

CHAPTER 4.0 PROJECT ALTERNATIVES

CEQA requires in Section 15126.6 of the CEQA Guidelines 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 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 alternative land use maps and is intended to implement the requirements set forth in the CEQA Guidelines. This chapter also identifies the Environmentally Superior Map Alternative as required by CEQA Guidelines Section 15126.6(e)(2). The requirements of Section 15126.6 of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.

The following discussion identifies a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening significant effects resulting from implementation of the proposed Project, even if these alternatives would not attain all of the Project objectives or would be more costly, and is designed to foster meaningful public participation and informed decision-making. The following discussion focuses on Project alternatives that could meet the majority of the Project objectives, identified in Chapter 1.0 of this EIR. According to the CEQA Guidelines, there are many factors that may be considered when determining the potential 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.

Additionally, the alternatives analysis need not be as detailed as that conducted for the proposed Project. Furthermore, analysis of 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 that would not achieve the majority of the basic Project objectives. Finally, it is required, through the evaluation of Project alternatives considered, that the Environmentally Superior Alternative be identified. If the Environmentally Superior Alternative is not the No Project Alternative, the next Environmentally Superior Alternative shall be identified.

The alternatives analysis below meets the requirements of CEQA Section 15126.6. The analysis includes sufficient information about each alternative to provide meaningful evaluation, analysis, and comparison with the proposed Project. A detailed comparison and analysis of the differences between the proposed Project and the Project alternatives (No New East Willows Village Alternative, Modified Project Alternative, and No Project Alternative) and the resulting environmental impacts is provided.

4.1 Rationale for Alternative Selection

Several alternatives were formulated that would reduce certain environmental impacts associated with Project implementation. The Project alternatives described below represent a reasonable range of alternatives to the proposed Project. Table 4-1 summarizes the environmental impacts of the Project alternatives compared to the proposed Project impacts. Alternatives that were considered but rejected are also described below.

No New East Willows Village Alternative (Alpine CPA). The primary purpose of this alternative would be to reduce impacts to the road network within the Alpine CPA resulting from Project buildout. As analyzed in Section 4.2 below, this alternative would involve a reduction of land use densities along Willows Road in Alpine east of the Viejas Casino. More specifically, this alternative would reassign the area east of the Viejas Casino and north of Interstate 8, which has a proposed designation of Village Core Mixed Use (VCMU), with a Semi-Rural 4 (SR-4) designation instead. In addition, this alternative would reassign the area that has a proposed designation of Rural Commercial, which is located immediately to the east of the VCMU area, with a Rural Lands 40 (RL-40) designation instead. In addition, this alternative would involve an increase in residential development in the surrounding outlying lands of the Alpine CPA, within and adjacent to the CNF, while still maintaining the proposed lower density land use designations (i.e., rural and semi-rural residential) in these areas. This alternative has been selected for analysis in order to reduce potential traffic impacts along Alpine Boulevard and Willows Road that would occur under the proposed Project, as discussed in Section 2.13 (Transportation and Traffic) of this SEIR.

Modified Project Alternative (Environmentally Superior Alternative). For the purpose of identifying feasible Project alternatives, certain comment letters were received during the NOP public review period for this SEIR (refer to Appendix B of this SEIR) that propose reduced densities on specific parcels to further reduce Project impacts associated with biological resources, fire hazards, increased urban interface (e.g., encroachment, habitat fragmentation, non-native invasive plants), unauthorized access (e.g., trails, roads) and off-highway vehicle use, and new construction of and improvements to infrastructure, public services and narrow County or U.S. Forest Service (USFS) roads. Based on the recommendations in these letters which propose reduced-density land use designations for specific parcels within and adjacent to the CNF lands, a Modified Project Alternative Map was created (Figure 4-1A-C), as analyzed in Section 4.3 below. This alternative is also considered the Environmentally Superior Alternative as it would accommodate less development than the proposed Project and all of the other alternatives, thus decreasing environmental impacts across the board.

No Project Alternative. The No Project Alternative assumes that the pre-existing General Plan land use densities that currently apply to the former FCI lands would remain in effect. As analyzed in Section 4.4 below, the No Project Alternative generally allows for higher densities within the Project areas, as compared to the proposed Project. As such, the No Project

Alternative would also result in substantially more adverse effects to the environment when compared to the proposed Project or other alternatives.

4.1.1 Alternatives Considered but Rejected

In addition to the Project alternatives described above, three additional alternatives were considered but rejected from further analysis in this SEIR because they did not accomplish most of the basic project objectives. This section describes these alternatives.

Increased Intensity Alternative (Alpine CPA)

This alternative considers shifting future growth from rural outlying lands of the Alpine CPA (primarily the parcels designated for low-density rural and semi-rural residential) to the proposed Alpine VCMU area through increased densities of village core mixed uses and rural commercial uses in this area. This would allow the outlying parcels to remain as undeveloped open space or as agricultural land. Such lands may contain important resources such as biological habitat, cultural artifacts, groundwater resources, minerals, and/or prime farmland/soils. As such, this alternative has the potential to reduce impacts on natural and agricultural resources in rural areas within and near the CNF, as well as a reduction in impacts related to air quality, traffic, noise, and aesthetics because it would result in less development in these areas which typically contributes to such impacts; however, this alternative would be infeasible because increasing densities in the Alpine VCMU area cannot be supported by the currently available or planned infrastructure, would require height limits beyond the firefighting capacity of the Alpine Fire Protection District, and there is not sufficient unbuilt capacity to substantially accommodate a transfer of development potential from the outlying rural areas. This alternative would also result in additional impacts in the Alpine VCMU area related to air quality, traffic, noise, and land use conflicts (i.e., land use compatibility and community character).

Reduced Development/No Build Alternatives

Potential environmental impacts associated with the proposed Project could be further avoided and/or minimized by reducing growth accommodated by the proposed Project via lower density land use designations, development moratoriums, and/or building permit limitations. Where future development would result in environmental impacts, a complete moratorium on such development would be the only method to avoid impacts. Both the No New East Willows Village and Modified Project alternatives already represent reduced development alternatives as compared to the proposed Project; however, given the comprehensive planning process that has been undertaken to vet the recommended land use designations proposed as part of the Project (involving years of County outreach to the relevant community planning groups, sponsor groups, and other interested parties), as well as the identification of a reasonable range of alternatives for consideration in this SEIR, it would be unreasonable to consider additional alternatives for reducing planned growth without substantially deviating from the established Project objectives. Therefore, it has been determined that the consideration of additional Reduced Development/No

Build Alternatives would provide negligible value to this SEIR process, and are rejected from further analysis herein.

FCI Density Alternative

When enacted, the FCI affected approximately 91,000 acres of privately-owned land within and adjacent to the CNF and established 40 acres as the minimum parcel size for residential dwelling units (one dwelling unit/40 acres or 1:40) on such lands. As such, the FCI Density Alternative would apply the RL 40 designation throughout the Project areas. This alternative was rejected as it would not fulfill many of the Project objectives. Specifically, applying a 1:40 development density over all of the former FCI lands would not be consistent with the Guiding Principles and Policies of the adopted General Plan. Furthermore, there are several former FCI parcels located within urban areas for which the application of a residential density of 1:40 would result in significant land use compatibility conflicts, as these parcels are better suited for more intense development which would avoid such conflicts. Therefore, this alternative was rejected from further analysis in this SEIR.

4.2 Analysis of the No New East Willows Village Alternative (Alpine CPA)

4.2.1 No New East Willows Village Alternative Description and Setting

The No New East Willows Village Alternative was specifically designed to reduce significant traffic impacts identified with the proposed Project on roadways within the Alpine CPA by reducing the intensity of Village land uses proposed for Alpine along Willows Road east of the Viejas Casino, as defined above, and therefore, causing a reduction in the total number of average daily traffic trips (ADT) generated. To accomplish this, a conceptual approach has been formulated in which this alternative would result in a slight increase in rural and semi-rural residential housing in the rural, outlying former FCI lands throughout the entire Project areas, within and near the CNF lands, while also reducing development intensity in the Alpine CPA east of the Viejas Casino and north of Interstate 8. Under this alternative, the proposed increase in residential units in the outlying areas would be incremental, consistent with existing rural land use patterns, and would be achieved through density transfers. For example, the proposed land use designations for some parcels would transition to the next higher density classification, as in the following progression: RL-80 to RL-40, RL-40 to RL-20, RL-20 to SR-10, and SR-10 to SR-4. To accomplish this increase of development densities in the outlying areas, conceptually the proposed VCMU designation to the east of the Viejas Casino would be replaced by the SR-4 designation (1 du per 4 ac) and the large area of proposed Rural Commercial designation adjacent to the east of the VCMU would be replaced by the RL-40 designation (1 du per 40 ac).

The intent of this approach is to transfer the potential increase in future residential dwelling units from the VCMU and Rural Commercial designated areas in Alpine along Willows Road east of Viejas to outlying FCI lands throughout the entire Project areas to achieve the same overall

buildout yield as in the proposed Project; however, there is no intention of replacing these areas with the RL-40 designation. No specific parcels are identified for increased residential densities at this time, as this would require a lengthy community outreach process by the County involving discussions with planning groups, sponsors, and property owners to determine which parcels could be likely candidates for such density transfers. Therefore, in this section, the potential environmental effects associated with this alternative may be evaluated qualitatively based on the conceptual approach described above.

As stated above, the land use pattern for this alternative would allow for the same number of residential units to be developed overall, as in the proposed Project; however, a greater amount of land in the outlying areas would be impacted, due to the increased acreage required to accommodate housing at the more rural densities listed above (i.e., RL-80, RL-40, RL-20, SR-10 and SR-4). This alternative would also increase development in areas where jobs, services, and infrastructure is generally lacking, while decreasing development in areas with jobs, services, and infrastructure.

4.2.2 Comparison of the Effects of the No New East Willows Village Alternative to the Proposed Project

4.2.2.1 *Aesthetics*

Scenic Vistas

Similar to the proposed Project, future development under the No New East Willows Village Alternative would have the potential to obstruct, interrupt, or detract from scenic vistas (refer to Section 4.2.2.1 regarding interruption of scenic expanse of open space and inconsistency with surrounding landscapes). Compared to the proposed Project, this alternative would propose reduced densities to the area east of Viejas Casino, which would result in less obstructions or distractions to scenic vistas in this area; however, compared to the proposed Project, this alternative would also involve greater development in the outlying rural lands, within and near the CNF lands, which would result in greater obstructions or distractions to scenic vistas in these areas. Nevertheless, these impacts would still be significant and the mitigation identified in Section 2.1.4 of this SEIR would be required.

Scenic Resources

Similar to the proposed Project, future development under the No New East Willows Village Alternative would result in potential removal of or substantial changes to features that contribute to the valued visual character or image of a neighborhood, community, State Scenic Highway, or localized area, including designated landmarks, 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. Compared to the proposed Project, this alternative would involve greater development in the outlying rural lands, within and near the

CNF lands, which would result in potentially greater impacts to scenic resources from construction or demolition activities. These impacts would still be significant and the mitigation identified in Section 2.1.4 of this SEIR would be required.

Visual Character or Quality

Compared to the proposed Project, the increase in future development in the outlying rural lands, within and near the CNF lands, under the No New East Willows Village Alternative would have the potential to impact the general character of a community if such development is improperly designed or located; however, a decrease in densities within the VCMU area would have lesser impacts on the existing visual quality or character of town centers, when compared to the proposed Project. These impacts would still be significant, and the mitigation identified in Section 2.1.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.1.4.3 of this SEIR; thus, the impacts would remain significant and unavoidable.

Light or Glare

Similar to the proposed Project, future development under the No New East Willows Village Alternative would result in new sources of light or glare from building materials and outdoor lighting used in new residential, commercial, industrial, or public/semi-public developments. This alternative designates land uses that are generally consistent with existing land uses throughout the Project areas and, therefore, lighting for development would be expected to be compatible with the existing setting; however, individual developments would have the potential to result in a nuisance or hazard to surrounding uses. Additionally, night lighting in the San Diego region is detrimental to astronomy research at the Palomar and Mount Laguna Observatories. When compared to the proposed Project, this alternative would accommodate increased development in the outlying rural lands, within and near the CNF lands, which would result in a greater potential for structures to cause substantial new sources of light or glare; however, this alternative proposes reduced intensities adjacent to the Viejas Casino complex resulting in a decrease in light or glare. These impacts would still be significant, and the mitigation identified in Section 2.1.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.1.4.3 of this SEIR; thus, the impacts would remain significant and unavoidable.

4.2.2.2 *Agricultural and Forestry Resources*

Direct Conversion of Agricultural Resources

Compared to the proposed Project, the No New East Willows Village Alternative would involve more residential development in the outlying rural lands, within and near the CNF lands, which would result in a greater potential for direct conversion of agricultural resources to non-

agricultural uses potential. These impacts would be significant and the mitigation identified in Section 2.2.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.2.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Land-Use Conflicts

Compared to the proposed Project, the No New East Willows Village Alternative would involve more residential development in outlying rural lands, within and near the CNF lands, thereby increasing potential land use conflicts with agricultural uses in these areas. As such, future development under this alternative would result in greater direct, indirect and cumulative impacts associated with potential conflicts with adjacent agricultural uses, Williamson Act Contract lands, or forest lands compared to the proposed Project. Such potential conflicts would be significant and the mitigation identified in Section 2.2.4 of this SEIR would be required.

Indirect Conversion of Agricultural Resources

Compared to the proposed Project, implementation of the No New East Willows Village Alternative would accommodate increased residential development in the outlying rural lands, within and near the CNF lands, which would result in a greater potential for indirect conversion of surrounding farmland as compared to the proposed Project. Therefore, additional acres of incompatible land uses would be placed near agricultural resources, and this alternative would be more likely to cause an indirect conversion of farmland to non-agricultural use than the proposed Project. These indirect and cumulative impacts would be significant and the mitigation identified in Section 2.2.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.2.4.3 of this SEIR; thus, the impacts would remain significant and unavoidable.

Direct and Indirect Conversion of Forestry Resources

The County of San Diego does not include lands zoned for forest land, timberland, or timberland production. Rather, these lands are located on State parks and National forests, including CNF lands which are under the jurisdiction of USFS; however, some private parcels within the Project areas which are under the jurisdiction of the County may contain lands that would be defined as “forestry resources” or “timberland” by USFS (e.g., trees that can be processed for timber products). Similar to the proposed Project, future development under the No New East Willows Village Alternative may result in the permanent loss of such forestry resources or timberland on private lands, or the direct conversion of such lands to non-forest use. Additionally, future development under this alternative may result in land uses that are incompatible with adjacent or nearby CNF lands, such as the construction of a housing tract next to a heavily forested area. Such development could eventually lead to permanent impacts on the CNF lands due to factors such as erosion/siltation, invasive plants, edge effects (e.g., human intrusion, predation by pets),

noise (e.g., nest abandonment), nightlighting (e.g., nocturnal wildlife predation), and habitat fragmentation, or the indirect conversion of such lands to non-forest use. This alternative would result in greater overall direct and indirect impacts to forestry resources, as compared to the proposed Project, because it would shift more residential development from a single defined area adjacent to urban development patterns, and towards the outlying CNF lands which contain forestry resources. These direct, indirect and cumulative impacts would be significant and the mitigation identified in Section 2.2.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.2.4.4 of this SEIR; thus, the impacts would remain significant and unavoidable.

4.2.2.3 *Air Quality*

Air Quality Plans

Similar to the proposed Project, future development under the No New East Willows Village Alternative would be required to be consistent with the emission reduction strategies in the RAQS and SIP. Therefore, this alternative would not result in significant conflicts with the RAQS and SIP.

Air Quality Violations, Non-attainment of Criteria Pollutants and Sensitive Receptors

Compared to the proposed Project, the No New East Willows Village Alternative would involve more residential development in the outlying rural lands, within and near the CNF lands, thereby resulting in increased VMT for residents to obtain goods and services from urban areas. This would in turn result in an overall increase in total emissions that could potentially violate air quality standards, greater emissions of non-attainment criteria pollutants, and greater exposure of sensitive receptors to TACs, as compared to the proposed Project. These impacts would be significant and the mitigation identified in Section 2.3.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.3.4.2 of this SEIR; thus, the impacts would remain significant and unavoidable.

Objectionable Odors

Similar to the proposed Project, any odor generating land uses that may occur with future development under the No New East Willows Village Alternative would be required to comply with APCD Rule 51 and County of San Diego Code of Regulatory Ordinances Sections 63.401 and 63.402, which prohibit nuisance odors from affecting nearby receptors. Therefore, this alternative would not result in a significant impact associated with objectionable odors.

4.2.2.4 Biological Resources

Special Status Plant/Wildlife Species, Riparian Habitat and Other Sensitive Natural Communities, and Federally Protected Wetlands

Similar to the proposed Project, future development under the No New East Willows Village Alternative would result in direct, indirect and cumulative impacts to special status plant and wildlife species and their habitats. This analysis is based on the same impact assumptions used for the proposed Project (refer to Section 4.2.2.4). Compared to the proposed Project, this alternative would increase residential development in the outlying rural lands, within and near the CNF lands, thereby resulting in greater direct impacts on habitats that would have the potential to support sensitive species, as well as more indirect impacts such as intensive nighttime lighting and noise which can adversely affect wildlife species, adverse effects to water quality in riparian habitats from pollutants in runoff and sedimentation during construction, and fugitive dust produced by construction that would have the potential to disperse onto sensitive vegetation adjacent to construction sites. This is because such land uses would be associated with larger lots in the rural areas that could be fully impacted by residential development, unlike the more concentrated development within the Alpine VCMU area (i.e., reduced potential for the presence of sensitive biological resources). These impacts would be significant, and the mitigation identified in Section 2.4.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.4.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Wildlife Movement Corridors and Nursery Sites

Because the No New East Willows Village Alternative would shift more residential development into outlying rural lands, within and near the CNF lands, it would result in greater impacts to potential wildlife movement corridors in these areas than the proposed Project. These impacts would be significant and the mitigation identified in Section 2.4.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.4.4.4 of this SEIR; thus, the impacts would remain significant and unavoidable.

Local Policies and Ordinances

Similar to the proposed Project, future development under the No New East Willows Village Alternative would not conflict with programs and ordinances that protect biological resources because such development would be required to comply with the County's Multiple Species Conservation Program (MSCP) Subarea Plan, Biological Mitigation Ordinance (BMO), Habitat Loss Permit (HLP) Ordinance, and Resource Protection Ordinance (RPO), and the Southern California Coastal Sage Scrub Natural Community Conservation Plan (NCCP) Process Guidelines.

HCPs and NCCPs

As stated above, future development under the No New East Willows Village Alternative would not conflict with the County's MSCP Subarea Plan and the Coastal Sage Scrub NCCP Process Guidelines, which are the applicable Habitat Conservation Plan (HCP) for the Project areas within the unincorporated County lands.

4.2.2.5 Cultural Resources

Historical Resources

Similar to the proposed Project, significant historical resources would have the potential to be disturbed as a result of the No New East Willows Village Alternative due to demolition, destruction, alteration, or structural relocation as a result of new private or public development or redevelopment of designated land uses; however, this alternative would result in greater impacts to such resources, as compared to the proposed Project, due to an increase in development intensity over substantially more acreage throughout the entire Project areas, rather than the single area of VCMU and Rural Commercial designations east of Viejas Casino. This which would have the potential to adversely affect historical sites though the introduction of visual, audible, or atmospheric effects that are out of character with such resources. For these same reasons, this alternative would also have the potential to result in more redevelopment of a historical structure or site that is not compatible with the authenticity of such resource and substantially alter its significance, as compared to the proposed Project. These impacts would be considered significant, and the mitigation identified in Section 2.5.4 of this SEIR would be required.

Archaeological Resources, Human Remains, and Paleontological Resources

Similar to the proposed Project, future development under the No New East Willows Village Alternative would have the potential to result in an adverse change in the significance of archaeological resources through ground-disturbing activities, such as excavation and grading, that have the potential to damage or destroy such resources and human remains that may be present on or below the ground surface. In addition, as with the proposed Project, this alternative would result in an equivalent level of potential damage or destruction to fossils in underlying rock units. These impacts would be significant, and the mitigation identified in Section 2.5.4 of this SEIR would be required.

4.2.2.6 Hazards and Hazardous Materials

Transportation, Use, Disposal, and Accidental Release (Including Hazards to Schools) of Hazardous Materials or Existing Hazardous Material Sites

Compared to the proposed Project, the No New East Willows Village Alternative would result in less area of VCMU and Rural Commercial designations in the Alpine CPA that may involve the use, disposal, transport or accidental releases of hazardous materials, including the siting of such uses within one-quarter mile of an existing or proposed school or daycare. Nevertheless, existing industries and businesses that use hazardous materials would have the potential to expand or increase to accommodate the anticipated growth under this alternative. Furthermore, future development under this alternative may be located on sites that have the potential to create significant hazards to the public or environment including: sites pursuant to Government Code 65962.5; burn dump sites; active, abandoned, or closed landfills; FUDS; areas with historic or current agriculture; or areas with petroleum contamination. Similar to the proposed Project, any future development of such uses would be required to comply with all applicable federal, State, and local regulations pertaining to the transportation, use, and disposal of hazardous materials which would reduce such impacts to below a level of significance.

Public and Private Airports

As discussed in Section 2.6.3.5 (Public and Private Airports) of this SEIR, there are no public airports within the unincorporated County that would be affected by the Project areas addressed in this SEIR, but there would be four private airports in the communities of Alpine (U.S. Forest Service), and North Mountain (Ward Ranch, Warner Springs, and Loma Madera Ranch) which would be affected by the Project areas. Similar to the proposed Project, future development under the No New East Willows Village Alternative may involve the siting of new land uses within two miles from one of these private airports, thereby resulting in a safety hazard for people residing or working in the vicinity of these airports. In addition, under this alternative, some private airports would have the potential to be located adjacent to land uses, such as village residential, which would maintain higher density populations and therefore be considered potentially incompatible. These impacts would be considered significant and the mitigation identified in Section 2.6.4 of this SEIR would be required.

Emergency Response and Evacuation Plans

Similar to the proposed Project, construction activities associated with future development under the No New East Willows Village Alternative would have the potential to interfere with adopted emergency plans and procedures if authorities are not properly notified or multiple roadways used for emergency routes are concurrently blocked. This alternative would also result in additional residential development in the outlying areas which could cause an inadvertent impairment to existing emergency response plans and policies. Compared to the proposed

Project, this alternative would result in more residential development with the potential to impair emergency response and evacuation plans in these outlying areas. These impacts would be significant and the mitigation identified in Section 2.6.4 of this SEIR would be required.

Wildland Fires

Similar to the proposed Project, future development in the outlying rural areas under the No New East Willows Village Alternative would be prone to wildland fires and therefore have the potential to expose people or structures to a significant risk of loss, injury, or death, particularly where residents are intermixed with wildlands. Compared to the proposed Project, however, this alternative would have an increased wildland fire risk because it proposes more residential development in the outlying areas that may be served by fire agencies with greater distance to cover (longer travel times) or in areas that have difficulty meeting fire code requirements due to limited access. These impacts would be significant and the mitigation identified in Section 2.6.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.6.4.7 of this SEIR; thus, the impacts would remain significant and unavoidable.

Vectors

Similar to the proposed Project, future development under the No New East Willows Village Alternative does not propose land uses that would create a potentially significant hazard to the public or the environment by substantially increasing human exposure to vectors. This alternative would not result in sources of standing water bodies or other vector breeding sources such as composting or manure management facilities. As such, a significant impact would not occur.

4.2.2.7 *Hydrology and Water Quality*

Water Quality Standards and Requirements

Surface Water

Similar to the proposed Project, future development under the No New East Willows Village Alternative would have the potential to result in the following: 1) substantial additional sources of polluted runoff which would have short-term impacts on surface water; 2) pollutants, such as soils, debris, and other materials, in quantities that would potentially exceed water quality standards and otherwise significantly degrade water quality; and 3) non-point source pollution into surface and groundwater bodies. Compared to the proposed Project, this alternative would result in lower density development within the proposed Project's new village east of the Viejas Casino, but more residential development in outlying rural areas, within and near the CNF lands,

which would cause greater potential impacts to surface water. These impacts would be significant, and the mitigation identified in Section 2.7.4 of this SEIR would be required.

Groundwater

Similar to the proposed Project, future development under the No New East Willows Village Intensity has the potential to violate groundwater quality standards by designating land uses in the rural outlying areas that would be groundwater dependent and are currently experiencing groundwater contamination. New wells constructed to support development in these areas would be susceptible to the contaminated groundwater supply which would have the potential to result in a non-potable water supply. Compared to the proposed Project, this alternative would result in lower density development within the proposed Project's new village east of Viejas Casino, but more residential development in outlying rural areas, within and near the CNF lands, which would cause greater groundwater contamination problems in the future. These impacts would be significant, and the mitigation identified in Section 2.7.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.7.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Groundwater Supplies and Recharge

Multiple areas of the unincorporated County are currently experiencing groundwater supply impacts. Similar to the proposed Project, future development under the No New East Willows Village Alternative would worsen these conditions of unsustainable groundwater supplies within: (1) outlying areas that are already impacted by large quantity groundwater users and clustered developments; (2) areas experiencing a high frequency of wells with low well yield; and, (3) groundwater basins having estimated groundwater in storage at or below 50 percent. Compared to the proposed Project, this alternative would result in lower density development within the proposed Project's new village east of Viejas Casino, but more residential development in outlying rural areas which would have greater impacts relative to groundwater supplies and recharge. Furthermore, under the proposed Project, the new village has densities that would require the use of imported water, rather than the use of groundwater resources. These impacts would be significant, and the mitigation identified in Section 2.7.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.7.4.2 of this SEIR; thus, the impacts would remain significant and unavoidable.

Erosion or Siltation

Similar to the proposed Project, future development under the No New East Willows Village Alternative would result in permanent alterations to existing drainage patterns by converting undeveloped areas within the outlying rural lands from pervious surfaces to impervious surfaces

which would increase runoff and potentially result in new erosion problems or the worsening of existing erosion problems. Compared to the proposed Project, this alternative would result in lower density development within the proposed Project's new village east of Viejas Casino, but more residential development in outlying rural areas which would have greater erosion/siltation impacts. These impacts would be significant, and the mitigation identified in Section 2.7.4.2 of this SEIR would be required.

Flooding

Similar to the proposed Project, future development under the No New East Willows Village Alternative would result in permanent alterations to existing drainage patterns and increase the rate or amount of surface runoff in a manner that could cause on- or off-site flooding during and after construction activities. Compared to the proposed Project, this alternative would result in lower density development within the proposed Project's new village east of Viejas Casino, but more residential development in outlying rural areas which would cause greater flooding impacts. These impacts would be significant, and the mitigation identified in Section 2.7.4.2 of this SEIR would be required.

Exceed Capacity of Storm Water Systems

Similar to the proposed Project, future development under the No New East Willows Village Alternative would increase the amount of impermeable surfaces from new development within the Project areas, thereby increasing the amount of stormwater runoff potentially exceeding the capacity of stormwater drainage systems and requiring new or expanded facilities which would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would result in lower density development within the proposed Project's new village east of Viejas Casino, but would allow more residential development in outlying rural areas resulting in greater demand for stormwater drainage facilities to be constructed or expanded. As such, the overall environmental impacts related to the construction of new or expanded stormwater drainage facilities would increase under this alternative because demand would be higher than for the proposed Project. These impacts would be significant, and the mitigation identified in Sections 2.7.4.2 and 2.14.4 of this SEIR would be required.

Housing within a 100-year Flood Hazard Area and Impeding or Redirecting Flood Flows

Similar to the proposed Project, and as discussed in Section 2.7.3.6 (Housing within a 100-year Flood Hazard Area) of this SEIR, the No New East Willows Village Alternative would not result in development (including housing) within a 100-year flood hazard area which could otherwise impede or redirect flood flows. As such, a significant impact would not occur.

Dam Inundation and Flood Hazards

Similar to the proposed Project, future development under the No New East Willows Village Alternative would place housing or structures within dam inundation areas, thereby increasing the potential for a significant risk of loss, injury or death involving flooding. Impacts related to dam inundation and flooding hazard areas would be considered significant and the mitigation identified in Section 2.7.4 of this SEIR would be required.

Seiche, Tsunami, and Mudflow Hazards

Similar to the proposed Project, due to the inland location of the Project areas and the history of minor tsunami events, future development under the No New East Willows Village Alternative would not expose people or structures to hazards associated with inundation by a tsunami, nor result in land uses within areas subject to inundation from a seiche. As such, a significant impact would not occur.

Similar to the proposed Project, future development under the No New East Willows Village Alternative could be susceptible to mudflows. Compared to the proposed Project, this alternative proposes more residential units in rural outlying areas that are more susceptible to mudflows, resulting in increased risk to people or structures being exposed to mudflow hazards. These impacts would be significant and the mitigation identified in Section 2.7.4 of this SEIR would be required.

4.2.2.8 Land Use

Physical Division of an Established Community

Similar to the proposed Project, the No New East Willows Village Alternative does not include any new or improved roadways, railroad tracks, airports, or other features that would physically divide a community. As such, a significant impact would not occur.

Conflicts with Land Use Plans, Policies, and Regulations

Similar to the proposed Project, the No New East Willows Village Alternative would not conflict with the following planning documents: Regional Comprehensive Plans (RCP), Regional Transit Plans (RTPs), Congestion Management Plan (CMP), Basin Plan, Airport Land Use Compatibility Plans (ALUCPs), Regional Air Quality Strategies (RAQS), County Trails Program (CTP), Sphere of Influence (SOI), community plans, the County Zoning Ordinance, or specific plans. Future development under this alternative would only be consistent with the intended growth anticipated under the current General Plan for the Project areas within the unincorporated County lands if the areas are re-designated according to the same mapping principles used for the General Plan Update. If Semi-Rural designations are applied in areas otherwise designated as Rural Lands, this would be inconsistent with the mapping principles of the current General Plan.

If consistent mapping principles are applied, and if an equivalent number of residential units from the proposed Project's new village east of Viejas Casino are transferred to the outlying rural lands, then this alternative would not result in a significant impact associated with conflicts with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Conflicts with HCPs or NCCPs

Similar to the proposed Project, future development under the No New East Willows Village Alternative would not conflict with the MSCP and Coastal Sage Scrub NCCP Process Guidelines, which are the applicable HCPs for the unincorporated County.

4.2.2.9 Mineral Resources

Mineral Resource Availability

As known and unknown mineral resources may occur within some of the Project areas, primarily in the outlying rural lands that are designated MRZ-2 and MRZ-3, are underlain by Quaternary alluvium, or contain (or potentially contain) important aggregate resources, the loss of such mineral resources availability would be unavoidable due to planned growth under the No New East Willows Village Alternative. Compared to the proposed Project, this alternative would result in greater impacts on such lands with mineral resource potential due to increased residential development in these areas. These impacts would be significant, and the mitigation identified in Section 2.9.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.9.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Mineral Resource Recovery Sites

Similar to the proposed Project, future development under the No New East Willows Village Alternative may result in the siting of land uses in locations that would be incompatible with mining and resource recovery operations which could ultimately lead to the loss of availability of such mineral recovery sites. Compared to the proposed Project, this alternative would result in greater impacts on such operations due to increased residential development in outlying rural areas, within and near the CNF lands, where there is greater potential (rather than in the proposed Project's new village east of Viejas Casino) to encounter mining and resource recovery operations. These impacts would be significant, and the mitigation identified in Section 2.9.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.9.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

4.2.2.10 Noise

Excessive Noise Levels

The No New East Willows Village Alternative would reduce densities near noise-generating sources within the Alpine VCMU area that would otherwise have the potential to expose people to noise levels in excess of the County's compatibility guidelines. Compared to the proposed Project, this alternative would increase residential densities in outlying rural areas, within and near the CNF lands, and there is a possibility that these residences could be exposed to noise levels in excess of noise compatibility guidelines because such development may be situated nearer to noise-generating land uses and/or reduced areas of open space. Nevertheless, these impacts would be significant, and the mitigation identified in Section 2.10.4 of this SEIR would be required.

Excessive Groundborne Vibration

Future development of infrastructure in all Project areas would have the potential to result in substantial groundborne vibration and noise levels from construction. Compared to the proposed Project, the No New East Willows Village Intensity Alternative would accommodate less development in the proposed Project's new village east of Viejas Casino and allow more residential development in the outlying areas, within and near the CNF lands, which would all experience vibration impacts from construction activities and possibly a reduced number of vibration sensitive land uses. These impacts would be significant and the mitigation identified in Section 2.10.4 of this SEIR would be required.

Permanent Increase in Ambient Noise Levels

Similar to the proposed Project, the No New East Willows Village Alternative would accommodate the development of new noise generating land uses that could result in a significant increase in ambient noise levels. This alternative would result in lower density development within the proposed Project's new village east of Viejas Casino and increased residential development in the outlying areas, within and near the CNF lands, both of which would expose people to permanent increases in traffic or operational noise levels, including noise-sensitive land uses, to the same degree as the proposed Project. These impacts would be significant, and the mitigation identified in Section 2.10.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.10.4.3 of this SEIR; thus, the impacts would remain significant and unavoidable.

Temporary Increase in Ambient Noise Levels

Future construction of new development and infrastructure anywhere in the County would have the potential to result in substantial construction noise. The No New East Willows Village

Alternative would accommodate less development within the proposed Project's new village east of Viejas casino and allow more residential development in the outlying rural County lands, as compared to the proposed Project, which would have the potential to increase nuisance noise and associated noise complaints from neighboring uses. Nevertheless, these impacts would be significant, and the mitigation identified in Section 2.10.4 of this SEIR would be required.

Excessive Noise Exposure from a Public or Private Airport

As discussed in Section 2.6.3.5 (Public and Private Airports) of this SEIR, there are no public airports within the unincorporated County that would be affected by the Project areas addressed in this SEIR, but there would be four private airports in the communities of Alpine (U.S. Forest Service), and North Mountain (Ward Ranch, Warner Springs, and Loma Madera Ranch) which would be affected by the Project areas. Compared to the proposed Project, future development under the No New East Willows Village Alternative would result in increased residential densities within the outlying FCI lands, possibly near an existing USFS airport to the south of Alpine, exposing more residents in this area to excessive noise levels from airplane over-flights. These impacts would be significant and the mitigation identified in Section 2.10.4 of this SEIR would be required.

4.2.2.11 Public Services

Similar to the proposed Project, future development under the No New East Willows Village Alternative would impose demands on fire protection, police, school, and library services. To maintain or achieve acceptable service standards, new or physically altered fire, police, school, and library facilities would be required. The construction of any future facilities would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would disperse the demand for these services and facilities from one community planning area to multiple planning areas. Nevertheless, it is unlikely that the impacts on schools would be reduced to below a level of significance for the same reasons given in Section 2.11.4.2 of this SEIR; thus, the impacts would remain significant and unavoidable. In addition, this alternative would have the potential to increase the demand for services in the more outlying areas resulting in longer response times for emergency services to reach these areas. Therefore, impacts would be significant, and the mitigation identified in Section 2.11.4 of this SEIR would be required.

4.2.2.12 Recreation

Similar to the proposed Project, future development under the No New East Willows Village Alternative would increase the demand for recreational facilities throughout the Project areas, which would have the potential to result in accelerated deterioration of the facilities and the need for new or expanded facilities. The construction of any future recreational projects would have the potential to cause additional secondary environmental effects. Compared to the proposed

Project, which would increase the demand for recreational facilities in a single community, this alternative would accommodate an overall similar population increase and similar demands for recreational facilities, but would disperse the demand throughout multiple communities. These impacts would still be significant and the mitigation identified in Section 2.12.4 of this SEIR would be required.

4.2.2.13 *Transportation and Traffic*

Unincorporated County Traffic and LOS Standards

As evaluated in Section 2.13.3.1 of this SEIR, the traffic impacts associated with the Project are focused in the Alpine CPA because this is where the highest density of proposed land use changes would occur relative to the remaining Project areas which would be primarily rural and semi-rural residential uses spread out over several parcels within and near the CNF. The analysis for the proposed Project identified 10 roadway segments in Alpine that would remain at a deficient LOS even with the implementation of recommended roadway reclassifications as approved under the General Plan Update. With additional mitigation measures and roadway reclassifications as recommended for the proposed Project, these Alpine roadway segments would be reduced to below a level of significance. The No New East Willows Village Alternative would likely impact fewer Alpine roadways than the proposed Project because this alternative would result in a shifting of more residential development into the outlying areas, away from the proposed Project's new village east of Viejas. The increase in residences in these outlying areas may still cause additional significant traffic impacts on rural roads (i.e., worsening of one or more of the 10 roadway segments mentioned above or degradation of additional roadways) that may require additional mitigation measures and roadway reclassifications beyond those recommended in Section 2.13.4.1 of this SEIR. Nevertheless, it is unlikely that the impacts would be reduced to below a level of significance for the same reasons given in Section 2.13.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Rural Road Safety

Similar to the proposed Project, future development under the No New East Willows Village Alternative would increase trips on two lane roads in rural areas that are not developed to current road safety standards; add traffic to roads with slow moving agricultural equipment; and contribute to road safety conflicts (e.g., pedestrians, bicyclists, at grade railroad crossings). Compared to the proposed Project, this alternative would increase residential development in the outlying areas, within and near the CNF lands, resulting in a higher concentration of people potentially exposed to road hazards in such rural areas. These impacts would be significant and the mitigation identified in Section 2.13.4.2 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same

reasons given in Section 2.13.4.2 of this SEIR; thus, the impacts would remain significant and unavoidable.

Emergency Access

Similar to the proposed Project, future development under the No New East Willows Village Alternative could add traffic on a roadway network that is incomplete or not fully connected; on roadways that are dead-end and one-way; or within gated communities, all of which have the potential to impair emergency access. Compared to the proposed Project, the conditions that would potentially impair emergency access would remain the same. Therefore, this alternative would result in a significant impact with regard to emergency access, and the mitigation identified in Section 2.13.4 of this SEIR would be required.

Parking Capacity

Similar to the proposed Project, future development under the No New East Willows Village Alternative would be required to comply with the parking standards set forth in the County of San Diego Zoning Ordinance, Parking Regulations, Sections 6750-6799 and the County of San Diego Off-Street Parking Design Manual, which implements Section 6793(c) of the County Zoning Ordinance. Compared to the Project, this alternative would allow for more residential development in the outlying areas which could better accommodate the need for off-street parking on the larger lots, versus the smaller parcels and less densities in the Alpine VCMU area which would result in fewer parking demands. Nevertheless, this alternative would still result in a significant impact with regard to parking capacity, and the mitigation identified in Section 2.13.4 of this SEIR would be required.

Alternative Transportation

Similar to the proposed Project, future development under the No New East Willows Village Alternative would provide for alternative modes of transportation, including bike lanes, bus stops, trails, and sidewalks. While existing County policies and regulations are intended to promote alternative transportation, this alternative may conflict with those of other agencies responsible for alternative transportation planning (e.g., SANDAG, Caltrans, transit agencies, and adjacent jurisdictions). Compared to the proposed Project, this alternative would result in lower density development within the VCMU-designated area in Alpine, which could reduce the potential for conflicts with existing public transportation plans due to a higher population of potential users of alternative modes of transportation in this area of Alpine. Nevertheless, potential impacts would be significant, and the mitigation identified in Section 2.13.4 of this SEIR would be required.

4.2.2.14 Utilities and Service Systems

Wastewater Treatment Requirements

Similar to the proposed Project, the No New East Willows Village Alternative would have the potential to violate wastewater treatment standards if the demand for wastewater treatment services increases at a rate disproportionate to the capacity of treatment facilities. Additionally, future development in the eastern portion of the County could violate water quality standards and wastewater discharge requirements if residences do not adequately maintain septic systems. Compared to the proposed Project, this alternative would accommodate a similar population in the SDCWA service area and result in a similar demand for wastewater treatment services; however, the proposed Project's new village east of the Viejas Casino would likely require an expansion of wastewater treatment facilities. As such, this alternative would shift Village residential density that requires wastewater treatment services to the outlying areas dependent on septic systems. Therefore, overall demand for wastewater treatment would likely decrease under this alternative, compared to the proposed Project. Nevertheless, these impacts would still be considered significant and the mitigation identified in Section 2.14.4 of this SEIR would be required.

New Water and Wastewater Facilities

Similar to the proposed Project, future development under the No New East Willows Village Alternative would require new and expanded water and wastewater facilities to meet demand, particularly new development in the backcountry areas that are not currently served. Additionally, the construction of new septic systems to serve new development in the outlying areas would require the installation of septic tanks and leach lines. The construction of any future facilities would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would accommodate an overall similar population increase and similar demands for new and expanded water and wastewater facilities because there would only be a shifting of development densities from the proposed Project's new village east of Viejas Casino to rural areas. Due to this shifting of development densities, the greater the dispersal of such development into the outlying areas, the greater would be the potential for associated environmental impacts because more infrastructure would be required. These impacts would be significant, and the mitigation identified in Section 2.14.4 of this SEIR would be required.

Sufficient Stormwater Drainage Facilities

Similar to the proposed Project, future development under the No New East Willows Village Alternative would increase the amount of impermeable surfaces from new development within the Project areas, thereby increasing the amount of stormwater runoff potentially exceeding the capacity of stormwater drainage systems and requiring new or expanded facilities which would

have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would result in more residential development within the outlying areas, some of which may not include stormwater drainage facilities. As such, the overall environmental impacts related to the construction of new or expanded stormwater drainage facilities would increase under this alternative because demand would be greater than for the proposed Project. These impacts would be significant, and the mitigation identified in Sections 2.7.4.2 and 2.14.4 of this SEIR would be required.

Adequate Water Supplies

Similar to the proposed Project, future development under the No New East Willows Village Alternative would increase the population and housing units within the service areas of SDCWA member water districts and groundwater dependent water districts, thereby increasing the demand for water supplies to serve the Project areas that may not have been accounted for in the most current water planning documents. This would potentially result in some groundwater dependent districts having inadequate water supply to serve the projected demand as some basins may experience substantial declines in groundwater storage. More wells may need to be replaced as water levels drop below perforated levels. The drawdown of groundwater supplies can significantly lower groundwater levels in an area and therefore cause a loss of flow in a surrounding river or other water body due to seepage through the riverbed. Compared to the proposed Project, this alternative would accommodate an overall similar population increase because there would only be a shifting of development densities from the Alpine VCMU area to rural areas. These impacts would be significant, and the mitigation identified in Section 2.14.4 of this SEIR would be required. Nevertheless, it is unlikely that the impacts on water supplies would be reduced to below a level of significance for the same reasons given in Section 2.14.4.4 of this SEIR; thus, the impacts would remain significant and unavoidable.

Adequate Wastewater Treatment Facilities

Similar to the proposed Project, future development under the No New East Willows Village Alternative would increase wastewater treatment demand due to increased sewage flows requiring new and expanded wastewater treatment facilities to meet demand. Some wastewater districts may have inadequate capacity to serve the projected demand in addition to their existing commitments. In addition, this alternative would increase population and housing in areas where wastewater districts do not have adequate service systems in place to serve the projected growth of the community. This alternative would accommodate an overall similar population increase within the SDCWA member agency service areas; however, it would not require the service areas be expanded as with the proposed Project. Therefore, this alternative would have less demand for new and expanded wastewater treatment facilities because the proposed Project's new village east of Viejas Casino would be built with semi-rural residential development which would not require expansion of the wastewater district's service area; however, due to this

shifting of development densities, the greater the dispersal of such development into rural areas, the greater would be the potential for associated environmental impacts because more infrastructure facilities would be required. These impacts would be significant and the mitigation identified in Section 2.14.4 of this SEIR would be required.

Sufficient Landfill Capacity

If additional landfills are not constructed and existing landfills are not expanded, it is anticipated that the County will run out of physical landfill capacity by 2024. Similar to the proposed Project, future development under the No New East Willows Village Alternative would result in an increase in solid waste disposal needs for which there will be insufficient landfill capacity to accommodate these needs. Since this alternative would have less rural commercial development within the proposed Project's new village east of Viejas Casino than the proposed Project, it would require slightly less solid waste disposal needs in this area. These impacts would still be significant, and the mitigation identified in Section 2.14.4 of this SEIR would be required. Nevertheless, it is unlikely that the impacts on landfill capacity would be reduced to below a level of significance for the same reasons given in Section 2.14.4.6 of this SEIR; thus, the impacts would remain significant and unavoidable.

Solid Waste Regulations

Similar to the proposed Project, future development under the No New East Willows Village Alternative would be required to comply with federal, State, and local statutes and regulations related to solid waste. Compliance with existing regulations would ensure that impacts to solid waste regulations would be reduced to below a level of significance. Therefore, this alternative would not result in a significant impact associated with conflicts with solid waste regulations.

Energy

Similar to the proposed Project, future development under the No New East Willows Village Alternative would require energy for construction and operation, thereby increasing energy demand in the County. To accommodate the projected increase in energy demand, energy facilities would need to be constructed or expanded, the construction of which would have the potential to cause additional secondary environmental effects. The compact development pattern of the proposed Project's new village east of Viejas Casino would likely result in a reduced energy demand compared to the dispersed pattern of residential development proposed by this alternative. In addition, this alternative would have a reduced amount of rural commercial development resulting in a further decrease in energy demands in this area. Nevertheless, these impacts would still be considered significant and the mitigation identified in Section 2.14.4 of this SEIR would be required.

4.2.2.15 Climate Change

Compliance with AB 32

Future development under the No New East Willows Village Alternative would result in greater VMT than the proposed Project due to more residential development in the outlying areas which would translate to increased GHG emissions from transportation. These impacts would be significant and the mitigation identified in Section 2.15.4 of this SEIR would be required.

Adverse Climate Change Impacts

Climate change impacts that would be most relevant to the unincorporated County are the effects on water supply, wildfires, energy needs, and impacts to public health. Similar to the proposed Project, future development under the No New East Willows Village Alternative would result in additional sensitive receptors (e.g., residential, daycare facilities) exposed to general climate change effects such as decreases in available water supply, increased frequency of wildfires, increased demand for energy as a result of the greater need for summer cooling, and impacts to public health related to increased heat, air pollution, wildfires, and infectious diseases. Compared to the proposed Project, this alternative would result in more residential development in the outlying areas which would translate to increased GHG emissions. These impacts would be significant and the mitigation identified in Section 2.15.4 of this SEIR would be required.

4.3 Analysis of the Modified Project (Environmentally Superior) Alternative

4.3.1 Modified Project (Environmentally Superior) Alternative Description and Setting

As described in Section 1.6.1 (Additional Review and Consultation Requirements) of this SEIR, prior to and since the adoption of the General Plan Update in August 2011, the County PDS Department has been working with community planning and sponsor groups, and affected property owners, to plan for the appropriate and equitable application of land use and zoning designations for the former FCI lands, while ensuring consistency with the Guiding Principles of the General Plan. Through this process, different approaches for distributing density were considered among the former FCI lands, with an emphasis on future development which is more sensitive to the environmental resources and/or constraints on the subject properties.

During the NOP public review period for this SEIR (refer to Section 1.1.2.1), comments were received and considered by the County in the preparation of this document. For the purpose of identifying feasible Project alternatives, the following comment letters are considered in this analysis because they propose reduced densities on specific parcels to further reduce Project impacts associated with biological resources, fire hazards, increased urban interface (e.g., encroachment, habitat fragmentation, non-native invasive plants), unauthorized access (e.g.,

trails, roads) and off-highway vehicle use, and new construction of and improvements to infrastructure, public services and narrow County or USFS roads (refer to Appendix B of this SEIR): Endangered Habitats League (dated September 19, 2012); USFS Cleveland National Forest (CNF) (dated September 28, 2012); and Nicole McDonough (dated September 24, 2012). These comments collectively form the basis of a new alternative referred to herein as the “Modified Project Alternative.”

Based on the recommendations in these letters which propose reduced density land use designations for specific parcels within and adjacent to the CNF lands, a Modified Project Alternative Map was created (Figure 4-1A-C) for environmental review. The specific changes addressed by these letters involve the following:

Alpine CPA: re-designate 263.66 acres of semi-rural residential (1 dwelling unit per acre [du/ac]) parcels located northwest and northeast of Viejas Reservation (USFS CNF) to rural lands residential (1 du/40 ac), 9.42 acres of rural commercial to semi-rural residential (1 du/4 ac) parcels along Willows Road west of the Viejas Casino (McDonough), and 1,707.66 of semi-rural residential (1 du/10 ac) in the vicinity of Japatul Valley Road, south of Abrams Ridge and south of Old Ranch Road, to rural lands (1 du/40 ac) parcels (EHL).

Central Mountain Subregion – Cuyamaca: re-designate 2,853.26 acres of rural lands (1 du/40 ac) along Boulder Creek Road, in the vicinity of the Upper San Diego River and the CNF Sill Hill Inventoried Roadless Area (IRA), to rural lands (1du/80 ac) parcels (USFS CNF).

Central Mountain Subregion – Descanso: re-designate 1,023.22 acres of semi-rural lands (1 du/10 ac) in the vicinity of the CNF King Creek Research Natural Area and Sill Hill IRA to rural lands (1du/40 ac) parcels (USFS CNF). In addition, this alternative involves re-designation of semi-rural lands (1 du/10 ac) in the vicinity of Vernal Road (north of I-8), and in the vicinity of Old Ranch Road/Japatul Valley Road (south of I-8), to rural lands (1du/20 ac) parcels (EHL). Finally, this alternative involves re-designation of rural lands (1 du/40 ac) in the vicinity of Old Ranch Road, east of Japatul Valley Road and south of I-8, to rural lands (1du/80 ac) parcels (EHL).

Jamul/Dulzura Subregion: re-designate 258.27 acres of semi-rural lands (1 du/10 ac) in the vicinity of Skye Valley Ranch to rural lands (1 du/20 ac); and, 1,042.63 acres of rural lands (1 du/40 ac) in the vicinity of the CNF Pine Creek and Hauser Wilderness Areas to rural lands (1du/80 ac) parcels (USFS).

Mountain Empire Subregion – Lake Morena/Campo: re-designate 165.80 acres of semi-rural lands (1 du/10 ac) south of Lake Morena Village to rural lands (1du/20 ac) parcels (EHL).

North Mountain Subregion – Palomar Mountain: re-designate 191.60 acres of semi-rural lands (1 du/10 ac) northeast of the Town Center Village to rural lands (1du/20 ac or 1du/40 ac) parcels (EHL).

Pendleton/De Luz CPA: re-designate 458.06 acres of rural lands (1 du/40 ac) in the vicinity of in the vicinity of Miller Mountain and the CNF San Mateo Canyon Wilderness Area to rural lands (1du/80 ac) parcels (USFS).

The Modified Project Alternative is less intensive than the proposed Project and would result in less environmental impacts. This alternative would support build-out of approximately 4,817 residential dwelling units, or approximately 382 less than the proposed Project. When compared to the proposed Project, this alternative would primarily involve the re-designation of semi-rural lands (1 du/10 ac) and rural lands (1 du/20 ac) to the lowest density rural land use designations allowed by the General Plan (1 du/40 ac and 1 du/80 ac), thereby increasing the amount of rural lands by 4,282.03 acres as compared to the proposed Project. In addition, this alternative would result in acreage decreases in the following land use designations within the Alpine CPA, as compared to the proposed Project: semi-rural residential (-1,980.74 acres). The areas that would experience substantial changes in the rural lands designations under this alternative, and therefore less residential buildout compared to the proposed Project, include Jamul/Dulzura Subregion (1,330.40 acres); and, Alpine CPA (13,372.30 acres); Central Mountain Subregion – Cuyamaca and Descanso (8,593.20 acres combined).

The Modified Project Alternative is also considered the Environmentally Superior Alternative as it would accommodate less development than the proposed Project, thus decreasing environmental impacts. As such, this alternative better accounts for environmental considerations and constraints, compared to the proposed Project and the other alternatives, by more aggressively restricting growth in remote areas within and adjacent to the CNF.

4.3.2 Comparison of the Effects of the Modified Project (Environmentally Superior) Alternative to the Proposed Project

4.3.2.1 *Aesthetics*

Scenic Vistas

Similar to the proposed Project, the Modified Project Alternative recommends land use designations that would have the potential to obstruct, interrupt, or detract from scenic vistas (refer to Section 4.2.2.1 regarding interruption of scenic expanse of open space and inconsistency with surrounding landscapes). Compared to the proposed Project, this alternative would result in an overall reduced density of residential development within and adjacent to the CNF, which would result in less obstructions or distractions to scenic vistas in these areas. As such, future development under this alternative would result in fewer direct, indirect and cumulative impacts to scenic vistas compared to the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.1.4 of this SEIR would be required.

Scenic Resources

Similar to the proposed Project, the Modified Project Alternative recommends land use designations that would result in the 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 out-croppings. For example, future development under this alternative could result in the removal or destruction of a scenic resource during construction or demolition activities. Additionally, if future development is inconsistent with surrounding scenic resources, it would detract from the visual quality of the resources. Compared to the proposed Project, this alternative would result in an overall reduced density of residential development within and adjacent to the CNF. As such, future development under this alternative would result in fewer direct, indirect and cumulative impacts to scenic resources from construction or demolition activities compared to the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.1.4 of this SEIR would be required.

Visual Character or Quality

Similar to the proposed Project, the Modified Project Alternative recommends land use designations that could degrade the existing visual character or quality of backcountry areas. While most land use designations would generally be compatible with existing communities, the proposed VCMU, village residential and rural commercial land uses within town centers could result in a substantial change to the existing community character of a CPA, particularly if future development is improperly designed or located; however, this alternative would provide lower density designations within the Alpine Town Center when compared to the proposed Project which would lessen impacts to existing community character.

When compared to the proposed Project, this alternative would accommodate 382 fewer housing units with less potential to impact the existing visual character or quality of a community. As such, future development under this alternative would result in less direct and cumulative visual character impacts compared to the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.1.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.1.4.3 of this SEIR; thus, the impacts would remain significant and unavoidable.

Light or Glare

Similar to the proposed Project, the Modified Project Alternative recommends land use designations that would result in new sources of light or glare from building materials and outdoor lighting used in new residential, commercial, or public/semi-public developments allowable under its land uses. Such additional night lighting is detrimental to astronomy research

at the Palomar and Mount Laguna Observatories. Within Zone A, which represents areas that have the greatest impact on the Palomar and Mount Laguna Observatories, this alternative would accommodate 382 fewer homes than the proposed Project and therefore less potential for structures to cause substantial new sources of light or glare. As such, future development under this alternative would result in fewer direct and cumulative impacts to dark skies compared to the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.1.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.1.4.4 of this SEIR; thus, the impacts would remain significant and unavoidable.

4.3.2.2 *Agricultural and Forestry Resources*

Impacts related to the direct and indirect conversion of agricultural and forestry resources, and land-use conflicts with agricultural/timberland production zoning would be similar to those discussed for the Proposed Project but to a lesser degree because of the overall decrease in development under the Modified Project Alternative.

Direct Conversion of Agricultural Resources

Potential impacts to County agricultural resources from the Modified Project Alternative would be less than that of the proposed Project. Similar to the impact assumptions for the proposed Project (per the General Plan Update Final Program EIR), the proposed village residential, VCMU, and rural commercial land use designations would result in direct conversion of all existing agricultural resources on the affected parcels because these land uses would result in parcels too small for viable agriculture. Future development under this alternative would result in fewer direct, indirect and cumulative impacts to agricultural resources compared to the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.2.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.2.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Land-Use Conflict

Similar to the proposed Project, future development under the Modified Project Alternative could result in significant direct and indirect land use conflicts with agricultural uses, Williamson Act Contract lands, forest land, timberland, or areas zoned for Timberland Production. Land use/agricultural interface issues would have the potential to occur such as dust, noise, and conflicts with pesticide use. In addition, future development adjacent to forest lands could conflict with the use and management of such lands as envisioned by the CNF Land Management Plan, such as the production of wood products and fuel wood harvesting activities; however, fewer acres of incompatible land uses would be placed near agricultural resources and forest lands under this alternative due to the overall decrease in development compared to the proposed Project. As

such, future development under this alternative would result in fewer direct, indirect and cumulative impacts associated with potential conflicts with adjacent agricultural uses, Williamson Act Contract lands, or forest lands compared to the proposed Project; however, these conflicts would still be considered significant and the mitigation identified in Section 2.2.4 of this SEIR would be required.

Indirect Conversion of Agricultural Resources

Although the Modified Project Alternative would increase lower density land uses while decreasing higher density land uses, as compared to the proposed Project, future development under this alternative would place some incompatible land uses in the vicinity of surrounding agricultural uses creating the potential for an indirect conversion of these lands to non-agricultural uses. When compared to the proposed Project, fewer acres of incompatible land uses would be placed near agricultural lands, thereby reducing the potential for such indirect conversions. As such, future development under this alternative would be less likely to cause an indirect conversion of these lands to non-agricultural uses compared to the proposed Project; however, the indirect and cumulative impacts would still be considered significant and the mitigation identified in Section 2.2.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.2.4.3 of this SEIR; thus, the impacts would remain significant and unavoidable.

Direct and Indirect Conversion of Forestry Resources

The County of San Diego does not include lands zoned for forest land, timberland, or timberland production. Rather, these lands are located on State parks and National forests, including CNF lands which are under the jurisdiction of USFS; however, some private parcels within the Project areas which are under the jurisdiction of the County may contain lands that would be defined as “forestry resources” or “timberland” by USFS (e.g., trees that can be processed for timber products). Similar to the proposed Project, future development under the Modified Project Alternative may result in the permanent loss of such forestry resources or timberland on private lands, or the direct conversion of such lands to non-forest use. Additionally, future development under this alternative may result in land uses that are incompatible with adjacent or nearby CNF lands, such as the construction of a housing tract next to a heavily forested area. Such development could eventually lead to permanent impacts on the CNF lands due to factors such as erosion/siltation, invasive plants, edge effects (e.g., human intrusion, predation by pets), noise (e.g., nest abandonment), nightlighting (e.g., nocturnal wildlife predation), and habitat fragmentation, or the indirect conversion of such lands to non-forest use. This alternative would result in less overall direct and indirect impacts to forestry resources, as compared to the proposed Project, because it would involve a reduction in residential densities in outlying areas within and near the CNF lands which contain forestry resources; however, the direct, indirect and cumulative impacts would still be considered significant and the mitigation identified in Section

2.2.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.2.4.4 of this SEIR; thus, the impacts would remain significant and unavoidable.

4.3.2.3 *Air Quality*

Air Quality Plans

The Modified Project Alternative would accommodate less growth than the proposed Project; therefore, it would result in fewer emissions Countywide than were accounted for in the Regional Air Quality Strategies (RAQS) and State Implementation Plan (SIP). Additionally, future development under this alternative would be required to be consistent with the emission reduction strategies in the RAQS and SIP. Therefore, this alternative would not result in significant conflicts with the RAQS and SIP.

Air Quality Violations

Temporary construction-related air pollutant emissions under the Modified Project Alternative would be less than the proposed Project because less development would be accommodated. Similar to the proposed Project, new stationary sources of pollutants under this alternative would be subject to the APCD requirements for permitting and must demonstrate that they will not cause or contribute to a violation of an air quality standard; however, future development under this alternative would result in a lesser increase in vehicle miles traveled (VMT), and corresponding emissions that would violate air quality standards, compared to the proposed Project. As such, future development under this alternative would result in fewer direct and cumulative impacts associated with air quality violations compared to the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.3.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.3.4.2 of this SEIR; thus, the impacts would remain significant and unavoidable.

Non-attainment of Criteria Pollutants

Similar to the proposed Project, the Modified Project Alternative would result in new construction activities and vehicle trips that would result in temporary and permanent increases in emissions of non-attainment criteria pollutants. As discussed in the preceding paragraph, this alternative would result in less construction and fewer VMT, and therefore fewer corresponding emissions that would violate air quality standards, as compared to the proposed Project. As such, future development under this alternative would result in fewer direct and cumulative impacts associated with potential exceedances of non-attainment criteria air pollutants compared to the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.3.4 of this SEIR would be required. Nevertheless, it is unlikely that these

impacts would be reduced to below a level of significance for the same reasons given in Section 2.3.4.3 of this SEIR; thus, the impacts would remain significant and unavoidable.

Sensitive Receptors

Similar to the proposed Project, the Modified Project Alternative would result in increased truck trips and use of construction equipment for new development which would emit diesel particulate matter and increase the exposure of sensitive receptors to TACs. As discussed in the preceding paragraph, this alternative would result in less construction and fewer VMT, and therefore fewer corresponding emissions that would violate air quality standards, as compared to the proposed Project. As such, future development under this alternative would result in fewer direct, indirect and cumulative impacts to sensitive receptors compared to the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.3.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.3.4.3 of this SEIR; thus, the impacts would remain significant and unavoidable.

Objectionable Odors

Similar to the proposed Project, odor generating land uses proposed under the Modified Project Alternative would be required to comply with APCD Rule 51 and County of San Diego Code of Regulatory Ordinances Sections 63.401 and 63.402, which prohibit nuisance odors from affecting nearby receptors. Therefore, this alternative would not result in a significant impact associated with objectionable odors.

4.3.2.4 Biological Resources

Special Status Plant and Wildlife Species

Similar to the proposed Project, future development under the Modified Project Alternative would result in direct, indirect and cumulative impacts to special status plant and wildlife species and their habitats. This analysis is based on the same impact assumptions used for the proposed Project (refer to Section 4.2.2.4). The Modified Project Alternative would involve approximately 4,282 additional acres of rural lands, resulting in less biological impacts (as stated above) compared to the proposed Project, and approximately 2,000 fewer acres of higher density land uses (i.e., semi-rural residential) which would otherwise result in greater impacts. As such, future development under this alternative would result in fewer direct and cumulative impacts to habitats that would have the potential to support special status plant and wildlife species, compared to the 5,142 acres impacted under the proposed Project (refer to Table 2.4-2 of this SEIR). Additionally, this alternative would result in fewer indirect impacts to special status species because it would accommodate fewer high-density land uses that are associated with intensive nighttime lighting and noise which can adversely affect wildlife; however, impacts

would still be considered significant and the mitigation identified in Section 2.4.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.4.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Riparian Habitat and Other Sensitive Natural Communities

Similar to the proposed Project, future development under the Modified Project Alternative would result in direct, indirect and cumulative impacts to riparian habitat and other sensitive natural communities by the removal or destruction of such habitat for new development or infrastructure. Potential indirect impacts include adverse effects to water quality in riparian habitat from pollutants in runoff and sedimentation during construction, and fugitive dust produced by construction that would have the potential to disperse onto sensitive vegetation adjacent to construction sites. As discussed in the preceding paragraph, future development under this alternative would result in fewer impacts to habitats (including riparian habitat and other sensitive vegetation communities), compared to the 5,142 acres impacted under the proposed Project (refer to Table 2.4-2 of this SEIR), due to an increase in rural lands, which result in less biological impacts, and a decrease in higher density land uses (i.e., semi-rural residential), which would otherwise result in greater impacts; however, impacts would still be considered significant and the mitigation identified in Section 2.4.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.4.4.2 of this SEIR; thus, the impacts would remain significant and unavoidable.

Federally Protected Wetlands

Similar to the proposed Project, impacts to federally protected wetlands from future development under the Modified Project Alternative would involve actions such as direct removal, filling, hydrological interruption, or other destructive modifications associated with new development and infrastructure. As discussed in the preceding paragraphs, future development under this alternative would result in fewer impacts to habitats (including wetlands) compared to the proposed Project, due to an increase in rural lands, which result in less biological impacts, and a decrease in higher density land uses (i.e., semi-rural residential), which would otherwise result in greater impacts; however, impacts would still be considered significant and the mitigation identified in Section 2.4.4 of this SEIR would be required.

Wildlife Movement Corridors and Nursery Sites

As discussed in the preceding paragraphs, future development under the Modified Project Alternative would result in fewer impacts to habitats (that may function as wildlife movement corridors or nursery sites), compared to the 5,142 acres impacted under the proposed Project (refer to Table 2.4-2 of this SEIR), due to an increase in rural lands, which result in less

biological impacts, and a decrease in higher density land uses (i.e., semi-rural residential), which would otherwise result in greater impacts; however, impacts would still be considered significant and the mitigation identified in Section 2.4.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.4.4.4 of this SEIR; thus, the impacts would remain significant and unavoidable.

Local Policies and Ordinances

Similar to the proposed Project, future development under the Modified Project Alternative would not conflict with programs and ordinances that protect biological resources because discretionary projects are required to comply with the County's MSCP Subarea Plan, BMO, HLP Ordinance, and RPO, and the Southern California Coastal Sage Scrub NCCP Process Guidelines.

HCPs and NCCPs

As stated above, future development under the Modified Project Alternative would not conflict with the County's MSCP Subarea Plan and the Coastal Sage Scrub NCCP Process Guidelines, which are the applicable HCPs for the Project areas within the unincorporated County lands.

4.3.2.5 Cultural Resources

Historical Resources

Similar to the proposed Project, future development under the Modified Project Alternative could result in direct, indirect and cumulative impacts to historical resources. In addition to direct disturbance from demolition, destruction, alteration, or structural relocation, direct impacts include redevelopment of a historical structure or site that is not compatible with the authenticity of a resource and would substantially alter its significance. Indirect impacts may involve the potential to adversely affect historical sites through the introduction of visual, audible, or atmospheric effects that are out of character with the historical resource. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in fewer potential impacts to historical resources; however, impacts would still be considered significant and the mitigation identified in Section 2.5.4 of this SEIR would be required.

Archaeological Resources

Similar to the proposed Project, future development under the Modified Project Alternative could result in direct and cumulative impacts to archaeological resources. These impacts include ground-disturbing activities, such as excavation and grading, that have the potential to damage or destroy archaeological resources that may be present on or below the ground surface, particularly

in areas that have not previously been developed. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) which are expected to result in less excavation or grading activities than the higher density land uses; thereby resulting in fewer potential impacts to archaeological resources; however, impacts would still be considered significant and the mitigation identified in Section 2.5.4 of this SEIR would be required.

Paleontological Resources

Similar to the proposed Project, future development under the Modified Project Alternative could result in direct and cumulative impacts to paleontological resources. These impacts include ground-disturbing activities, such as excavation and grading, that have the potential to damage or destroy fossils in the underlying rock units, particularly in areas that have not previously been developed. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) which are expected to result in less excavation or grading activities than the higher density land uses; thereby resulting in fewer potential impacts to paleontological resources; however, impacts would still be considered significant and the mitigation identified in Section 2.5.4 of this SEIR would be required.

Human Remains

Similar to the proposed Project, future development under the Modified Project Alternative could result in direct and cumulative impacts to archaeological resources which are often associated with human remains. These impacts include ground-disturbing activities, such as excavation and grading, that have the potential to damage or destroy human remains that may be present on or below the ground surface, particularly in areas that have not previously been developed. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) which are expected to result in less excavation or grading activities than the higher density land uses; thereby resulting in fewer potential impacts to human remains; however, impacts would still be considered significant and the mitigation identified in Section 2.5.4 of this SEIR would be required.

4.3.2.6 Hazards and Hazardous Materials

Transportation, Use, and Disposal of Hazardous Materials

Similar to the proposed Project, future development under the Modified Project Alternative may involve the use, disposal, or transport of hazardous materials. Although hazardous materials can be found in all land uses, the proposed rural commercial designation is more likely to result in

uses that regularly involve hazardous materials; however, all development is required to comply with applicable federal, State, and local regulations pertaining to the transportation, use, and disposal of hazardous materials. Due to the reduction in rural commercial land uses in the Alpine Town Center, compared to the proposed Project, the Modified Project Alternative would result in less potential for impacts associated with the use, disposal, or transport of hazardous materials. Nevertheless, compliance with existing regulations would reduce such impacts to below a level of significance.

Accidental Release of Hazardous Materials

Similar to the proposed Project, future development under the Modified Project Alternative may involve uses that could result in accidental release of hazardous materials. Although hazardous materials can be found in all land uses, the proposed rural commercial designation is more likely to result in uses that regularly involve hazardous materials. Additionally, existing industries and businesses that use hazardous materials would have the potential to expand or increase to accommodate the anticipated growth under this alternative; however, all development is required to comply with applicable federal, State, and local regulations pertaining to the transportation, use, and disposal of hazardous materials. Due to the reduction in rural commercial land uses in the Alpine Town Center, compared to the proposed Project, the Modified Project Alternative would result in less potential for impacts associated with the accidental release of hazardous materials. Nevertheless, compliance with existing regulations would reduce such impacts to below a level of significance.

Hazards to Schools

Similar to the proposed Project, future development under the Modified Project Alternative may involve land uses that have a high potential for hazardous materials usage which would be located within one-quarter mile of an existing or proposed school or daycare. Although hazardous materials can be found in all land uses, the proposed rural commercial designation is more likely to result in uses that regularly involve hazardous materials. Additionally, existing industries and businesses that use hazardous materials would have the potential to expand or increase to accommodate the anticipated growth under this alternative; however, all development is required to comply with applicable federal, State, and local regulations pertaining to the transportation, use, and disposal of hazardous materials. Due to the reduction in rural commercial land uses in the Alpine Town Center, compared to the proposed Project, the Modified Project Alternative would result in less potential for impacts associated with the potential release of hazardous materials near schools or daycare facilities. Nevertheless, compliance with existing regulations would reduce such impacts to below a level of significance.

Existing Hazardous Material Sites

Similar to the proposed Project, future development under the Modified Project Alternative may result in the placement of designated land uses on or near sites that would have the potential to create significant hazards to the public or environment, such as those pursuant to Government Code 65962.5; burn dump sites; active, abandoned, or closed landfills; FUDS; areas with historic or current agriculture; or areas with petroleum contamination; however, all development is required to comply with applicable federal, State, and local regulations pertaining to remediation efforts and/or protection of new development in the vicinity of known hazardous materials sites. Compliance with these regulations would reduce such impacts to below a level of significance.

Public and Private Airports

As discussed in Section 2.6.3.5 (Public and Private Airports) of this SEIR, there are no public airports within the unincorporated County that would be affected by the Project areas addressed in this SEIR, but there would be four private airports in the communities of Alpine (U.S. Forest Service), and North Mountain (Ward Ranch, Warner Springs, and Loma Madera Ranch) which would be affected by the Project areas. Similar to the proposed Project, future development under the Modified Project Alternative may involve the siting of new land uses within two miles from one of these private airports, thereby resulting in a safety hazard for people residing or working in the vicinity of these airports; however, this alternative would designate lower density development near these airports (i.e., 1 du/80 ac or 1 du/40 ac versus the semi-rural residential land uses under the proposed Project), resulting in a reduced risk to people living or working in areas associated with potential airport operation hazards. Nevertheless, impacts would still be considered significant and the mitigation identified in Section 2.6.4 of this SEIR would be required.

Emergency Response and Evacuation Plans

Similar to the proposed Project, construction activities associated with development occurring under the Modified Project Alternative would have the potential to interfere with adopted emergency plans and procedures if authorities are not properly notified or if multiple roadways used for emergency routes are concurrently blocked. There is also a potential that the existing emergency response and evacuation plans that serve the unincorporated County lands in the vicinity of the Project areas may not account for the different development patterns associated with Project buildout. This could cause an inadvertent impairment of the existing emergency response plans and policies, which could result in a loss of life and/or property in the event of an emergency; however, this alternative would designate lower density development throughout the backcountry areas within and near the CNF (i.e., 1 du/80 ac or 1 du/40 ac versus the semi-rural residential land uses under the proposed Project), resulting in less development with the potential to impair emergency response and evacuation plans. Nevertheless, impacts would still be

considered significant and the mitigation identified in Section 2.6.4 of this SEIR would be required.

Wildland Fires

Similar to the proposed Project, future development under the Modified Project Alternative would occur in areas that are prone to wildland fires and would, therefore, have the potential to expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands; however, this alternative would designate lower density development throughout the backcountry areas within and near the CNF (i.e., 1 du/80 ac or 1 du/40 ac versus the semi-rural residential land uses under the proposed Project), resulting in less development and reduced risk to people living or working in areas subject to wildfires. Additionally, when compared to the proposed Project, this alternative specifically reduces land use densities in the backcountry areas that are served by fire agencies with greater distance to cover (longer travel times) and in areas which have difficulty meeting fire code requirements due to limited access; however, impacts would still be considered significant and the mitigation identified in Section 2.6.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.6.4.7 of this SEIR; thus, the impacts would remain significant and unavoidable.

Vectors

Similar to the proposed Project, future development under the Modified Project Alternative would not create a potentially significant hazard to the public or the environment by substantially increasing human exposure to vectors. This alternative would not result in sources of standing water bodies or other vector breeding sources such as composting or manure management facilities. As such, a significant impact would not occur.

4.3.2.7 Hydrology and Water Quality

Water Quality Standards and Requirements

Similar to the proposed Project, future development under the Modified Project Alternative would have the potential to result in the following: 1) substantial additional sources of polluted runoff which would have short-term impacts on surface water; 2) pollutants, such as soils, debris, and other materials, in quantities that would potentially exceed water quality standards and otherwise significantly degrade water quality; 3) non-point source pollution into surface and groundwater bodies; and 4) violate groundwater quality standards by designating land uses that would be groundwater dependent in areas that are currently experiencing groundwater contamination (i.e., new wells constructed to support development in these areas would be susceptible to the contaminated groundwater supply which would have the potential to result in a

non-potable water supply). Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less development and less surface and groundwater quality impacts; however, impacts would still be considered significant and the mitigation identified in Section 2.7.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.7.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Groundwater Supplies and Recharge

As discussed in the County General Plan Update Groundwater Study (DPLU 2008d), multiple areas of the unincorporated County are currently experiencing groundwater supply impacts. Similar to the proposed Project, additional development reliant on groundwater sources under the Modified Project Alternative would occur in areas already impacted by large quantity groundwater users and clustered development, and in areas experiencing a high frequency of wells with low yield, thereby worsening an unsustainable groundwater supply. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less development and less reliance on groundwater sources; however, impacts would still be considered significant and the mitigation identified in Section 2.7.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.7.4.2 of this SEIR; thus, the impacts would remain significant and unavoidable.

Erosion or Siltation

Similar to the proposed Project, future development under the Modified Project Alternative would result in permanent alterations to existing drainage patterns by converting areas from pervious surfaces to impervious surfaces, thereby increasing runoff volumes and erosion/siltation. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less potential for erosion/siltation impacts; however, impacts would still be considered significant and the mitigation identified in Section 2.7.4 of this SEIR would be required.

Flooding

Similar to the proposed Project, future development under the Modified Project Alternative would result in permanent alterations to existing drainage patterns by converting areas from pervious surfaces to impervious surfaces, thereby increasing the rate or amount of surface runoff in a manner which would result in flooding on- or off-site during and after construction

activities. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less potential for flooding impacts; however, impacts would still be considered significant and the mitigation identified in Section 2.7.4 of this SEIR would be required.

Exceed Capacity of Stormwater Systems

Similar to the proposed Project, future development under the Modified Project Alternative would result in permanent alterations to existing drainage patterns by converting areas from pervious surfaces to impervious surfaces, thereby increasing the rate or amount of surface runoff in a manner which could exceed the capacity of stormwater drainage facilities and require the construction of new facilities. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less potential for runoff to exceed the capacity of stormwater drainage facilities; however, impacts would still be considered significant and the mitigation identified in Section 2.7.4 of this SEIR would be required.

Housing within a 100-year Flood Hazard Area

Similar to the proposed Project, and as discussed in Section 2.7.3.6 (Housing within a 100-year Flood Hazard Area) of this SEIR, the Modified Project Alternative would not result in development (including housing) within a 100-year flood hazard area. As such, a significant impact would not occur.

Impeding or Redirecting Flood Flows

As discussed in the preceding paragraph, the Modified Project Alternative would not result in development within a 100-year flood hazard area which could otherwise impede or redirect flood flows. As such, a significant impact would not occur.

Dam Inundation and Flood Hazards

Similar to the proposed Project, future development under the Modified Project Alternative would place housing or structures within dam inundation areas, thereby increasing the potential for a significant risk of loss, injury or death involving flooding. Impacts related to dam inundation and flooding hazard areas would be considered significant and the mitigation identified in Section 2.7.4 of this SEIR would be required.

Seiche, Tsunami, and Mudflow Hazards

Similar to the proposed Project, due to the inland location of the Project areas and the history of minor tsunami events, future development under the Modified Project Alternative would not

expose people or structures to hazards associated with inundation by a tsunami, nor result in land uses within areas subject to inundation from a seiche. As such, a significant impact would not occur.

Similar to the proposed Project, future development under the Modified Project Alternative could be susceptible to mudflows. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in reduced risk to people or structures being exposed to mudflow hazards; however, impacts would still be considered significant and the mitigation identified in Section 2.7.4 of this SEIR would be required.

4.3.2.8 Land Use

Physical Division of an Established Community

Similar to the proposed Project, the Modified Project Alternative does not include any new or improved roadways, railroad tracks, airports, or other features that would physically divide a community. As such, a significant impact would not occur.

Conflicts with Land Use Plans, Policies, and Regulations

Similar to the proposed Project, the Modified Project Alternative would not conflict with the following planning documents: RCP, RTP, CMP, San Diego Basin Plan, ALUCPs, RAQS, CTP, SOI, community plans, the County Zoning Ordinance, and specific plans. The proposed Project is aimed at ensuring consistency with the General Plan, Zoning Ordinance, and other relevant plans, as appropriate. Further, this alternative would allow for development of the former FCI lands in a manner that would be consistent with the intended future growth anticipated under the current General Plan but only if these areas are re-designated according to the same mapping principles used for the General Plan Update. For example, if the “Rural Lands” designation is applied in areas otherwise designated as “Semi-Rural”, and “Rural Commercial” to “Semi-rural Residential” within the Alpine CPA, then these changes would be inconsistent with the mapping principles of the current General Plan. If consistent mapping principles are applied, then this alternative would not result in a significant impact associated with conflicts with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Conflicts with HCPs or NCCPs

Similar to the proposed Project, future development under the Modified Project Alternative would not conflict with MSCP and the Coastal Sage Scrub NCCP Process Guidelines, which are the applicable HCPs for the unincorporated County, because discretionary projects are required

to comply with these guidelines. Therefore, this alternative would not result in a significant impact associated with conflicts with HCPs or NCCPs.

4.3.2.9 Mineral Resources

Mineral Resource Availability

Similar to the proposed Project, future development under the Modified Project Alternative could result in direct and cumulative impacts related to the loss of mineral resources availability. Additionally, this alternative would place residential land uses in the backcountry which would result in constraints that would make permitting new mines more difficult. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) which are expected to result in less excavation or grading activities than the higher density land uses; thereby resulting in fewer potential impacts to mineral resources; however, impacts would still be considered significant and the mitigation identified in Section 2.9.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.9.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Mineral Resource Recovery Sites

Similar to the proposed Project, future development under the Modified Project Alternative would be incompatible with mining and mineral resource recovery operations in areas that are designated MRZ-2 and MRZ-3, underlain by Quaternary alluvium, or contain or potentially contain important aggregate resources. Incompatible land uses include semi-rural residential and village residential land uses. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) which would have less potential for incompatibility with mining and mineral resource recovery operations; however, impacts would still be considered significant and the mitigation identified in Section 2.9.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.9.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

4.3.2.10 Noise

Excessive Noise Levels

Similar to the proposed Project, future development under the Modified Project Alternative would designate land uses near noise-generating sources that would have the potential to expose people to noise levels in excess of the County's compatibility guidelines (refer to Table 2.11-9 of

this SEIR). Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in lower density land uses that are less likely to be exposed to excessive noise levels because it is assumed that less development would be constructed on larger lots and buffered from noise-generating land uses due to intervening open space; however, impacts would still be considered significant and the mitigation identified in Section 2.10.4 of this SEIR would be required.

Excessive Groundborne Vibration

Future development of infrastructure in all Project areas would have the potential to result in substantial groundborne vibration and noise levels from construction. Under the Modified Project Alternative, planning areas that would accommodate a substantial amount of new development, and thus have the potential to result in vibration from construction, include Alpine CPA, Central Mountain Subregion (Cuyamaca and Descanso CPAs), and North Mountain Subregion. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in lower density development that would have fewer impacts from construction vibration because it is assumed that less construction would take place, and less new vibration sensitive land uses would be constructed; however, impacts would still be considered significant and the mitigation identified in Section 2.10.4 of this SEIR would be required.

Permanent Increase in Ambient Noise Levels

Under the Modified Project Alternative, planning areas that would accommodate a substantial amount of new development, major roadway improvements and other noise generating land uses, and thus have the potential to result in a significant increase in ambient noise levels, include Alpine CPA, Central Mountain Subregion (Cuyamaca and Descanso CPAs), and North Mountain Subregion. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in lower density development that would be less likely to expose people to permanent increases in traffic noise because it is assumed that less development would be constructed on larger lots and buffered from roadways due to intervening open space; however, impacts would still be considered significant and the mitigation identified in Section 2.10.4 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.10.4.3 of this SEIR; thus, the impacts would remain significant and unavoidable.

Temporary Increase in Ambient Noise Levels

Construction of new development and infrastructure in all Project areas would have the potential to result in substantial construction noise levels. In addition, similar to the proposed Project, future development under the Modified Project Alternative would accommodate intensified residential and rural commercial development in town centers that would have the potential to increase nuisance noise and associated noise complaints from neighboring uses. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in lower density land uses that are less likely to be exposed to substantial construction noise levels because it is assumed that less development would be constructed on larger lots and buffered from temporary construction-related noise activities due to intervening open space; however, impacts would still be considered significant and the mitigation identified in Section 2.10.4 of this SEIR would be required.

Excessive Noise Exposure from a Public or Private Airport

As discussed in Section 2.6.3.5 (Public and Private Airports) of this SEIR, there are no public airports within the unincorporated County that would be affected by the Project areas addressed in this SEIR, but there would be four private airports in the communities of Alpine (U.S. Forest Service), and North Mountain (Ward Ranch, Warner Springs, and Loma Madera Ranch) which would be affected by the Project areas. Similar to the proposed Project, future development under the Modified Project Alternative may involve the siting of new land uses near some of these private airports, thereby exposing people to excessive noise levels from airplane overflights. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in lower density land uses that are less likely to be exposed to excessive airport-related noise levels because it is assumed that less development would be constructed on larger lots and buffered from private airports due to intervening open space; however, impacts would still be considered significant and the mitigation identified in Section 2.10.4 of this SEIR would be required.

4.3.2.11 Public Services

Fire Protection, Police, School, and Library Services

Similar to the proposed Project, future development under the Modified Project Alternative would impose demands on fire protection, police, school, and library services throughout the Project areas. To maintain or achieve acceptable service standards, new or physically altered fire, police, school, and library facilities would be required. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural

residential) resulting in less population growth throughout the Project areas and less demand for fire, police, school, and library facilities to be constructed or expanded; however, impacts would still be considered significant and the mitigation identified in Section 2.11.4 of this SEIR would be required. Nevertheless, it is unlikely that the impacts on schools would be reduced to below a level of significance for the same reasons given in Section 2.11.4.2 of this SEIR; thus, the impacts would remain significant and unavoidable.

4.3.2.12 Recreation

Deterioration/Construction of Parks and Recreational Facilities

Similar to the proposed Project, future development under the Modified Project Alternative would increase the existing demand for recreational facilities throughout the Project areas, which would have the potential to result in accelerated deterioration of the facilities and the need for new or expanded facilities. The construction of any future recreational projects, including those proposed by the County Department of Parks and Recreation, would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less population growth throughout the Project areas and less demand for recreational facilities leading to reduced deterioration of facilities and increased need for such facilities to be constructed or expanded; however, impacts would still be considered significant and the mitigation identified in Section 2.12.4 of this SEIR would be required.

4.3.2.13 Transportation and Traffic

Unincorporated County Traffic and LOS Standards

As evaluated in Section 2.13.3.1 of this SEIR, the traffic impacts associated with the proposed Project are focused in the Alpine CPA because this is where the highest density of proposed land uses changes would occur relative to the remaining Project areas which would be primarily rural and semi-rural residential uses spread out among several parcels within and near the CNF. The analysis for the proposed Project identified eight roadway segments in Alpine that would remain at a deficient LOS even with the implementation of recommended roadway reclassifications as approved under the General Plan Update. With additional mitigation measures and roadway reclassifications as recommended for the proposed Project, five of these Alpine roadway segments would be reduced to below a level of significance, and three segments were determined to be maintained at deficient LOS E or F operations in accordance with the County's Mobility Element. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential resulting in less vehicle trips generated on local

roadways and reduced LOS impacts to the eight roadway segments in Alpine as described above. Under this alternative, substantial reductions in trips are anticipated for the Alpine CPA and especially the Town Center. With the overall decrease in trips associated with this alternative, in comparison to the proposed Project, it is reasonable to assume that not all eight of the Alpine segments would deteriorate to unacceptable LOS, and it is likely that this alternative would impact a lesser number of these eight facilities; however, impacts would still be considered significant and the mitigation identified in Section 2.13.4.1 of this SEIR would be required. Nevertheless, it is unlikely that the impacts would be reduced to below a level of significance for the same reasons given in Section 2.13.4.1 of this SEIR; thus, the impacts would remain significant and unavoidable.

Rural Road Safety

Similar to the proposed Project, future development under the Modified Project Alternative would increase trips on two lane roads in rural areas that are not developed to current road safety standards; add traffic to roads with slow moving agricultural equipment; and contribute to road safety conflicts (e.g., pedestrians, bicyclists, at grade railroad crossings). Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less vehicle trips generated on local roadways which would translate to fewer people exposed to rural road safety hazards; however, impacts would still be considered significant and the mitigation identified in Section 2.13.4.2 of this SEIR would be required. Nevertheless, it is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.13.4.2 of this SEIR; thus, the impacts would remain significant and unavoidable.

Emergency Access

Similar to the proposed Project, future development under the Modified Project Alternative could add traffic on a roadway network that is incomplete or not fully connected; on roadways that are dead-end and one-way; or within gated communities, all of which have the potential to impair emergency access. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less vehicle trips generated on local roadways which would translate to fewer conflicts with emergency access; however, impacts would still be considered significant and the mitigation identified in Section 2.13.4 of this SEIR would be required.

Parking Capacity

Similar to the proposed Project, future development under the Modified Project Alternative would be required to comply with the parking standards set forth in the County of San Diego

Zoning Ordinance, Parking Regulations, Sections 6750-6799 and the County of San Diego Off-Street Parking Design Manual, which implements Section 6793(c) of the County Zoning Ordinance. Compared to the proposed Project, this alternative would involve an overall decrease in higher density land uses (e.g., semi-rural residential) within the community town centers resulting in less parking demand in these areas; however, impacts would still be considered significant and the mitigation identified in Section 2.13.4 of this SEIR would be required.

Alternative Transportation

Similar to the proposed Project, future development under the Modified Project Alternative would provide for alternative modes of transportation, including bike lanes, bus stops, trails, and sidewalks. While existing County policies and regulations are intended to promote alternative transportation, this alternative may conflict with those of other agencies responsible for alternative transportation planning (e.g., SANDAG, Caltrans, transit agencies, and adjacent jurisdictions). Compared to the proposed Project, this alternative would involve an overall decrease in higher density land uses (e.g., semi-rural residential) within the community town centers resulting in less demand for alternative transportation planning in these areas; however, impacts would still be considered significant and the mitigation identified in Section 2.13.4 of this SEIR would be required.

4.3.2.14 Utilities and Service Systems

Wastewater Treatment Requirements

Similar to the proposed Project, future development under the Modified Project Alternative would have the potential to violate wastewater treatment standards if the demand for wastewater treatment services increases at a rate disproportionate to the capacity of treatment facilities. Additionally, residential development in the eastern portion of the County could violate water quality standards and wastewater discharge requirements if residences do not adequately maintain septic systems. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less population growth throughout the Project areas and less demand for wastewater treatment within the SDCWA service area and in areas dependent on septic systems; however, impacts would still be considered significant and the mitigation identified in Section 2.14.4 of this SEIR would be required.

New Water and Wastewater Facilities

Similar to the proposed Project, future development under the Modified Project Alternative would increase the demand for new or expanded water and wastewater facilities throughout the Project areas, the construction of which would have the potential to cause additional secondary

environmental effects. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less population growth throughout the Project areas and less demand for water and wastewater facilities to be constructed or expanded. As such, the overall environmental impacts related to the construction of new or expanded water and wastewater facilities would decrease under this alternative because demand would be lower than for the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.14.4 of this SEIR would be required.

Sufficient Stormwater Drainage Facilities

Similar to the proposed Project, future development under the Modified Project Alternative would increase the amount of impermeable surfaces from new development within the Project areas, thereby increasing the amount of stormwater runoff potentially exceeding the capacity of stormwater drainage systems and requiring new or expanded facilities which would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less development (impermeable surfaces) throughout the Project areas and less demand for stormwater drainage facilities to be constructed or expanded. As such, the overall environmental impacts related to the construction of new or expanded stormwater drainage facilities would decrease under this alternative because demand would be lower than for the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.14.4 of this SEIR would be required.

Adequate Water Supplies

Similar to the proposed Project, future development under the Modified Project Alternative would increase the population and housing units within the service areas of SDCWA member water districts and groundwater dependent water districts, thereby increasing the demand for water supplies to serve the Project areas that may not have been accounted for in the most current water planning documents. This would potentially result in some groundwater dependent districts having inadequate water supply to serve the projected demand as some basins may experience substantial declines in groundwater storage. More wells may need to be replaced as water levels drop below perforated levels. The drawdown of groundwater supplies from increased water supply sources would result in significantly lower groundwater levels in an area and therefore cause a loss of flow in a surrounding river or other water body due to seepage through the riverbed. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in lesser

concentration of housing units occurring in areas that import water or are groundwater dependent and therefore less demand for water supplies; however, impacts would still be considered significant and the mitigation identified in Section 2.14.4 of this SEIR would be required. Nevertheless, it is unlikely that the impacts on water supplies would be reduced to below a level of significance for the same reasons given in Section 2.14.4.4 of this SEIR; thus, the impacts would remain significant and unavoidable.

Adequate Wastewater Facilities

Similar to the proposed Project, future development under the Modified Project Alternative would increase wastewater treatment demand due to increased sewage flows from future residential, commercial and industrial land uses. Some wastewater districts may have inadequate capacity to serve the projected demand in addition to their existing commitments. In addition, this alternative would designate land uses that would increase population and housing in areas where wastewater districts do not have adequate service systems in place to serve the projected growth of the community. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in lesser concentration of housing units occurring in areas that import water or are groundwater dependent and therefore less demand for wastewater treatment. This alternative would also decrease impacts to wastewater service providers outside of the SDCWA service area boundary and impacts to areas dependent on septic systems because this alternative proposes fewer residential units outside the SDCWA boundary; however, impacts would still be considered significant and the mitigation identified in Section 2.14.4 of this SEIR would be required.

Sufficient Landfill Capacity

If additional landfills are not constructed and existing landfills are not expanded, it is anticipated that the County will run out of physical landfill capacity by 2024. Similar to the proposed Project, future development under the Modified Project Alternative would result in an increase in solid waste disposal needs for which there will be insufficient landfill capacity to accommodate these needs. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less population growth throughout the Project areas and less demand for landfill capacity; however, impacts would still be considered significant and the mitigation identified in Section 2.14.4 of this SEIR would be required. Nevertheless, it is unlikely that the impacts on water supplies would be reduced to below a level of significance for the same reasons given in Section 2.14.4.6 of this SEIR; thus, the impacts would remain significant and unavoidable.

Solid Waste Regulations

Similar to the proposed Project, future development under the Modified Project Alternative would be required to comply with federal, State, and local statutes and regulations related to solid waste. Compliance with existing regulations would ensure that impacts to solid waste regulations would be reduced to below a level of significance. Therefore, this alternative would not result in a significant impact associated with conflicts with solid waste regulations.

Energy

Similar to the proposed Project, future development under the Modified Project Alternative would require energy for construction and operation, thereby increasing energy demand in the County. To accommodate the projected increase in energy demand, energy facilities would need to be constructed or expanded, the construction of which would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less population growth throughout the Project areas and less demand for energy facilities to be constructed or expanded. As such, the overall environmental impacts related to the construction of new or expanded energy facilities would decrease under this alternative because demand would be lower than for the proposed Project; however, impacts would still be considered significant and the mitigation identified in Section 2.14.4 of this SEIR would be required.

4.3.2.15 Climate Change

Compliance with AB 32

Similar to the proposed Project, future development under the Modified Project Alternative would result in an increase in greenhouse gas (GHG) emissions. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less population growth throughout the Project areas and less GHG emissions overall; however, this alternative would result in less concentrated growth within town centers, such as in the community of Alpine, which would be less consistent with applicable General Plan goals and policies relative to AB32 compliance than the proposed Project. Nevertheless, GHG impacts would still be considered significant and the mitigation identified in Section 2.15.4 of this SEIR would be required.

Adverse Climate Change Impacts

Climate change impacts that would be most relevant to the unincorporated County are the effects on water supply, wildfires, energy needs, and impacts to public health. Similar to the proposed Project, future development under the Modified Project Alternative would result in additional sensitive receptors (e.g., residential, daycare facilities) exposed to general climate change effects such as decreases in available water supply, increased frequency of wildfires, increased demand for energy as a result of the greater need for summer cooling, and impacts to public health related to increased heat, air pollution, wildfires, and infectious diseases. Compared to the proposed Project, this alternative would involve an overall decrease in development intensity within the Project areas (i.e., increase in rural lands and decrease in higher density land uses such as semi-rural residential) resulting in less population growth throughout the Project areas and less GHG emissions overall; however, GHG impacts would still be considered significant and the mitigation identified in Section 2.15.4 of this SEIR would be required.

4.4 Analysis of the No Project Alternative

4.4.1 No Project Alternative Description and Setting

The No Project Alternative assumes that the previous (pre-FCI) General Plan land use designations would remain in effect. As such, the No Project Alternative generally allows higher densities in areas outside of the SDCWA boundary, as compared to the proposed Project. Whereas the proposed Project would allow for approximately 5,200 dwelling units, the No Project Alternative would allow for over 16,700 dwelling units (refer to Table 1-1 of this SEIR); however, the proposed Project would result in 346 more acres of commercial uses when compared to the existing designations/No Project Alternative. The land use categories currently in effect are not consistent with those under the current General Plan per the General Plan Update which was adopted in August 2011. Even more problematic, however, these outdated land use designations on the former FCI lands may present substantial conflicts with adjacent properties that are developed according to the recently adopted General Plan land use designations. For example, the General Plan Update land uses promote future development which is more sensitive to existing environmental and infrastructure constraints, particularly in the outlying areas within and near the CNF lands, than the land use designations that are in effect there now. The proposed Project land use designations would reflect the carrying capacity of the land through better protection of biological resources, steep slopes, groundwater resources, and floodplains.

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

4.4.2.1 *Aesthetics*

Scenic Vistas

Similar to the proposed Project, future development under the No Project Alternative would have the potential to obstruct, interrupt, or detract from scenic vistas (refer to Section 4.2.2.1 regarding interruption of scenic expanse of open space and inconsistency with surrounding landscapes). This alternative would accommodate more development (e.g., approximately 16,711 versus 5,200 residential units per Table 1-1 of this SEIR) than the proposed Project, which would result in more obstructions or distractions to scenic vistas within all Project areas. These impacts would be significant and unavoidable.

Scenic Resources

Similar to the proposed Project, future development under the No Project Alternative would result in potential removal of or substantial changes to features that contribute to the valued visual character or image of a neighborhood, community, State Scenic Highway, or localized area, including designated landmarks, 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. This alternative would accommodate more development (e.g., approximately 16,711 versus 5,200 residential units per Table 1-1 of this SEIR) than the proposed Project, which would result in potentially greater impacts to scenic resources from construction or demolition activities. These impacts would be significant and unavoidable.

Visual Character or Quality

Compared to the proposed Project, the increase in future development in all Project areas under the No Project Alternative would have the potential to impact community character if such development is improperly designed or located. These impacts would be significant and unavoidable.

Light or Glare

Similar to the proposed Project, future development under the No Project Alternative would result in new sources of light or glare from building materials and outdoor lighting used in new residential, commercial, industrial, or public/semi-public developments. Compared to the proposed Project, this alternative would designate land uses that are inconsistent with the recently adopted General Plan throughout the Project areas and, therefore, lighting for new development would have the potential to result in a nuisance or hazard to surrounding uses.

Additionally, this alternative would result in a greater number of structures and substantial new sources of light or glare impacting Zone A of the Palomar and Mount Laguna observatories, compared to the proposed Project. These impacts would be significant and unavoidable.

4.4.2.2 *Agricultural Resources*

Direct Conversion of Agricultural Resources

Compared to the proposed Project, the No Project Alternative would result in higher density land uses throughout the Project areas, which would result in a greater potential for direct conversion of agricultural resources to non-agricultural uses potential. These impacts would be significant and unavoidable.

Land-Use Conflicts

With regard to direct, indirect, or cumulative land use conflicts in terms of potential conversion of Williamson Act contracted lands and Agricultural Preserves (i.e., agricultural-zoned lands), one of the Project's actions involves the removal of the County Zoning Ordinance "A" Special Area Regulation Designator in all Agricultural Preserves not currently under a Williamson Act Contract, as pertains to the Project areas. As evaluated in Section 2.2.3.2 (Conflicts with Agricultural or Forest Lands) of this SEIR, the proposed Project would not result in a direct land use conflict in this respect because it would not convert any existing Williamson Act contracted lands to non-agricultural uses; however, an indirect land use conflict could occur, whereby the removal of the "A" Designator within certain Project areas may result in the development of new incompatible land uses adjacent to existing Williamson Act contracted lands, Agricultural Preserves, or agricultural operations resulting in potential indirect conversion of these lands. In contrast, the No Project Alternative would not affect any existing Williamson Act contracted lands and Agricultural Preserves within the Project areas, nor would it involve the removal of such designations within the Project areas as applicable. For situations where development may occur on Project areas next to those that are under an existing Williamson Act Contract or Agricultural Preserve designation, such adjacent agricultural resources would still be protected from surrounding development pressures. Therefore, compared to the proposed Project, the No Project Alternative would not result in direct, indirect, or cumulative land use conflicts with respect to potential conversion of Williamson Act contracted lands and Agricultural Preserves

Indirect Conversion of Agricultural Resources

Compared to the proposed Project, the No Project Alternative would result in higher density land uses throughout the Project areas, which would result in a greater potential for indirect conversion of surrounding farmland. Therefore, additional acres of incompatible land uses would be placed near agricultural resources, and this alternative would be more likely to cause an

indirect conversion of farmland to non-agricultural use than the proposed Project. These indirect and cumulative impacts would be significant and unavoidable.

Direct and Indirect Conversion of Forestry Resources

The County of San Diego does not include lands zoned for forest land, timberland, or timberland production. Rather, these lands are located on State parks and National forests, including CNF lands which are under the jurisdiction of USFS; however, some private parcels within the Project areas which are under the jurisdiction of the County may contain lands that would be defined as “forestry resources” or “timberland” by USFS (e.g., trees that can be processed for timber products). Similar to the proposed Project, future development under the No Project Alternative may result in the permanent loss of such forestry resources or timberland on private lands, or the direct conversion of such lands to non-forest use. Additionally, future development under this alternative may result in land uses that are incompatible with adjacent or nearby CNF lands, such as the construction of a housing tract next to a heavily forested area. Such development could eventually lead to permanent impacts on the CNF lands due to factors such as erosion/siltation, invasive plants, edge effects (e.g., human intrusion, predation by pets), noise (e.g., nest abandonment), nightlighting (e.g., nocturnal wildlife predation), and habitat fragmentation, or the indirect conversion of such lands to non-forest use. This alternative would result in greater overall direct and indirect impacts to forestry resources, as compared to the proposed Project, because it would involve more residential development near the outlying CNF lands which contain forestry resources. These direct, indirect and cumulative impacts would be significant and unavoidable.

4.4.2.3 *Air Quality*

Air Quality Plans

Similar to the proposed Project, future development under the No Project Alternative would be required to be consistent with the emission reduction strategies in the RAQS and SIP. Therefore, this alternative would not result in significant conflicts with the RAQS and SIP.

Air Quality Violations, Non-attainment of Criteria Pollutants and Sensitive Receptors

Compared to the proposed Project, the No Project Alternative would involve more development in the outlying rural lands, within and near the CNF lands, thereby resulting in increased VMT for residents to obtain goods and services from urban areas. This would in turn result in an overall increase in total emissions that could potentially violate air quality standards, greater emissions of non-attainment criteria pollutants, and greater exposure of sensitive receptors to TACs, as compared to the proposed Project. These impacts would be significant and unavoidable.

Objectionable Odors

Similar to the proposed Project, any odor generating land uses that may occur with future development under the No Project Alternative would be required to comply with APCD Rule 51 and County of San Diego Code of Regulatory Ordinances Sections 63.401 and 63.402, which prohibit nuisance odors from affecting nearby receptors. Therefore, this alternative would not result in a significant impact associated with objectionable odors.

4.4.2.4 Biological Resources

Special Status Plant and Wildlife Species

Similar to the proposed Project, future development under the No Project Alternative would result in direct, indirect and cumulative impacts to special status plant and wildlife species and their habitats. This analysis is based on the same impact assumptions used for the proposed Project (refer to Section 4.2.2.4). Compared to the proposed Project, this alternative would increase residential development in the outlying rural lands, within and near the CNF lands, thereby resulting in greater direct impacts on habitats that would have the potential to support sensitive species, as well as more indirect impacts such as intensive nighttime lighting and noise which can adversely affect wildlife species, adverse effects to water quality in riparian habitats from pollutants in runoff and sedimentation during construction, and fugitive dust produced by construction that would have the potential to disperse onto sensitive vegetation adjacent to construction sites. This is because such land uses would be more evenly distributed throughout the Project areas with a higher development capacity. These impacts would be significant and unavoidable.

Wildlife Movement Corridors and Nursery Sites

Because the No Project Alternative would involve more residential development in the outlying rural lands, within and near the CNF lands, it would result in greater impacts to potential wildlife movement corridors in these areas than the proposed Project. These impacts would be significant. It is unlikely that these impacts would be reduced to below a level of significance for the same reasons given in Section 2.4.4.4 of this SEIR; thus, the impacts would remain significant and unavoidable.

Local Policies and Ordinances

Similar to the proposed Project, future development under the No Project Alternative would not conflict with programs and ordinances that protect biological resources because such development would be required to comply with the County's MSCP Subarea Plan, BMO, HLP Ordinance, and RPO, and the Southern California Coastal Sage Scrub NCCP Process Guidelines.

HCPs and NCCPs

As stated above, future development under the No Project Alternative would not conflict with the County's MSCP Subarea Plan and the Coastal Sage Scrub NCCP Process Guidelines, which are the applicable HCPs for the Project areas within the unincorporated County lands.

4.4.2.5 Cultural Resources

Historical Resources

Similar to the proposed Project, significant historical resources would have the potential to be disturbed as a result of the No Project Alternative due to demolition, destruction, alteration, or structural relocation as a result of new private or public development or redevelopment of designated land uses; however, this alternative would result in greater impacts to such resources, as compared to the proposed Project, due to an increase in development intensity within all Project areas which would have the potential to adversely affect historical sites through the introduction of visual, audible, or atmospheric effects that are out of character with such resources. For these same reasons, this alternative would also have the potential to result in more redevelopment of a historical structure or site that is not compatible with the authenticity of such resource and substantially alter its significance, as compared to the proposed Project. These impacts would be significant and unavoidable.

Archaeological Resources, Human Remains, and Paleontological Resources

Future development under the No Project Alternative would have the potential to result in an adverse change in the significance of archaeological resources through ground-disturbing activities, such as excavation and grading, that have the potential to damage or destroy such resources and human remains that may be present on or below the ground surface. In addition, this alternative would result in potential damage or destruction to fossils in underlying rock units; however, this alternative would result in greater impacts to such resources, as compared to the proposed Project, due to an increase in development intensity within all Project areas. These impacts would be significant and unavoidable.

4.4.2.6 Hazards and Hazardous Materials

Transportation, Use, Disposal, and Accidental Release (Including Hazards to Schools) of Hazardous Materials or Existing Hazardous Material Sites

Compared to the proposed Project, the No Project Alternative would result in more land uses that may involve the use, disposal, transport or accidental releases of hazardous materials (e.g., rural commercial, VCMU), including the siting of such uses within one-quarter mile of an existing or proposed school or daycare, due to an increase in development intensity within all Project areas.

In addition, existing industries and businesses that use hazardous materials would have the potential to expand or increase to accommodate the anticipated growth under this alternative. Furthermore, future development under this alternative may be located on sites that have the potential to create significant hazards to the public or environment including: sites pursuant to Government Code 65962.5; burn dump sites; active, abandoned, or closed landfills; FUDS; areas with historic or current agriculture; or areas with petroleum contamination. Similar to the proposed Project, any future development of such uses would be required to comply with all applicable federal, State, and local regulations pertaining to the transportation, use, and disposal of hazardous materials which would reduce such impacts to below a level of significance.

Public and Private Airports

As discussed in Section 2.6.3.5 (Public and Private Airports) of this SEIR, there are no public airports within the unincorporated County that would be affected by the Project areas addressed in this SEIR, but there would be four private airports in the communities of Alpine (U.S. Forest Service), and North Mountain (Ward Ranch, Warner Springs, and Loma Madera Ranch) which would be affected by the Project areas. Similar to the proposed Project, future development under the No Project Alternative may involve the siting of new land uses within two miles from one of these private airports, thereby resulting in a safety hazard for people residing or working in the vicinity of these airports. In addition, under this alternative, some private airports would have the potential to be located adjacent to land uses, such as village residential, which would maintain higher density populations and therefore be considered potentially incompatible. These impacts would be considered significant and unavoidable.

Emergency Response and Evacuation Plans

Similar to the proposed Project, construction activities associated with future development under the No Project Alternative would have the potential to interfere with adopted emergency plans and procedures if authorities are not properly notified or multiple roadways used for emergency routes are concurrently blocked. This alternative would also result in additional residential development in the outlying areas which could cause an inadvertent impairment to existing emergency response plans and policies. Compared to the proposed Project, this alternative would result in more residential development with the potential to impair emergency response and evacuation plans in these outlying areas. These impacts would be significant and unavoidable.

Wildland Fires

Similar to the proposed Project, future development in the outlying rural areas under the No Project Alternative would be prone to wildland fires and therefore have the potential to expose people or structures to a significant risk of loss, injury, or death, particularly where residents are intermixed with wildlands. Compared to the proposed Project, however, this alternative would have an increased wildland fire risk because it proposes more residential development in the

outlying areas that may be served by fire agencies with greater distance to cover (longer travel times) or in areas that have difficulty meeting fire code requirements due to limited access. These impacts would be significant and unavoidable.

Vectors

Compared to the proposed Project, future development under the No Project Alternative may involve land uses, such as manufacturing facilities for animal products (e.g., dairy, egg production), that create potentially significant hazards to the public or the environment by substantially increasing human exposure to vectors. Such land uses may also result in sources of standing water bodies or other vector breeding sources including composting or manure management facilities. These impacts would remain significant and unavoidable.

4.4.2.7 Hydrology and Water Quality

Water Quality Standards and Requirements

Surface Water

Similar to the proposed Project, future development under the No Project Alternative would have the potential to result in the following: 1) substantial additional sources of polluted runoff which would have short-term impacts on surface water; 2) pollutants, such as soils, debris, and other materials, in quantities that would potentially exceed water quality standards and otherwise significantly degrade water quality; and 3) non-point source pollution into surface and groundwater bodies. Compared to the proposed Project, this alternative would result in an increase in development intensity within all Project areas, which would cause greater potential impacts to surface water. These impacts would be significant and unavoidable.

Groundwater

Similar to the proposed Project, future development under the No Project Alternative has the potential to violate groundwater quality standards by designating land uses in the rural outlying areas that would be groundwater dependent and are currently experiencing groundwater contamination. New wells constructed to support development in these areas would be susceptible to the contaminated groundwater supply which would have the potential to result in a non-potable water supply. Compared to the proposed Project, this alternative would result in an increase in development intensity within all Project areas, which would cause greater groundwater contamination problems in the future. These impacts would remain significant and unavoidable.

Groundwater Supplies and Recharge

Multiple areas of the unincorporated County are currently experiencing groundwater supply impacts. Similar to the proposed Project, future development under the No Project Alternative would worsen these conditions of unsustainable groundwater supplies within: (1) outlying areas that are already impacted by large quantity groundwater users and clustered developments; (2) areas experiencing a high frequency of wells with low well yield; and (3) groundwater basins having estimated groundwater in storage at or below 50 percent. Compared to the proposed Project, this alternative would result in an increase in development intensity within all Project areas, which would have greater impacts relative to groundwater supplies and recharge. These impacts would remain significant and unavoidable.

Erosion or Siltation

Similar to the proposed Project, future development under the No Project Alternative would result in permanent alterations to existing drainage patterns by converting undeveloped areas within the outlying rural lands from pervious surfaces to impervious surfaces which would increase runoff and potentially result in new erosion problems or the worsening of existing erosion problems. Compared to the proposed Project, this alternative would result in an increase in development intensity within all Project areas, which would have greater erosion/siltation impacts. These impacts would be significant and unavoidable.

Flooding

Similar to the proposed Project, future development under the No Project Alternative would result in permanent alterations to existing drainage patterns and increase the rate or amount of surface runoff in a manner that could cause on- or off-site flooding during and after construction activities. Compared to the proposed Project, this alternative would result in an increase in development intensity within all Project areas, which would cause greater flooding impacts. These impacts would be significant and unavoidable.

Exceed Capacity of Storm Water Systems

Similar to the proposed Project, future development under the No Project Alternative would increase the amount of impermeable surfaces from new development within the Project areas, thereby increasing the amount of stormwater runoff potentially exceeding the capacity of stormwater drainage systems and requiring new or expanded facilities which would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would result in an increase in development intensity within all Project areas, resulting in greater demand for stormwater drainage facilities to be constructed or expanded. As such, the overall environmental impacts related to the construction of new or expanded stormwater drainage facilities would increase under this alternative because demand would be higher than for the proposed Project. These impacts would be significant and unavoidable.

Housing within a 100-year Flood Hazard Area and Impeding or Redirecting Flood Flows

Compared to the proposed Project, the No Project Alternative could place housing within a 100-year flood hazard area which would impede or redirect flood flows. These impacts would be significant and would require additional measures to mitigate, such as the elevation of housing above the flood zones which could result in significant visual impacts. Therefore, it is unlikely that these impacts would be reduced to below a level of significance, and they would remain significant and unavoidable.

Dam Inundation and Flood Hazards

Similar to the proposed Project, future development under the No Project Alternative would place housing or structures within dam inundation areas, thereby increasing the potential for a significant risk of loss, injury or death involving flooding. Impacts related to dam inundation and flooding hazard areas would be considered significant and unavoidable.

Seiche, Tsunami, and Mudflow Hazards

Similar to the proposed Project, due to the inland location of the Project areas and the history of minor tsunami events, future development under the No Project Alternative would not expose people or structures to hazards associated with inundation by a tsunami, nor result in land uses within areas subject to inundation from a seiche. As such, a significant impact would not occur.

Similar to the proposed Project, future development under the No Project Alternative could be susceptible to mudflows. Compared to the proposed Project, this alternative proposes more residential units in rural outlying areas that are more susceptible to mudflows, resulting in increased risk to people or structures being exposed to mudflow hazards. These impacts would be significant and unavoidable.

4.4.2.8 Land Use

Physical Division of an Established Community

Compared to the proposed Project, the No Project Alternative may involve the construction of new or improved roadways, railroad tracks, airports, or other features that would physically divide a community. These impacts would be significant and require additional mitigation measures, such as the rerouting of such facilities through the CNF lands which could result in a number of other significant environmental effects. Therefore, it is unlikely that these impacts would be reduced to below a level of significance, and they would remain significant and unavoidable.

Conflicts with Land Use Plans, Policies, and Regulations, and HCPs or NCCPs

Compared to the proposed Project, future development under the No Project Alternative could conflict with the following planning documents: RCP, RTP, CMP, Basin Plan, ALUCPs, RAQS, CTP, SOI, community plans, the County Zoning Ordinance, specific plans, the MSCP Subarea Plans, and Coastal Sage Scrub NCCP Process Guidelines. Future development under this alternative may also be inconsistent with the intended growth anticipated under the current General Plan for the Project areas within the unincorporated County lands. These impacts would be significant and require additional mitigation measures that may result in other significant environmental effects. Therefore, it is unlikely that these impacts would be reduced to below a level of significance, and they would remain significant and unavoidable.

4.4.2.9 Mineral Resources

Mineral Resource Availability

As known and unknown mineral resources may occur within some of the Project areas, primarily in the outlying rural lands that are designated MRZ-2 and MRZ-3, are underlain by Quaternary alluvium, or contain (or potentially contain) important aggregate resources, the loss of such mineral resources availability would be unavoidable due to planned growth under the No Project Alternative. Compared to the proposed Project, this alternative would result in greater impacts on such lands with mineral resource potential due to increased residential development in these areas. These impacts would remain significant and unavoidable.

Mineral Resource Recovery Sites

Similar to the proposed Project, future development under the No Project Alternative may result in the siting of land uses in locations that would be incompatible with mining and resource recovery operations which could ultimately lead to the loss of availability of such mineral recovery sites. Compared to the proposed Project, this alternative would result in greater impacts on such operations due to increased residential development in outlying rural areas, within and near the CNF lands, where there is greater potential (rather than in the town centers and village cores) to encounter mining and resource recovery operations. These impacts would remain significant and unavoidable.

4.4.2.10 Noise

Excessive Noise Levels

The No Project Alternative would increase densities near noise-generating sources that would have the potential to expose people to noise levels in excess of the County's noise compatibility guidelines. These impacts would be significant and unavoidable.

Excessive Groundborne Vibration

Future development of infrastructure in all Project areas would have the potential to result in substantial groundborne vibration and noise levels from construction. Compared to the proposed Project, the No Project Alternative would accommodate more development in all Project areas, which would experience vibration impacts from construction activities and possibly a greater number of vibration sensitive land uses. These impacts would be significant and unavoidable.

Permanent Increase in Ambient Noise Levels

Similar to the proposed Project, the No Project Alternative would accommodate the development of new noise generating land uses that could result in a significant increase in ambient noise levels. This alternative would result in more development in all Project areas, as compared to the proposed Project, which would expose more people to permanent increases in traffic or operational noise levels, including noise-sensitive land uses. These impacts would remain significant and unavoidable.

Temporary Increase in Ambient Noise Levels

Future construction of new development and infrastructure anywhere in the County would have the potential to result in substantial construction noise. The No Project Alternative would accommodate more development in all Project areas, as compared to the proposed Project, which would have the potential to increase nuisance noise and associated noise complaints from neighboring uses. These impacts would be significant and unavoidable.

Excessive Noise Exposure from a Public or Private Airport

As discussed in Section 2.6.3.5 (Public and Private Airports) of this SEIR, there are no public airports within the unincorporated County that would be affected by the Project areas addressed in this SEIR, but there would be four private airports in the communities of Alpine (U.S. Forest Service), and North Mountain (Ward Ranch, Warner Springs, and Loma Madera Ranch) which would be affected by the Project areas. Compared to the proposed Project, future development under the No Project Alternative would result in greater densities within the village cores, generally near existing airports, exposing more residents to excessive noise levels from airplane over-flights. These impacts would be significant and unavoidable.

4.4.2.11 Public Services

Similar to the proposed Project, future development under the No Project Alternative would impose demands on fire protection, police, school, and library services. To maintain or achieve acceptable service standards, new or physically altered fire, police, school, and library facilities would be required. The construction of any future facilities would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative

would increase the demand for services in all Project areas resulting in longer response times for emergency services to reach these areas. These impacts would remain significant and unavoidable.

4.4.2.12 Recreation

Similar to the proposed Project, future development under the No Project Alternative would increase the demand for recreational facilities throughout the Project areas, which would have the potential to result in accelerated deterioration of the facilities and the need for new or expanded facilities. The construction of any future recreational projects would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would accommodate an overall greater population increase and demand for recreational facilities. These impacts would be significant and unavoidable.

4.4.2.13 Transportation and Traffic

Unincorporated County Traffic and LOS Standards

As evaluated in Section 2.13.3.1 of this SEIR, the traffic impacts associated with the Project are focused in the Alpine CPA because this is where the highest density of proposed land use changes would occur relative to the remaining Project areas which would be primarily rural and semi-rural residential uses spread out over several parcels within and near the CNF. The analysis for the proposed Project identified 10 roadway segments in Alpine that would remain at a deficient LOS even with the implementation of recommended roadway reclassifications as approved under the General Plan Update. With additional mitigation measures and roadway reclassifications as recommended for the proposed Project, these Alpine roadway segment impacts would be reduced to below a level of significance. Because the No Project Alternative would accommodate an overall greater population increase than the proposed Project, it would likely cause additional significant traffic impacts on rural roads (i.e., worsening of one or more of the 10 roadway segments mentioned above or degradation of additional roadways). Such impacts would remain significant and unavoidable.

Rural Road Safety

Similar to the proposed Project, future development under the No Project Alternative would increase trips on two lane roads in rural areas that are not developed to current road safety standards; add traffic to roads with slow moving agricultural equipment; and contribute to road safety conflicts (e.g., pedestrians, bicyclists, at grade railroad crossings). Compared to the proposed Project, this alternative would increase development in all Project areas, resulting in a higher concentration of people potentially exposed to road hazards in such rural areas. These impacts would remain significant and unavoidable.

Emergency Access

Similar to the proposed Project, future development under the No Project Alternative could add traffic on a roadway network that is incomplete or not fully connected; on roadways that are dead-end and one-way; or within gated communities, all of which have the potential to impair emergency access. Compared to the proposed Project, the conditions that would potentially impair emergency access would be greater due to the overall greater population increase. Therefore, this alternative would result in a significant and unavoidable impact with regard to emergency access.

Parking Capacity

Similar to the proposed Project, future development under the No Project Alternative would be required to comply with the parking standards set forth in the County of San Diego Zoning Ordinance, Parking Regulations, Sections 6750-6799 and the County of San Diego Off-Street Parking Design Manual, which implements Section 6793(c) of the County Zoning Ordinance. Compared to the Project, this alternative would allow for more development in all Project areas, which would result in greater parking demands. Therefore, this alternative would result in a significant and unavoidable impact with regard to parking capacity.

Alternative Transportation

Similar to the proposed Project, future development under the No Project Alternative would provide for alternative modes of transportation, including bike lanes, bus stops, trails, and sidewalks. While existing County policies and regulations are intended to promote alternative transportation, this alternative may conflict with those of other agencies responsible for alternative transportation planning (e.g., SANDAG, Caltrans, transit agencies, and adjacent jurisdictions). Compared to the proposed Project, this alternative would result in increased densities in all Project areas, which could increase the potential for conflicts with existing public transportation plans due to a higher population of potential users of alternative modes of transportation in these areas. These impacts would be significant and unavoidable.

4.4.2.14 Utilities and Service Systems

Wastewater Treatment Requirements

Similar to the proposed Project, the No Project Alternative would have the potential to violate wastewater treatment standards if the demand for wastewater treatment services increases at a rate disproportionate to the capacity of treatment facilities. Additionally, future development in the eastern portion of the County could violate water quality standards and wastewater discharge requirements if residences do not adequately maintain septic systems. Compared to the proposed Project, this alternative would accommodate a greater population in the SDCWA service area

and result in a higher demand for wastewater treatment services and septic systems. These impacts would be significant and unavoidable.

New Water and Wastewater Facilities

Similar to the proposed Project, future development under the No Project Alternative would require new and expanded water and wastewater facilities to meet demand, particularly new development in the backcountry areas that are not currently served. Additionally, the construction of new septic systems to serve new development in the outlying areas would require the installation of septic tanks and leach lines. Compared to the proposed Project, this alternative would accommodate an overall greater population increase and demand for new and expanded water and wastewater facilities and associated environmental impacts. These impacts would be significant and unavoidable.

Sufficient Stormwater Drainage Facilities

Similar to the proposed Project, future development under the No Project Alternative would increase the amount of impermeable surfaces from new development within the Project areas, thereby increasing the amount of stormwater runoff potentially exceeding the capacity of stormwater drainage systems and requiring new or expanded facilities which would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would result in more development in all Project areas, some of which may not include stormwater drainage facilities. As such, the overall environmental impacts related to the construction of new or expanded stormwater drainage facilities would increase under this alternative because demand would be greater than for the proposed Project. These impacts would be significant and unavoidable.

Adequate Water Supplies

Similar to the proposed Project, future development under the No Project Alternative would increase the population and housing units within the service areas of SDCWA member water districts and groundwater dependent water districts, thereby increasing the demand for water supplies to serve the Project areas that may not have been accounted for in the most current water planning documents. This would potentially result in some groundwater dependent districts having inadequate water supply to serve the projected demand as some basins may experience substantial declines in groundwater storage. More wells may need to be replaced as water levels drop below perforated levels. The drawdown of groundwater supplies can significantly lower groundwater levels in an area and therefore cause a loss of flow in a surrounding river or other water body due to seepage through the riverbed. Compared to the proposed Project, this alternative would accommodate an overall greater population increase. These impacts would remain significant and unavoidable.

Adequate Wastewater Treatment Facilities

Similar to the proposed Project, future development under the No Project Alternative would increase wastewater treatment demand due to increased sewage flows requiring new and expanded wastewater treatment facilities to meet demand. Some wastewater districts may have inadequate capacity to serve the projected demand in addition to their existing commitments. In addition, this alternative would increase population and housing in areas where wastewater districts do not have adequate service systems in place to serve the projected growth of the community. Compared to the proposed Project, this alternative would accommodate an overall greater population increase within the SDCWA member agency service areas, and therefore, would have higher demands for new and expanded wastewater treatment facilities the construction of which would cause additional secondary environmental effects. These impacts would be significant and unavoidable.

Sufficient Landfill Capacity

If additional landfills are not constructed and existing landfills are not expanded, it is anticipated that the County will run out of physical landfill capacity by 2024. Similar to the proposed Project, future development under the No Project Alternative would result in an increase in solid waste disposal needs for which there will be insufficient landfill capacity to accommodate these needs. This alternative would accommodate an overall greater population increase within the SDCWA member agency service areas as the proposed Project, and therefore, would have higher solid waste disposal needs. These impacts would remain significant and unavoidable.

Solid Waste Regulations

Similar to the proposed Project, future development under the No Project Alternative would be required to comply with federal, State, and local statutes and regulations related to solid waste. Compliance with existing regulations would ensure that impacts to solid waste regulations would be reduced to below a level of significance. Therefore, this alternative would not result in a significant impact associated with conflicts with solid waste regulations.

Energy

Similar to the proposed Project, future development under the No Project Alternative would require energy for construction and operation, thereby increasing energy demand in the County. To accommodate the projected increase in energy demand, energy facilities would need to be constructed or expanded, the construction of which would have the potential to cause additional secondary environmental effects. Compared to the proposed Project, this alternative would accommodate an overall greater population increase and demands for new and expanded energy facilities. These impacts would be significant and unavoidable.

4.4.2.15 *Climate Change*

Compliance with AB 32

Future development under the No Project Alternative would result in greater VMT than the proposed Project due to more development in all Project areas which would translate to increased GHG emissions from transportation. These impacts would be significant unavoidable.

Adverse Climate Change Impacts

Climate change impacts that would be most relevant to the unincorporated County are the effects on water supply, wildfires, energy needs, and impacts to public health. Similar to the proposed Project, future development under the No Project Alternative would result in additional sensitive receptors (e.g., residential, daycare facilities) exposed to general climate change effects such as decreases in available water supply, increased frequency of wildfires, increased demand for energy as a result of the greater need for summer cooling, and impacts to public health related to increased heat, air pollution, wildfires, and infectious diseases. Compared to the proposed Project, this alternative would result in more development in all Project areas which would translate to increased GHG emissions. These impacts would be significant and unavoidable.

TABLE 4-1. COMPARISON OF ALTERNATIVES – ENVIRONMENTAL IMPACTS

Issue Areas	Proposed Project		Alternatives to the Proposed Project		
	Without Mitigation	With Mitigation	No New East Willows Village (Alpine CPA)	Modified Project	No Project
2.1 Aesthetics					
Scenic Vistas	PS	LS	—	▼	▲
Scenic Resources	PS	LS	▲	▼	▲
Visual Character or Quality	PS	SU	—	▼	—
Lighting and Glare	PS	SU	—	▼	▲
2.2 Agricultural Resources					
Direct Conversion of Agricultural Resources	PS	SU	▲	▼	▲
Land Use Conflicts	PS	LS	▲	▼	▼
Indirect Conversion of Agricultural Resources	PS	SU	▲	▼	▲
Direct/Indirect Conversion of Forestry Resources	PS	LS	▲	▼	▲
2.3 Air Quality					
Air Quality Plans	LS	LS	—	—	—
Air Quality Violations	PS	SU	▲	▼	▲
Non-attainment of Criteria Pollutants	PS	SU	▲	▼	▲
Sensitive Receptors	PS	SU	▲	▼	▲
Objectionable Odors	LS	LS	—	—	—
2.4 Biological Resources					
Special Status Plant and Wildlife Species	PS	SU	▲	▼	▲
Riparian Habitat and Other Sensitive Natural Communities	PS	SU	▲	▼	▲
Federally Protected Wetlands	PS	LS	▲	▼	▲
Wildlife Movement Corridors and Nursery Sites	PS	SU	▲	▼	▲
Local Policies and Ordinances	LS	LS	—	—	—
Habitat Conservation Plans and Natural Community Conservation Plans	LS	LS	—	—	—
2.5 Cultural Resources					
Historical Resources	PS	LS	▲	▼	▲
Archaeological Resources	PS	LS	—	▼	▲
Paleontological Resources	PS	LS	—	▼	▲
Human Remains	PS	LS	—	▼	▲

TABLE 4-1, CONTINUED

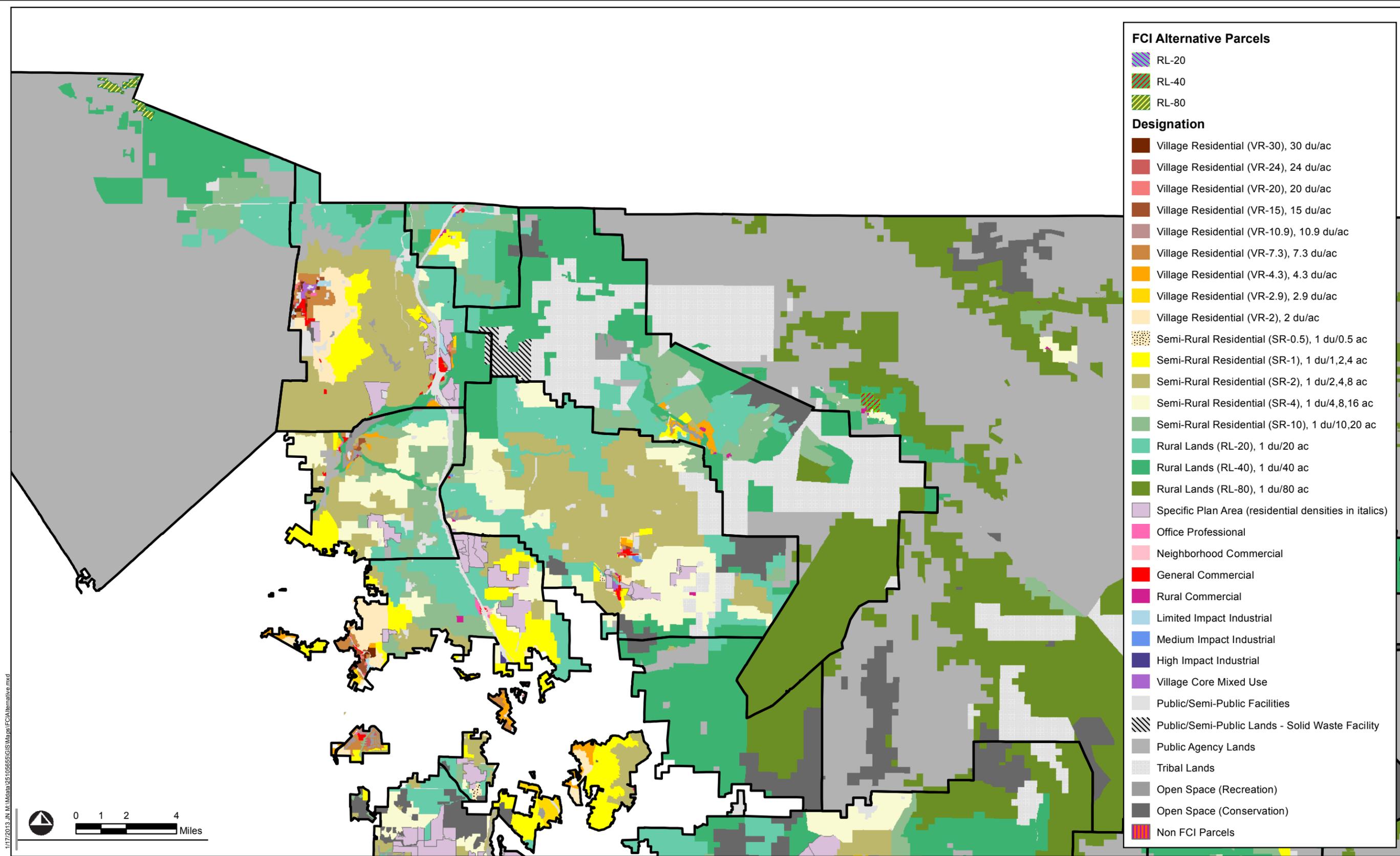
Issue Areas	Proposed Project		Alternatives to the Proposed Project		
	Without Mitigation	With Mitigation	No New East Willows Village (Alpine CPA)	Modified Project	No Project
2.6 Hazards and Hazardous Materials					
Transport, Use, and Disposal of Hazardous Materials	LS	LS	—	▼	▲
Accidental Release of Hazardous Materials	LS	LS	—	▼	▲
Hazards to Schools	LS	LS	—	▼	▲
Existing Hazardous Materials Sites	LS	LS	—	—	▲
Public and Private Airports	PS	LS	—	▼	—
Emergency Response and Evacuation Plans	PS	LS	▲	▼	▲
Wildland Fires	PS	SU	▲	▼	▲
Vectors	LS	LS	—	—	▲/SU
2.7 Hydrology and Water Quality					
Water Quality Standards and Requirements	PS	SU	—	▼	▲
Groundwater Supplies and Recharge	PS	SU	—	▼	▲
Erosion or Siltation	PS	LS	—	▼	▲
Flooding	PS	LS	—	▼	▲
Exceed Capacity of Stormwater Systems	PS	LS	▲	▼	▲
Housing within a 100-year Flood Hazard Area	LS	LS	—	—	▲/SU
Impeding or Redirecting Flood Flows	LS	LS	—	—	▲/SU
Dam Inundation and Flood Hazards	PS	LS	—	—	▲
Seiche, Tsunami, and Mudflow Hazards	PS	LS	▲	▼	▲
2.8 Land Use					
Physical Division of an Established Community	LS	LS	—	—	▲/SU
Conflicts with Land Use Plans, Policies, and Regulations	LS	LS	—	—	▲/SU
Conflicts with HCPs or NCCPs	LS	LS	—	—	▲/SU
2.9 Mineral Resources					
Mineral Resource Availability	PS	SU	▲	▼	▲
Mineral Resource Recovery Sites	PS	SU	▲	▼	▲
2.10 Noise					
Excessive Noise Levels	PS	LS	—	▼	▲
Excessive Groundborne Vibration	PS	LS	—	▼	▲
Permanent Increase in Ambient Noise Levels	PS	SU	—	▼	▲
Temporary Increase in Ambient Noise Levels	PS	LS	—	▼	▲
Excessive Noise Exposure from a Public or Private Airport	PS	LS	▼	▼	▲

TABLE 4-1, CONTINUED

Issue Areas	Proposed Project		Alternatives to the Proposed Project		
	Without Mitigation	With Mitigation	No New East Willows Village (Alpine CPA)	Modified Project	No Project
2.11 Public Services					
Fire Protection Services	PS	LS	—	▼	▲
Police Protection Services	PS	LS	—	▼	▲
School Services	PS	SU	—	▼	▲
Library Services	PS	LS	—	▼	▲
2.12 Recreation					
Deterioration of Parks and Recreational Facilities	PS	LS	—	▼	▲
Construction of New Recreational Facilities	PS	LS	—	▼	▲
2.13 Transportation and Traffic					
Unincorporated County Traffic and LOS Standards	PS	SU	—	▼	▲
Rural Road Safety	PS	SU	▲	▼	▲
Emergency Access	PS	LS	—	▼	▲
Parking Capacity	PS	LS	▼	▼	▲
Alternative Transportation	PS	LS	▼	▼	▲
2.14 Utilities and Service Systems					
Wastewater Treatment Requirements	PS	LS	▲	▼	▲
New Water or Wastewater Treatment Facilities	PS	LS	—	▼	▲
Sufficient Stormwater Drainage Facilities	PS	LS	▲	▼	▲
Adequate Water Supplies	PS	SU	—	▼	▲
Adequate Wastewater Facilities	PS	LS	▲	▼	▲
Sufficient Landfill Capacity	PS	SU	—	▼	▲
Solid Waste Regulations	LS	LS	—	—	—
Energy	PS	LS	—	▼	▲
2.15 Global Climate Change					
Compliance with AB 32	PS	LS	▲	—	▲
Effects of Global Climate Change on the Proposed Project	PS	LS	▲	▼	▲

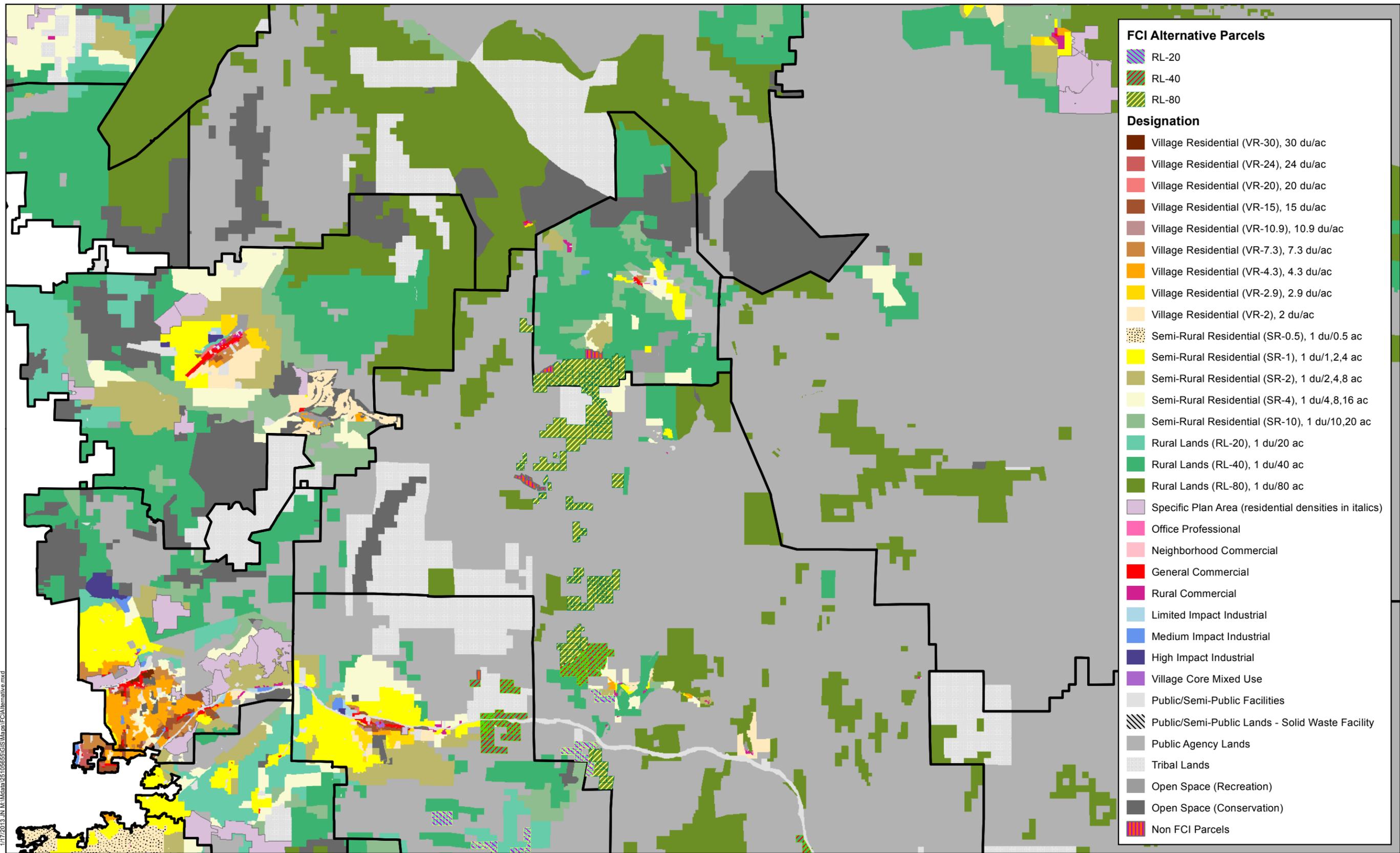
- ▲ Alternative is likely to result in greater impacts to issue when compared to proposed Project.
- Alternative is likely to result in a similar impacts to issue when compared to proposed Project.
- ▼ Alternative is likely to result in less impacts to issue when compared to proposed Project, however, impacts would still be significant before mitigation.
- PS Potentially significant impact
- LS Less than significant impact
- SU Potentially significant and unavoidable impact

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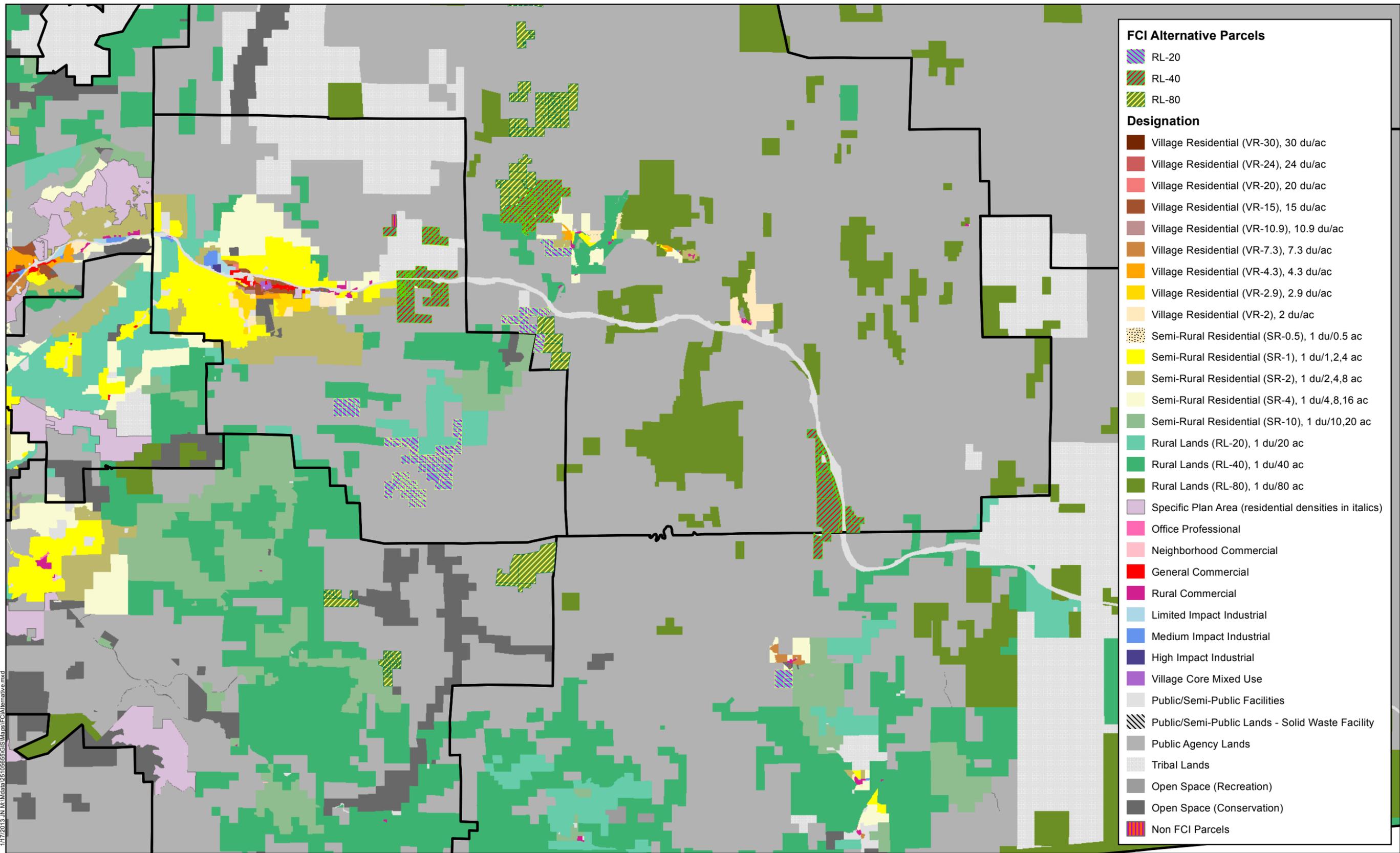


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