200 ADTs to this road segment under this alternative, the project would be required to widen the road (refer to the Transportation and Traffic section below). Thus, despite the stated intent of the Newland Sierra Parkway Alternatives to serve as an alternative to the project's proposed widening of Deer Springs Road, Deer Springs Road would still need to be widened. Deer Springs Road would remain a public road open to local and regional pass-through traffic, however, Newland Sierra Parkway would replace Deer Springs Road as County Route S12 and be added to the County's Mobility Element, which would require a County General Plan Amendment. This alternative also would require the acquisition of additional properties along its depicted alignment to accommodate the grading and right-of-way required for this alternative, as shown in Figure 4-4.

When compared to the proposed project, open space would decrease by approximately 20 acres; disturbed area would increase by approximately 38 acres; and grading would increase by approximately 3,883,000 cubic yards of export that would be required to be hauled from the project Site as a result of constructing Newland Sierra Parkway. Newland Sierra Parkway Alternative A would otherwise have the same proposed land uses and planning areas as the proposed project.

### 4.6.2 Comparison of Significant Effects between Alternative and Proposed Project

#### Aesthetics

Under Newland Sierra Parkway Alternative A, all the proposed land uses potentially affecting visual resources would remain the same as under the proposed project, with the exception of Newland Sierra Parkway. Grading would substantially increase, since construction of Newland Sierra Parkway would require approximately 40 percent more cut (approximately 4,743,400 cubic yards) compared to the proposed project. As shown in Figures 4-3 and 4-4, grading required for construction of Newland Sierra Parkway would cut into the slopes on the southern portion of the project Site and into large portions just south of the project Site, affecting existing landforms and boulders. Newland Sierra Parkway would be visible from public roadways and other vantage points to the southeast of the project Site. Therefore, under this alternative, the addition of Newland Sierra Parkway to the project would result in greater aesthetic impacts.

#### Agricultural Resources

Impacts to on-site agricultural resources would be similar to 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 to six lanes which would result in greater off-site impacts to agricultural resources compared to the project.

### Air Quality

Under the proposed project, grading would be balanced within the boundaries of the project and the improvements to Deer Springs Road and Sarver Lane immediately off site and, therefore, would not result in the need for soil import or export activity and associated off-site haul truck trips. Under the Newland Sierra Parkway Alternative A, grading would not be balanced, and approximately 3,883,000 cubic yards would be exported. Exported material would be hauled off site, resulting in approximately 242,700 haul trips (assuming the CalEEMod default 16-cubic-yard hauling capacity), or 485,400 one-way haul trips, during the construction phase that would not occur under the proposed project. CalEEMod employs a 20-mile default haul distance for import and export trips. The addition of these export haul trips would result in an increase of emissions during the grading phase when compared to the proposed project. The construction duration and equipment fleet would be the same as under the proposed project. The increased intensity during the grading period for construction of Newland Sierra Parkway Alternative A would result in an increase in daily emissions. Therefore, during construction, this alternative would result in greater air quality impacts than the proposed project.

As the proposed land uses would be the same under this alternative as with the proposed project, project-generated trips would be the same. Although trip distribution would differ somewhat on site and within the immediate vicinity of the project with the inclusion of Newland Sierra Parkway (refer to Appendix HH, Newland Sierra Parkway Feasibility Study, February 2017), overall operational emissions would remain the same as the proposed project. Therefore, in consideration of the additional air quality impacts that would occur during construction, this alternative would result in greater impacts compared to the proposed project.

### Biological Resources

Impacts to biological resources would be greater under this alternative due to the decrease in open space by approximately 20 acres and increase in disturbed area by approximately 38 acres as a result of constructing Newland Sierra Parkway. Impacts to biological resources associated with Deer Springs Road would be the same as the proposed project, and development of Newland Sierra Parkway would substantially increase impacts to sensitive vegetation communities both on site and off site (including southern mixed chaparral), although no new impacts to critical habitat would likely occur.

North/south wildlife movement across the project Site would be impeded by two roadways under this alternative, instead of just Deer Springs Road as planned under the proposed project. Overall

preserve design would be affected by the inclusion of Newland Sierra Parkway. Newland Sierra Parkway would reduce the acreage, contiguous design, and connectivity of the central block of open space to the Pre-Approved Mitigation Area to the south. Newland Sierra Parkway Alternative A would result in greater impacts to biological resources than the proposed project.

### Cultural Resources

Deer Springs Road would be improved as planned under the proposed project. Therefore, potentially significant impacts to cultural resources sites (CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822) would be similar to the proposed project under this alternative. All other potentially significant impacts to historical and archeological resources would occur as under the proposed project. Therefore, under this alternative, impacts to cultural resources would be similar to the proposed project.

### Geology and Soils

Existing geologic conditions and hazards would be the same as under the proposed project. This alternative would result in the same proposed land uses as under the proposed project, resulting in similar types of impacts to geology and soils. The construction and alignment of Newland Sierra Parkway may result in new areas of potential rock fall hazard where existing boulders are located above the finished roadway. Therefore, impacts under this alternative would be greater than the proposed project.

### Greenhouse Gas Emissions

Under this alternative, GHG emissions would increase during construction compared to the proposed project due to the increase in grading and the required export of approximately 3,883,000 cubic yards of material and associated increased haul-truck trips. The export haul-truck trips would result in an increase in GHG emissions during construction. Therefore, during construction, this alternative would result in greater GHG emissions than the proposed project.

The operational emissions would be the same as the proposed project under this alternative. However, due to the greater grading and construction impacts, overall GHG emissions impacts would be greater than the proposed project.

The project includes a combination of mitigation and project design features, including the purchase of carbon offsets, to fully offset its construction and operational GHG emissions. It is reasonable to assume this alternative would implement similar or equivalent mitigation and project design features to fully offset GHG emissions.

## Hazards and Hazardous Materials

As the same Site would be used for this alternative, potential impacts relating to existing hazardous materials sites and contamination would be similar to the project. Like the structures along Sarver Lane that would be removed as part of the project, any additional structures on off-site properties that would require removal in association with the development of Newland Sierra Parkway would be assessed for existing hazardous materials. Impacts associated with hazardous materials would be similar to the proposed project.

Potential for wildfire hazard would be similar to the proposed project. The inclusion of Newland Sierra Parkway would not affect the need for or provision of fire access, limited building zones, and fuel modification zones for the proposed land uses. Newland Sierra Parkway would require additional assessment for fire hazard and approval from the County, DSFPD, and SMFPD to be included in the Fire Protection Plan and incorporated into alternative design. Impacts related to wildfire hazard would be similar to the proposed project.

The proposed project's evacuation plan would require revisions under this alternative to account for Newland Sierra Parkway as an additional evacuation route. Although this adjustment would be necessary, the routes would be similar to that for the proposed project (egress to the south via Mesa Rock Road, egress to the south on Sarver Lane, and egress to the west via Camino Mayor). The evacuation plan under this alternative would be subject to the same standards and County approval as for the proposed project. Evacuation would have similar impacts when compared to the proposed project. Therefore, impacts to hazards and hazardous materials would be similar to the proposed project.

## Hydrology and Water Quality

For the majority of the project Site, impacts to hydrology and water quality would remain similar to the proposed project under this alternative. The inclusion of Newland Sierra Parkway would increase the area, both on site and off site that would be altered from the existing drainage pattern. The segment of Deer Springs Road between Sarver Lane and Mesa Rock Road would still be improved as proposed under the project. Additionally, the segment of Deer Springs between Twin Oaks Valley Road and Sarver Lane, and the segment of Twin Oaks Valley Road between Buena Creek Road and Deer Springs Road, would require widening to six lanes under this alternative, increasing hydrology and water quality impacts compared to the project. Accordingly, adding a second, four-lane road in addition to increased widening of off-site roads would result in greater hydrology impacts. Newland Sierra Parkway would also introduce new impervious surfaces in an area that would be preserved as open space under the proposed project. Impacts to hydrology and water quality would therefore be greater under this alternative than the proposed project.

### Land Use and Planning

As the majority of the project Site would be developed as proposed by the project, this alternative would also be consistent with most of the General Plan Guiding Principles, policies, and goals. Newland Sierra Parkway would cut across the southern portion of the project Site, along slopes and require additional acquisition of property, altering the character of these off-site properties. This alternative would require an amendment to the Mobility Element to add Newland Sierra Parkway and designate this new road as Route S12. Therefore, this alternative would result in similar land use impacts to the proposed project.

### Mineral Resources

Under this alternative, the land use plan and the corresponding impacts to MRZ-2 area in the northwest portion of the project Site would be the same as the proposed project.

### Noise

Development of Newland Sierra Parkway under this alternative likely would result in additional construction activity compared to the proposed project. This alternative would require an additional 4,225,500 cubic yards of cut and 342,000 cubic yards of fill, necessitating 3,883,000 cubic yards of export, which would result in more blasting activities, more construction generated noise, and more construction generated trips compared to the proposed project. Therefore, construction of this alternative would result in greater noise impacts than the proposed project.

Newland Sierra Parkway would be located in proximity to proposed noise-sensitive land uses (Town Center, Terraces, and Valley planning areas). The addition of a high-volume roadway that would be used by the majority of project-generated traffic, as well as traffic from the surrounding area, would result in new operational noise impacts at these noise-sensitive land uses.

This alternative would result in lower traffic volumes along the segment of Deer Springs Road between the existing Sarver Lane and Mesa Rock Road, resulting in decreased noise impacts along this road segment. However, as a result of the induced background traffic that would occur under this alternative (refer to the Transportation and Traffic below), traffic volumes on the balance of the road network would be higher, resulting in greater operational trip-generated noise levels overall. Therefore, operational trip-generated noise impacts would be greater compared to the proposed project.

## Paleontological Resources

Newland Sierra Parkway would be located above igneous and metamorphic bedrock, which underlies the majority of the project Site. This geologic formation has no potential to yield paleontological resources. Town Center, the Valley, Sierra Farms Park, and Sarver Lane (the same areas as the proposed project) would still be underlain by paleontologically sensitive geologic formations, and mitigation would still be required. Therefore, impacts to paleontological resources would be similar to the proposed project.

## Parks and Recreation

The same park and recreational land uses and opportunities would be provided under this alternative as the proposed project. The same County Parkland Dedication Ordinance (PLDO) requirements and compliance would occur under this alternative when compared to the proposed project. Therefore, impacts to park and recreation would be the same as the proposed project.

## Population and Housing

The same land uses are proposed under this alternative when compared to the proposed project, which would result in the same growth-inducing potential. However, compared to the project, this alternative would have greater growth inducing features with the expansion of off-site roadways to accommodate the higher traffic volumes induced by this alternative (specifically the widening of portions of Deer Springs Road and Twin Oaks Valley Road to six lanes south of the project, and the creation of two, four lane roads through the project area. (See Transportation and Traffic section below.) Therefore, impacts to population and housing would be greater compared to the proposed project.

## Public Services

This alternative would result in the same increase in population and demand for public services as the proposed project. This alternative would also pay the required public services fees and have project design features to aid in emergency response, similar to the proposed project. Primary site access would be provided in the same location as the proposed project, which would not affect emergency travel times from DSFPD Station 12 on Mesa Rock Road. Overall, this alternative would result in similar impacts to public services when compared to the proposed project.

## Transportation and Traffic

The following analysis is based in part on a detailed feasibility study assessing the preliminary grading, engineering, and long-term traffic impacts of the Newland Sierra Parkway Alternatives (see Appendix HH, Newland Sierra Parkway Feasibility Study, February 2017). The analysis is also based on a comparison of the Newland Sierra Parkway Alternatives 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.

The Newland Sierra Parkway Alternatives are based on the inclusion of a bypass road ("Newland Sierra Parkway") incorporated into the proposed project with the stated intent that this bypass road would divert a substantial amount of traffic, including project traffic, from Deer Springs Road to avoid the widening of Deer Springs Road.

Although each of the Newland Sierra Parkway alternatives includes a different alignment through the project Site and portions of off-site property, each alternative is based on a bypass road that connects in two places to Deer Springs Road, one connection each where the Sarver Lane and Mesa Rock Road intersections are today. Therefore, from a traffic modeling perspective, in the context of forecasting traffic volumes and assessing traffic impacts on the existing road network, the differing alignment alternatives have been modeled as a single alternative. Other than the inclusion of this bypass road and different engineering, grading, and environmental impacts associated with each of the three Newland Sierra Parkway Alternatives, all other project details, including the project's land uses, are assumed to be the same as the proposed project. Thus, the trip generation and the project's trip distribution on the surrounding road network (excepting the two Newland Sierra Parkway segments analyzed herein) is the same as the proposed project.

SANDAG modeling was performed for the Newland Sierra Parkway Feasibility Study to forecast how trips would be distributed between the two roads, Deer Springs Road and the Newland Sierra Parkway. The SANDAG modeling results showed that, even with the addition of Newland Sierra Parkway to the road network, the segment of Deer Springs Road between Sarver Lane and Mesa Rock Road would continue to operate at a Level of Service (LOS) E, a failing LOS. In accordance with the County's CEQA "Guidelines for Determining Significance, Transportation and Traffic (Aug. 2011)," because the project would contribute more than 200 ADTs to this segment of Deer Springs Road (under any of the Newland Sierra Parkway Alternatives); and, thus, the project would have a significant direct impact and this segment would need to be widened and improved to the County's 4.1B Major Road classification.

The SANDAG modeling results also showed that adding Newland Sierra Parkway to the County's road network would result in a significant amount of induced background traffic that would use the combination of two roads (Newland Sierra Parkway and Deer Springs Road). The SANDAG modeling of Newland Sierra Parkway and Deer Springs Road, with both serving as four-lane roads between the same two points resulted in the majority of background traffic remaining on Deer Springs Road. Deer Springs Road, as a four-lane road is the more direct route between the same two points and; therefore, would carry the majority of the traffic using the network of two roads.

Compared to the proposed project, the induced demand created by two four-lane roads under the Newland Sierra Parkway Alternative scenarios (in lieu of just one road under the proposed project) would result in greater impacts to the I-15/Deer Springs Road interchange, reduced impacts to Deer Springs Road between Mesa Rock Road and Sarver Lane, greater impacts to Deer Springs Road between Sarver Lane/Newland Sierra Parkway and Twin Oaks Valley Road, greater impacts to Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road (within the City of San Marcos), and greater impacts to Buena Creek Road and its intersections with Twin Oaks Valley Road, Monte Vista Drive, and S. Santa Fe Ave.

Compared to the proposed project, the higher traffic volumes resulting from the Newland Sierra Parkway Alternatives would require the widening of the segment of Deer Springs Road between Sarver Lane and Twin Oaks Valley Road and the segment of Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road to six lanes. Like the proposed project, the Newland Sierra Parkway Alternatives would result in the need for a new interchange at Deer Springs Road and I-15, although the Newland Sierra Parkway Alternatives would necessitate a larger, higher capacity interchange compared to the proposed project as a result of higher traffic volumes through the interchange. As Newland Sierra Parkway would traverse through the project, it would also require a number of intersections with the project's neighborhoods, reducing the effectiveness of the road as a Mobility Element road.

Additionally, this alternative would conflict with San Diego County General Plan Mobility Element Goal M-9 because it would build a new, four lane Major Road without maximizing the effective use of the existing transportation network.

In summary, Newland Sierra Parkway Alternative A would result in greater traffic impacts than the proposed project due to additional segment and intersection impacts and inconsistencies with the Mobility Element. 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.

### Utilities and Service Systems

As this alternative does not include any land use changes compared to the project, this alternative would result in the same increase in population and demand for utilities and service systems on site as the proposed project. Demand and generation of water and wastewater on site would also be the same when compared to the proposed project. Therefore, this alternative would result in similar impacts compared to the proposed project.

Energy

The additional grading and construction impacts would result in an increase of energy consumption under this alternative as compared to the proposed project. As this alternative does not include any land use changes compared to the project, this alternative would result in the same on-site energy consumption from operations as the proposed project. Due to the substantial increase in grading and construction required, energy impacts would be greater than the proposed project.

### 4.6.3 Relation to Project Objectives

Newland Sierra Parkway Alternative A would not meet all of the proposed project's objectives (see Section 4.2.1, Project Purpose and Objectives). By retaining the majority of the project's design, unit count and land uses, it would be generally consistent with Objectives 2, 3, 4, and 6, however, it would reduce attainment of Objectives 1 and 5. Related to Objective 1, due to the decrease in open space of approximately 20 acres and increase in disturbed area by approximately 38 acres, this alternative would reduce the attainment of preserving substantial open space in a permanent, managed preserve. Additionally, this alternative would bifurcate the southern block of preserve area resulting in a reduction in preserve connectivity due to the addition of a second, four lane major road. Due to the nature of the landform alteration required to implement this alternative, this alternative would also reduce attainment of integrating, maintaining, and preserving unique landscape features and distinct landforms along the I-15 corridor.

### 4.6.4 Feasibility

Deer Springs Road first appeared on U.S. Geological Survey Maps in 1901. The road was added to the County's Maintained Road System in 1951, became County Route S12 in 1961, and added to the County's Circulation/Mobility Element in 1967. In 1997, Deer Springs Road was added to the San Diego Association of Government's (SANDAG) Regional Arterial System (RAS). In 2011, the County updated the General Plan and classified Deer Springs Road as a six-lane Prime Arterial roadway in the Mobility Element. Neither the County's General Plan nor SANDAG's RAS anticipated two parallel Mobility Element roads in the Twin Oaks Valley area, making this alternative inconsistent with previous planning by SANDAG and the County.

Newland Sierra Parkway Alternative A would require design exceptions to the County's Public Road Standards, specifically to accommodate a road grade of up to 12 percent in steepness for an approximately 2,500-foot-long section of the road and for a horizontal curve radius of 750 feet. In contrast, the County's Road Standards for the Major Road classification allow for a maximum road grade of 7 percent and a minimum curve radius of 1,200 feet; and, thus, this design would not meet County Public Road Standards. The design would increase the likelihood of speeding

which could result in a public safety issue. Additionally, the steep grade and potential substandard design, in combination with the fact that available mitigating design features to control speed would be limited under the circumstances, could, effectively, prevent most trucks from using the road, despite it serving as Route S12 under this alternative.

This alternative has implications for the project and the County's Mobility Element, some of which render this Alternative impractical, including: (a) 3,883,000 yards of dirt export; (b) a Major Road with a grade of 12 percent (71 percent steeper than allowed by the County's road standards for this classification); (c) a road whose steepness would present an impediment to trucks despite serving as Route S12; and (d) the applicant's ability to acquire additional off-site properties or right-of-way for the Newland Sierra Parkway alignment.

### 4.6.5 Evaluation of Significant Impacts

Newland Sierra Parkway Alternative A does not reduce any impacts from the proposed project. Because this alternative does not reduce any impacts, it is not considered an alternative under CEQA; however, it is provided in full to allow decision makers and the public to evaluate and understand the alternatives suggested by Golden Door Properties, LLC.

The Newland Sierra Parkway Alternative A would result in greater significant impacts than the proposed project in the following areas:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Population and Housing
- Transportation and Traffic

## 4.7 Newland Sierra Parkway Alternative B

### 4.7.1 Newland Sierra Parkway Alternative B Description and Setting

Approximately one year after the NOP comment period closed, on April 8, 2016, Golden Door Properties, LLC submitted a letter requesting the study of two additional variations of the Newland Sierra Parkway Alternative (herein referred to as Newland Sierra Parkway Alternatives B and C). The letter was accompanied by engineering information from Delane Engineering. Alternative B, depicted in Figure 4-5, is similar to the Newland Sierra Parkway Alternative A, but with a different alignment.

In this alternative, a four-lane Major Road (referred to as Newland Sierra Parkway classified 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, north of and parallel to the existing Deer Springs Road. This alternative is similar to Alternative A on the westerly half of its alignment. On its easterly half, the four-lane road would be aligned to bisect the project's proposed Terraces neighborhood, requiring a redesign of this area of the project. Newland Sierra Parkway would join into the existing 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. The road profile also cuts down through the Terraces neighborhood, requiring the grade of the road to reach 9 percent. The eastern leg of this Alternative would require a 350-foot-tall cut slope along the east-facing slopes of the project Site that would be visible from traffic along I-15 and at the I-15/Deer Springs Road Interchange. Alternative B would be approximately 10,500 feet in length compared to the approximate 7,700-foot-long 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 200 ADTs to this road segment under this alternative, the project would be required to widen Deer Springs Road. Thus, despite the stated intent of the Newland Sierra Parkway Alternatives to serve as an alternative to the project's proposed widening of Deer Springs Road, Deer Springs Road would still need to be widened under this alternative. Deer Springs Road would remain a public road open to local and regional pass-through traffic, however, Newland Sierra Parkway would replace Deer Springs Road as County Route S12 and be added to the County's Mobility Element, which would require a County General Plan Amendment. This alternative also would require the acquisition of additional properties along its depicted alignment to accommodate the grading and right-of-way required for this alternative, as shown in Figure 4-6.

When compared to the proposed project, open space would decrease by approximately 7.5 acres; disturbed area would increase by approximately 17 acres; and grading would increase by approximately 404,700 cubic yards of export that would be required to be hauled from the project Site due to the construction of Newland Sierra Parkway. Newland Sierra Parkway Alternative B would otherwise have the same proposed land uses and planning areas as the proposed project.

### 4.7.2 Comparison of Significant Effects between Alternative and Proposed Project

#### Aesthetics

Under Newland Sierra Parkway Alternative B, all the proposed land uses potentially affecting visual resources would remain the same as under the proposed project, with the exception of Newland Sierra Parkway. Grading would substantially increase under this alternative when compared to the proposed project. As shown in Figures 4-5 and 4-6, grading required for construction of Newland Sierra Parkway would cut into the slopes on the southern portion of the project Site and into large portions just south of the project, affecting existing landforms and boulders. Newland Sierra Parkway likely would be visible from public roadways and other vantage points to the southeast of the project due to the steep grade of the roadway. The eastern leg of Newland Sierra Parkway under this alternative would require a 350-foot-tall cut slope along the east facing slopes of the project site that would be visible from traffic along I-15 and at the I-15/Deer Springs Road interchange. Therefore, under this alternative, the addition of Newland Sierra Parkway to the project Site would result in greater aesthetic impacts.

#### Agricultural Resources

Impacts to on-site agricultural resources would be similar to 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 to six lanes which would result in greater impacts to off-site agricultural resources compared to the project.

#### Air Quality

Under the proposed project, grading would be balanced within the boundaries of the project and the improvements to Deer Springs Road and Sarver Lane immediately off site and, therefore, would not result in the need for soil import or export activity and associated off-site haul truck trips. Under Newland Sierra Parkway Alternative B, grading would not be balanced, and approximately 404,700 cubic yards would be exported. Exported material would be hauled off site, resulting in approximately 25,300 haul trips (assuming the CalEEMod model default 16-cubic-yard hauling capacity), or 50,600 one-way haul trips, during the construction phase that would not occur under the proposed project. CalEEMod also employs a 20-mile default haul distance for import and export trips. Therefore, the addition of these export haul trips would result in an increase of emissions during the grading phase when compared to the proposed project. The construction duration and equipment fleet would be the same as the proposed project. This increased intensity during the grading period for construction of Newland Sierra

Parkway Alternative B would result in an increase in daily emissions. Therefore, during construction, this alternative would result in greater air quality impacts than the proposed project.

As the proposed land uses would be the same under this alternative as with the proposed project, project-generated trips would be the same. Although trip distribution would differ somewhat on site and within the immediate vicinity of the project with the inclusion of Newland Sierra Parkway (refer to Appendix HH, Newland Sierra Parkway Feasibility Study, February 2017), overall operational emissions would remain the same as the proposed project. Therefore, in consideration of the additional air quality impacts that would occur during construction, this alternative would result in greater impacts compared to the proposed project.

### Biological Resources

Impacts to biological resources would be greater under this alternative due to the decrease in approximately 7.5 acres of open space and increase in approximately 17 acres of disturbed area as a result of the addition of Newland Sierra Parkway. In addition to impacts to biological resources associated with widening Deer Springs Road, development of Newland Sierra Parkway would substantially increase impacts to sensitive vegetation communities both on site and off site (including southern mixed chaparral), although no new impacts to critical habitat would likely occur.

North/south wildlife movement across the project Site would be impeded by two roadways under this alternative, instead of just Deer Springs Road as planned under the proposed project. Overall preserve design would be affected by the inclusion of Newland Sierra Parkway. Newland Sierra Parkway would reduce the acreage, contiguous design, and connectivity of the central block of open space to the Pre-Approved Mitigation Area to the south. Newland Sierra Parkway Alternative B would result in greater impacts to biological resources than the proposed project.

### Cultural Resources

Deer Springs Road would be improved as proposed 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. All other potentially significant impacts to historical and archeological resources would occur as under the proposed project. Therefore, under this alternative, impacts to cultural resources would be similar to the proposed project.

### Geology and Soils

Existing geologic conditions and hazards would be the same as under the proposed project. This alternative would result in the same proposed land uses as under the proposed project, resulting in similar types of impacts to geology and soils. The construction and alignment of Newland Sierra Parkway may result in new areas of potential rock fall hazard where existing

boulders are located above the finished roadway. Therefore, impacts under this alternative would be greater than the proposed project.

### Greenhouse Gas Emissions

Similar to potential impacts to air quality, GHG emissions would increase during construction under this alternative compared to the proposed project due to the increase in grading and the required export of approximately 404,700 cubic yards of material and associated increase in haul truck trips. The export haul truck trips would result in an increase of GHG emissions during construction. Therefore, during construction, this alternative would result in greater GHG emissions than the proposed project.

The operational emissions would be the same as the proposed project under this alternative. However, due to the greater grading and construction impacts, overall GHG emissions impacts would be greater than the proposed project.

The project includes a combination of mitigation and project design features, including the purchase of carbon offsets, to fully offset its construction and operational GHG emissions. It is reasonable to assume this alternative would implement similar or equivalent mitigation and project design features to fully offset GHG emissions.

### Hazards and Hazardous Materials

As the same Site would be used for this alternative, potential impacts relating to existing hazardous materials sites and contamination would remain similar to the project. Like the structures along Sarver Lane that would be removed as part of the project, any structures on off-site properties that would require removal in association with the development of Newland Sierra Parkway would be assessed for existing hazardous materials. Impacts associated with hazardous materials would be similar to the proposed project.

Potential for wildfire hazard would be similar to the proposed project. The inclusion of Newland Sierra Parkway would not affect the need for or provision of fire access, limited building zones, and fuel modification zones for the proposed land uses. Newland Sierra Parkway would require additional assessment for fire hazard and approval from the County, DSFPD, and SMFPD to be included in the Fire Protection Plan and incorporated into alternative design. Impacts related to wildfire hazard would be similar to the proposed project.

The proposed project's evacuation plan would require revisions under this alternative to account for Newland Sierra Parkway as an additional route. Although this adjustment would be necessary, the routes would be similar to that of the proposed project (egress to the south via Mesa Rock Road, egress to the south on Sarver Lane, and egress to the west via Camino Mayor).

The evacuation plan under this alternative would be subject to the same standards and County approval as for the proposed project. Evacuation would have similar impacts compared to the proposed project. Therefore, hazards and hazardous materials impacts would be similar to the proposed project.

### Hydrology and Water Quality

For the majority of the project Site, impacts to hydrology and water quality would remain similar to the proposed project under this alternative. The inclusion of Newland Sierra Parkway would increase the area both on site and off site that would be altered from the existing drainage pattern. The segment of Deer Springs Road between Sarver Lane and Mesa Rock Road would still be improved as proposed under the project. Additionally, the segment of Deer Springs between Twin Oaks Valley Road and Sarver Lane and the segment of Twin Oaks Valley Road between Buena Creek Road and Deer Springs Road would require widening to six lanes under this alternative, increasing hydrology and water quality impacts compared to the project. Accordingly, adding a second four-lane road in addition to increased widening of off-site roads would result in greater hydrology impacts. Newland Sierra Parkway would also introduce new impervious surfaces in an area that would be preserved as open space under the proposed project. Therefore, under this alternative, hydrology and water quality impacts would be greater than the proposed project.

### Land Use and Planning

As a vast majority of the Site would be developed as planned under the proposed project, this alternative would also be consistent with most of the General Plan Guiding Principles, policies, and goals. Newland Sierra Parkway would cut across the southern portion of the project Site along slopes, and require additional acquisition of property, altering the character of these off-site properties. This alternative would require an amendment to the Mobility Element to add Newland Sierra Parkway and designate the new road as Route S12. This alternative would result in similar land use impacts to the proposed project.

### Mineral Resources

Under this alternative, the land use plan and the corresponding impacts to MRZ-2 area in the northwest portion of the project Site would be the same as the proposed project.

### Noise

Development of Newland Sierra Parkway under this alternative likely would result in additional construction activity compared to the proposed project. This alternative would require an additional 2,236,100 cubic yards of cut, 1,728,600 cubic yards of fill, and 404,700

cubic yards of export, which would result in more grading-related activities, more construction generated noise, and more construction generated trips on the road network compared to the proposed project. Therefore, construction of this alternative would result in greater noise impacts than the proposed project.

Newland Sierra Parkway would be located in proximity to proposed noise-sensitive land uses (Town Center, Terraces, and Valley planning areas). The addition of a high-volume roadway that would be used by the majority of project-generated traffic, as well as traffic from the surrounding area, would result in new operational noise impacts at these noise-sensitive land uses, and likely would require additional noise-attenuating features.

This alternative would result in lower traffic volumes along the segment of Deer Springs Road between the existing Sarver Lane and Mesa Rock Road, resulting in decreased noise impacts along this road segment. However, as a result of the induced background traffic that would occur under this alternative (refer to the Transportation and Traffic section in Section below), traffic volumes on the balance of the road network would be higher, resulting in greater operational trip-generated noise levels overall. Therefore, operational trip-generated noise impacts would be greater compared to the proposed project.

### Paleontological Resources

Newland Sierra Parkway would be located on top of igneous and metamorphic bedrock, which underlies the majority of the project Site. This geologic formation has no potential to yield paleontological resources. Town Center, the Valley, Sierra Farms Park, and Sarver Lane (the same areas as the proposed project) would still be underlain by paleontologically sensitive geologic formations, and mitigation would still be required. Therefore, impacts to paleontological resources would be similar to the proposed project.

### Parks and Recreation

The same park and recreational land uses and opportunities would be provided under this alternative as the proposed project. The same County Parkland Dedication Ordinance (PLDO) requirements and compliance would occur under this alternative when compared to the proposed project. Therefore, impacts to park and recreation would be the same as the proposed project.

### Population and Housing

The same land uses are proposed under this alternative when compared to the proposed project, which would result in the same growth-inducing potential. However, compared to the project, this alternative would have greater growth inducing features with the expansion of off-site roadways to accommodate the higher traffic volumes induced by this alternative (specifically the

widening of portions of Deer Springs Road and Twin Oaks Valley Road south of the project to six lanes, and the creation of two, four lane roads through the project area). (See Transportation and Traffic section below.) Therefore, impacts to population and housing would be greater compared to the proposed project.

### Public Services

This alternative would result in the same increase in population and demand for public services as the proposed project. This alternative would also pay the required public services fees and have project design features to aid in emergency response, similar to the proposed project. Primary Site access would be provided in the same location as the proposed project, which would not affect emergency travel times from DSFPD Station 12 on Mesa Rock Road. Overall, this alternative would result in similar impacts to public services as the proposed project.

### Transportation and Traffic

Although this alternative would result in a different alignment of Newland Sierra Parkway from Newland Sierra Parkway Alternative A, traffic impacts would be the same as those described under Newland Sierra Parkway Alternative A. For a detailed discussion of the traffic modeling performed for the Newland Sierra Parkway Alternatives and the analysis of those modeling results, please refer to Appendix HH, Newland Sierra Parkway Feasibility Study, February 2017, and the Transportation and Traffic section under Section 4.6.2 above. For a comparison of the Newland Sierra Parkway Alternatives 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.

As discussed above with respect to Newland Sierra Parkway Alternative A, compared to the proposed project, the induced demand created by two four-lane roads under the Newland Sierra Parkway Alternatives (in lieu of just one road under the proposed project) would result in greater impacts to the I-15/Deer Springs Road interchange, reduced impacts to Deer Springs Road between Mesa Rock Road and Sarver Lane, greater impacts to Deer Springs Road between Sarver Lane/Newland Sierra Parkway and Twin Oaks Valley Road, greater impacts to Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road (within the City of San Marcos), and greater impacts to Buena Creek Road and its intersections with Twin Oaks Valley Road, Monte Vista Drive, and S. Santa Fe Ave.

Compared to the proposed project, the higher traffic volumes resulting from the Newland Sierra Parkway Alternatives would require the widening of the segment of Deer Springs Road between Sarver Lane and Twin Oaks Valley Road and the segment of Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road to six lanes. Like the proposed project, the Newland

Sierra Parkway Alternatives would result in the need for a new interchange at Deer Springs Road and I-15, although the Newland Sierra Parkway Alternatives would necessitate a larger, higher capacity interchange compared to the proposed project as a result of higher traffic volumes through the interchange. As Newland Sierra Parkway would traverse through the project Site, it would also require a number of intersections with the project's neighborhoods, reducing the effectiveness of the road as a Mobility Element road.

Additionally, this alternative would conflict with San Diego County General Plan Mobility Element Goal M-9 because it would build a new, four lane Major Road without maximizing the effective use of the existing transportation network.

In summary, Newland Sierra Parkway Alternative B would result in greater traffic impacts than the proposed project due to additional segment and intersection impacts and inconsistencies with the Mobility Element. Like the proposed Project, impacts to Caltrans and San Marcos facilities (the I-15 interchange, freeway mainlines, and Twin Oaks Valley Road), to the intersection of Robelini Dr./S. Santa Fe Ave, and to the segment of S. Santa Fe Ave. between Robelini Dr. and Buena Creek Rd. would remain significant and unavoidable.

#### Utilities and Service Systems

As this alternative does not include any land use changes compared to the project, this alternative would result in the same increase in demand for utilities and service systems on site as the proposed project. Demand and generation of water and wastewater on site would also be the same when compared to the proposed project. Therefore, this alternative would result in similar impacts compared to the proposed project.

#### Energy

The additional grading and construction impacts would result in an increase of energy consumption under this alternative as compared to the proposed project. As this alternative does not include any land use changes compared to the project, this alternative would result in the same on-site energy consumption from operations as the proposed project. Due to the increase in grading and construction required, energy impacts would be greater than the proposed project.

### 4.7.3 Relation to Project Objectives

Newland Sierra Parkway Alternative B would not meet all of the proposed project's objectives (see Section 4.2.1, Project Purpose and Objectives). By retaining the majority of the project's design, unit count and land uses, it would be generally consistent with Objectives 2, 3, 4, and 6, however, it would reduce attainment of Objectives 1 and 5. Related to Objective 1, due to the decrease in open space of approximately 7.5 acres and increase in

disturbed area by approximately 17 acres, this alternative would reduce the attainment of preserving substantial open space in a permanent, managed preserve. Additionally, this alternative would bifurcate the southern block of preserve area resulting in a reduction in preserve connectivity due to the addition of a second, four lane road. Due to the nature of the landform alteration required to implement this alternative, this alternative would also reduce attainment of integrating, maintaining, and preserving unique landscape features and distinct landforms along the I-15 corridor.

### 4.7.4 Feasibility

Deer Springs Road first appeared on U.S. Geological Survey Maps in 1901. The road was added to the County's Maintained Road System in 1951, became County Route S12 in 1961, and added to the County's Circulation/Mobility Element in 1967. In 1997, Deer Springs Road was added to the San Diego Association of Government's (SANDAG) Regional Arterial System (RAS). In 2011, the County updated the General Plan and classified Deer Springs Road as a six-lane Prime Arterial roadway in the Mobility Element. Neither the County's General Plan nor SANDAG's RAS anticipated two parallel Mobility Element roads in the Twin Oaks Valley area, making this alternative inconsistent with previous planning by SANDAG and the County.

Similar to Newland Sierra Parkway Alternative A, Newland Sierra Parkway Alternative B would require design exceptions to the County's Public Road Standards, specifically to accommodate a maximum road grade of up to 9 percent for an approximately 5,000-foot-long section of the road and for a horizontal curve radius of 850 feet. In contrast, the County's Road Standards allow for a maximum road grade of 7 percent and minimum curve radius of 1,200 feet for a road with a Major Road classification; and, thus, it would not meet County Public Road Standards. The design would increase the likelihood of speeding which could result in a public safety issue. Additionally, the steep grade and potential substandard design, in combination with the fact that available mitigating design features to control speed would be limited under the circumstances, could, effectively, prevent most trucks from using the road, despite it serving as Route S12 under this alternative.

Newland Sierra Parkway Alternative B has implications for the project and the County's Mobility Element, some of which render this Alternative impractical, including: (a) a redesign of the project; (b) a highly visible 350-foot-tall cut slope; (c) 404,700 yards of dirt export over a 6-month period; (d) a Major Road with a grade of 9 percent (28 percent steeper than allowed by the County's road standards for this classification); (e) a road whose steepness would present an impediment to trucks despite serving as Route S12; and (f) the applicant's ability to acquire additional off-site properties or right-of-way for the Newland Sierra Parkway alignment.

### 4.7.5 Evaluation of Significant Impacts

Newland Sierra Parkway Alternative B does not reduce any impacts from the proposed project. Because this alternative does not reduce any impacts, it is not considered an alternative under CEQA; it is still provided in full to allow decision makers and the public to evaluate and understand the alternatives suggested by Golden Door Properties, LLC.

The Newland Sierra Parkway Alternative B would result in greater significant impacts than the proposed project in the following areas:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Population and Housing
- Transportation and Traffic

## 4.8 Newland Sierra Parkway Alternative C

### 4.8.1 Newland Sierra Parkway Alternative C Description and Setting

Approximately one year after the NOP comment period closed, on April 8, 2016, Golden Door Properties, LLC submitted a letter addressing another version of the Newland Sierra Parkway Alternative (referred to as Newland Sierra Parkway Alternative C), and the letter was accompanied by engineering information from Delane Engineering. This alternative, depicted in Figure 4-7, is similar to Newland Sierra Parkway Alternatives A and B, but with a different alignment.

In this alternative, a four-lane Major Road (referred to as Newland Sierra Parkway classified 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 begin with a 25-degree skewed intersection at the existing Deer Springs Road/Mesa Rock Road intersection. The road would then traverse the southern edge of the project Site north of Deer Springs Road, similar to Newland Sierra Parkway Alternative A, except, rather than ramping down to the Valley neighborhood to join Sarver Lane, this Alternative stays at a higher elevation and then turns to the south to cut through the saddle between two peaks on off-site property, which is not owned or controlled by the project applicant. In so doing, the grade of the road reaches 9 percent in steepness. Under this alternative, Newland Sierra Parkway would be sized and designed to accommodate existing traffic along Deer Springs Road, project buildout traffic, and future cumulative traffic that could otherwise use Deer Springs Road. This alternative would be approximately 9,400 feet in length.

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 200 ADTs to this road segment under this alternative, the project would be required to widen Deer Springs Road. Thus, despite the stated intent of the Newland Sierra Parkway Alternatives to serve as an alternative to the project's proposed widening of Deer Springs Road, Deer Springs Road would still need to be widened. Deer Springs Road would remain a public road open to local and regional pass-through traffic, however, Newland Sierra Parkway would replace Deer Springs Road as County Route S12 and be added to the County's Mobility Element, which would require a County General Plan Amendment. This alternative also would require the acquisition of additional properties along its depicted alignment to accommodate the grading and right-of-way required for this alternative, as shown in Figure 4-8. Further, when compared to the proposed project, open space would decrease, the disturbed area would increase, and grading would increase by approximately 4,298,900 cubic yards of import that would be required to be hauled to the project.

This alternative would cross over the San Diego County Water Authority's 66-inch-diameter aqueduct, a regional water supply transmission facility, requiring the placement of 100 to 125 feet of fill placed over an approximately 600-foot-long stretch of the aqueduct southwest of the project Site. This amount of fill placed over the aqueduct would require a partial removal and reconstruction of the aqueduct with a reinforced design in the area subject to the additional fill. The San Diego County Water Authority would be required to approve the placement of fill over this water transmission facility and the rebuilding of the aqueduct.

In addition, this alternative would require construction of a new intersection with Deer Springs Road/Newland Sierra Parkway near where Sarver Lane connects to Deer Springs Road today. As part of the construction, approximately 1,200 feet of Deer Springs Road would need to be raised to the southwest of the project Site so that it could merge with Newland Sierra Parkway, and approximately 1,000 feet of Deer Springs Road would need to be raised along the north side of the Golden Door Properties, LLC property to form a new intersection with Newland Sierra Parkway.

When compared to the proposed project, open space would decrease by approximately 11 acres; disturbed area would increase by approximately 33.5 acres; and grading would increase by approximately 4,298,900 cubic yards of import that would be required to be hauled to the project Site due to the proposed alignment of Newland Sierra Parkway. Newland Sierra Parkway Alternative C would otherwise have the same proposed land uses and planning areas as the proposed project.

### 4.8.2 Comparison of Significant Effects between Alternative and Proposed Project

#### Aesthetics

Under Newland Sierra Parkway Alternative C, all the proposed land uses potentially affecting visual resources would remain the same as under the proposed project, with the exception of Newland Sierra Parkway. Grading would substantially increase, since construction of Newland Sierra Parkway would require approximately 4,298,900 cubic yards of import when compared to the proposed project. As shown in Figures 4-7 and 4-8, grading required for construction of Newland Sierra Parkway would cut into the slopes on the southern portion of the project Site and into large portions of land just south of the project Site, affecting existing landforms and boulders. Under this alternative, Newland Sierra Parkway would be visible from public roadways and other vantage points to the southeast of the project Site. The 100 to 125-foot-high fill slope would be highly visible from Deer Springs Road and Twin Oaks Valley Road. Additionally, the raised intersection at Deer Springs Road/Newland Sierra Parkway under this alternative would be visible from neighboring properties. Therefore, under this alternative, the addition of Newland Sierra Parkway would result in greater aesthetic impacts.

#### Agricultural Resources

Impacts to on-site agricultural resources would be similar to 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, to six lanes which would result in greater impacts to off-site agricultural resources compared to the project.

#### Air Quality

Under the proposed project, grading would be balanced within the boundaries of the project and the improvements to Deer Springs Road and Sarver Lane immediately off site and, therefore, would not result in the need for soil import or export activity and associated off-site haul truck trips. Under Newland Sierra Parkway Alternative C, grading would not be balanced, and approximately 4,298,900 cubic yards would be imported. Imported material would be hauled on site, resulting in approximately 286,700 haul trips (assuming the CalEEMod default 16-cubic-yard hauling capacity), or 537,400 one-way haul trips, during the construction phase that would not occur under the proposed project. CalEEMod also employs a 20-mile default haul distance for import and export trips. Therefore, the addition of these export haul trips would result in an increase of emissions during the grading phase when compared to the proposed project. The construction duration and equipment fleet would be the same as the proposed project. This

increased intensity during the grading period for construction of Newland Sierra Parkway Alternative C would result in an increase in daily emissions. Therefore, during construction, this alternative would result in greater air quality impacts than the proposed project.

As the proposed land uses would be the same under this alternative as with the proposed project, project-generated trips would be the same. Although trip distribution would differ somewhat on site and within the immediate vicinity of the project with the inclusion of Newland Sierra Parkway (refer to Appendix HH, Newland Sierra Parkway Feasibility Study, February 2017), overall operational emissions would remain the same as the proposed project. Therefore, in consideration of the additional air quality impacts that would occur during construction, this alternative would result in greater impacts compared to the proposed project.

### Biological Resources

Impacts to biological resources would be greater under this alternative due to the decrease in open space by approximately 11 acres and increase in disturbed area by approximately 33.5 acres as a result of the addition of Newland Sierra Parkway. In addition to impacts to biological resources associated with widening Deer Springs Road, development of Newland Sierra Parkway would substantially increase impacts to sensitive vegetation communities both on site and off site (including southern mixed chaparral), although no new impacts to critical habitat likely would occur.

North/south wildlife movement across the project Site would be impeded by two roadways under this alternative, instead of just Deer Springs Road as planned under the proposed project. Overall preserve design would be affected by the inclusion of Newland Sierra Parkway. Newland Sierra Parkway would reduce the acreage, contiguous design, and connectivity of the central block of open space to the Pre-Approved Mitigation Area to the south. Newland Sierra Parkway Alternative C would result in greater impacts to biological resources than the proposed project.

### Cultural Resources

Deer Springs Road would be improved as planned under the proposed 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 through capping with a natural park. However, under this alternative, this portion of site CA-SDI-4558 would be partially impacted by this Newland Sierra Parkway Alternative C. Therefore, under this alternative, impacts to significant cultural resources would be greater than the proposed project.

## Geology and Soils

Existing geologic conditions and hazards would be the same as under the proposed project. This alternative would result in the same proposed land uses as under the proposed project, resulting in similar types of impacts to geology and soils. The construction and alignment of Newland Sierra Parkway may result in new areas of potential rock fall hazard where existing boulders are located above the finished roadway. Therefore, impacts under this alternative would be greater than the proposed project.

## Greenhouse Gas Emissions

Under this alternative, GHG emissions would increase during construction compared to the proposed project due to the increase in grading and the required import of approximately 4,298,900 cubic yards of material and associated increase in haul truck trips under this alternative. The import haul truck trips would result in an increase of GHG emissions during construction. Therefore, during construction, this alternative would result in greater GHG emissions than the proposed project.

The operational emissions would be the same as the proposed project under this alternative. However, due to the greater construction impacts, overall GHG impacts would be greater than the proposed project.

The project includes a combination of mitigation and project design features, including the purchase of carbon offsets, to fully offset its construction and operational GHG emissions. It is reasonable to assume this alternative would implement similar or equivalent mitigation and project design features to fully offset GHG emissions.

## Hazards and Hazardous Materials

As the same Site would be used for this alternative, potential impacts relating to existing hazardous materials sites and contamination would remain similar to the project. Like the structures along Sarver Lane that would be removed as part of the project, any structures on off-site properties that would require removal in association with the development of Newland Sierra Parkway would be assessed for existing hazardous materials. Impacts associated with hazardous materials would be similar to the proposed project.

Potential for wildfire hazard would be similar to the proposed project. The inclusion of Newland Sierra Parkway would not affect the need for or provision of fire access, limited building zones, and fuel modification zones for the proposed land uses. Newland Sierra Parkway would require additional assessment for fire hazard and approval from the County, DSFPD, and SMFPD to be