

CHAPTER 4.0 PROJECT ALTERNATIVES

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines requires that an environmental impact report (EIR) describe a range of reasonable alternatives to the proposed project or to the proposed project location that would feasibly attain most of the project objectives but would avoid or substantially lessen any significant environmental impacts. An EIR should evaluate the environmental impacts of the alternatives compared to the proposed project. This chapter of the EIR describes and evaluates project alternatives and is intended to satisfy the requirements set forth in the CEQA Guidelines. This chapter also identifies the Environmentally Superior Project Alternative as required by CEQA Guidelines Section 15126.6(e)(2).

4.1 Rationale for Alternative Selection

The following discussion covers a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening any significant effects of the project, even if these alternatives would not attain all of the project objectives or would be more costly. The discussion shall focus on alternatives to the project that are capable of meeting most of the project objectives identified in Chapter 1.0 of this EIR. According to the CEQA Guidelines, many factors may be taken into account when addressing the feasibility of alternatives, such as environmental impacts, site suitability as it pertains to various land use designations, economic viability, availability of infrastructure, regulatory limitations, and jurisdictional boundaries. Also, according to CEQA Guidelines, discussion of each alternative should be sufficient “to allow meaningful evaluation, analysis, and comparison with the proposed project” (14 CCR 15000 et seq.). Therefore, the significant effects of each alternative are discussed in less detail than those of the proposed project, but in enough detail to provide decision makers with perspective and a reasoned choice among alternatives to the proposed project.

Additionally, a No Project Alternative is required to be included in the range of alternatives. An EIR need not consider an alternative whose effects cannot be reasonably identified, whose implementation is remote or speculative, or one that would not achieve most of the basic project objectives. Finally, the Environmentally Superior Alternative shall be identified and if it is the No Project Alternative, another Environmentally Superior Alternative shall be identified from the remaining alternatives.

The proposed project would result in potentially significant and unavoidable adverse impacts for which feasible mitigation measures would not reduce the impacts to below a level of significance for the following issues: aesthetics, agriculture and forestry resources, air quality and greenhouse gases, biological resources, cultural resources, hazards and hazardous materials, and noise. Potentially significant traffic impacts would be reduced to below a level of significance with implementation of the recommended mitigation measure. Potential impacts to the following were

determined not to be significant after further evaluation: land use and planning, and hydrology and water quality. The following issues were determined to be not significant or have no impact in the Initial Study process: hydrology, geology and soils, mineral resources, population and housing, public services, recreation, and utilities.

The project alternatives evaluated in this chapter are:

- Four Horses per Acre Alternative
- Reduced Project Area Alternative
- No Project Alternative

The evaluated alternatives were selected, in part, relative to their ability to meet the basic objectives of the proposed project and as required by CEQA. As described in Chapter 1.0, the project objectives include the following:

1. Streamline the permitting process for equine facilities in order to better facilitate the development of such uses within the County of San Diego (County), while ensuring compliance with local, state, and federal regulations and utilizing sound management practices.
2. Develop a tiered permitting process for commercial horse stables.
3. Provide definitions for the types of equine facilities that are not defined in the Zoning Ordinance, and provide criteria for distinguishing between types.
4. Minimize the potential for land use conflicts that may arise through the development of equine uses.
5. Update regulations for equine uses to be consistent with current technology and design.
6. Increase the level of knowledge regarding proper management of horse stables among stable operators and County Staff.
7. Assist property owners in coming into compliance with County equine regulations.

These alternatives represent a reasonable range of alternatives as required by CEQA. The alternatives are compared to the impacts of the proposed project. A qualitative summary of the alternatives that compares their potential impacts is provided in Table 4-1.

4.2 Analysis of the Four Horses per Acre Alternative

4.2.1 Four Horses per Acre Alternative Description and Setting

The Four Horses per Acre Alternative would reduce the threshold of horses allowed in Tier Two and Tier Three from 10 horses per acre to 4 horses per acre. This analysis will focus on only the

environmental issue areas for which significant impacts were identified for the proposed project. The main components of the Four Horses per Acre Alternative are described as follows:

- Tier One would remain the same. Boarding (only) of up to three horses not owned by the property owner would be allowed without a ministerial or discretionary permit.
- Tier Two would allow 4 horses per acre of usable area up to 20 horses and 5 acres with a ministerial Zoning Verification Permit.
- Tier Three would allow 4 horses per acre of usable area up to 40 horses and 10 acres with a discretionary Administrative Permit.
- Tier Four would allow more than 40 horses on more than 10 acres of usable area, or more than 4 horses per acre, with a discretionary Major Use Permit (MUP).

The potential impacts associated with Tier One facilities under this alternative would be the same as the proposed project since these types of facilities would not be affected by the four horses per acre limit. In addition, similar to the proposed project, this alternative would allow for a greater number of horses beyond the four horses per useable acre under Tier Four with an MUP. Through the MUP discretionary review process, all future equine facilities developed under Tier Four would be required to implement mitigation measures that would minimize environmental impacts. However, as there is ultimately no guarantee on a facility-specific level that mitigation measures would reduce impacts to a level below significant, these larger equine facilities may result in significant impacts. Therefore, impacts would remain potentially significant and unavoidable for Tier Four facilities under both the proposed project and Four Horses per Acre Alternative.

4.2.2 Comparison of the Effects of the Four Horses per Acre Alternative to the Proposed Project

4.2.2.1 Aesthetics

Scenic Vistas

Development of equine facilities under Tier One and Tier Two facilities under the proposed project would not result in significant impacts to scenic vistas; however Tier Three and Tier Four facilities would result in potentially significant and unavoidable impacts to scenic vistas.

Compared to the proposed project, the Four Horses per Acre Alternative would reduce the allowed number of horses for a Tier Two or Tier Three facility, which in turn would reduce the number of horse corrals, paddocks, or stalls needed. Fewer horse corrals, paddocks, or stalls would potentially result in fewer obstructions or distractions of scenic vistas. Therefore, potential impacts associated with Tier Two and Tier Three facilities would likely be reduced compared to the proposed project.

Scenic Resources

Development of equine facilities under Tier One and Tier Two pursuant to the proposed project would result in less-than-significant impacts to scenic resources. Development of equine facilities under Tier Three and Tier Four pursuant to the proposed project would have the potential to result in potentially significant and unavoidable impacts to scenic resources.

Similar to the proposed project, the Four Horses per Acre Alternative proposes the development of equine facilities that would have the potential to result in removal or substantial adverse change to features that contribute to the valued visual character or image of a neighborhood, community, State Scenic Highway, or localized area, including landmarks, (designated) historic resources, trees, and rock outcroppings. Additionally, if future development is inconsistent with surrounding scenic resources, it would detract from the visual quality of the resources. When compared to the proposed project, the Four Horses per Acre Alternative would reduce the allowed number of horses on a Tier Two or Tier Three property, which in turn would reduce the number of horse corrals, paddocks, or stalls needed. Therefore, impacts associated with Tier Two and Tier Three facilities would be reduced as compared to the proposed project.

4.2.2.2 Agriculture and Forestry Resources

Development of the proposed project would result in potentially significant and unavoidable impacts related to the conversion of farmland, the loss or conversion of forest land, and the indirect conversion of farmland or forest land. Similar to the proposed project, the Four Horses per Acre Alternative proposes the development of equine facilities that would have the potential to result in the permanent conversion of farmland, the loss or conversion of forest land, and the indirect conversion of farmland or forest land. The project area would be the same under the Four Horses per Acre Alternative as the proposed project; therefore, this alternative would have the same potential impacts in terms of permanent conversion of farmland, the loss or conversion of forest land, and the indirect conversion of farmland or forest land. Impacts related to conversion of farmland, the loss or conversion of forest land, and the indirect conversion of farmland or forest land would remain significant and unavoidable for both the proposed project and Four Horses per Acre Alternative.

4.2.2.3 Air Quality and Greenhouse Gases

Development of Tier One and Tier Two facilities pursuant to the proposed project would not result in significant impacts in terms of conformance to federal and state air quality standards or non-attainment criteria pollutants. However, development of Tier Three and Tier Four facilities pursuant to the proposed project would result in potentially significant and unavoidable impacts in terms of conformance to federal and state air quality standards, and nonattainment criteria

pollutants. Future Tier Three and Tier Four facilities may be able to mitigate emissions to a level below significant on an individual basis, although it cannot be guaranteed.

Similar to the proposed project, emissions from the construction of future equine facilities may violate air quality standards, contribute substantially to an existing or projected air quality violation, or contribute to a cumulatively considerable net increase of a criteria air pollutants for which the project region is nonattainment. When compared to the proposed project, the Four Horses per Acre Alternative would allow for fewer horses per acre and, therefore, is expected to result in less construction of horse corrals, paddocks, or stalls. Less construction would potentially result in fewer impacts from construction activities. Therefore, impacts would be lessened as compared to the proposed project. However, impacts would still be considered significant since the alternative could still allow for equine facilities with significant construction impacts in exceedance of air quality standards or contribution to a net increase of nonattainment criteria pollutants. Mitigation proposed in Section 2.3.6.2 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts related to air quality standards and nonattainment criteria pollutants would remain significant and unavoidable for both the proposed project and Four Horses per Acre Alternative. Overall, air quality impacts would be reduced under this alternative when compared to the proposed project.

4.2.2.4 Biological Resources

Special-Status Plant and Wildlife Species

Development of equine facilities pursuant to the proposed project would result in potentially significant and unavoidable impacts to candidate, sensitive, or special-status species. Similar to the proposed project, the Four Horses per Acre Alternative proposes the development of equine facilities that would have the potential to result in impacts to candidate, sensitive, or special-status species. The project area would be the same under the Four Horses per Acre Alternative as the proposed project; however, the Four Horses per Acre Alternative would reduce the number of horses allowed on a Tier Two or Tier Three property to four per acre. Fewer horses would result in a reduction in the number of horse corrals, paddocks, or stalls needed, which would also result in less ground disturbance. The reduction in ground disturbance would lessen impacts to special-status plant and wildlife species. Mitigation measures would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and the Four Horses per Acre Alternative.

Riparian Habitat and Other Sensitive Natural Communities

Development of equine facilities pursuant to the proposed project would have the potential to result in significant adverse effects to riparian habitat or sensitive natural communities. Similar to the proposed project, the Four Horses per Acre Alternative proposes the development of equine

facilities that would have the potential to result in impacts to candidate, sensitive, or special-status species. The project area would be the same under the Four Horses per Acre Alternative as the proposed project; however, the Four Horses per Acre Alternative would reduce the number of horses allowed on a Tier Two or Tier Three property to four per acre. Fewer horses would result in a reduction in the number of horse corrals, paddocks, or stalls needed, which would also result in less ground disturbance. The reduction in ground disturbance would lessen impacts to riparian habitat or sensitive natural communities. Mitigation measures would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and the Four Horses per Acre Alternative.

Wildlife Movement

Development of equine facilities pursuant to the proposed project would result in potentially significant and unavoidable impacts to wildlife corridors and nursery sites. Similar to the proposed project, the Four Horses per Acre Alternative proposes the development of equine facilities that would have the potential to result in impacts to candidate, sensitive, or special-status species. The project area would be the same under the Four Horses per Acre Alternative as the proposed project; however, the Four Horses per Acre Alternative would reduce the number of horses allowed on a Tier Two or Tier Three property to four per acre. Fewer horses would result in a reduction in the number of horse corrals, paddocks, or stalls needed, which would also result in less ground disturbance. The reduction in ground disturbance would lessen impacts to wildlife corridors and nursery sites. Mitigation measures would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and the Four Horses per Acre Alternative.

Local Policies, Ordinances, and Adopted Plans

Development of equine facilities pursuant to the proposed project under Tier One could potentially conflict with local policies or ordinances protecting biological resources. Similarly, the Four Horses per Acre Alternative would allow for future equine uses under Tier One that would not be subject to a discretionary or ministerial permit, and therefore, there is no guarantee future equine uses under Tier One would not hinder or interfere with the assembly of the Multiple Species Conservation Program (MSCP) preserve or conflict with the provisions of local ordinances such as the Resource Protection Ordinance (RPO).

Ministerial permits are covered by the MSCP and are exempt from requirements of the local ordinances such as Biological Mitigation Ordinance (BMO), RPO, and Habitat Loss Permit (HLP) Ordinance. Therefore, as with the proposed project, impacts to the MSCP or other habitat conservation plans for Tier Two facilities under the Four Horses per Acre Alternative are considered to be less than significant.

All discretionary projects located within the boundaries of the existing South County MSCP Subarea Plan (Plan) are reviewed for consistency with the Plan and the BMO. Administrative Permits and MUPs are also subject to the RPO, which requires applicable projects to protect steep slopes, preserve sensitive habitat lands, avoid wetlands and wetland buffers, and protect floodplain and floodplain fringe areas. In addition, the discretionary review process for Administrative Permits and MUPs includes review of any other applicable Natural Community Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) to ensure that its provisions are met. Therefore, as with the proposed project, equine uses developed under Tier Three and Tier Four would be required to comply with applicable local policies and ordinances regulating biological resources, and impacts would remain less than significant.

4.2.2.5 Cultural Resources

Development of equine uses pursuant to the proposed project would result in potentially significant and unavoidable impacts to historical resources, archaeological resources, human remains, and paleontological resources. Similar to the proposed project, the Four Horses per Acre Alternative proposes the development of equine facilities that would have the potential to result in impacts to historical resources, archaeological resources, human remains, and paleontological resources. The project area would be the same under the Four Horses per Acre Alternative as the proposed project; however, the Four Horses per Acre Alternative would reduce the number of horses allowed on a Tier Two or Tier Three property to four per acre. Fewer horses would result in a reduction in the number of horse corrals, paddocks, or stalls needed, which would also result in less ground disturbance. The reduction in ground disturbance would lessen impacts to historical resources, archaeological resources, human remains, and paleontological resources. Mitigation measures would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and the Four Horses per Acre Alternative.

4.2.2.6 Hazards and Hazardous Materials

Wildland Fires

Development of equine facilities pursuant to the proposed project would result in significant and unavoidable impacts related to wildland fire risk. Similar to the proposed project, the Four Horses per Acre Alternative proposes the development of equine facilities that would have the potential to result in impacts related to wildland fire risk. The project area would be the same under the Four Horses per Acre Alternative as the proposed project; therefore, the impacts would be the same as the proposed project. Mitigation measures would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and the Four Horses per Acre Alternative.

4.2.2.7 *Noise*

Development of Tier One and Tier Two facilities pursuant to the proposed project would not result in significant impacts due to noise exposure, a permanent increase in ambient noise levels, or a temporary or periodic increase in ambient noise levels. However, Tier Three and Tier Four facilities developed under the proposed project would result in potentially significant and unavoidable impacts relative to noise exposure, a permanent increase in ambient noise levels, or a temporary or periodic increase in ambient noise levels. Similar to the proposed project, the Four Horses per Acre Alternative could potentially increase noise. All future equine facilities would be required to comply with the County's Noise Compatibility Guidelines, the County's General Plan Noise Element Noise Standards, and the County's Noise Ordinance for on-site noise. However, it is possible that off-site noise sources such as vehicular traffic and delivery trucks could potentially result in significant noise impacts, as discussed in Section 2.8.3.1 of this EIR.

The Four Horses per Acre Alternative would decrease the number of horses allowed on Tier Two and Tier Three properties to four per acre. Fewer horses would result in a reduction in the amount vehicular traffic and delivery trucks, which would also reduce potential impacts related to off-site noise. However, since potential off-site noise sources are dependent on a variety of factors that are specific to a project and its location, significant impacts may still result under this alternative. Since no feasible mitigation was identified for the proposed project, noise impacts related to off-site noise would remain significant and unavoidable for both the proposed project and Four Horses per Acre Alternative. Overall, impacts would be reduced due to the expected reduction in impacts associated with fewer horses per acre under this alternative.

4.2.2.8 *Transportation and Traffic*

Conflict with Plan, Policy, or Ordinance

The proposed project would result in potentially significant impacts on several segments within the various community planning areas studied. Payment of the County's Transportation Impact Fee (TIF) would reduce potentially significant impacts to a less-than-significant level. Similar to the proposed project, the Four Horses per Acre Alternative could potentially increase traffic or exceed Level of Service (LOS) levels, thereby conflicting with an applicable transportation plan, policy, or ordinance. The Four Horses per Acre Alternative would decrease the number of horses allowed on Tier Two and Tier Three properties to four per acre. Fewer horses would likely result in fewer vehicle trips associated with operations and maintenance of these facilities. Therefore, impacts as a result of future traffic would be lessened. However, because there is ultimately no guarantee that the reduction in number of horses will reduce impacts to a level below significant, the Four Horses per Acre Alternative may still result in significant impacts. Mitigation proposed in Section 2.9.6 of this EIR would reduce impacts to a level below significant. Therefore, impacts related to increased traffic levels would be less than significant for both the proposed project and the Four Horses per Acre Alternative.

Conflict with Congestion Management Program

Future development of Tier One, Tier Two, and Tier Three facilities would not exceed the Congestion Management Program (CMP) thresholds and would therefore, not result in any significant impacts relative to conflicting with the CMP. Tier Four facilities, however, have the potential to exceed CMP thresholds, and to result in potentially significant impacts relative to conflicting with the CMP. Similar to the proposed project, the Four Horses per Acre Alternative, Tier One, Tier Two, and Tier Three facilities would not result in any significant impacts relative to conflicting with the CMP. However, since Tier Four facilities have the potential to result in significant impacts relative to conflicting with the CMP, impacts would remain the same as the proposed project under the Four Horses per Acre Alternative.

4.3 Analysis of the Reduced Project Area Alternative

4.3.1 Reduced Project Area Alternative Description and Setting

The Reduced Project Area Alternative would only allow Tier One through Tier Four equine facilities on properties that are 1 acre or larger. All properties under 1 acre would not be included in the project area. The elimination of these properties would result in a reduced project area of 328,452 acres compared to 344,665 acres under the proposed project. The number of parcels within the project area would also be reduced from 85,326 under the proposed project to 50,712 under this alternative. This analysis will focus on only the environmental issue areas for which significant impacts were identified for the proposed project. The main components of the Reduced Project Area Alternative are described as follows:

- Tier One: boarding (only) of up to 3 horses not owned by the property owner would be allowed without a ministerial or discretionary permit on properties 1 acre or larger.
- Tier Two would allow 10 horses per acre of usable area up to 50 horses and 5 acres with a ministerial Zoning Verification Permit on properties 1 acre or larger.
- Tier Three would allow 10 horses per acre of usable area up to 100 horses and 10 acres with an Administrative Permit.
- Tier Four would allow more than 100 horses on more than 10 acres of usable area with a Major Use Permit.

4.3.2 Comparison of the Effects of the Reduced Project Area Alternative to the Proposed Project

4.3.2.1 *Aesthetics*

Compared to the proposed project, the Reduced Project Area Alternative would result in a reduced project area and likely fewer new equine facilities due to the elimination of all properties under 1 acre. Under the proposed project, Tier Three and Tier Four facilities would potentially

interrupt or detract from a scenic resource or scenic vista that previously did not include infrastructure or development. This is because there is ultimately no guarantee on a facility-specific level that mitigation measures would reduce impacts to a level below significant for these larger facilities. The Reduced Project Area Alternative would result in significantly fewer equine facilities under Tier One and Tier Two. However, it would not affect equine facilities under Tier Three and Tier Four because those properties would be 5 acres or more in size. Potential impacts to a scenic resource or scenic vista would remain the same under this alternative.

Similar to the proposed project, the Reduced Project Area Alternative would not result in significant impacts relative to visual character or light and glare. This is because equine uses are compatible with the existing visual character in the project area and would be required to comply with the County Light Pollution Code found in Section 59.101 of the County Code of Regulatory Ordinances. Overall, aesthetics impacts under this alternative would be similar to the proposed project.

4.3.2.2 *Agriculture and Forestry Resources*

Compared to the proposed project, the Reduced Project Area Alternative would result in a reduced project area. The reduction in total project area would lessen potential impacts in terms of permanent conversion of farmland, the loss or conversion of forest land, and the indirect conversion of farmland or forest land. However, since there is ultimately no guarantee on a facility-specific level that mitigation measures will reduce impacts to a level below significant, impacts from the Reduced Project Area Alternative would remain potentially significant.

4.3.2.3 *Air Quality and Greenhouse Gases*

Compared to the proposed project, the Reduced Project Area Alternative would result in a reduced project area, less ground disturbance, and fewer vehicle miles traveled (VMT). Fewer VMT would result in fewer air quality impacts. However, similar to the proposed project, future large-scale equine facilities could potentially exceed screening-level thresholds and therefore could potentially result in impacts related to significant impacts relative to conformance to federal and state air quality standards and nonattainment criteria pollutants. The Reduced Project Area Alternative would not result in a significant impact associated with conflicts with air quality plans, sensitive receptors, or objectionable odors, similar to the proposed project.

4.3.2.4 *Biological Resources*

Compared to the proposed project, the Reduced Project Area Alternative would result in a reduced project area and less ground disturbance. However, similar to the proposed project, there is ultimately no guarantee on a facility-specific level that mitigation measures will reduce impacts from ground disturbance to a level below significant. Therefore, the Reduced Project

Area Alternative could still result in significant impacts to sensitive species, riparian and other sensitive natural communities, wildlife corridors, and nursery sites from the development of new equine facilities. However, given the reduced project area, impacts would be reduced under this alternative when compared to the proposed project.

Development of equine facilities pursuant to the proposed project under Tier One could potentially conflict with local policies or ordinances protecting biological resources. Similarly, the Reduced Project Area Alternative would allow for future equine uses under Tier One that would not be subject to a discretionary or ministerial permit, and therefore, there is no guarantee future equine uses under Tier One would not hinder or interfere with the assembly of the MSCP preserve or conflict with the provisions of local ordinances such as the RPO. Ministerial permits are covered by the MSCP and are exempt from requirements of the local ordinances such as BMO, RPO, and HLP Ordinance. Therefore, as with the proposed project, impacts to the MSCP or other habitat conservation plans for Tier Two facilities under the Reduced Project Alternative are considered to be less than significant.

All discretionary projects located within the boundaries of the existing South County MSCP Subarea Plan are reviewed for consistency with the Plan and the BMO. Administrative Permits and MUPs are also subject to the RPO, which requires applicable projects to protect steep slopes, preserve sensitive habitat lands, avoid wetlands and wetland buffers, and protect floodplain and floodplain fringe areas. In addition, the discretionary review process for Administrative Permits and MUPs includes review of any other applicable NCCP or HCP to ensure that its provisions are met. Therefore, as with the proposed project, equine uses developed under Tier Three and Tier Four would be required to comply with applicable local policies and ordinances regulating biological resources, and impacts would remain less than significant.

4.3.2.5 Cultural Resources

Compared to the proposed project, the Reduced Project Area Alternative would result in a reduced project area and less ground disturbance. However, similar to the proposed project, there is ultimately no guarantee on a facility-specific level that mitigation measures will reduce impacts from ground disturbance to a level below significant. Therefore, although the Reduced Project Area Alternative could still result in significant impacts to historic resources, archeological resources, human remains, and paleontological resources from the development of new equine facilities, this alternative would have reduced impacts compared to the proposed project.

4.3.2.6 Hazards and Hazardous Materials

Similar to the proposed project, compliance with existing regulations would reduce impacts related to accidental release of hazardous materials, hazards to schools, and existing hazardous material sites to a level less than significant. Additionally, the Reduced Project Area Alternative

would result in potentially significant impacts related to wildland fire, just as the proposed project does. This is because new equine facilities may be developed in High or Very High fire hazard severity areas, and there is ultimately no guarantee that mitigation measures would reduce impacts relative to wildfires to a level below significant. However, since the project area is reduced under this alternative, the potential for facilities to be developed in High or Very High fire hazard severity areas would be reduced compared to the proposed project.

4.3.2.7 *Noise*

Compared to the proposed project, the Reduced Project Area Alternative would result in a reduced project area and likely fewer new equine facilities, which would reduce overall VMT. Fewer new equine facilities and fewer VMT would result in fewer noise impacts. However, similar to the proposed project, there is ultimately no guarantee on a facility-specific level that mitigation measures will reduce impacts to a level below significant. Although impacts related to noise exposure and permanent or temporary increases in ambient noise would be potentially significant, impacts would be reduced under this alternative compared to the proposed project.

4.3.2.8 *Transportation and Traffic*

Compared to the proposed project, the Reduced Project Area Alternative would result in a reduced project area and likely fewer new equine facilities, which would result in fewer VMT. Therefore, impacts as a result of future roadway development and traffic would be lessened. The project proposes mitigation that would reduce impacts to a level less than significant. This same mitigation measure would reduce impacts from the Reduced Project Area Alternative to less than significant. Therefore, as with the proposed project, impacts related to traffic would be less than significant with mitigation.

4.4 Analysis of the No Project Alternative

4.4.1 No Project Alternative Description and Setting

Under the No Project Alternative, the existing Zoning Ordinance would remain in effect, and any non-conforming uses established prior to 1978 would continue to be allowed to operate in their current state. The No Project Alternative would require an MUP for new equine uses, non-conforming uses built after 1978, or expansion of non-conforming uses established prior to 1978 within the project area; whereas the proposed project would allow for a tiered permitting system based on the size of the future equine use. Under the No Project Alternative, definitions and development parameters for review and permitting of equine facilities contained in the Zoning Ordinance would remain the same.

4.4.2 Comparison of the Effects of the No Project Alternative to the Proposed Project

4.4.2.1 *Aesthetics*

Compared to the proposed project, the No Project Alternative would likely result in significantly fewer new equine facilities due to the perceived burden of having to process a discretionary MUP for an equine facility regardless of size or intensity. Additionally, the development parameters for equine facilities in the existing Zoning Ordinance would be outdated, and would require additional permits and processing associated with an MUP in order for new facilities to be approved, which would also likely result in fewer new equine facilities.

Under the proposed project, Tier Three and Tier Four facilities would potentially interrupt or detract from a scenic resource or scenic vista that previously did not include infrastructure or development. This is because there is ultimately no guarantee on a facility-specific level that mitigation measures would reduce impacts to a level below significant for these larger facilities. The No Project Alternative would result in significantly fewer equine facilities. Those equine facilities that are already established (prior to 1978) and allowed to continue as non-conforming uses are already part of the scenic landscape and therefore would not result in an impact. The reduced potential for new equine facilities would likely reduce potential impacts to a scenic resource or scenic vista to less than significant.

Similar to the proposed project, the No Project Alternative would not result in significant impacts relative to visual character or light and glare. This is because equine uses are compatible with the existing visual character in the project area and would be required to comply with the County Light Pollution Code found in Section 59.101 of the County Code of Regulatory Ordinances. Overall, impacts to aesthetics would be reduced under this alternative when compared to the proposed project.

4.4.2.2 *Agriculture and Forestry Resources*

Compared to the proposed project, the No Project Alternative would likely result in significantly fewer new equine facilities and less ground disturbance. The reduction in ground disturbance would lessen potential impacts in terms of permanent conversion of farmland, the loss or conversion of forest land, and the indirect conversion of farmland or forest land. However, similar to the proposed project, there is ultimately no guarantee on a facility-specific level that mitigation measures will reduce impacts to a level below significant. Therefore, impacts from the No Project Alternative would remain potentially significant.

4.4.2.3 *Air Quality and Greenhouse Gases*

Compared to the proposed project, the No Project Alternative would likely result in significantly fewer new equine facilities, less ground disturbance, and fewer VMT. Fewer VMT would result

in fewer air quality impacts. However, similar to the proposed project, future large-scale equine facilities could potentially exceed screening-level thresholds and therefore could potentially result in impacts related to conformance to federal and state air quality standards and nonattainment criteria pollutants. The No Project Alternative would not result in a significant impact associated with conflicts with air quality plans, sensitive receptors, or objectionable odors, similar to the proposed project.

4.4.2.4 Biological Resources

Compared to the proposed project, the No Project Alternative would likely result in significantly fewer new equine facilities and less ground disturbance. However, similar to the proposed project, there is ultimately no guarantee on a facility-specific level that mitigation measures will reduce impacts from ground disturbance to a level below significant. Therefore, the No Project Alternative could still result in significant impacts to sensitive species, riparian and other sensitive natural communities, wildlife corridors, and nursery sites from the development of new equine facilities.

The No Project Alternative would not allow for multiple Tier One and Tier Two facilities to be developed without discretionary review as the proposed project would. All future equine facilities within the project area would require an MUP. Therefore, unlike the proposed project, the No Project Alternative would not have the potential to result in significant adverse effects to local policies, ordinances, and adopted plans.

4.4.2.5 Cultural Resources

Compared to the proposed project, the No Project Alternative would likely result in significantly fewer new equine facilities and less ground disturbance. Additionally, the No Project Alternative would not allow for multiple Tier One and Tier Two facilities to be developed without discretionary review as the proposed project would. All future equine facilities within the project area would require a Major Use Permit. However, similar to the proposed project, there is ultimately no guarantee on a facility-specific level that mitigation measures will reduce impacts from ground disturbance to a level below significant. Therefore, the No Project Alternative could still result in significant impacts to historic resources, archeological resources, human remains, and paleontological resources from the development of new equine facilities.

4.4.2.6 Hazards and Hazardous Materials

Similar to the proposed project, compliance with existing regulations would reduce impacts related to accidental release of hazardous materials, hazards to schools, and existing hazardous material sites to a level less than significant. Additionally, the No Project Alternative would result in potentially significant impacts related to wildland fire, just as the proposed project does. This is because new equine facilities may be developed in High or Very High fire hazard severity

areas, and there is ultimately no guarantee that mitigation measures would reduce impacts relative to wildfires to a level below significant.

4.4.2.7 Noise

Compared to the proposed project, the No Project Alternative would likely result in significantly fewer new equine facilities and fewer VMT. Fewer new equine facilities and fewer VMT would result in fewer noise impacts. Additionally, the No Project Alternative would not allow for multiple Tier One and Tier Two facilities to be developed without discretionary review as the proposed project would. All future equine facilities within the project area would require an MUP. However, similar to the proposed project, there is ultimately no guarantee on a facility-specific level that mitigation measures will reduce impacts to a level below significant. Additionally, it is possible that non-conforming uses (prior to 1978) that are allowed to operate would result in noise impacts that would not go through the discretionary process and be subject to mitigation. These uses may also result in potentially significant noise impacts. Therefore, as with the proposed project, impacts related to noise exposure and permanent or temporary increases in ambient noise would be potentially significant.

4.4.2.8 Transportation and Traffic

Compared to the proposed project, the No Project Alternative would likely result in significantly fewer new equine facilities and fewer VMT. Therefore, impacts as a result of future roadway development and traffic would be lessened. Additionally, the No Project Alternative would not allow for multiple Tier One and Tier Two facilities to be developed without discretionary review as the proposed project would. Although all future equine facilities within the project area would require an MUP, there is the potential for significant traffic impacts to occur as a result of such development, and as with the proposed project, mitigation would reduce potential impacts to a level less than significant. Therefore, traffic impacts under the No Project Alternative would be similar to the proposed project.

4.5 Environmentally Superior Project

As compared to the proposed project, the Four Horses per Acre Alternative, Reduced Project Area Alternative, and No Project Alternative would result in reduced environmental impacts as illustrated in Table 4-1. None of the alternatives would reduce impacts of the proposed project to less than significant. The Four Horses per Acre Alternative would result in fewer horses allowed under Tier Two and Tier Three and, therefore, would reduce the number of horse corrals, paddocks, or stalls needed, which would also result in less ground disturbance. The reduction in ground disturbance would lessen impacts to biological resources and cultural resources. Impacts relative to air quality, noise, and transportation and traffic would also be reduced due to fewer horses at a particular Tier Two or Tier Three facility and fewer VMT from visitors. The Reduced Project Area Alternative would result in less ground disturbance and likely fewer equine facilities, which would help to

decrease environmental impacts. The reduced project area would lessen impacts to agricultural resources, biological resources, cultural resources, and hazards and hazardous materials. Similarly, impacts to air quality, noise, and transportation and traffic would be reduced due to a reduced number of equine facilities. Although the Four Horses per Acre and Reduced Project Area alternatives would lessen environmental impacts as compared to the proposed project, many of the same impacts would remain significant and unavoidable. The No Project Alternative would decrease environmental impacts by continuing to require discretionary review for equine facilities within the project area; however, this alternative would not meet any of the project objectives. As indicated in Table 4-1, the Reduced Project Area Alternative would lessen more impacts as compared to the Four Horses per Acre (such as those related to agriculture and forestry resources and wildland fires); therefore, this is the environmentally preferred alternative.

**Table 4-1
Summary of Analysis for Alternatives to the Proposed Project**

Issue Areas	Zoning Ordinance Amendments (Proposed Project)		Alternatives to the Proposed Project		
	Tier One and Tier Two	Tier Three and Tier Four	Four Horses per Acre	Reduced Project Area	No Project
2.1 Aesthetics					
1. Scenic Vistas	NS	SU	▼	—	▼
2. Scenic Resources	NS	SU	▼	▼	▼
3. Visual Character or Quality	NS	NS	—	—	—
4. Light and Glare	NS	NS	—	—	—
2.2 Agriculture and Forestry Resources					
1. Conversion of Farmland	SU	SU	—	▼	▼
2. Agricultural Zoning and Williamson Act Contracts	NS	NS	—	—	—
3. Forest or Timberland Conflicts	NS	NS	—	—	—
4. Loss or Conversion of Forest Land	SU	SU	—	▼	▼
5. Indirect Conversion of Farmland of Forest Land	SU	SU	—	▼	▼
6. Agricultural Zoning and Williamson Act Contracts	NS	NS	—	—	—
2.3 Air Quality and Greenhouse Gases					
1. Conformance to the SDRAQS and SIP	NS	NS	—	—	—
2. Conformance to Federal and State Air Quality Standards	SU	SU	▼	▼	▼
3. Nonattainment Criteria Pollutants	SU	SU	▼	▼	▼
4. Sensitive Receptors	NS	NS	—	—	—
5. Odors	NS	NS	—	—	—
2.4 Biological Resources					
1. Candidate, Sensitive, or Special-Status Species	SU	SU	▼	▼	▼
2. Riparian Habitat or Sensitive Natural Community	SU	SU	▼	▼	▼
3. Federally Protected Wetlands	NS	NS	—	—	—

**Table 4-1
Summary of Analysis for Alternatives to the Proposed Project**

Issue Areas	Zoning Ordinance Amendments (Proposed Project)		Alternatives to the Proposed Project		
	Tier One and Tier Two	Tier Three and Tier Four	Four Horses per Acre	Reduced Project Area	No Project
4. Wildlife Movement	SU	SU	▼	▼	▼
5. Local Policies, Ordinances, Adopted Plans	SU	SU	—	—	▼
2.5 Cultural Resources					
1. Historical Resources	SU	SU	▼	▼	▼
2. Archaeological Resources	SU	SU	▼	▼	▼
3. Human Remains	SU	SU	▼	▼	▼
4. Paleontological Resources	SU	SU	▼	▼	▼
2.6 Hazards and Hazardous Materials					
1. Hazardous Substance Handling	NS	NS	—	—	—
2. Accidental Release of Hazardous Materials	NS	NS	—	—	—
3. Hazards to Schools	NS	NS	—	—	—
4. Existing Hazardous Materials Sites	NS	NS	—	—	—
5. Airport Hazards	NS	NS	—	—	—
6. Emergency Response and Evacuation Plans	NS	NS	—	—	—
7. Wildland Fires	SU	SU	—	▼	—
2.7 Noise					
1. Noise Exposure	NS	SU	▼	▼	▼
2. Excessive Groundborne Vibration	NS	NS	—	—	—
3. Permanent Increase in Ambient Noise Levels	NS	SU	▼	▼	▼
4. Temporary or Periodic Increase in Ambient Noise Levels	NS	SU	▼	▼	▼
5. Excessive Noise Exposure from a Public or Private Airport	NS	NS	—	—	—
2.8 Transportation and Traffic					
1. Conflict with Plan, Policy, or Ordinance	LTS	LTS	▼	▼	—
2. Conflict with CMP Guidelines for the Determination of Significance	NS	NS	—	—	—
3. Road Safety Guidelines for the Determination of Significance	NS	NS	—	—	—
4. Emergency Access	NS	NS	—	—	—
5. Alternative Transportation	NS	NS	—	—	—

▲ Alternative is likely to result in greater impacts to issue when compared to proposed project.

— Alternative is likely to result in similar impacts to issue when compared to proposed project.

▼ Alternative is likely to result in less impacts to issue when compared to proposed project; however, impacts would still be significant and unavoidable.

NS = Not a potentially significant impact.

LTS = Less than significant with mitigation.

SU = Potentially significant and unavoidable impact.

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