

CHAPTER 4 PROJECT ALTERNATIVES

4.1 Scope and Purpose

Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines requires that an environmental impact report (EIR) “describe a range of reasonable alternatives to the proposed project, or to the location of the project, that would feasibly attain most of the basic objectives but would avoid or substantially lessen any of the significant environmental effects of the project, and evaluate the comparative merits of the alternatives.” Section 15126.6(a) also provides that an EIR need not consider every conceivable alternative to a project. Instead, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. However, an EIR need not consider alternatives that are infeasible. There also is no ironclad rule governing the nature or scope of the alternatives to be discussed in an EIR, other than the “rule of reason.” The “rule of reason” governing the range of alternatives specifies that an EIR should only discuss those alternatives necessary to foster meaningful public participation and informed decision-making.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the purpose of an EIR’s alternatives discussion is to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if the alternatives would impede to some degree the attainment of the project’s objectives or be more costly. Further, CEQA requires that an EIR identify the environmentally superior alternative from among the alternatives.

This EIR has evaluated the proposed project’s potential significant impacts on the environment related to aesthetics, agricultural resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, paleontological resources, parks and recreation, population and housing, public services, transportation and traffic, and utilities and service systems. The proposed project would result in potential impacts in the following three categories: (1) those impacts determined not to be significant: energy, hydrology and water quality, land use and planning, parks and recreation, and public services (2) those impacts reduced to less than significant with implementation of mitigation measures: agricultural resources, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, paleontological resources, utilities and service systems, and (3) those impacts that remain significant and unavoidable and feasible mitigation would not reduce such impacts to less-than-significant levels: aesthetics, air quality, mineral resources, noise, population and housing, and transportation and traffic. This information allows for the project to be compared against the merits of each alternative.

For each of the alternatives identified, the EIR conducted the following assessment:

- Described the alternative;
- Identified the impacts of the alternative and evaluated the significance of those impacts; and
- Evaluated each alternative relative to the proposed project, specifically addressing project objectives, feasibility, avoidance or reduction of significant impacts, and comparative merits.

The analysis in this section is supported by the following technical reports:

- Newland Sierra Agricultural Alternative Report prepared by Ecology Artisans (Appendix GG of this EIR)
- Newland Sierra Parkway Feasibility Study prepared by Fuscoe Engineering (Appendix HH of this EIR)
- Newland Sierra Project Alternatives Traffic Analysis prepared by LLG (Appendix II of this EIR)

The EIR has evaluated eleven alternatives to the proposed project as follows:

1. No Project (No Build) Alternative
2. Existing General Plan Alternative
3. Newland Sierra Parkway Alternative A
4. Newland Sierra Parkway Alternative B
5. Newland Sierra Parkway Alternative C
6. Multi-Family Town Center Alternative
7. CDFW/USFWS Land Planning Alternative A
8. CDFW Land Planning Alternative B
9. CDFW Land Planning Alternative C

In addition, the EIR considered but rejected two alternatives. These alternatives are briefly described and compared to the proposed project, followed by the basis for rejecting the alternative.

10. Alternative Site Location Alternatives
11. Agricultural Alternative

4.2 Criteria for Selection and Analysis of Alternatives

The criteria for the selection and analysis of alternatives are provided in CEQA Guidelines Section 15126.6(c). The alternatives must (1) meet most of the project objectives, (2) be feasible, and (3) avoid or substantially lessen the significant impacts resulting from the project.

4.2.1 Project Purpose and Objectives

The underlying purpose of the proposed project is to implement a new mixed-use planned Community near existing and planned infrastructure, services, and jobs proximate to the north San Diego County Interstate 15 (I-15) corridor, guided by the following project objectives:

1. Preserve substantial open space and thereby enhance habitat conservation and natural community conservation planning in north San Diego County (County) through the permanent dedication and management of open space to protect multiple special-status species and their habitats and provide connectivity to existing designated open space and preserve areas in areas surrounding the project.
2. Create compact, sustainable interrelated neighborhoods, consistent with the County's Community Development Model and "Village" designation in the General Plan and facilitating a multi-modal transportation network linked to regional transportation mobility options.
3. Construct public facilities phased concurrent with demand and support public services within existing service areas without burden or cost to existing residents, visitors, or North County unincorporated communities.
4. Provide a range of recreational amenities and facilities that are accessible to residents of both the Community and the surrounding area.
5. Integrate, maintain, and preserve unique landscape features and distinct landforms along the I-15 corridor.
6. Accommodate existing, planned, and future growth in north San Diego County by providing a diverse range of housing opportunities in conjunction with a Town Center that supports a mix of uses for the benefit of the new Community and surrounding areas.

4.2.2 Feasibility

CEQA Guidelines Section 15126.6(f)(1) identifies the factors to be taken into account to determine the feasibility of alternatives. The factors include site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the applicant can reasonably acquire, control, or

otherwise have access to the alternative site. No one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote or speculative.

4.2.3 Evaluation of Significant Impacts

According to CEQA Guidelines Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of the project. The alternatives will be evaluated to determine if, as anticipated when selected as alternatives, they eliminate any significant adverse environmental effects or reduce them to a less-than-significant level. The project-related impacts are considered to be those that are identified prior to the incorporation or implementation of any mitigation measures.

The performance of the alternative relative to the proposed project will be evaluated to determine the “comparative merits of the alternatives.” (CEQA Guidelines Section 15126.6(a)) This analysis will be based, in part, on a comparison to the proposed project’s impacts. It also will include a discussion of the relative feasibility of each alternative.

4.3 Rationale for the Selection of Alternatives

As part of an alternatives analysis, CEQA requires an EIR to address a No Project (No Build) Alternative. The purpose of describing and analyzing a No Project (No Build) Alternative is to allow decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. This EIR addresses two “No Project” alternatives. The first is the No Project (No Build) Alternative evaluated in Section 4.4, below, and the second is the Existing General Plan Alternative evaluated in Section 4.5, below.

EIRs should also identify any alternatives that were considered by the Lead Agency but rejected, and briefly explain the reasons why the Lead Agency made such a determination. Among the factors that may be used in an EIR to eliminate alternatives from detailed consideration are (i) failure to meet most of the basic project objectives, (ii) infeasibility, and/or (iii) inability to avoid significant environmental impacts.

In accordance with these requirements and based on comments received during the CEQA Notice of Preparation and scoping process for the project, a total of eleven alternatives to the proposed project were considered and analyzed compared to the project. Two of the project alternatives were considered but rejected as explained in Section 4.3.1 below, while nine alternatives are more fully analyzed in Sections 4.4 through 4.12, below.

Input was received along with recommendations for project alternatives during the project EIR's Notice of Preparation and scoping process. In a letter dated March 16, 2015, Golden Door Properties, LLC, (owner and operator of the Golden Door Spa Resort which is situated on the south side of Deer Springs Road between Sarver Lane and Mesa Rock Road in the vicinity of the project), through its counsel, Latham & Watkins LLP, recommended an on-site alternative to the project's proposed improvements to Deer Springs Road. In lieu of widening and improving Deer Springs Road to a four-lane Major Road classification, the letter recommended construction of a new four-lane road, named "Newland Sierra Parkway." This alternative is identified as the Newland Sierra Parkway Alternative A in Section 4.6 of this EIR. Under this alternative, Newland Sierra Parkway would be routed through the project north of Deer Springs Road. According to Golden Door Properties, LLC, the purpose of this alternative is to keep project traffic trips off Deer Springs Road by accommodating forecasted traffic on this new road. Golden Door Properties, LLC requested this alternative with the intent that it would "encourage trips on the new four-lane road through the project rather than onto Deer Springs Road in order to avoid traffic, noise, air quality, and safety impacts to the community and the pedestrians, cyclists, and equestrians traveling along Deer Springs Road, and instead route trips through the project" (Appendix A).

Approximately one year after the NOP comment period closed, on April 8, 2016, Latham & Watkins LLP submitted a second letter on behalf of Golden Door Properties, LLC, requesting that the project address two additional Newland Sierra Parkway alignments. Latham & Watkins LLP hired Delane Engineering, Inc. to prepare a technical memorandum analyzing these two additional alignment options, identified as Options C1 and C2. These two additional alignments are referred to as Newland Sierra Parkway Alternative B and Alternative C, and are analyzed in this EIR in Sections 4.7 and 4.8, below.

In addition to requesting the project analyze alternatives to widening and improving Deer Springs Road, Golden Door Properties, LLC, through Latham & Watkins, LLP, recommended that the EIR focus on a multi-family project alternative with all of the units (2,135) built as multi-family homes situated within and around the Town Center on the east side of the project. This Multi-Family Town Center Alternative would not include any single-family residential units. Instead, it would provide a transit connection via an expanded park-and-ride facility, a transit center with direct access onto I-15, and a shuttle system to the Escondido Transit Center. The goal of the alternative would be to provide a clustered, transit-oriented design that would reduce greenhouse gas (GHG) emissions. This alternative is assessed in Section 4.9, below.

In addition to the two No Project Alternatives and the four alternatives recommended by Golden Door Properties, LLC, three additional alternatives were recommended by the California Department of Fish & Wildlife (CDFW) in its NOP comment letter dated March 11, 2015.

CDFW commented on the NOP stating

“to provide for a larger, contiguous block of open space, in the eastern and northern portion of the property, to minimize edge effects to on site biological open space areas, and to maintain connectivity between on site and off site areas designated for conservation, we recommend that the draft EIR include the following EIR alternatives: 1) one that would remove the three easternmost development bubbles (i.e., areas identified by the County in a prior meeting as Towncenter, Terraces, and Hillside) and associated access roads; 2) another possible alternative to consider would remove the easterly half of the Mesa development area (located just northwest of Hillside) and the Terraces and Hillside areas (but retain the Towncenter area); and 3) a third alternative that would move some of the development proposed in the central and eastern areas of the site to the old quarry locations.”

On March 12, 2015, the U.S. Fish and Wildlife Service (USFWS) submitted a comment letter in response to the NOP requesting that the EIR analyze one of three alternatives also recommended by CDFW, stating “we recommend that the DEIR fully analyze a project alternative that would remove the three development bubbles identified as Towncenter, Terraces, and Hillside...and associated access roads.”

Based on these recommended alternatives from CDFW and USFWS, three separate alternatives were developed which remove or reduce development areas with the intent of reducing the project’s impacts to sensitive biological resources. The three alternatives are referred to herein as the CDFW/USFWS Land Planning Alternative A, CDFW Land Planning Alternative B, and CDFW Land Planning Alternative C, and analyzed in Sections 4.10 through 4.12, below.

4.3.1 Alternatives Considered but Rejected

As described above, this EIR considered but rejected two alternatives, the Alternative Site Location Alternatives and the Agricultural Alternative.

4.3.1.1 Alternative Site Location Alternatives

The applicant considered alternative locations for the project using the project objectives and feasibility criteria. The applicant considered sites that were available and suitable for development within San Diego County with a General Plan land use designation of Village to ensure development of a mixed-use community. The project applicant did not own or control any other land of comparative size and location at the time it acquired the project.

During the EIR Notice of Preparation process, Golden Door Properties, LLC requested that the EIR address site NC 2-1, which is listed in the General Plan's Housing Element Inventory for the North County Metropolitan Subregional Plan Area. According to Golden Door Properties, LLC, site NC 2-1 is "located in the same planning area as the project, could accommodate a similar number of residential units, is located in closer proximity to existing communities and transit infrastructure, and appears to largely avoid the project's impacts" (Appendix A).

Site NC 2-1 is located generally east of Buena Creek Road, east of the SPRINTER light rail line, north of Estrelita Drive, and south of an existing single-family residential subdivision, as shown in the County of San Diego General Plan Housing Element Site Inventory for North County Metropolitan Subregional Plan Area. According to the County of San Diego General Plan Housing Element Site Inventory, Site NC 2-1 consists of 25 individual parcels totaling approximately 63 acres (compared to the 1,985-acre project). All parcels of the NC 2-1 site have the VR30 land use designation; therefore, the potential yield of residential land uses would be approximately 1,500 dwelling units according to the Housing Element Site Inventory (compared to the 2,135 residential units proposed under the project). To achieve a yield of 1,500 units, the NC 2-1 site would need to be built entirely as a high density, multifamily project at or above 24 to 30 dwelling units/acre.

Although the NC 2-1 site would be located closer to exiting transit infrastructure, it would not feasibly accommodate a similar number or mix of residential units as the project due to its smaller size. Therefore, this site would not provide the range of housing units as the proposed project. Developing the project on the NC 2-1 site may result in avoidance of some project impacts, new impacts resulting from noise, air quality, and traffic would likely occur, due to the size of the NC 2-1 site, proximity to existing sensitive land uses, and the capacity of the existing roadways/intersections. Additionally, a portion of the NC 2-1 site is located in a floodplain. Given the size and location, the NC 2-1 site would not reasonably meet project objectives for preserving substantial open space, providing the same number and type of recreational opportunities, and providing a diverse range of housing opportunities, nor would it guarantee preservation of unique landscape features along the I-15 corridor (due to the project site still being available for development under the existing General Plan). Further, development of the NC 2-1 site by the applicant would require purchase of 25 individual parcels with existing residential and agricultural land uses. Therefore, NC 2-1 was rejected as an alternate site location.

In addition to site NC 2-1, the project applicant assessed other potential alternative locations within the County that currently possess a Village designation that could feasibly meet most of the project objectives. This assessment of alternative project sites did not yield any other locations that would meet most of the project objectives, specifically by being site that includes a Village designation and of sufficient size to provide a range of housing

opportunities and in close proximity to a major transportation corridor and job centers. The project is the closest location that includes a Village designation to existing jobs, services, and infrastructure in proximity to a major transportation corridor. In contrast to the other considered locations, the project is located at the Deer Springs Road interchange with direct access to I-15, providing regional access to existing job centers in San Marcos, Escondido, Vista, Carlsbad, and Oceanside, and job centers to the south including Rancho Bernardo and Poway. The project is also located in proximity to California State University San Marcos and Palomar College. Further, commuting options for residents of the proposed project would be enhanced with proximity to six Sprinter stations within six miles of the project, including: (1) the Escondido Transit Center, (2) Nordahl Road Station, (3) the Cal State San Marcos Station, (4) the San Marcos Civic Center Station, (5) the Palomar College Station, and (6) the Buena Creek Station. The location of the project would promote consistency with the County's General Plan Guiding Principles and Community Development Model. The other potential sites with a Village designation were determined to be substantially developed and occupied by multiple property owners, businesses, and residents such that they would be infeasible or undesirable for the project applicant to reasonably acquire, take control, or otherwise gain access to sufficient acreage to implement a new, mixed-use planned community. Therefore, Alternative Site Location Alternatives were rejected from further consideration.

4.3.1.2 Agricultural Alternative

During the Notice of Preparation and public scoping process, Golden Door Properties, LLC requested that the EIR evaluate and compare an agricultural alternative to the proposed project. The applicant considered an alternative in which the project would be used for agricultural purposes, as shown in Figure 4-1. A study was conducted to determine the agricultural potential of the project from both a suitability and viability standpoint. This study is included as Appendix GG of this EIR. No residential, commercial, school, parks, or other land uses proposed under the project would be developed as part of this alternative. As this alternative would use the existing topography of the site, no significant grading or landform alteration would be required to implement this alternative. As this alternative would contribute more than 100 ADTs to Deer Springs Road, which operates at Level of Service (LOS) F under existing conditions (County of San Diego Guidelines for Determining Significance, Transportation and Traffic, Aug. 2011), this alternative would be required to widen and improve Deer Springs Road to meet the County's four-lane Major Road classification. When compared to the proposed project, under this alternative the disturbed area (which equates to the limits of grading and fuel modification zones (FMZs) for the proposed project) would increase by approximately 311 acres, decreasing the amount of open space by the same amount.

As shown in Figure 4-1, the different agricultural uses would be spread across the project Site for grazing and wide-spaced silvopasture, olive silvopasture, olive orchard, vineyard, and small-plot-

intensive farming for vegetables. Approximately half of the Site (more than 1,000 acres) could be managed through Holistic Planned Grazing to improve ecosystem functions, such as water retention, and reduce fire risk. Less than 18 percent of the Site (approximately 300 acres) has been designated as Productive Lands with a higher agricultural potential. These are the flatter lands (primarily less than 15 percent slopes) with deeper soils more supportive of vineyards and olive trees. The remainder of the agriculturally suitable land, approximately 15 percent of the site, could be used for small-plot-intensive farming. This method consists of high-intensity, short-rotation growth of valuable crops such as leafy greens, basil, carrots, and microgreens, which allows for greater return on investment.

Although the Site may have the potential to become a viable agricultural operation over the long-term, this potential has significant limitations and risk. The Site has substantial limitations for agricultural productivity. Only a small portion of the Site (15 percent) has potential for intensive agricultural production with minimal to no opportunity for expansion over time. Substantial portions of the Site are either inaccessible or are too rocky to be productive. Small-plot-intensive farming would likely have the highest returns; however, this form of farming requires suitable soils and has a high water demand. As indicated in the Agricultural Alternative Study (Appendix GG), although wine grapes and oil olives could potentially be profitable in the long-term on this Site, returns would not be realized for 20 to 30 years. The capital investment required to establish these types of operations is considered high risk and sensitive to market and weather fluctuations and the rising cost of water.

There are many sites in the County with higher agricultural potential, including existing agricultural operations in Twin Oaks Valley. Conversely, the project Site has limited potential to support agricultural operations, and has never supported any significant agricultural use or operation despite previous attempts to establish such uses on the project Site, reinforcing the determination that it is an unlikely choice for such a use. Although Golden Door Properties, LLC suggested the project Site could support avocado farming, the Agricultural Alternative Study (Appendix GG) does not recommend avocados or citrus due to these crops' high water demand and the prevalence of the disease *Phytophthora* sp., which is leading to removal of many established orchards in the region.

The Agricultural Alternative would not meet any of the project objectives, with the exception of Objective 5 of maintaining unique landscape features and distinct landforms. The Agriculture Alternative also would not meet the project's underlying purpose, which is to implement a new mixed-use planned Community near existing and planned infrastructure, services, and jobs proximate to the North County I-15 corridor. The Agricultural Alternative would not preserve substantial open space through permanent dedication and management, nor create compact, sustainable neighborhoods or facilitate a multi-modal transportation network linked to regional transportation mobility options. In addition, the alternative would not provide recreational

opportunities or accommodate existing, planned, or future growth in north San Diego County by providing a diverse range of housing opportunities with a mixed-use Town Center. Therefore, the Agricultural Alternative was rejected from further consideration.

4.4 No Project (No Build) Alternative

4.4.1 No Project (No Build) Alternative Description and Setting

Under the No Project (No Build) Alternative, the project Site would remain in its existing condition and would not involve construction of a new mixed-use Community near existing and planned infrastructure, services, and jobs proximate to the North County I-15 corridor. No residential, commercial, park, or school land uses would be developed on site. Improvements to Camino Mayor, Sarver Lane, and Deer Springs Road would not occur. None of the Site would be permanently preserved as open space, nor would any management of biota resources to maintain and enhance habitat functions and values occur.

In its existing undeveloped condition, the project Site contains a number of on-site dirt roads, access trails, and service roads for existing water infrastructure. Portions of the Site have been and continue to be used for various unauthorized land uses, including off-roading, motorcycling, shooting, occasional dumping, horseback riding, hiking, and mountain biking. An abandoned quarry is located in the northwest portion of the Site fronting Twin Oaks Valley Road, and an abandoned private landing strip is situated in the north-central portion of the Site.

4.4.2 Comparison of Significant Effects between Alternative and Proposed Project

Aesthetics

No changes or impacts to the existing condition of the Site would occur under this alternative. Slopes, rock formations, and landforms would remain in their existing conditions. No development or physical change would occur on site; therefore, no changes to the existing visual character of the project Site would occur, and there would be no visual/aesthetic impacts. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Agricultural Resources

No construction or development resulting in impacts to agricultural resources would occur under this alternative. Therefore, this alternative would result in reduced impacts to agricultural resources compared to the proposed project.

Air Quality

No construction or development would occur under this alternative. Use of construction equipment, architectural coatings, and other producers of construction-related emissions would not occur. This alternative would not result in emissions-generating land uses or project vehicle trips, and would not result in any new air quality impact. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Biological Resources

No significant impacts to sensitive vegetation, special-status plant and wildlife species, wetlands/waters, or wildlife movement would occur under this alternative. On-site sensitive biological resources would not benefit from the permanent dedication and management of 1,209 acres, or 61 percent of the project Site, as open space preserve. This alternative would result in reduced impacts compared to the proposed project.

Cultural Resources

No grading or site disturbance would occur on-site or off-site under this alternative. Known and unknown cultural resources would remain in their existing condition. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Geology and Soils

No development would occur on-site or off-site under this alternative, therefore, there would be no exposure to potential geologic hazards that could affect people or structures. No impacts related to geology and soils would occur. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Greenhouse Gas Emissions

No grading, construction, or development would occur under this alternative. Use of construction equipment for grading, architectural coatings, and other producers of construction-related GHG emissions would not occur under this alternative, and this alternative would not result in GHG-generating land uses or project vehicle trips. The proposed project includes a combination of project design features and mitigation, including the purchase of carbon offsets, to fully offset its construction and operational GHG emissions; however, this alternative would not generate any GHG emissions, nor release any sequestered carbon as a result of any clearing, and would not require any mitigation or project design features to offset GHG emissions. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Hazards and Hazardous Materials

No construction, development or use of hazardous materials during construction would occur under this alternative. No grading of potentially contaminated soils would occur under this alternative. Similarly, demolition of three structures on Sarver Lane that may contain hazardous building materials would not occur under this alternative. Therefore, this alternative would result in reduced impacts to hazardous materials compared to the proposed project.

As the project would not be developed under this alternative, the potential for wildfire hazards resulting from the project's residents and structures would not exist. Evacuation and emergency response to the project would not be required. Thus, under this alternative, no impact related to wildfire hazards and emergency response resulting from the project's people and structures would occur. Existing residents to the west and south of the project would not benefit from the fire access and fuel modification the project proposes along the western and southwestern boundaries of the project, or the project's additional water supply infrastructure (e.g., water tank). Under this alternative, DSFPD would not benefit from the fire fees the project is required to pay under the County's Fire Mitigation Fee, or the future tax revenue and assessments the project's residences would generate. This alternative would result in reduced impacts compared to the proposed project.

Hydrology and Water Quality

No new impervious surfaces or other changes to drainage on the project would occur under this alternative. No new potential sources of stormwater pollutants would be introduced. The existing drainage facilities and the existing flooding condition that occurs along portions of Deer Springs Road and Sarver Lane during major rain events would remain. This alternative would result in reduced impacts compared to the proposed project.

Land Use and Planning

No residential or commercial development would occur under this alternative, and the proposed General Plan and North County Metropolitan Subregional Plan Amendments would not be required under this alternative. This alternative would not accommodate any of the planned growth expected to occur in the North San Diego County area, or contribute to the County achieving its General Plan Housing Element (i.e., Regional Housing Needs Assessment) goals. This alternative would not aid in implementing the County's General Plan, nor generate funding for existing and planned infrastructure and services through payment of development impact fees. Leaving the project and other sites in the County planned for development in an undeveloped state could have the cumulative effect of forcing development into neighboring counties, such as Riverside, resulting in worsening traffic impacts, conflicts with state planning

directives (e.g., SB 743) and regional planning efforts relying in part on new development to fund the regional arterial system, and other negative environmental effects associated with a growing jobs/housing imbalance. Therefore, this alternative would have greater land use and planning impacts compared to the project.

Mineral Resources

No construction or development that could potentially impact known mineral resources would occur under this alternative. Therefore, this alternative would result in no impact to mineral resources. Compared to the proposed project, impacts to mineral resources would be reduced under this alternative.

Noise

No construction or development would occur under this alternative. Use of construction equipment and other noise-generating construction activities would not occur. The alternative would not result in operational noise from project-generated vehicle trips. Compared to the proposed project noise impacts would be reduced under this alternative.

Paleontological Resources

No construction or development would occur under this alternative. Excavation in paleontologically sensitive soils would not occur under this alternative. Known and unknown paleontological resources would remain in their existing condition. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Parks and Recreation

No new parks or recreational facilities would be provided under this alternative, and no new or increased demand for parks and recreational facilities would occur, as no new population would be introduced to, or generated by, the project. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Population and Housing

No residential or commercial development that generates on-site population and housing would occur under this alternative. Additionally, this alternative would not widen or improve off-site roads identified in the County's Mobility Element or extend or expand existing planned infrastructure. This alternative has no growth-inducing potential. Additionally, the alternative would not require the acquisition of existing residential properties. Conversely, this alternative would not accommodate any of the planned growth expected in the North San Diego County

area or contribute to the County achieving its Housing Element (i.e., Regional Housing Needs Assessment) goals. This alternative would not implement the County's General Plan, including policies of the Housing Element to provide a wide range of housing types (Goal H-1, Policies H-1.7 and H-1.8). This alternative would result in reduced impacts compared to the project.

Public Services

No residential or commercial development that generates a need for new public services would occur under this alternative and no impact to public service would occur. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Transportation and Traffic

No vehicle-trip-generating land uses would be developed on Site under this alternative and, therefore, no construction or operational trips would be generated as a result of this alternative. Additionally, however, this alternative would not provide any improvements to the access points to the project Site or any off-site roadways or intersections. As a result, the segments of Deer Springs Road from the I-15 Southbound Ramps to Twin Oaks Valley Road, and Twin Oaks Valley Road from Deer Springs Road to Cassou Road, would continue to operate at LOS E or worse. Also, the segment of Buena Creek Road from Twin Oaks Valley Road to S. Santa Fe Avenue, which is forecast to operate at LOS F with the addition of cumulative traffic, and certain associated intersections, would remain unimproved and forecast to operate at a deficient Level of Service (LOS). However, under this alternative there would be no new impacts to transportation and traffic and, therefore, this alternative would result in reduced impacts compared to the proposed project.

Utilities and Service Systems

No residential or commercial development that generates a need for new utilities and service systems would occur under this alternative, and no new impacts would occur to utilities and service systems. Therefore, this alternative would result in reduced impacts compared to the project.

Energy

No construction or development would occur under this alternative, therefore, no construction related energy would be consumed. Additionally, the project Site would remain in its existing condition and no ongoing, operational energy usage would occur. Therefore, this alternative would result in reduced impacts compared to the proposed project.

4.4.3 Relation to Project Objectives

The No Project (No Build) Alternative would only meet Objective 5 by maintaining unique landscape features and distinct landforms along the I-15 corridor for the time being; however, it would not meet any of the other project's objectives (see Section 4.2.1, Project Purpose and Objectives). Specifically, the alternative would not meet the proposed projects underlying purpose, which is to implement a new mixed-use Community near existing and planned infrastructure, services, and jobs within the north San Diego County I-15 corridor. The No Project (No Build) alternative would not preserve substantial open space and thereby enhance habitat conservation and natural community conservation planning in north San Diego County through the permanent dedication and management of open space to protect multiple special-status species and their habitats and provide connectivity to existing designated open space and preserve areas surrounding the project Site.

This alternative would not create compact, sustainable, interrelated neighborhoods and a Village core, nor construct public facilities phased concurrent with demand within existing areas without burden or cost to existing residents, or provide recreational opportunities or public services accessible to project residents and surrounding areas. Further, the alternative would not accommodate existing, planned, and future growth in north San Diego County by providing a diverse range of housing opportunities with a mixed-use Town Center for the benefit of the new residents and surrounding areas. This alternative also would not aid in implementing the County's General Plan.

4.4.4 Feasibility

The No Project (No Build) Alternative is feasible. However, in the long-term, the project would remain developable under existing General Plan land use designations and zoning.

4.4.5 Evaluation of Significant Impacts

With the exception of Land Use and Planning impacts, the No Project (No Build) Alternative would reduce all significant impacts related to construction and use of the project Site as a new mixed-use Community within the north San Diego County I-15 corridor. Specifically, when compared to the proposed project, the No Project (No Build) Alternative would avoid, reduce, or substantially lessen significant impacts in the following areas:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils

- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Noise
- Paleontological Resources
- Parks and Recreation
- Population and Housing
- Public Services
- Transportation and Traffic
- Utilities and Service Systems
- Energy

4.5 Existing General Plan Alternative

4.5.1 Existing General Plan Alternative Description and Setting

The Existing General Plan Alternative is depicted in Figure 4-2. Under this alternative, the project Site would be developed under existing General Plan land use designations of Village, Semi-Rural, and Rural Lands. According to the Land Use Element of the County's General Plan, approximately 19.6 acres of the existing property is designated Semi-Rural 10, which allows one dwelling unit per 10 gross acres on land with slopes of less than 25 percent, and one dwelling unit per 20 gross acres on land with slopes greater than 25 percent. Approximately 1,907 acres of the existing property is designated Rural Lands 20, which allows one dwelling unit per 20 gross acres. Approximately 4.64 acres is designated General Commercial (C-1), which allows a maximum intensity of 0.70 floor area ratio in areas designated as Village. Approximately 53.64 acres is designated Office Professional (C-2), which allows a maximum intensity of 0.80 floor area ratio in areas designated as Village.

In summary, the existing General Plan land use designations would allow approximately 99 single-family residential dwelling units and 2,008,116 square feet of office professional and commercial space with associated roadways, leach fields for septic systems, and Fuel Modification Zones (FMZs). The distribution of the 99 single-family residential dwelling units was developed to ensure compliance with the County's Conservation Subdivision Ordinance and other existing development requirements and constraints that apply to the project Site.

Compared to the proposed project, only 2.4 acres of private parks would be provided; open space preserve area would decrease by approximately 273 acres; the disturbed area would increase by approximately 273 acres; and grading would decrease by approximately 9,723,000 cubic yards of cut and would be balanced on site, similar to the proposed project. Deer Springs Road and Camino Mayor would be improved as proposed under the proposed project to the County's 4.1B Major Road classification and Hillside Residential Road standard, respectively. Sarver Lane would be improved to the County's Rural Residential Road standard.

4.5.2 Comparison of Significant Effects between Alternative and Proposed Project

Aesthetics

Under this alternative, the majority of the project site would be developed as low-density, single-family homes with an internal roadway network consisting of several interconnected residential roadways. Within the Village Area in the southeastern corner of the project Site, over 2 million square feet of office and commercial uses would be situated on approximately 58.3 acres of land, which would intensify uses near the I-15/Deer Springs Road interchange. Outside the Village Area, when compared to the proposed project, this alternative would reduce the bulk and scale of development across the majority of the project Site, resulting in less overall contrast in visual character compared to the project when viewed from public roadways in the vicinity of the project. However, residential development allowed under the existing General Plan land use designations may result in placement of homes in more visually prominent areas of the project Site consistent with traditional lower density development, as opposed to the proposed project where residential uses and neighborhoods are sited in lower-elevation areas and grading has been designed to more closely follow the existing natural terrain of the Site. Additionally, the two million square feet of commercial and office professional space in the Village Area adjacent to the I-15/Deer Springs Road interchange would contrast with the existing character of the surrounding area. When viewed from public roadways, the office professional and commercial uses would result in a significant change in the visual environment, greater than those associated with the proposed project, which have been designed to be integrated into the existing topography through smaller, stepped pads. This alternative would result in greater visual impacts, as more area fronting I-15 would be developed at a higher intensity than the proposed project. Therefore, this alternative would result in greater aesthetic impacts compared to the proposed project.

Agricultural Resources

As with the proposed project, this alternative would require the widening of Deer Springs Road between the Twin Oaks Valley Road and Mesa Rock Road, and the widening of Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road which would result in the same impacts to agricultural resources as the proposed project. Like the project, this alternative would be required to comply with the County's PACE Program to mitigate off-site impacts. Therefore, this alternative would result in similar impacts compared to the project.

Air Quality

Construction emissions under the Existing General Plan Alternative would be reduced when compared to the project due to the smaller amount of cut and fill on site.

During operation, this alternative would result in six percent (6%) fewer average daily trips (ADTs), resulting in slightly lower transportation-related operational emissions in the off-peak periods compared to the project. Overall, this alternative would result in reduced impacts compared to the proposed project due to reduced construction and transportation-related emissions.

Biological Resources

Overall, open space would decrease by approximately 273 acres and disturbed area would increase by the same acreage under the Existing General Plan Alternative compared to the project. The increase in development footprint would result in greater impacts to on-site vegetation communities, including coastal sage scrub. Despite the expanded footprint of this alternative, open space would be designed as large, contiguous blocks of preserve area. An increase in internal roadways could result in a greater impediment to wildlife movement through the project Site. The commercial area in the southeastern portion of the project would impact coastal California gnatcatcher (*Polioptila californica californica*), a federally listed threatened bird species, and the coastal California gnatcatcher biological ladder along the I-15 corridor. Therefore, this alternative would result in greater impacts compared to the proposed project.

Cultural Resources

Under this alternative, Deer Springs Road would still be widened and improved as planned under the project. Therefore, potentially significant impacts to cultural resources sites (CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822) would occur under this alternative. Under the proposed project, the portion of site CA-SDI-4558 that is located within the development impact area (outside of the Deer Springs Road improvements) would be avoided by the proposed project. However, under this alternative, this portion of site CA-SDI-4558 would be fully impacted by commercial land uses. Therefore, this alternative would result in greater impacts to cultural resources compared to the proposed project.

Geology and Soils

Because this alternative would be located within the same project boundary, existing geologic conditions and hazards would be the same as under the proposed project. Similar mitigation required for potentially unsuitable soils would be required for this alternative to reduce impacts to less-than-significant levels. Specific areas of potential rock fall hazards identified under the proposed project would not be affected by the design of this alternative; however, other areas

not affected by the proposed project could be affected by this alternative. Mitigation required for rock fall hazard under the proposed project would also be a viable mitigation for any areas of potential new rock fall hazard associated with this alternative. Therefore, this alternative would result in similar impacts to geology and soils compared to the proposed project.

Greenhouse Gas Emissions

Grading under this alternative would be substantially less than the proposed project and would be balanced on site, resulting in a shorter construction schedule and less construction equipment.

During operation, this alternative would result in 6% fewer ADTs (refer to the Transportation and Traffic section below), thus resulting in slightly lower operational GHG emissions than the proposed project. Fewer residential dwelling units during the operational phase would also contribute fewer GHG emissions associated with energy use, water demand, area sources, and solid waste generation; however, GHG emissions would still occur. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Hazards and Hazardous Materials

Under this alternative, potential impacts related to existing hazardous materials sites and contamination would be similar to the proposed project. The residential, commercial, and office professional land uses that would be developed under this alternative would not involve the handling of hazardous materials that may pose a health risk to surrounding residential land uses. Impacts associated with hazardous materials would be similar to the proposed project.

This alternative would require a Fire Protection Plan to be approved by the County, DSFPD, and SMFPD specific to the land use plan. This alternative would meet the different General Plan fire response time standards for the existing land use designations of Commercial, Office Professional, Semi- Rural 10, and Rural Land 20. All new structures would be required to comply with the County's Consolidated Fire Code (CCFC) and California Building Code and California Fire Code. A reduction in residential structures would result in reduced exposure to wildfire risk. Compared to the project, with a smaller on-site population, evacuation times would be shorter. The residential units located in the northern portion of the Site would need to be served by DSFPD Fire Station 11. Given the expansion of the development footprint and the internal roadway network to reach each single-family dwelling unit, emergency fire response times would be greater than the proposed project, but as noted above would comply with the General Plan response time standards. Overall, this alternative would result in similar impacts to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

The disturbed area would be greater under this alternative; however, it would result in a decreased impervious footprint when compared to the proposed project. Construction and operation of this alternative would have similar sources of stormwater pollutants as the proposed project, and similar construction best management practices (BMPs), source control facilities, and drainage management area facilities would be employed under this alternative to control stormwater pollution and flooding. Therefore, this alternative would result in reduced hydrology and water quality impacts compared to the proposed project.

Land Use and Planning

This alternative would be consistent with the existing General Plan land use designations of the project Site and not require an amendment to the General Plan. However, this alternative would not provide for the same share of projected population growth (99 residential units compared to 2,135 residential units); create a range of housing types, promote health and sustainability through a mixed-use development pattern; or provide and support a multi-modal transportation network. Despite the preservation of a larger area of open space, this alternative would result in greater impacts to coastal California gnatcatcher and its habitat, a resource under the County RPO. Overall, this alternative would result in similar impacts compared to the proposed project.

Mineral Resources

This alternative would result in a larger development footprint being located within Mineral Resource Zone-2 (MRZ-2) portion of the project. Therefore, this alternative would result in greater impacts to mineral resources than the proposed project.

Noise

Overall, construction activities would be reduced and shortened under the Existing General Plan Alternative. Construction would require less blasting, rock drilling, grading, and other noise-generating activities. Therefore, construction noise impacts would be less than the proposed project.

New project-generated trips would be approximately six percent (6%) less than the proposed project, however, AM and PM peak hour trips would be 56% and 21% greater, respectively, compared to the project (see the Transportation and Traffic section below). The majority of operational trips would be generated from the commercial land uses in the southeastern corner of the project Site. Commercial uses are not considered noise-sensitive, but the project trips generated from the commercial land uses would have different trip distributions than the proposed project, and would result in a greater increase in ambient noise levels during peak hours. Noise likely would not be of concern for the majority of the homes on the project Site, except for those nearest I-15. It is likely that noise-

attenuating features would be required due to traffic noise along I-15. Impacts due to operational noise would be similar to the proposed project. Overall noise impacts would be reduced compared to the proposed project.

Paleontological Resources

Areas of paleontological sensitivity on the project site would still be impacted under this alternative due to the development footprint and potential excavation quantities. Therefore, impacts related to paleontological resources would be similar to the proposed project.

Parks and Recreation

Only 2.4 acres of private parks or recreational facilities would be developed under this alternative. Although this alternative would result in a substantially smaller new resident population, it would be required to meet the same County Park Land Dedication Ordinance (PLDO) requirements as the proposed project and comply by providing on-site public park acreage or paying PLDO fees or a combination of both. Therefore, this alternative would result in similar impacts to parks and recreation when compared to the proposed project.

Population and Housing

This alternative would be consistent with the existing General Plan land use designations applicable to the project Site. Therefore, the population induced both directly and indirectly by on-site land uses would not exceed planned growth as contemplated by the County General Plan. Although this alternative would not exceed planned growth, it would still result in approximately 2 million square feet of commercial/office professional land uses that could result in additional indirect growth. This alternative would expand transportation infrastructure that would increase accessibility to the area (i.e., Deer Springs Road would be widened as described further below), resulting in growth-inducing potential. Additionally, this alternative would generate 1,240 fewer Average Daily Trips (ADT) than the proposed project, and would require mitigation to improve the I-15/Deer Springs Road interchange. This alternative would not exceed planned growth for the project. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Public Services

While the number of on-site residents would be reduced under this alternative due the reduction in the residential dwelling unit count, the total service population introduced to the area would increase because of the total square footage of commercial use and associated employees. The total service population would be approximately 8,474 people, and result in an increased demand for fire and law enforcement services. A school site would not be provided under this alternative. This alternative would be required to pay public facility development impact fees and school fees. Overall, this alternative would result in similar impacts compared to the proposed project.

Transportation and Traffic

The following analysis is based on a comparison of the Existing General Plan Alternative to the proposed project under the Existing Plus Project Plus Cumulative Project scenario. Please refer to Appendix II (Newland Sierra Project Alternatives Traffic Analysis, May 2017) for the trip generation tables and analysis of project impacts.

Land uses under this alternative are based on the existing General Plan land use designations for the Site, including 4.64 acres of general commercial uses, 53.64 acres of office professional uses, and 99 estate residential units. Compared to the project, this alternative would generate 1,240 (6%) fewer ADTs.

Compared to the proposed project, the Existing General Plan Alternative would result in greater impacts to Deer Springs Road from Mesa Rock Road to Twin Oaks Valley Road, greater impacts to Buena Creek Road between Twin Oaks Valley Road and Monte Vista Drive, and greater impacts to North Twin Oaks Valley Road. Additionally, under this alternative, Sarver Lane would need to be improved to the County's Rural Residential Road standards with a 48-foot-wide right-of-way (ROW).

Like the proposed project, this alternative would require a new interchange at the I-15/Deer Springs Road interchange, and improvements to Camino Mayor. Also, like the proposed project, impacts to Caltrans and San Marcos facilities (the I-15 interchange, freeway mainlines, and Twin Oaks Valley Road), impacts to the intersection of Robelini Dr./S. Santa Fe Ave, and impacts to the segment of S. Santa Fe Ave. between Robelini Dr. and Buena Creek Rd. would remain significant and unavoidable. This alternative would result in greater impacts compared to the project.

Utilities and Service Systems

A reduced residential population introduced to the area would result in reduced demand for utilities and service systems under the Existing General Plan Alternative. However, the inclusion of approximately 2 million square feet of commercial/office professional land uses would result in an increased demand for utilities and service systems for these uses compared to the project. Overall, this alternative would result in similar impacts to utilities and services systems compared to the project.

Energy

Overall construction activities would be reduced and shortened under the Existing General Plan Alternative; therefore, energy consumption during construction would be reduced when compared to the proposed project. Operationally, this alternative would include increased commercial/office land uses, and would result in increased long-term operational energy

consumption from these uses; however, it would reduce residential land uses and energy consumption from residential uses. Overall, impacts to energy under this alternative would be reduced compared to the project.

4.5.3 Relation to Project Objectives

The Existing General Plan Alternative would meet some of the project objectives, specifically Objectives 1 as it relates to preserving large blocks of open space (see Section 4.2.1, Project Purpose and Objectives). The alternative would provide substantial commercial uses, consistent with the Village designation of the proposed project (Objective 2); however, it would not have commensurate residential neighborhoods to fully implement the County's Community Development Model. As a result, this alternative would not meet the project's underlying purpose to implement a new mixed-use Community near existing and planned infrastructure, services, and jobs within the north San Diego County I-15 corridor.

The Existing General Plan Alternative would not create compact, sustainable, interrelated neighborhoods (Objective 2) or provide recreational opportunities and public services accessible to Community residents and surrounding areas to the same degree as the proposed project (Objective 4). Further, this alternative would not integrate, maintain, or preserve unique landscape features or distinct landforms along the I-15 corridor (Objective 5), or accommodate existing or future growth in north San Diego County by providing a diverse range of housing opportunities for the benefit of the new residents and surrounding areas to the same degree as the proposed project (Objective 6) because it would only provide 99 units. This alternative, however, would provide substantial office professional and commercial uses. The inclusion of commercial uses would be partially consistent with the Town Center component of the proposed project.

4.5.4 Feasibility

The Existing General Plan Alternative is feasible due to consistency with the existing General Plan land use designations and zoning. ~~However, this alternative would not be in compliance with General Plan policies M 3.3, S 3.1, S 3.3, and S 3.5, as well as County Consolidated Fire Code Section 503.1.3.~~

4.5.5 Evaluation of Significant Impacts

The Existing General Plan Alternative would avoid, reduce, or substantially lessen significant impacts compared to the proposed project in the following areas:

- Air Quality
- Greenhouse Gas Emissions

- Hydrology and Water Quality
- Population and Housing
- Energy
- Noise

The Existing General Plan Alternative would result in greater significant impacts compared to the proposed project in the following areas:

- Aesthetics
- Biological Resources
- Cultural Resources
- Mineral Resources
- Transportation and Traffic

4.6 Newland Sierra Parkway Alternative A

4.6.1 Newland Sierra Parkway Alternative A Description and Setting

During the EIR NOP and public scoping process, Golden Door Properties, LLC requested that the EIR address Newland Sierra Parkway Alternative A. The “goal” of this alternative is to “study alternatives to widening Deer Springs Road by instead maximizing the use of Newland-owned property for build-out of a major arterial.”

This alternative is depicted in Figure 4-3. In this alternative, a four-lane Major Road (referred to as Newland Sierra Parkway, designed as a 4.1A Major Road with Raised Median requiring a maximum right-of-way of 100 feet and maximum curb-to-curb width of 78 feet) would be constructed generally along the southern edge of the project Site, north of and parallel to the existing Deer Springs Road. Newland Sierra Parkway would connect Sarver Lane to the project entrance at Mesa Rock Road in the Town Center and be sized and designed to accommodate the existing traffic along Deer Springs Road, project traffic, and future cumulative traffic that would otherwise use Deer Springs Road. Other road improvements would include an improved intersection at the Sarver Lane/Deer Springs Road intersection. Under Alternative A, Newland Sierra Parkway would be approximately 9,800 feet in length, compared to the approximate 7,700 foot length of Deer Springs Road under the proposed project.

Even with the addition of Newland Sierra Parkway to the County’s Mobility Element, the segment of Deer Springs Road between Sarver Lane and Mesa Rock Road continues to support enough traffic to cause the road to fall to an LOS E. As the project would contribute more than