormwater inlet protection, and soil stabilization measures. Implementation of these state-mandated measures would ensure that Project construction and operation would not violate any water quality standards or waste discharge requirements and would not further contribute to water quality impacts identified in the</p>	Consistent

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		Clean Water Act Section 303(d) List of Water Quality Limited Segments.	
Policy 6.3	Protect the sustainability of groundwater resources.	The Project would protect the sustainability of groundwater resources. New residences will be designed to minimize water usage for both interior and exterior facilities. Drought-tolerant plant materials and landscape design concepts that minimize the use of water will also be used.	Consistent
Policy 6.12	Regulate construction and operational activities through the use of stormwater protection measures in accordance with the City's National [Pollutant] Discharge Elimination System (NPDES) permit.	Runoff at construction sites in the City is subject to the State Water Resources Control Board, Division of Water Quality, NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2010-0014-DWQ, NPDES No. CAS000002. Under the NPDES permit program, BMPs are mandated for construction sites greater than 1 acre to reduce the occurrence of pollutants in surface water. Project temporary construction BMPs could include the following: street sweeping, waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, and proper handling and storage of hazardous materials. Typical erosion and sediment control BMPs include silt fences, fiber rolls, gravel bags, temporary desilting basins, velocity check dams, temporary ditches or swales, stormwater inlet protection, and soil stabilization measures. Refer to Appendix O of the EIR, the SWQMP, which was prepared in accordance with the applicable stormwater management regulations.	Consistent
Policy 6.14	Require new development to protect the quality of water resources and natural drainage systems through site design and use of source controls, stormwater treatment, runoff reduction measures, best management practices, and Low Impact Development measures.	Refer to Community Protection Policy 6.12.	Consistent
Goal 7	Improved air quality in the city and the region to maintain the community's health and reduce greenhouse gas emissions that contribute to climate change.	The Project would result in less than significant impacts relative to air quality during operation and GHG emissions. The Project would result in a net decrease in GHG emissions when compared to the existing hospital uses.	Consistent

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Policy 7.2	<p>Reduce regional greenhouse gas emissions through the following measures including, but not limited to:</p> <ul style="list-style-type: none"> <li>a) Implementing land use patterns that reduce automobile dependence (compact, mixed-use, pedestrian, and transit-oriented development, etc.);</li> <li>b) Reducing the number of vehicular miles traveled through implementation of Transportation Demand Management programs, jobs-housing balance, and similar techniques;</li> <li>c) Supporting public transportation improvements;</li> <li>d) Encouraging the use of alternative modes of transportation by expanding public transit, bicycle, and pedestrian networks and facilities;</li> <li>e) Participating in the development of park-and-ride facilities;</li> <li>f) Maintaining and updating the city's traffic signal synchronization plan;</li> <li>g) Promoting local agriculture;</li> <li>h) Promoting the use of drought-tolerant landscaping; and</li> <li>i) Encouraging the use of non-polluting alternative energy systems.</li> </ul>	<p>The Project would result in a net decrease in GHG emissions when compared to the existing hospital uses. Refer to Section 5.2.6, Greenhouse Gas Emissions. Specifically:</p> <ul style="list-style-type: none"> <li>a) The Project would result in the redevelopment of an underutilized site within the Downtown SPA. The proposed development would include pedestrian-oriented structures and improvements to increase alternative forms of transportation such as transit, walkability, and bicycle uses.</li> <li>b) The Project would provide a public transit bus turn-out, a bike lane, a ride-share area, and improved pedestrian circulation to support alternative modes of transportation, within an urban infill site.</li> <li>c) See item b.</li> <li>d) See item b.</li> <li>e) The Project does not include park-and-ride facilities.</li> <li>f) The Project would provide necessary improvements to the surrounding roadway network, including the installation of traffic signals per <b>CM-TR-1</b> and <b>CM-TR-2</b> (see EIR Section 2.3.4).</li> <li>g) The Project does not include or would not impact local agriculture.</li> <li>h) All proposed landscaping would be drought tolerant (Figure 2-6, Landscape Plan).</li> <li>i) Title 24, Part 11, contains voluntary and mandatory energy measures that are applicable to the Project under the California Green Building Standards Code. As discussed under the previous threshold, the Project would result in an increased demand for electricity, natural gas, and petroleum.</li> </ul>	Consistent
Policy 7.3	<p>Require that new development Projects incorporate feasible measures that reduce construction and operational emissions.</p>	<p>The amortized construction GHG emissions over the lifetime of the Project (30 years) would be approximately 186 metric tons carbon dioxide equivalent (MT CO<sub>2</sub>e) per year. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in conjunction with the</p>	Consistent

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		operational emissions. The Project would result in a net decrease in GHG emissions when compared to the existing hospital uses. Refer to Section 5.2.6, Greenhouse Gas Emissions.	
<i>Growth Management</i>			
Goal 1	Quality, managed, and sustainable growth that maintains and provides adequate public facilities for existing and future development.	Refer to Housing Goal 1 and Housing Policy 1.3.	Consistent
Policy 1.1	Use the General Plan quality of life thresholds (or refinements adopted by subsequent master plans, as appropriate) as the standard to assess the impact of new facility and service demands created by growth, and apply those standards, as appropriate when considering discretionary projects.	Quality of Life Standards were reviewed for consistency. Refer to Quality of Life Standards Standard 1 to 11.	Consistent
<i>Economic Prosperity</i>			
Policy 2.3	Provide opportunities for a balance of local job and housing opportunities offering a diverse supply of housing types at prices and rents correlated with the wage levels of local jobs.	Refer to Mobility and Infrastructure Goal 1 and Housing Policy 2.1. The Project would also construct approximately 10,000 square feet of commercial space. This project feature, in addition to the proposed infrastructure improvements, would increase opportunities by enhancing accessibility to local jobs.	Consistent
Policy 6.1	Revitalize the Downtown, East Valley Parkway, Center City Parkway, and Escondido Boulevard commercial areas by upgrading their appearance and achieving a coordinated land use pattern that includes retail, office, visitor serving, and residential development of appropriate density and intensity.	Refer to Land Use and Community Form Element Policy 1.1 and 1.3. The Project would also construct approximately 10,000 of commercial space, which would include potential retail and office space.	Consistent.

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<i>Escondido Downtown Specific Plan</i>			
<i>Downtown Specific Plan Strategic Goals</i>			
Goal 1	An economically viable Downtown with an appropriate mix of retail, office, residential, entertainment and cultural uses.	<p>The underlying purpose of the Project is to revitalize an underutilized downtown site in accordance with the Downtown Specific Plan vision. The Project would provide residential dwelling units consistent with the Downtown Specific Plan within the Historic Downtown District that would support the long-term planning of the Downtown SPA. The Project's overall density would be approximately 37 du/ac, consistent with the Downtown Specific Plan.</p> <p>The Project would promote multi-modal transportation use and provide enhanced pedestrian/bicycle connections to the surrounding area, including the existing and planned locally serving retail, restaurant, bars, and other commercial land uses.</p> <p>The proposed ground-floor commercial uses would be located along Grand Avenue on the southwestern corners of the Project site at the intersection of Valley Boulevard and Grand Avenue. These commercial uses would be located nearest the Retail Core Area of the Downtown SPA along Grand Avenue to the west of the Project site (refer to Figure II-1 of the Downtown Specific Plan).</p> <p>The Project, through provision of housing and commercial uses as envisioned by the Downtown Specific Plan, and proposed circulation improvements would promote the viability of the Downtown SPA.</p>	Consistent
Goal 2	A local and regional destination for specialty shopping, dining, nightlife, employment, culture, and the arts.	Refer to Downtown Specific Plan Strategic Goal 1. The Project would promote an economically viable Downtown by introducing residents within walking distance to current and future shopping, employment, entertainment, and other uses within the Downtown SPA. The introduction of these residents and pedestrian improvements would support the Downtown SPA as a local destination for these uses.	Consistent
Goal 3	A vibrant and exciting environment with land uses that foster an "18-hour" atmosphere, in addition to areas that provide mixed	Refer to Downtown Specific Plan Strategic Goal 1. The introduction of these residents and pedestrian improvements	Consistent

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	use, office employment and high-density residential opportunities.	would support the Downtown SPA's current and future commercial uses. The Project is a higher-density mixed-use development that would add to, and support, the City's vision for the Downtown SPA.	
Goal 4	Development and signage that strengthen the character of Downtown and are architecturally compatible with the existing urban fabric.	The Project would have a unified modern architectural style, with a subset of styles for each area of the site. The proposed structures would range from one to five stories, with heights ranging from 36 feet to 75 feet. Proposed residential and commercial development within the Project incorporates a design that reflects the requirements of the Downtown Specific Plan, which includes step-back building facades for upper floors, variation of roofline heights, and articulation of facades to create a pedestrian and street orientation. Surface parking would be located on the interior of the site behind buildings so those areas would not be visible from the street. A focal point of the Project would be at the E. Grand Avenue/Valley Boulevard/ Second Avenue intersection, where the proposed Tower would be located. This corner is intended to include a public plaza with art and outdoor dining area associated with the commercial uses (refer to Figure 2-4, Elevations, and Figure 2-5, Renderings in Chapter 1, Project Description). The Project's compliance with the design and development guidelines of the Downtown Specific Plan would ensure its design compatibility with the long-term buildout of the Downtown SPA as envisioned by the City, which emphasizes a human-scale mix of retail, office, entertainment to support an economically viable Downtown.	Consistent
Goal 5	Street-level and human-scale design elements in new and remodeled developments that improve pedestrian orientation.	The Project would create human-scale, pedestrian-oriented buildings and landscape design to promote pedestrian use of the local sidewalks and pedestrian site access. This includes high-profile and vertical design features, architecturally distinguishing the ground-floor facade, providing landscaping along pedestrian areas, and enhanced commercial building corners with special architectural treatments. The Project would promote multi-modal transportation use of Valley Boulevard via methods such as reducing the roadway	Consistent

## APPENDIX H

### City of Escondido General Plan Policy Consistency Analysis Table

Goal/Policy Number	Policy Text	Consistency Analysis	Consistency
		crossing distance for pedestrians, providing a public transit bus-turn out, and providing a bike lane and a ride-share pick-up/drop-off area.	
Goal 6	Preserved historically significant sites and structures that enhance the character of Downtown.	Refer to General Plan Conservation Element Goal 5 and associated policies above, as well as Section 4.2, Cultural Resources. The 121–141 N. Fig Street building is eligible for designation on the CRHR under Criterion 3 as well as City of Escondido Register under City of Escondido Criteria 2 and 5, and is considered a historically significant structure. However, this structure is not considered to enhance the character of Downtown. The structure is located on the very eastern side of the Downtown area away from other commercial uses, and is not a key focal point in the visual quality or character of the area. Thus, the proposed removal of this structure would not conflict with this goal.	Consistent
Goal 7	Pedestrian-oriented, ground-floor, specialty retail and restaurant uses on Grand Avenue that reinforce and expand its unique character.	The proposed ground-floor commercial uses (approximately 10,000 square feet) would be located along E. Grand Avenue on the southwestern corners of the Project site at the intersection of Valley Boulevard and Grand Avenue. These commercial uses would be located nearest the Retail Core Area of the Downtown SPA along Grand Avenue to the west of the Project site (refer to Figure II-1 of the Downtown Specific Plan).	Consistent
Goal 8	Higher residential densities in key locations that support Downtown non-residential uses.	Refer to Downtown Specific Plan Strategic Goal 1. The Project’s compliance with the design guidelines and other provisions of the Downtown Specific Plan ensure that the Project would be compatible with adjacent off-site land uses and those land uses proposed within the Project site. Beyond the Downtown SPA, land use designations in the immediately surrounding commercial areas include Urban II and Urban III, which allow for densities up to 12 and 18 du/ac, respectively. These adjacent land use designations allow residential development that is less dense than the proposed 37 du/ac. The proposed density within the Project site would allow for a transition from the allowable higher residential densities of the	Consistent

## APPENDIX H

### City of Escondido General Plan Policy Consistency Analysis Table

Goal/Policy Number	Policy Text	Consistency Analysis	Consistency
		Downtown SPA to the west, to the lower-density residential and commercial uses just beyond the Downtown SPA boundary to the north, east, and south. Therefore, while the Project site has a much higher allowable density, the proposed density would be more compatible with the surrounding residential land uses while still achieving consistency with the Downtown Specific Plan.	
Goal 9	A pedestrian environment that provides connections, convenient access and opportunities for alternative modes of transportation.	Refer to Downtown Specific Plan Strategic Goal 1.	Consistent
Goal 10	Embellished landscaping, public art, comfortable street furniture and décor that improves walkability and pedestrian connections.	Landscaping is proposed throughout the site. Streetscape trees would be incorporated along Valley Boulevard, E. Grand Avenue, and E. Valley Parkway. Defining landscaping at the corner of N. Hickory Street/E. Valley Parkway/Valley Boulevard would demarcate the area as the main Project entrance, and a variety of trees, shrubs, and groundcover would be appropriately incorporated throughout the interior of the site. All proposed landscaping would be drought tolerant.	Consistent
Goal 11	Maximized parking opportunities.	Parking would be provided throughout the site. Parking for senior units would be provided within the first floor of the building, and would be provided at a rate of 0.75 spaces per one-bedroom senior unit and 1.5 spaces per two-bedroom senior unit. Parking for the proposed multi-family units would include 1.5 spaces per one-bedroom unit, 1.75 spaces per two-bedroom unit, and 2 spaces per three-bedroom unit. Parking for the multi-family units would be provided within the first floor of the apartment buildings, garages within the rowhomes and villas, and surface lots within the interior area of the site. The Project would also provide guest parking at a rate of approximately 0.17 spaces per multi-family unit, which is less than the typical 0.25 guest parking rate per unit as described further under the Planned Development in Section 2.3.3, Project Approvals. The Valley Boulevard improvements would include removal of the southbound lane in order to provide 21 parking spaces along the west side of the roadway and to improve the sidewalk conditions.	Consistent

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### City of Escondido General Plan Policy Consistency Analysis Table

Goal/Policy Number	Policy Text	Consistency Analysis	Consistency
<i>City of Escondido – Climate Action Plan (CAP)</i>			
R1-T1	Assembly Bill 1493: Pavley I	The Project would be consistent with statewide standards. Refer to Section 5.2.6, Greenhouse Gas Emissions, and Appendix M to the EIR for additional information.	Consistent
R1-T2	Assembly Bill 1493: Pavley II	The Project would be consistent with statewide standards. Refer to Section 5.2.6, Greenhouse Gas Emissions, and Appendix M to this EIR for additional information.	Consistent
R1-T3	Executive order S-1-07	The Project would be consistent with statewide standards. Refer to Section 5.2.6, Greenhouse Gas Emissions, and Appendix M to this EIR for additional information.	Consistent
R2-T1	Land Use Based Trips and VMT Reduction Policies	The underlying purpose of the Project is to revitalize an underutilized site in the Downtown SPA near existing and planned infrastructure, services, and jobs. In addition, the Project would provide a public transit bus turn-out, a bike lane, a ride-share area, and improved pedestrian circulation to support alternative modes of transportation. Overall, the proposed improvements are provided to improve multi-modal transportation and promote pedestrian and bikeway connections to the other areas of the Downtown SPA, including the Retail Core Area, which would promote long-term viability of the SPA.	Consistent
R2-T2	Bicycle Master Plan	The Project would not impact any bicycle facilities. Rather, it would provide additional bicycle infrastructure and connectivity within the Downtown SPA and would not interfere the City's ability to implement the current or future Bicycle Master Plan.	Consistent
R2-T3	Transit Improvements	The Project would provide a public transit bus turn-out, a bike lane, a ride-share area, and improved pedestrian circulation to support alternative modes of transportation. Therefore, the Project would support and not impede future transit projects within the City.	Consistent
R2-T4	Transportation Demand Management	The Project would provide a public transit bus turn-out, a bike lane, a ride-share area, and improved pedestrian circulation to support alternative modes of transportation.	Consistent
R1-E1	Renewable Portfolio Standard for Building Energy Use	The Project would be consistent with statewide standards. Refer to Section 5.2.4, Energy, and Appendix M to this EIR for	Consistent

## APPENDIX H

### City of Escondido General Plan Policy Consistency Analysis Table

Goal/Policy Number	Policy Text	Consistency Analysis	Consistency
		additional information.	
R1-E2 and E-3	Assembly Bill 1109 Energy Efficiency Standards for Lighting (Residential and Commercial Indoor and Outdoor Lighting)	The Project would be consistent with statewide standards. Refer to Section 5.2.4, Energy, and Appendix M to this EIR for additional information.	Consistent
R1-E4	Electricity Energy Efficiency	The Project would be consistent with statewide standards. Refer to Section 5.2.4, Energy, and Appendix M to this EIR for additional information.	Consistent
R2-E1	Residential Energy Efficiency Requirements	The Project would comply with Title 24, Part 6 and Part 11. The building envelope; HVAC; lighting; and other systems, such as electric motor equipment, shall be designed to maximize energy performance. The Project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains voluntary energy measures that are applicable to the Project under the California Green Building Standards Code. Prior to Project approval, the applicant would ensure that the Project would meet Title 24 requirements applicable at that time, as required by state regulations through their plan review process. Furthermore, the Project would result in a net reduction in electricity use compared to the existing site. Refer to Section 5.1.4, Energy.	Consistent
R2-E2	Commercial Energy Efficiency Requirements	Refer to R2-E1.	Consistent
R2-E3	Residential Renewable Energy Requirements	The Project does not include renewable energy. However, the Project would comply with Title 24 requirements and would not impede the City's ability to implement renewable energy projects.	Consistent
R2-E4	Commercial Renewable Energy Requirements	Refer to R2-E3.	Consistent
R2-W2	Water Conservation Strategies	The Project would provide adequate and sustainable infrastructure and water supply to serve a community that values and conserves water. As discussed in Section 5.2.12, Utilities and Service Systems, the Project would be located in an urbanized area with existing wastewater infrastructure. The Project would involve construction of new on-site wastewater connections to existing infrastructure, which would adequately serve Project demand. Additionally, a Water Supply Assessment and Water Verification	Consistent

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**City of Escondido General Plan Policy Consistency Analysis Table**

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Goal/Policy Number	Policy Text	Consistency Analysis	Consistency
		is required for the Project because the Project is above the 500 residential unit threshold. The Water Supply Assessment is included as Appendix S to the EIR. All proposed landscaping would be drought tolerant.	