

Compared to the proposed project, CDFW Land Planning Alternative B would have the same commercial square footage and educational uses, but would result in a reduction in the total number of residential units from 2,135 residential units under the proposed project to 1,333 residential units (781 single-family and 552 multi-family units). Open space would increase by approximately 214 acres; the disturbed area would decrease by approximately 214 acres; and grading would decrease by approximately 4,636,000 cubic yards of cut and decrease by approximately 3,553,000 cubic yards of fill, resulting in approximately 1,083,000 cubic yards of imported material. Sarver Lane would be improved to a 2.1B Community Collector with a Continuous Turn Lane, which is larger than the proposed project's Modified 2.2E Light Collector. Deer Springs Road would be improved as proposed under the proposed project (either Option A or Option B).

4.11.2 Comparison of Significant Effects between Alternative and Proposed Project

Aesthetics

Under this alternative, some of the more visible portions of the proposed project (Terraces, Hillside, and the eastern most portion of Mesa planning areas) would no longer be developed. The remaining portions to be developed under this alternative would primarily be located in the western portion of the project Site, which is less visible from public vantage points. However, the Town Center would be included under this alternative and would remain visible along the I-15 Scenic Corridor. Despite this, a reduction in development would reduce overall impacts to visual character. Additionally, less development would occur within the I-15 Scenic Corridor (as shown in Figure 4-11 compared to Figure 1-1 in Chapter 1). Overall, more of the existing landform of the project Site would remain unaltered. Therefore, this alternative would result in reduced aesthetic impacts compared to the proposed project. Although the more visible portions of the project would not be developed under this alternative, it would still result in a substantial visual change from the existing character of the Site and surroundings.

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.

Air Quality

Construction emissions under the CDFW Land Planning Alternative B would decrease compared to the proposed project due to the construction of fewer units, less cut and fill quantities, and less grading required; however, this alternative would require the import of approximately 1,083,000 cubic yards of material. Importing material to the Site would result in approximately 67,688 haul trips (assuming the CalEEMod default 16-cubic-yard hauling capacity), or 135,376 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. The addition of these import haul trips could result in an increase of emissions during the grading phase when compared to the proposed project.

During operation, this alternative would result in fewer units and fewer ADTs, thus resulting in lower operational emissions compared to the proposed project. Overall air quality impacts would be reduced compared to the proposed project.

Biological Resources

The development footprint would be smaller under this alternative, resulting in a reduction in impacts to on-site vegetation, but on-site impacts to critical habitat would not be reduced. This alternative would primarily result in benefits to wildlife movement and preserve design. With the elimination of the middle planning areas, a larger block of open space, more consistent with County preservation goals, would be available to wildlife for north/south movement. This reduction in impediments (internal roadways) would allow for more points of movement. This alternative would result in similar impacts to coastal California gnatcatcher and its biological ladder along the I-15 corridor due to the inclusion of the Town Center planning area. Impacts to biological resources as a result of off-site improvements required for Deer Springs Road, Sarver Lane, and Camino Mayor would be the same as the proposed project. With an improved preserve design benefiting wildlife movement, overall impacts to biological resources under this alternative would be reduced compared to the proposed project.

Cultural Resources

Although the reduction in the development footprint may reduce the need for cultural resources monitoring in many areas of the project Site, 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 still be impacted under this alternative. Therefore, impacts to significant cultural resources would be similar to the proposed project.

Geology and Soils

Elimination of several planning areas under this alternative would reduce the potential occurrence of geologic hazards. As less area would be used for development, the potential for the presence of geologic hazards (soil and surficial instability) and the need for soils testing would be reduced. Rock fall hazard would also be reduced, as several rock fall hazard areas identified near the Terraces and Hillside planning areas would no longer potentially impact development at these locations. As this alternative would result in a reduction in development by means of removal of planning areas, overall geology and soils impacts would be reduced compared to the proposed project.

Greenhouse Gas Emissions

Similar to potential impacts to air quality, GHG emissions would decrease during construction compared to the proposed project due to the construction of fewer units, less cut and fill quantities, and less grading required, resulting in a shorter construction schedule and less equipment required to complete the alternative.

During operation, this alternative would result in fewer units and fewer ADTs, thus resulting in lower operational GHG emissions compared to the proposed project. Fewer units during the operational phase would also contribute fewer GHG emissions associated with energy use, water demand, area sources, and solid waste generation. Overall GHG emissions impacts would be reduced compared to 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 related to existing hazardous materials sites and contamination would remain similar to the proposed project. Although construction of this alternative would likely require a shorter construction phase, hazardous materials would still be handled, stored, and disposed of. Impacts related to hazardous materials would be similar when compared to the proposed project.

Given the reduction in development on the project, potential for wildfire hazard to affect structures and residents would be reduced. The elimination of several planning areas would not affect the need or provision of fire walls or FMZs for the proposed land uses and impacts would be similar to the proposed project. Fewer lots would require mitigation in the form of heat-

deflecting walls. As internal access between the Town Center planning area and the planning areas in the western portion of the Site would not occur, emergency response times would increase when compared to the proposed project. Portions of the Summit, Knoll, and Mesa planning areas would have a travel greater than 5 minutes from Fire Station 12. This travel time would be inconsistent with Policy S-6.4 of the General Plan, which requires a response time of 5 minutes. Impacts related to wildfire hazard would be greater when compared to the proposed project. Refer to Land Use and Planning for additional discussion regarding compliance with CCFC and General Plan fire policies.

The evacuation plan under this alternative would be subject to the same standards and County approval as for the proposed project. With a reduction in development (resulting in a reduction in resident population), the potential required time of evacuation likely would be reduced. Additionally, fewer residents would result in a reduction in traffic during an evacuation emergency. Evacuation impacts would have similar impacts when compared to the proposed project. Overall, this alternative would result in greater impacts than the proposed project.

Hydrology and Water Quality

This alternative would retain a greater area of the project Site as it exists today. Disturbed area would decrease by 214 acres, resulting in a reduced impervious footprint when compared to the proposed project. As such, drainage for a larger portion of the project Site would be unaltered. Construction and operation of this alternative would have similar, but reduced, sources of stormwater pollutants as the proposed project, and similar construction BMPs, source control facilities, and drainage management area facilities would be employed under this alternative to control for stormwater pollution and flooding. This alternative would also require the same off-site road improvements as the proposed project. Due to the decreased footprint, hydrology and water quality impacts would be reduced under this alternative compared to the project.

Land Use and Planning

Development of the project under this alternative would result in a disjointed community that would no longer support the connectivity as planned under the proposed project. Residents in the western portion of the project would no longer have direct access to the commercial or school uses in the Town Center.

This alternative proposes the main entrance to the project be from Sarver Lane and the additional access to be from Camino Mayor, which connects to Twin Oaks Valley Road and eventually back to Deer Springs Road. The intersections of Sarver Lane and Twin Oaks Valley Road with Deer Spring Road are too close together to be considered remote. This would result in the alternative not being in compliance with CCFC Sections 503.1.2 and 503.1.3 and General Plan

policies M-3.3 and S-3.5. The Town Center would be accessed from Mesa Rock Road. Depending on the resultant rezoning of this development area, it may not be in compliance with CCFC Sections 503.1.2 and 503.1.3 and General Plan Policies M-3.3 and S-3.5. Moving of the main entrance to the project to Sarver Lane would result in some of the project being further than 5 minutes travel time from the nearest responding fire station — which is the GP standard for projects of this density. Portions of the Summit, Knoll, and Mesa planning areas would have a travel time greater than 5 minutes from Fire Station 12. This response time would be inconsistent with Policy S-6.4 of the General Plan, which requires a travel time of 5 minutes or less. Impacts to land use under this alternative would be greater compared 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 site would be the same as the proposed project.

Noise

Construction of this alternative would result in a reduced amount of cut and fill (4,636,000 cubic yards and 3,553,000 cubic yards, respectively) and less construction activity compared to the project. The reduced construction activity and reduced grading would result in reduced noise-generating construction activities, such as blasting. Therefore, construction of this alternative would result in reduced noise impacts when compared to the proposed project.

This alternative would result in greater traffic volumes along the segment of Deer Springs Road between Sarver Lane and Mesa Rock Road, resulting in increased noise impacts along this road segment. However, new project-generated trips would be less under this alternative compared to the proposed project, resulting in reduced traffic volumes on the balance of the road network and reduced operational trip-generated noise impacts overall. Therefore, operational trip-generated noise impacts would be less compared to the proposed project.

Paleontological Resources

The 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 when compared to the proposed project.

Parks and Recreation

Similar to the proposed project, this alternative would be subject to PLDO requirements and, like the project, would comply by providing on-site public park acreage. Therefore, this alternative would result in similar impacts to parks and recreation when compared to the proposed project.

Population and Housing

This alternative would result in a smaller new population size introduced to the area. Under this alternative, approximately 3,786 people would be introduced to the area, approximately 3,504 people more than allowed under existing land use designations. Under the proposed project, approximately 6,063 people would be introduced to the area, approximately 5,782 people more than under existing land use designations. However, it would exhibit the same or similar growth-inducing attributes when compared to the proposed project. This alternative would introduce population growth beyond what is planned under the General Plan, and would expand transportation infrastructure that would increase accessibility to the area. However, because of the reduced potential population, this alternative would result in reduced impacts to population and housing when compared to the proposed project.

Public Services

Reduced population introduced to the area would result in a reduced demand for public services. This alternative would still be required to pay public facility development impact fees and school fees equivalent to the reduced nature of development. With a reduced population, this alternative would result in reduced impacts to public services when compared to the proposed project.

Transportation and Traffic

Under the CDFW Alternative B, residential development would be concentrated in the western half of the project Site, and retail development would be concentrated in the eastern section of the project Site. This alternative would consist of 1,333 total dwelling units, including 781 single-family dwelling units and 552 multi-family dwelling units, 81,000 square feet of commercial uses, 10.3 acres of community parks, and 22.0 acres of neighborhood parks. This alternative would not include a school site. Compared to the proposed project, this alternative would generate 5,558 (25%) fewer ADTs, 474 (30%) fewer trips in the AM peak period, and 514 (25%) fewer trips in the PM peak period.

Compared to the proposed project, CDFW Alternative B would result in greater impacts to Deer Springs Road from Mesa Rock Road to Sarver Lane, reduced impacts on Deer Springs Road between Sarver Lane and Twin Oaks Valley Road, reduced impacts on North Twin Oaks Valley Road, reduced impacts to Twin Oaks Valley Road between Deer Springs Road and Buena Creek

Road (within the City of San Marcos), and reduced impacts to Buena Creek Road and its intersections with Twin Oaks Valley Road, Monte Vista Drive, and S. Santa Fe Ave. Like the proposed project, this alternative would require a new interchange at Deer Springs Road and I-15 and improvements to Camino Mayor.

Like the 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

This alternative would result in a smaller increase in population and demand for utilities and service systems on site compared to the proposed project. Demand and generation of water and wastewater on site would be reduced compared to the proposed project. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Energy

The addition of import haul trips could result in an increase of energy consumption during the grading phase when compared to the proposed project; however, the decrease in overall grading and site disturbance, cut and fill, and unit construction likely would result in overall reduced energy consumption when compared to the proposed project. Additionally, the reduced unit count would result in reduced long-term energy consumption. Overall, this alternative would result in reduced impacts compared to the proposed project.

4.11.3 Relation to Project Objectives

CDFW/USFWS Land Planning Alternative B would meet project Objectives 1, 3, 4, 5 and 6 (see Section 4.2.1, Project Purpose and Objectives) by preserving substantial open space areas, maintaining the Town Center, constructing facilities concurrent with demand within existing service areas, providing diverse recreational opportunities and preserving unique landscape features and distinct landforms along I-15. However, this alternative would eliminate three planning areas, which are interrelated with other neighborhoods; and, thus, the alternative would not meet Objectives 2 and 6. In addition, under this alternative, eliminating the three planning areas from a project with interrelated neighborhoods would frustrate the entire Community from an overall land planning standpoint. Further, under CEQA (Public Resources Code, § 21159.26), a public agency may not reduce the proposed number of housing units as a project alternative for a particular significant effect on the environment if it determines there is another feasible project alternative that would provide a comparable level of mitigation — a factor for the County to consider in whether to approve the project or a project alternative. Moreover, this alternative

would reduce the use of the electric bike-share program, bike lanes, and pedestrian features due to the separation of the Town Center and the change in internal circulation. Pass-by trips and other trip-reduction benefits also would be altered due to changes in internal circulation. On balance, the alternative would not attain the project's underlying purpose to implement a new, mixed-use, interrelated planned community.

4.11.4 Feasibility

As CDFW Land Planning Alternative B is a reduced version of the proposed project land use plan, it would likely be as feasible to develop as the proposed project. However, from a General Plan consistency and safety perspective, portions of the Summit, Knoll, and Mesa planning areas under this alternative would be inconsistent with Policy S-6.4 of the General Plan, which requires a travel time of 5 minutes or less for emergencies, as well as CCFC Sections 503.1.2 and 503.1.3, and General Plan policies M-3.3 and S-3.5. This inconsistency would increase risk to life and structures during emergency fire and medical situations.

4.11.5 Evaluation of Significant Impacts

The CDFW Land Planning Alternative B would avoid, reduce, or substantially lessen significant impacts compared to the proposed project in the following areas:

- Aesthetics
- Air Quality
- Biological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Population and Housing
- Public Services
- Utilities and Service Systems
- Energy

The CDFW Land Planning Alternative B would result in greater significant impacts compared to the proposed project in the following areas:

- Hazards and Hazardous Materials
- Land Use
- Transportation and Traffic

4.12 CDFW Land Planning Alternative C

4.12.1 CDFW Land Planning Alternative C Description and Setting

During the public scoping process, CDFW requested that the EIR evaluate and compare a CDFW Land Planning Alternative C to the proposed project. The alternative is depicted in Figure 4-12. Under this alternative, the Town Center, Terraces, and Hillside planning areas, along with associated access roadways, parks, and other improvements, would be removed and replaced with open space, similar to that of CDFW Land Planning Alternative A. The eastern portion of the Valley planning area would be removed and replaced with open space. Multi-family units would be located in the northwestern portion of the project along Twin Oaks Valley Road, at the location of the old quarry. The remainder of the planning areas (Valley, Mesa, Knoll, and Summit) would remain as proposed under the project. CDFW suggested this alternative to provide for a larger, contiguous block of open space in the eastern and northern portion of the Site, to minimize edge effects to on-site biological open space areas, and to maintain connectivity between on- and off-site areas designated for conservation.

Compared to the proposed project, CDFW Land Planning Alternative C would eliminate the Town Center from the proposed project, and thereby remove all commercial and educational land uses to serve the Community and surrounding areas. In addition, the alternative would result in a reduction in the total number of residential units from 2,135 residential units under the proposed project to 1,549 total residential units (787 single-family and 762 multi-family units); open space would increase by approximately 223 acres; the disturbed area would decrease by approximately 223 acres; and grading would decrease by approximately 4,366,000 cubic yards of cut and decrease by approximately 4,081,000 cubic yards of fill, resulting in approximately 285,000 cubic yards of imported material. Sarver Lane would be improved to a 4.2B Boulevard with Intermittent turn lanes and Deer Springs Road would be improved as proposed under the project (either Option A or Option B).

4.12.2 Comparison of Significant Effects between Alternative and Proposed Project

Aesthetics

Under this alternative, the more visible portions of the proposed project (Town Center, Terraces, and Hillside planning areas) would no longer be developed. The remaining portions of the project to be developed under this alternative would primarily be located in the western portion of the project, which is less visible from public vantage points. Additionally, the location of the multi-family units at the old quarry site would be less visible from many public vantage points. A reduction in development would reduce overall impacts to visual character. Additionally, less development would occur within the I-15 Scenic Corridor. Overall, more of the existing landform

of the project Site would remain unaltered. However, the multi-family units located in the northwestern portion of the project Site would substantially contrast with the surrounding visual and rural character. Although the more visible portions of the project would no longer be developed under this alternative, it would still result in a substantial visual change from the existing character of the project Site and surroundings. Therefore, this alternative would result in reduced 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.

Air Quality

Construction emissions under the CDFW Land Planning Alternative C would decrease compared to the proposed project due to the construction of fewer units, less cut and fill quantities, and less grading required; however, this alternative would include approximately 285,000 cubic yards of imported material. Imported material would be brought to the Site, resulting in approximately 17,813 haul trips (assuming the CalEEMod default 16-cubic-yard hauling capacity), or 35,626 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. The addition of these import haul trips could result in an increase of emissions during the grading phase when compared to the proposed project.

During operation, this alternative would result in fewer units and fewer ADTs, thus resulting in lower operational emissions compared to the proposed project. Overall, air quality impacts would be reduced when compared to the proposed project.

Biological Resources

The development footprint would be smaller under this alternative, resulting in a reduction in impacts to on-site native habitat. However, the multi-family units located in the northwestern portion of the project Site may result in increased impacts to coastal sage scrub. This alternative would primarily result in benefits to wildlife movement and preserve design. With the elimination of the eastern and southeastern planning areas, a larger block of open space more consistent with County preservation goals would be available to wildlife for north/south movement. There also would be a reduction in impediments (internal roadways), which would allow for more points of movement. This alternative would preserve the coastal California

gnatcatcher biological ladder along the I-15 corridor that the proposed project would otherwise impact. However, the multi-family units located in the northwestern portion of the project Site would constrain east/west wildlife movement within the San Marcos Mountains.

Impacts to biological resources as a result of off-site improvements required for Deer Springs Road and Camino Mayor would be the same as the proposed project; however, improvements to Sarver Lane to meet the County's Community Collector road classification (refer to Transportation and Traffic below) would result in additional off-site impacts to biological resources. Overall, with an improved preserve design benefiting wildlife movement and avoidance of coastal California gnatcatcher habitat, impacts to biological resources under this alternative would be reduced compared to the proposed project.

Cultural Resources

Although the reduction in the development footprint may reduce the need for cultural resources monitoring in many areas of the project Site, Deer Springs Road would still 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 remain under this alternative. Therefore, impacts to significant cultural resources would be similar when compared to the proposed project.

Geology and Soils

Elimination of several planning areas under this alternative would reduce the potential occurrence of geologic hazards. As less area would be used for development, the potential for the presence of geologic hazards (soil and surficial instability) and the need for soils testing would be reduced. Rock fall hazard areas identified near the Town Center, Terraces, and Hillside planning areas would no longer potentially impact development at these locations. However, construction of the northwestern multi-family area may result in new areas of potential rock fall hazard where existing boulders are located above the graded pads. Mitigation required for rock fall hazard under the proposed project also would be viable mitigation for any new areas of potential rock fall hazard areas associated with CDFW Land Planning Alternative C. As this alternative would result in a reduction in development by means of removal of three planning areas, overall geology and soils impacts would be reduced when compared to the proposed project.

Greenhouse Gas Emissions

Similar to potential impacts to air quality, GHG emissions would decrease during construction compared to the proposed project due to the construction of fewer units, less cut and fill quantities, and less grading required (despite the need for importing soil), resulting in a shorter construction schedule and less equipment required to complete the alternative.

During operation, this alternative would result in fewer units and fewer ADTs, thus resulting in lower operational GHG emissions compared to the proposed project. Fewer units during the operational phase would also contribute fewer GHG emissions associated with energy use, water demand, area sources, and solid waste generation. Overall, GHG emissions impacts would be reduced when compared to 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 related to existing hazardous materials sites and contamination would remain similar to the proposed project. Although construction of this alternative would likely require a shorter construction phase, hazardous materials would still be handled, stored, and disposed of. Therefore, impacts associated with hazardous materials under this alternative would be similar to the proposed project.

Given the reduction in development on the project Site, potential for wildfire hazard to affect structures and residents would be reduced, however, a higher fuel load within the open space would exist. The elimination of several planning areas would not affect the need or provision of fire walls or FMZs for the proposed land uses and impacts would be similar to the proposed project. Fewer lots would require mitigation in the form of heat-deflecting walls. Primary access to the Site would be located farther away from DSFPD Fire Station 12 (Sarver Lane instead of Deer Springs Road at Mesa Rock Road), increasing emergency response times when compared to the proposed project. Portions of the Summit, Knoll, and Mesa planning areas would have a travel time greater than 5 minutes from Fire Station 12. Additionally, the northwestern multi-family units would have a travel time greater than 5 minutes. This travel time would be inconsistent with Policy S-6.4 of the General Plan, which requires a travel time of 5 minutes or less. Impacts related to wildfire hazard would be greater when compared to the proposed project. Refer to Land Use and Planning for additional discussion regarding compliance with CCFC and General Plan fire policies.

The evacuation plan under this alternative would be subject to the same standards and County approval as the proposed project. With a reduction in development (resulting in a reduction in resident population), the potential required time of evacuation likely would be reduced. Additionally, fewer residents would result in a reduction in traffic during an evacuation emergency. Overall, impacts to hazards and hazardous materials would be greater than the proposed project.

Hydrology and Water Quality

This alternative would retain a greater area of the project Site. Disturbed area would decrease by 223 acres, resulting in a reduced impervious footprint when compared to the proposed project. As such, drainage for a larger portion of the project Site would be unaltered. Construction and operation of this alternative would have similar, but reduced, sources of stormwater pollutants as the proposed project, and similar construction BMPs, source control facilities, and drainage management area facilities would be employed under this alternative to control for stormwater pollution and flooding, including at the northwestern multi-family area. This alternative would also require the same off-site road improvements as the proposed project. Due to the decreased footprint, hydrology and water quality impacts would be reduced under this alternative compared to the project.

Land Use and Planning

This alternative would lack Community-serving commercial and school uses for project residents and the surrounding area by not including the Town Center. This alternative would also require improving Sarver Lane to the County's Community Collector road classification (refer to Transportation and Traffic section below), resulting in impacts to biological resources and adjacent properties. This alternative would be consistent with most General Plan policies. With the removal of development in the southeastern portion of the project under this alternative, inconsistencies with the County Resource Protection Ordinance related to coastal California gnatcatcher would no longer occur.

This alternative proposes the main entrance to the project be from Sarver Lane and the additional access to be from Camino Mayor, which connects to Twin Oaks Valley Road and eventually back to Deer Springs Road. The intersections of Sarver Lane and Twin Oaks Valley Road with Deer Spring Road are too close together to be considered remote. This would result in the alternative not being in compliance with CCFC Sections 503.1.2 and 503.1.3 and General Plan policies M-3.3 and S-3.5. Unless Twin Oaks Valley Road is improved to public road standards northerly to Gopher Canyon Road, the multi-family development area would not be in compliance with CCFC Sections 503.1.2 and 503.1.3 and General Plan Policies M-3.3 and S-3.5. Moving of the main entrance to the project to Sarver Lane would result in some of the project being further than 5 minutes travel time from the nearest responding fire station—which is the GP standard for projects of this density. Portions of the Summit, Knoll, and Mesa planning areas would have a travel time greater than 5 minutes from Fire Station 12. Additionally, the northwestern multi-family units would have a travel time greater than 5 minutes. This travel time would be inconsistent with Policy S-6.4 of the General Plan, which requires a travel time of 5 minutes or less. Overall, land use impacts would be greater when compared to the proposed project.

Mineral Resources

The northwestern multi-family units included under this alternative would be located within the MRZ-2 area of the project Site. As the remainder of development under this alternative would have the same impacts to mineral resources as the proposed project, the addition of the northwestern multi-family units would result in greater impacts to mineral resources compared to the proposed project.

Noise

Construction of this alternative would require a shorter timeline and reduced amount of cut and fill (4,366,000 cubic yards and 4,081,000 cubic yards, respectively). The shorter construction phase and reduced development footprint would require fewer noise-generating construction activities, such as blasting. However, construction would occur in the northwestern portion of the Site, and construction noise at this location would affect surrounding noise-sensitive land uses or exceed noise standards in areas previously not affected by the proposed project. Therefore, construction noise impacts under this alternative would result in similar impacts when compared to the proposed project.

This alternative would result in greater traffic volumes along the segment of Deer Springs Road between Sarver Lane and Mesa Rock Road, resulting in increased noise impacts along this road segment. However, new project-generated trips would be less under this alternative compared to the proposed project, resulting in reduced traffic volumes on the balance of the road network and reduced operational trip-generated noise impacts overall. Therefore, operational trip-generated noise impacts would be less compared to the proposed project.

Paleontological Resources

The northwestern multi-family units would be built 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. Under this alternative, the Town Center planning area would no longer be developed, which is underlain by paleontologically sensitive soils. The remaining developed area under this alternative would result in similar impacts to paleontological resources as the proposed project. Therefore, this alternative would result in reduced impacts to paleontological resources when compared to the proposed project.

Parks and Recreation

Similar to the proposed project, this alternative would be subject to PLDO requirements and, like the project, would comply by providing on-site public park acreage. Therefore, this alternative would result in similar impacts to parks and recreation when compared to the proposed project.

Population and Housing

This alternative would result in a smaller new population introduced to the area. Under this, approximately 4,399 people would be introduced to the area, approximately 4,118 people more than under existing land use designations. Under the proposed project, approximately 6,063 people would be introduced to the area, approximately 5,782 people more than under existing land use designations. However, it would still exhibit the same or similar growth-inducing attributes when compared to the proposed project. This alternative would introduce population growth beyond what is planned for under the General Plan, and would expand transportation infrastructure, which would increase accessibility to the area. However, solely analyzing the reduced potential population, this alternative would result in reduced impacts to population and housing compared to the proposed project.

Public Services

A reduced population introduced to the area would result in a reduced demand for public services. However, a school would no longer be provided because the Town Center would be removed. This alternative would still be required to pay public facility development impact fees and school fee equivalent to the reduced nature of development. With a reduced population, this alternative would result in reduced impacts to public services when compared to the proposed project.

Transportation and Traffic

Under CDFW Alternative C, residential development would be concentrated in the western half of the project Site. Additional residential development would be located on a site (the Quarry site) adjacent to N. Twin Oaks Valley Road, north of Camino Mayor. This alternative would consist of 1,549 total dwelling units, including 787 single family dwelling units and 762 multifamily dwelling units, 10.3 acres of community parks, and 16.3 acres of neighborhood parks. This alternative would not include a school site or any commercial uses. Compared to the proposed project, this alternative would generate 8,542 (38%) fewer ADTs, 632 (33%) fewer trips in the AM peak period, and 824 (33%) fewer trips in the PM peak period.

Compared to the proposed project, the alternative would result in greater impacts to Deer Springs Road from Mesa Rock Road to Sarver Lane, reduced impacts on Deer Springs Road between Sarver Lane and Twin Oaks Valley Road, reduced impacts on North Twin Oaks Valley Road, reduced impacts to Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road (within the City of San Marcos), and reduced impacts to Buena Creek Road and its intersections with Twin Oaks Valley Road, Monte Vista Drive, and S. Santa Fe Ave. Like the proposed project, this alternative would require a new interchange at Deer Springs Road and I-15 and improvements to Camino Mayor. Additionally, as this alternative would result in significantly

higher volumes along Sarver Lane, and Sarver Lane would be required to be improved to the Community Collector classification.

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

This alternative would result in a smaller increase in population and demand for utilities and service systems on site compared to the proposed project. Demand and generation of water and wastewater on site would be reduced compared to the proposed project. Therefore, this alternative would result in reduced impacts compared to the proposed project.

Energy

The addition of import haul trips could result in an increase of energy consumption during the grading phase when compared to the proposed project; however, the decrease in overall grading and site disturbance, cut and fill, and unit construction likely would result in overall reduced energy consumption when compared to the proposed project. Additionally, the reduced unit count would result in reduced long-term energy consumption. Overall, this alternative would result in reduced impacts compared to the proposed project.

4.12.3 Relation to Project Objectives

CDFW/USFWS Land Planning Alternative C would meet project Objectives 1, 3, 4, and 5 (see Section 4.2.1, Project Purpose and Objectives) by preserving substantial open space areas, constructing facilities concurrent with demand within existing service areas, providing diverse recreational opportunities and preserving unique landscape features and distinct landforms along I-15. However, due to the removal of the Town Center and the elimination of three planning areas, which are interrelated with other neighborhoods, this alternative would not meet Objectives 2 and 6. Further, the project contains a Village designation, and under this alternative, elimination of the Town Center from the project would not be desirable from a General Plan or community benefits standpoint. In addition, under this alternative, eliminating the three planning areas from a project with interrelated neighborhoods would frustrate the entire Community from an overall land planning standpoint. Further, under CEQA (Public Resources Code, § 21159.26), a public agency may not reduce the proposed number of housing units as a project alternative for a particular significant effect on the environment if it determines there is another feasible project alternative that would provide a comparable level of mitigation — a factor for the County to consider in whether to approve the project or a project alternative. Moreover, this alternative

would reduce the use of the electric bike-share program, bike lanes, and pedestrian features due to the change in internal circulation. Pass-by trips and other trip-reduction benefits also would be altered due to such changes in circulation. On balance, the alternative would not attain the project's underlying purpose to implement a new, mixed-use, interrelated planned community.

4.12.4 Feasibility

As CDFW Land Planning Alternative C is a reduced version of the proposed project land use plan, it would likely be as feasible to develop as the proposed project. However, from a General Plan consistency and safety perspective, portions of the Summit, Knoll, and Mesa planning areas, as well as the northwestern multi-family units, under this alternative would be inconsistent with Policy S-6.4 of the General Plan, which requires a travel time of 5 minutes or less for emergencies, as well as CCFC Sections 503.1.2 and 503.1.3 and General Plan Policies M-3.3 and S-3.5. This inconsistency would increase risk to life and structures during emergency fire and medical situations.

4.12.5 Evaluation of Significant Impacts

CDFW Land Planning Alternative C would avoid, reduce, or substantially lessen significant impacts compared to the proposed project in the following areas:

- Aesthetics
- Air Quality
- Biological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Paleontological Resources
- Population and Housing
- Public Services
- Utilities and Service Systems
- Energy

The CDFW Land Planning Alternative C would result in greater significant impacts compared to the proposed project in the following areas:

- Hazards and Hazardous Materials
- Land Use
- Mineral Resources
- Transportation and Traffic

4.13 Environmentally Superior Alternative

Table 4-1 outlines the comparative impacts between each alternative and the proposed project. The No Project (No Build) Alternative would result in the least environmental impacts and would be the environmentally superior alternative. However, CEQA Guidelines Section 15126.6(e)(2) states that if the environmentally superior alternative is the “no project” alternative, the EIR also must identify an environmentally superior alternative among the other alternatives. In this case, the environmentally superior alternative is CDFW/USFWS Land Planning Alternative A.

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

Issue Areas	Proposed Project	Alternatives to the Proposed Project								
		1	2	3	4	5	6	7	8	9
		No Project/ No Build	Existing General Plan	Newland Sierra Parkway A	Newland Sierra Parkway B	Newland Sierra Parkway C	Multi-Family Town Center	CDFW Land Planning A	CDFW Land Planning B	CDFW Land Planning C
Aesthetics	SU	▼	▲	▲	▲	▲	▲	▼	▼	▼
Agricultural Resources	LTS	▼	—	▲	▲	▲	—	—	—	—
Air Quality	SU	▼	▼	▲	▲	▲	▲	▼	▼	▼
Biological Resources	LTS	▼	▲	▲	▲	▲	—	▼	▼	▼
Cultural Resources	LTS	▼	▲	—	—	▲	—	—	—	—
Geology and Soils	LTS	▼	—	▲	▲	▲	—	▼	▼	▼
Greenhouse Gas Emissions	LTS	▼	▼	▲	▲	▲	▲	▼	▼	▼
Hazards and Hazardous Materials	LTS	▼	—	—	—	—	▲	▲	▲	▲
Hydrology and Water Quality	NS	▼	▼	▲	▲	▲	▼	▼	▼	▼
Land Use and Planning	NS	▲	—	—	—	—	▲	▲	▲	▲
Mineral Resources	SU	▼	▲	—	—	—	▼	—	—	▲
Noise	SU	▼	▼	▲	▲	▲	—	▼	▼	▼
Paleontological Resources	LTS	▼	—	—	—	—	▼	▼	—	▼
Parks and Recreation	NS	▼	—	—	—	—	—	—	—	—
Population and Housing	SU	▼	▼	▲	▲	▲	—	▼	▼	▼
Public Services	NS	▼	—	—	—	—	—	▼	▼	▼

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

Issue Areas	Proposed Project	Alternatives to the Proposed Project								
		1	2	3	4	5	6	7	8	9
		<i>No Project/ No Build</i>	<i>Existing General Plan</i>	<i>Newland Sierra Parkway A</i>	<i>Newland Sierra Parkway B</i>	<i>Newland Sierra Parkway C</i>	<i>Multi-Family Town Center</i>	<i>CDFW Land Planning A</i>	<i>CDFW Land Planning B</i>	<i>CDFW Land Planning C</i>
Transportation and Traffic	SU	▼	▲	▲	▲	▲	—	▲	▲	▲
Utilities and Service Systems	LTS	▼	—	—	—	▲	—	▼	▼	▼
Energy	NS	▼	▼	▲	▲	▲	—	▼	▼	▼

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

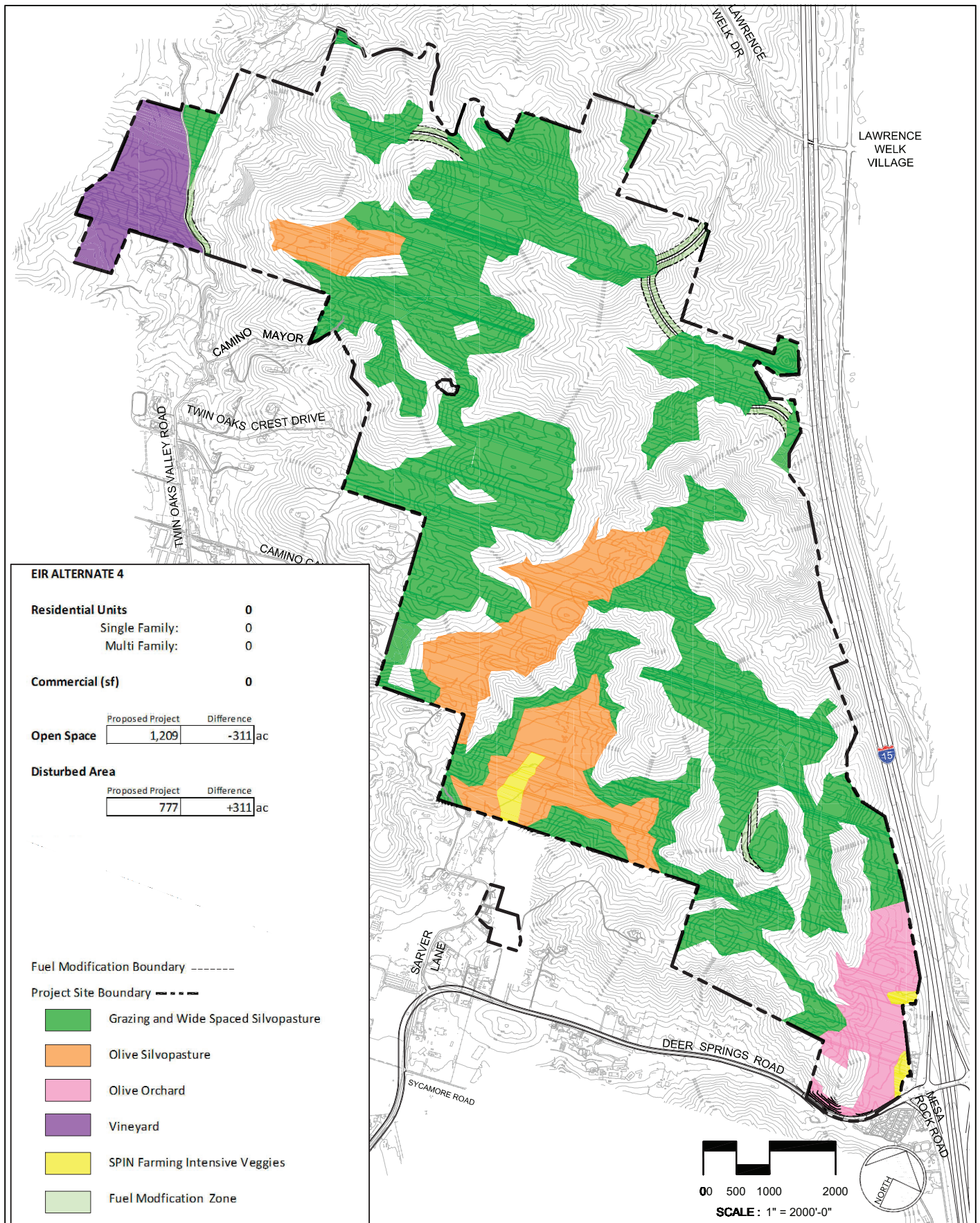
— Alternative is likely to result in similar impacts to issue when compared to proposed project.

▼ Alternative is likely to result in reduced impacts to issue when compared to proposed project.

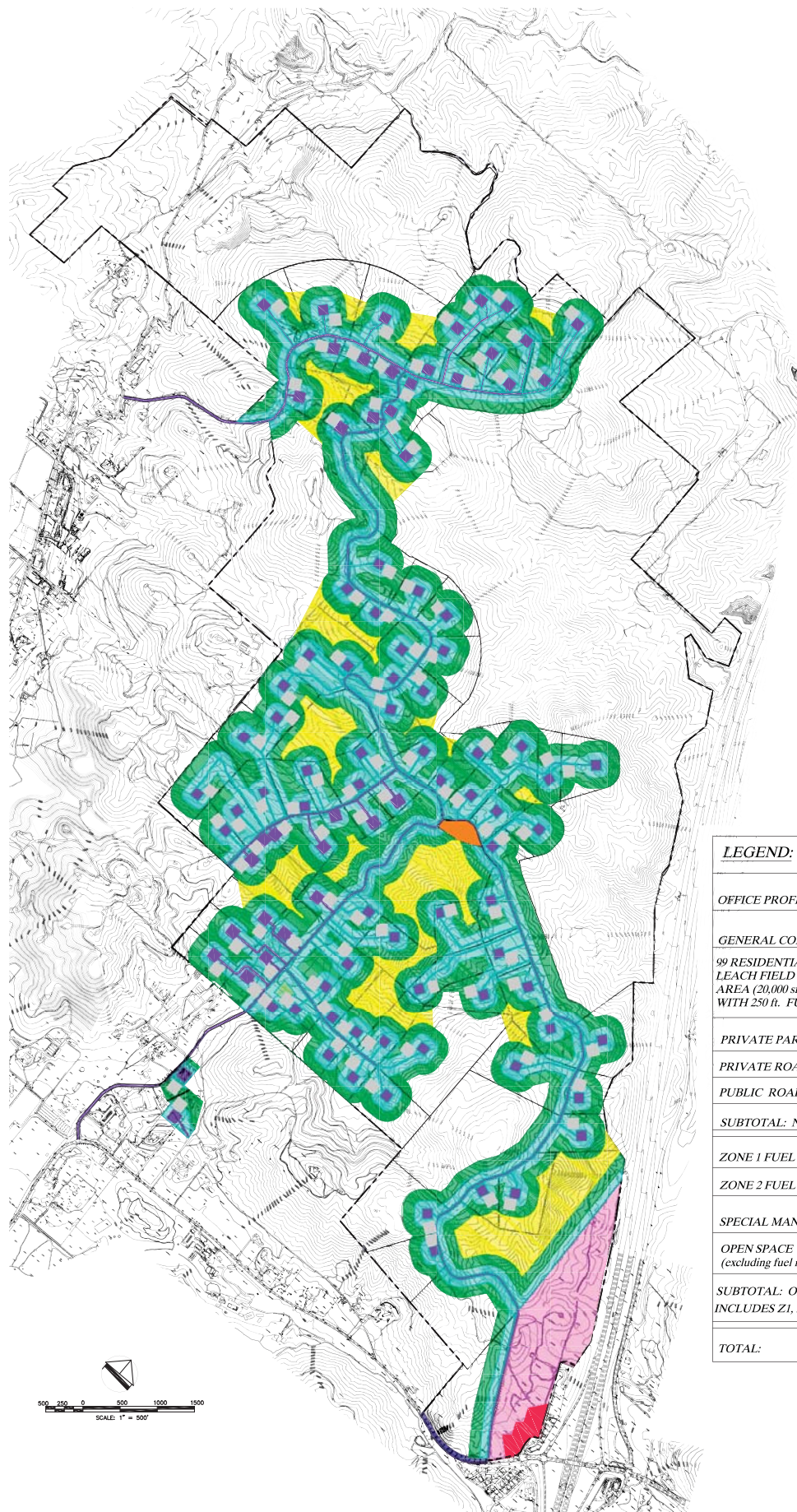
NS Not a potentially significant impact

LTS Less than Significant with mitigation measures

SU Potentially significant and unavoidable impact



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GENERAL PLAN ALTERNATIVE

RESIDENTIAL UNITS	99
GENERAL COMMERCIAL LAND USE	4 AC
OFFICE PROFESSIONAL LAND USE	54 AC
OPEN SPACE	1,772 AC
DISTURBED AREA	1,049 AC
GRADED AREA	213 AC
PROJECT SITE BOUNDARY	-----

LEGEND:	SYMBOL	AREA	%	AREA	%
OFFICE PROFESSIONAL LAND USE		54 ac	2.7		
GENERAL COMMERCIAL LAND USE		4 ac	0.2		
99 RESIDENTIAL PADS (20,000 sf ea.), LEACH FIELD AND EXPANSION AREA (20,000 sf ea.), DRIVEWAY, WITH 250 ft. FUEL MOD. BUFFER		115 ac	5.8		
PRIVATE PARK		2.4ac	1.2		
PRIVATE ROADS (6.9 mi)		35.5ac	1.8		
PUBLIC ROADS		1.8ac	0.1%		
SUBTOTAL: NON-OPEN SPACE				212.7 ac	10.7
ZONE 1 FUEL MOD. (100 ft.)		373 ac	18.8		
ZONE 2 FUEL MOD. (150 ft.)		392 ac	19.8		
SPECIAL MANAGEMENT AREA		71.2 ac	3.6		
OPEN SPACE (excluding fuel mod)		936.1 ac	47.2		
SUBTOTAL: OPEN SPACE INCLUDES Z1, Z2 AND SMA FUEL MOD				1,772.3 ac	89.3
TOTAL:				1,985 ac	100

FIGURE 4-2
Existing General Plan Alternative

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