

CHAPTER 4 PROJECT ALTERNATIVES

4.1 Scope and Purpose

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

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

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

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

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

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

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

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

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

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

10. Alternative Site Location Alternatives
11. Agricultural Alternative

4.2 Criteria for Selection and Analysis of Alternatives

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

4.2.1 Project Purpose and Objectives

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

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

4.2.2 Feasibility

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

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

4.2.3 Evaluation of Significant Impacts

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

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

4.3 Rationale for the Selection of Alternatives

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

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

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

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

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

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

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

CDFW commented on the NOP stating

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

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

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

4.3.1 Alternatives Considered but Rejected

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

4.3.1.1 *Alternative Site Location Alternatives*

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

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

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

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

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

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

4.3.1.2 Agricultural Alternative

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

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

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

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

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

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

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

4.4 No Project (No Build) Alternative

4.4.1 No Project (No Build) Alternative Description and Setting

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

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

4.4.2 Comparison of Significant Effects between Alternative and Proposed Project

Aesthetics

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

Agricultural Resources

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

Air Quality

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

Biological Resources

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

Cultural Resources

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

Geology and Soils

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

Greenhouse Gas Emissions

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

Hazards and Hazardous Materials

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

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

Hydrology and Water Quality

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

Land Use and Planning

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

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

Mineral Resources

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

Noise

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

Paleontological Resources

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

Parks and Recreation

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

Population and Housing

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

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

Public Services

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

Transportation and Traffic

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

Utilities and Service Systems

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

Energy

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

4.4.3 Relation to Project Objectives

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

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

4.4.4 Feasibility

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

4.4.5 Evaluation of Significant Impacts

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

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

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

4.5 Existing General Plan Alternative

4.5.1 Existing General Plan Alternative Description and Setting

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

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

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

4.5.2 Comparison of Significant Effects between Alternative and Proposed Project

Aesthetics

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

Agricultural Resources

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

Air Quality

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

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

Biological Resources

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

Cultural Resources

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

Geology and Soils

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

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

Greenhouse Gas Emissions

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

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

Hazards and Hazardous Materials

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

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

Hydrology and Water Quality

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

Land Use and Planning

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

Mineral Resources

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

Noise

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

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

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

Paleontological Resources

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

Parks and Recreation

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

Population and Housing

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

Public Services

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

Transportation and Traffic

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

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

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

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

Utilities and Service Systems

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

Energy

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

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

4.5.3 Relation to Project Objectives

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

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

4.5.4 Feasibility

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

4.5.5 Evaluation of Significant Impacts

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

- Air Quality
- Greenhouse Gas Emissions

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

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

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

4.6 Newland Sierra Parkway Alternative A

4.6.1 Newland Sierra Parkway Alternative A Description and Setting

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

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

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

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

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. 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. Additionally, 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 widening 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. Additionally, the 100 to 125 foot slope for Newland Sierra Parkway would increase stormwater runoff to off-site properties immediately to the south. Therefore, under this alternative, hydrology and water quality impacts would be greater than the proposed project.

Land Use and Planning

As the 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. 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 1,456,100 cubic yards of cut, 5,652,200 cubic yards of fill, and 4,298,900 cubic yards of import, 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 4.6.2 above), traffic volumes on the balance of the road network would be higher, resulting in greater operational trip-generated noise impacts overall. Therefore, operational trip-generated noise levels 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 to six lanes south of the project Site, 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 compared to Newland Sierra Parkway Alternatives A and B, traffic impacts would be the same as those described under the other two alternatives. 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 Alternatives A and B, 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 C 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 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. This alternative also would result in up to 125 feet of fill placed over an approximately 600-foot-long stretch of the San Diego County Water Authority's existing 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. As a result, this alternative would result in

potential conflicts with utilities and service systems. Accordingly, under this alternative, impacts related to utilities and service systems would be greater than 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.

4.8.3 Relation to Project Objectives

Newland Sierra Parkway Alternative C 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 11 acres and increase in disturbed area by approximately 33.5 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.

4.8.4 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 C would require design exceptions to the County's Public Road Standards, specifically an exception to accommodate a road grade of up to 9 percent in steepness for an approximately 7,000-foot-long section of the road, for a horizontal curve radius of 700 feet, and a non-standard/skewed intersection with Deer Springs Road. In contrast, the

County's road standards allow for a maximum road grade of 7 percent and a minimum curve radius of 1,200 feet for a road with a Major Road classification; and, thus, the design would not comply with the 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 also would result in up to 125 feet of fill placed over an approximately 600-foot-long stretch of the San Diego County Water Authority's existing 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 also must approve the placement of fill over this water transmission facility and the rebuilding of the aqueduct.

In summary, this alternative has implications for the project and the County's Mobility Element, some of which render this Alternative impractical, including: (a) 4,298,900 yards of dirt import over a 2-year period; (b) a redesign of the project with a highly visible 125-foot-tall fill slope impacting a large area of private property, and the related partial removal and reconstruction of a County Water Authority aqueduct; (c) a Major Road with a grade of 9 percent (28 percent steeper than allowed by the County's road standards for this classification); (d) the realignment, raising, and reconstruction of approximately 2,200 feet of the existing Deer Springs Road; (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.

4.8.5 Evaluation of Significant Impacts

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

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy

- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Population and Housing
- Transportation and Traffic
- Utilities and Utility Systems

4.9 Multi-Family Town Center Alternative

4.9.1 Multi-Family Town Center Alternative Description and Setting

During the public scoping process, Golden Door Properties, LLC asked that the EIR address a Multi-Family Town Center Alternative to the proposed project. This alternative is depicted in Figure 4-9. The Multi-Family Town Center Alternative would move all residential units to the southeastern corner of the project Site, clustered around the proposed commercial area (near the area currently designated as Village in the County's General Plan) to promote walkability. This alternative would be accessed by a single ingress/egress point near the Deer Springs Road/Mesa Rock Road intersection. A secondary access, which would generally follow the alignment of the proposed project's internal roadway to Sarver Lane, would serve as emergency access only. The comment letter received during the public scoping process requested that this alternative also provide a shuttle to Escondido Transit Center; this shuttle is already included in the proposed project and would be included under this alternative.

When compared to the proposed project, open space would increase by approximately 342 acres; disturbed area would decrease by approximately 342 acres; and grading would increase by approximately 16,931,000 cubic yards of cut and decrease by approximately 355,000 cubic yards of fill, resulting in approximately 17,266,000 cubic yards of exported material under this alternative. The residential unit count and commercial square footage would remain the same as the proposed project. However, all 2,135 units would be multi-family units, with no single-family units provided. Sarver Lane would not be improved as planned under the proposed project. Deer Springs Road, however, would be improved as proposed under the proposed project (under either Option A or Option B), due to traffic generated by this alternative.

4.9.2 Comparison of Significant Effects between Alternative and Proposed Project

Aesthetics

Under this alternative, approximately 342 acres would no longer be developed and would remain as open space. As such, for much of the northern and western portions of the project Site, changes to visual character and quality would no longer occur when compared to the proposed

project. However, with all development placed in the southeastern corner of the project Site, impacts to Key Views 1, 2, and 3 would be greater, as land uses would be more intense and more strongly contrast with the existing character of the area when compared to the proposed project. Development of this alternative would require substantially more grading (additional 16,931,000 cubic yards of cut, 158 percent more than the proposed project), which would cut into existing slopes and landforms to a greater degree when compared to the proposed project. The entire southeastern corner would be flattened to provide large graded pads to accommodate the intensity of development of this alternative. The southeastern portion of the project Site is the most visible portion from the I-15 corridor (“B” Design Review Area). This alternative would require structures of greater bulk, scale, form, and height when compared to the proposed project to accommodate all land uses in a smaller area. This would result in an inconsistency with the I-15 Corridor Scenic Preservation Guidelines (Site Design, Site Planning Standards, Policy 1). Despite an increase in open space, this alternative would result in greater significant impacts to visual character and consistency with applicable visual resources plans than the proposed project. Therefore, this alternative would result in greater aesthetic impacts.

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 off-site 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

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 Multi-Family Town Center Alternative, grading would not be balanced, and approximately 17,266,000 cubic yards would be exported (refer to cut/fill quantities above). Exported material would be hauled off site, resulting in approximately 1,079,125 haul trucks (assuming the CalEEMod default 16-cubic-yard hauling capacity), or 2,158,250 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 increased emissions during the grading phase when compared to the proposed project. Therefore, during construction, this alternative would result in greater air quality impacts when compared to the proposed project.

Although the same unit count is proposed under the Multi-Family Town Center Alternative, all units would be multi-family, which would result in lower trip generation. This alternative would result in 17,532 ADT, which would be 4,677 fewer trips when compared to the proposed project. Trip distribution would differ under this alternative because all traffic would ingress/egress at the southeastern corner of the project Site. Overall operational emissions would decrease when compared to the proposed project. However, due to construction, overall air quality impacts would be greater than the proposed project.

Biological Resources

Open space would increase by 342 acres under this alternative due to the consolidation of development in the southeastern portion of the project Site. This would result in an overall reduction of on-site impacts to vegetation communities and critical habitat (coastal sage scrub). The consolidation of development would create a larger block of open space, creating more points of available movement for wildlife and promoting conservation goals. However, the intensity and consolidation of development in the southeastern portion of the project would impact all habitat for coastal California gnatcatcher in this area of the Site, and would impact the coastal California gnatcatcher biological ladder along the I-15 corridor. Off-site impacts associated with improving Deer Springs Road would be the same under this alternative as the proposed project, however, overall, off-site biological impacts would be less under this alternative compared to the proposed project as Sarver Lane and Camino Mayor would not require improvements. Although this alternative would have greater impacts to coastal California gnatcatcher, a larger preserve would be achieved, avoiding potential biological impacts elsewhere within the project Site; and, therefore, impacts would be similar to the proposed project.

Cultural Resources

The reduction in the development footprint would reduce the need for cultural resources monitoring in many areas of the project Site, but the improvement of Deer Springs Road (due to traffic generation) would result in impacts similar to those proposed 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. A portion of site CA-SDI-4558 would remain within the proposed development impact area (outside of the Deer Springs Road improvements). However, the proposed use would remain a natural park, as planned under the proposed project. Therefore, impacts to significant cultural resources would be similar to the proposed project.

Geology and Soils

As this alternative would be located within a portion of the same project, existing geologic conditions and hazards within these areas would be the same as under the proposed project. Many areas of potential rock fall hazards would no longer result in potential impacts, as development would avoid areas in the western and northern portions of the project Site. However, grading and slope alteration associated with placing all land uses in the southeastern portion of the project Site may result in new areas of rock fall hazard. Mitigation required for rock fall hazard under the proposed project would also be viable mitigation for any areas of potential new rock fall hazard areas associated with this alternative.

Greenhouse Gas Emissions

GHG emissions would increase during construction compared to emissions under the proposed project due to the increase in grading and the required export of approximately 17,266,000 cubic yards of material and the associated increase in haul truck trips under this alternative. 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 compared to the proposed project.

New project-generated trips would decrease under this alternative when compared to the proposed project, resulting in a decrease in mobile GHG emissions. Although trip distribution would differ, overall operational GHG emissions would decrease when compared to the proposed project. All multi-family units compared to a mix of single-family and multi-family units under the proposed project would contribute fewer GHG emissions associated with energy use, water demand, area sources, and solid waste generation. However, due to construction, 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

While some of the existing hazardous materials would be avoided (such as shot gun shells), potential impacts related to existing hazardous materials sites and contamination would remain similar to the proposed project, due to the existing gas station. Impacts associated with hazardous materials would be less than significant with the incorporation of mitigation measures, similar when compared to the proposed project.

Although this alternative would be required to undergo approval by the County, DSFPD, and SMFPD, as well as comply with all applicable fire codes, site design would substantially affect emergency response and evacuation. This alternative would include numerous dead-ends that would require full accessibility by fire-fighting equipment and vehicles. Despite a secondary emergency access point, the single primary point of access under this alternative would present emergency and evacuation issues. During an evacuation scenario, fewer egress points would be available to residents of the project, increasing evacuation times and hazards to residents. Impacts related to wildfire and evacuation would be greater than the proposed project. Refer to Land Use and Planning for additional discussion specific to CCFC and General Plan fire policies. Therefore, hazards and hazardous materials impacts would be greater than the proposed project.

Hydrology and Water Quality

The Multi-Family Town Center Alternative would retain a greater area of the project Site as it exists today. Disturbed area would decrease by 342 acres, resulting in a reduced impervious footprint when compared to the proposed project. As such, drainage for the majority of the project Site would be unaltered. Construction and operation of this alternative would have similar 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 prevent flooding. Therefore, hydrology and water quality impacts would be reduced under this alternative compared to the project.

Land Use and Planning

As noted above, Golden Door Properties, LLC suggested this alternative during the public scoping process as a possible “Transit-Oriented Development” scenario. The land use plan described under this alternative (shown in Figure 4-9) follows typical patterns found in existing transit-oriented developments, but would be more densely clustered and located closer to commercial uses and parks with the intention of promoting walkability and reducing single-occupancy-vehicle trips. However, the key feature of transit-oriented development is the placement of residential and commercial uses in proximity to transit options such as a high-frequency bus line, trolley, or train. Although this alternative would provide a shuttle to the Escondido Transit Center (as would the proposed project), no transit options are available within walking distance of the project and the provision of transit would be within the authority of North County Transit District. Therefore, this alternative is not a transit-oriented development due to the absence of available transit options.

As reviewed by County Fire, this alternative proposes long looped roadways within many of the development areas, and proposes an alternative access road that traverses a great length through

native vegetation that would be used for emergency access only. As such, this project 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.

This alternative would only provide multi-family units, and as such, conflicts with General Plan Guiding Principles and Housing Element policies, including policies H-1.7 and H-1.8, that encourage the provision of a range of housing types to accommodate various needs of the population. Despite the preservation of a larger area of open space, this alternative would result in greater impacts to coastal California gnatcatcher and its habitat, a resource under the County RPO. Additionally, this alternative would result in greater visual impacts along I-15, resulting in potential inconsistency with the I-15 Corridor Scenic Preservation Guidelines (Site Design, Site Planning Standards, Policy 1). Overall, impacts to land use under this alternative would result in greater impacts when compared to the proposed project.

Mineral Resources

Under this alternative, no development would occur within MRZ-2 area of the project Site. Therefore, impacts to mineral resources would be avoided under this alternative. The alternative would reduce impacts to mineral resources when compared to the proposed project.

Noise

Construction of this alternative would require an additional 16,931,000 cubic yards of cut, which would result in more blasting activities when compared to the proposed project. Therefore, construction of this alternative would result in greater 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. Overall, noise impacts would be similar compared to the proposed project.

Paleontological Resources

Under this alternative, the Valley planning area, which is underlain by paleontologically sensitive soils, would not be developed. 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. Therefore, this alternative would result in similar impacts to parks and recreation when compared to the proposed project.

Population and Housing

Unlike the proposed project, this alternative would not require acquiring existing residences along Sarver Lane. Although acquiring these residences under the proposed project would not result in a significant impact, the impact to displacement of existing homes would be reduced under this alternative when compared to the proposed project.

This alternative would have similar growth-inducing potential when compared to the proposed project, and would develop the same number of residential units. Therefore, this alternative would result in similar impacts when 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 also would pay the required public services fees and offer 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. Therefore, this alternative would result in similar impacts to public services when compared to the proposed project.

Transportation and Traffic

Under the Multifamily Town Center Alternative, development would be concentrated in the far southeastern portion of the project Site. This alternative would consist of 2,135 multifamily units, 81,000 square feet of retail, 10.3 acres of community parks, 24.3 acres of neighborhood parks, and a school site, combining all of these uses on 435 acres of the project. Compared to the proposed project, this alternative would generate 4,677 (21%) fewer ADTs, 333 (21%) fewer trips in the AM peak period, and 557 (27%) fewer trips in the PM peak period.

Compared to the proposed project, this alternative would result in greater impacts to Deer Springs Road between Mesa Rock Road and Sarver Lane, reduced impacts to Deer Springs Road between Sarver Lane and 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 Avenue. This alternative would also not have any impacts to N.

Twin Oaks Valley Road or generate any traffic on Sarver Lane as both the Sarver Lane and Camino Mayor project access points would be eliminated by this alternative. However, because Sarver Lane would serve as an emergency access for this alternative, Sarver Lane would need to be improved to the County's Rural Residential Road standard.

Like the proposed project, this alternative would require a new interchange at Deer Springs Road and I-15, and 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 Avenue and impacts to the segment of S. Santa Fe Avenue between Robelini Drive and Buena Creek Road would remain significant and unavoidable.

Utilities and Service Systems

Although the same unit count would be developed under this alternative when compared to the proposed project, all units would be multi-family. Therefore, although demand and generation of water, wastewater, and solid waste would differ, it likely would not be substantially different. Therefore, this alternative would result in similar impacts compared to the proposed project.

Energy

The construction equipment fleet would remain similar to the proposed project; however, the grading duration would be decreased. Due to the amount of truck haul trips to export material from the Site, additional energy consumption would occur during construction compared to the proposed project. While the unit count would remain the same, the overall energy usage for an all multi-family development would be lower than the proposed project. Overall, energy impacts would be similar to the proposed project.

4.9.3 Relation to Project Objectives

The Multi-Family Town Center Alternative would meet project Objectives 1, 3, and 4 (see Section 4.2.1, Project Purpose and Objectives) by preserving substantial open space areas, constructing facilities concurrent with demand within existing service areas, and providing a diverse range of recreational opportunities. Although a larger open space area would be preserved, substantial landform alterations would be required for this alternative; therefore, it would meet project Objective 5, but to a lesser degree than the proposed project.

This alternative would not satisfy Objective 2 because all of the residential, interrelated neighborhoods would be removed and thereby eliminate all single-family and age-qualified residences. The "Village" designation in the General Plan for this project Site, however, would be satisfied with regard to a multi-family Town Center. In addition, this alternative would not satisfy Objective 6, which calls for the provision of a diverse range of housing opportunities. The

alternative would not provide for the construction of any single-family or age-qualified residential units. The project's objective of providing for a diverse range of housing opportunities is supported by a consumer survey of buyer preferences and demand over a consumer life stage (John Burns Real Estate Consulting 2016). The survey was used to inform the applicant of the variety of residential products to be proposed for each neighborhood. Of the consumers surveyed, an average of 80 percent indicated a preference for a traditional detached single-family home.

4.9.4 Feasibility

This alternative would result in a substantial increase in land use intensity at the southeastern portion of the project Site, resulting in various potential inconsistencies with the County General Plan and I-15 Scenic Preservation Guidelines. Similar to the proposed project, this alternative would require a General Plan Amendment. Additionally, the single point of access would inhibit adequate and safe emergency response from fire and medical service providers and evacuation, potentially increasing the risk to life and property. As discussed previously, this alternative would be in conflict with several CCFC and General Plan fire policies.

4.9.5 Evaluation of Significant Impacts

The Multi-Family Town Center Alternative would avoid, reduce, or substantially lessen significant impacts compared to the proposed project in the following areas:

- Hydrology and Water Quality
- Mineral Resources
- Paleontological Resources

The Multi-Family Town Center Alternative would result in greater significant impacts compared to the proposed project in the following areas:

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning

4.10 CDFW/USFWS Land Planning Alternative A

4.10.1 CDFW/USFWS Land Planning Alternative A Description and Setting

CDFW submitted a letter in response to the EIR NOP requesting that the EIR evaluate and compare a Land Planning Alternative A to the proposed project. USFWS also generally requested the same type of alternative. This alternative is depicted in Figure 4-10. 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. The remainder of the planning areas (Valley, Mesa, Knoll, and Summit) would remain as proposed under the project. Both CDFW and USFWS suggest that this scaled-back alternative would minimize project impacts to the draft Pre-Approved Mitigation Area in the draft North County Multi-Species Conservation Plan; provide for a large, continuous block of open space in the eastern and northern portion of the Site; and maintain connectivity between on- and off-site areas designated as a draft Pre-Approved Mitigation Area and other conservation efforts outside the North County Multi-Species Conservation Plan planning area.

When compared to the proposed project, the CDFW/USFWS Land Planning Alternative A would eliminate the Village Town Center as shown in the proposed project, and thereby remove all commercial 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 1,353 residential units (896 single-family and 457 multi-family units). Open space would increase by approximately 237 acres; the disturbed area would decrease by approximately 237 acres; and grading would decrease by approximately 4,187,000 cubic yards of cut and decrease by approximately 3,737,000 cubic yards of fill, resulting in approximately 450,000 cubic yards of imported material. Deer Springs Road would be improved as proposed under the project (either under Option A or Option B).

4.10.2 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 Site to be developed under this alternative would be primarily located in the western portion of the project Site, which is less visible from public vantage points. A reduction in development would reduce overall impacts to visual resources. Additionally, less development would occur within the I-15 Scenic Corridor. Overall, more of the existing landform of the project Site would remain unaltered. Although the more visible portions of the project Site 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/USFWS Land Planning Alternative A 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 450,000 cubic yards of imported material. Imported material would be brought to the Site, resulting in approximately 28,125 haul trips (assuming the CalEEMod default 16-cubic-yard hauling capacity), or 56,250 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 would result in an increase in emissions 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 fewer emissions when compared to the proposed project.

During operation, this alternative would result in fewer units and fewer ADTs (12,317 total ADT, 9,892 fewer ADTs compared to the proposed project), thus resulting in lower operational emissions compared to the proposed project. Both operational and construction emissions would be reduced compared to the proposed project. Therefore, this alternative would result in reduced air quality impacts compared to the proposed project.

Biological Resources

The development footprint would be smaller with this alternative, resulting in a reduction in impacts to on-site vegetation; however, 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 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. Reduction in impediments (internal roadways) would allow for more points of movement. This alternative would also preserve the coastal California gnatcatcher biological

ladder along the I-15 corridor that the proposed project would otherwise impact. 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. With an improved preserve design and avoidance of coastal California gnatcatcher habitat on site, overall impacts to biological resources under this alternative would be reduced compared to the proposed project.

Cultural Resources

The reduction in the development footprint may reduce the need for cultural resources monitoring in many areas of the project Site, but improvement of Deer Springs Road (same as the proposed project) would require the same monitoring 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 to the proposed project.

Geology and Soils

Elimination of several planning areas under this alternative would reduce the potential occurrence of geologic hazards. Less area would be used for development, thereby reducing the potential for the presence of geologic hazards (soil and surficial instability) and the need for soils testing. Rock fall hazard also would be reduced, as several rock fall hazard areas identified near the Town Center, Terraces, and Hillside planning areas would be avoided under this alternative. As this alternative would result in a reduction in development by removing three 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, despite the need for construction truck trips, due to the construction of fewer units, less cut and fill quantities, and less grading required, resulting in reduced construction activity 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 material 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, 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. 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 travel 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. 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 than 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 of traffic during an evacuation emergency. Evacuation impacts would have similar impacts as the proposed project. Therefore, this alternative would potentially result in greater impacts to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

This alternative would impact a smaller area of the project Site and avoid or reduce impacts to certain drainages impacted by the proposed project. Disturbed area would decrease by 237 acres, resulting in a reduced impervious footprint on site 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 facilities would be employed under this alternative to control for stormwater pollution and flooding. This alternative would 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

Under this alternative, only residential units and parks, with associated roadway improvements, would be developed. This alternative lacks Community-serving commercial and school uses for project residents and the surrounding area. To accommodate trip distribution, Sarver Lane would require improvements, such as an increase in right-of-way and curb-to-curb width, beyond the requirements for the proposed project such that it would have potential impacts to additional biological resources and adjacent properties. With the exception of the above, this alternative would be consistent with most General Plan policies.

This alternative proposes the main entrance to the project Site 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. Moving the main entrance to the project to Sarver Lane would result in some of the project Site being farther 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 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 than 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 require a shorter timeline and reduced amount of cut and fill (4,187,000 cubic yards and 3,737,000 cubic yards, respectively). While import truck trips would be required under this alternative, it is not likely that the use and frequency of travel to and from the Site would result in additional noise impacts. The shorter construction phase and reduced development footprint would require fewer 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

Under this alternative, the Town Center planning area would not 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 alternative, approximately 3,843 people would be introduced to the area, approximately 3,562 people more than under existing land use designations (2.84 persons per household; refer to Section 1.8 of this EIR). 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, this alternative would still exhibit 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 population, this alternative would result in reduced impacts to population and housing when 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 site would not be provided because the Town Center would be

removed. This alternative would 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/USFWS Alternative A, development would be concentrated in the western half of the project Site. This alternative would consist of 1,353 total dwelling units, including 896 single family dwelling units and 457 multifamily dwelling units, 10.3 acres of community parks, and 16.3 acres of neighborhood parks developed on 540 acres of the project Site. This alternative would not include any commercial retail uses or a school site. Compared to the proposed project, this alternative would generate 9,892 (45%) fewer ADTs, 632 (39%) fewer trips in the AM peak period, and 824 (40%) fewer trips in the PM peak period.

Compared to the proposed project, CDFW/USFWS Alternative A 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. Additionally, as this alternative would result in significantly higher volumes along Sarver Lane, Sarver Lane would need 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. Like the project, with mitigation, impacts to utilities and service systems would be reduced to less than significant

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.

4.10.3 Relation to Project Objectives

CDFW/USFWS Land Planning Alternative A 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 Site 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 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.

4.10.4 Feasibility

As CDFW/USFWS Land Planning Alternative A 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 fire and medical 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.

4.10.5 Evaluation of Significant Impacts

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

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

4.11 CDFW Land Planning Alternative B

4.11.1 CDFW Land Planning Alternative B Description and Setting

During the public scoping process, CDFW requested that the EIR evaluate and compare a CDFW Land Planning Alternative B to the proposed project. The alternative is depicted in Figure 4-11. Under this alternative, the Terraces, Hillside, and the eastern portion of the Mesa planning areas, along with associated access roadways, parks, and other improvements, would instead be open space. The remainder of the planning areas (Town Center, Valley, Knoll, and Summit) would remain as under the proposed project. The Town Center planning area would not have direct access to the other planning areas. CDFW suggested this alternative to provide for a larger, contiguous block of open space in the eastern and northern portions of the property, 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 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.

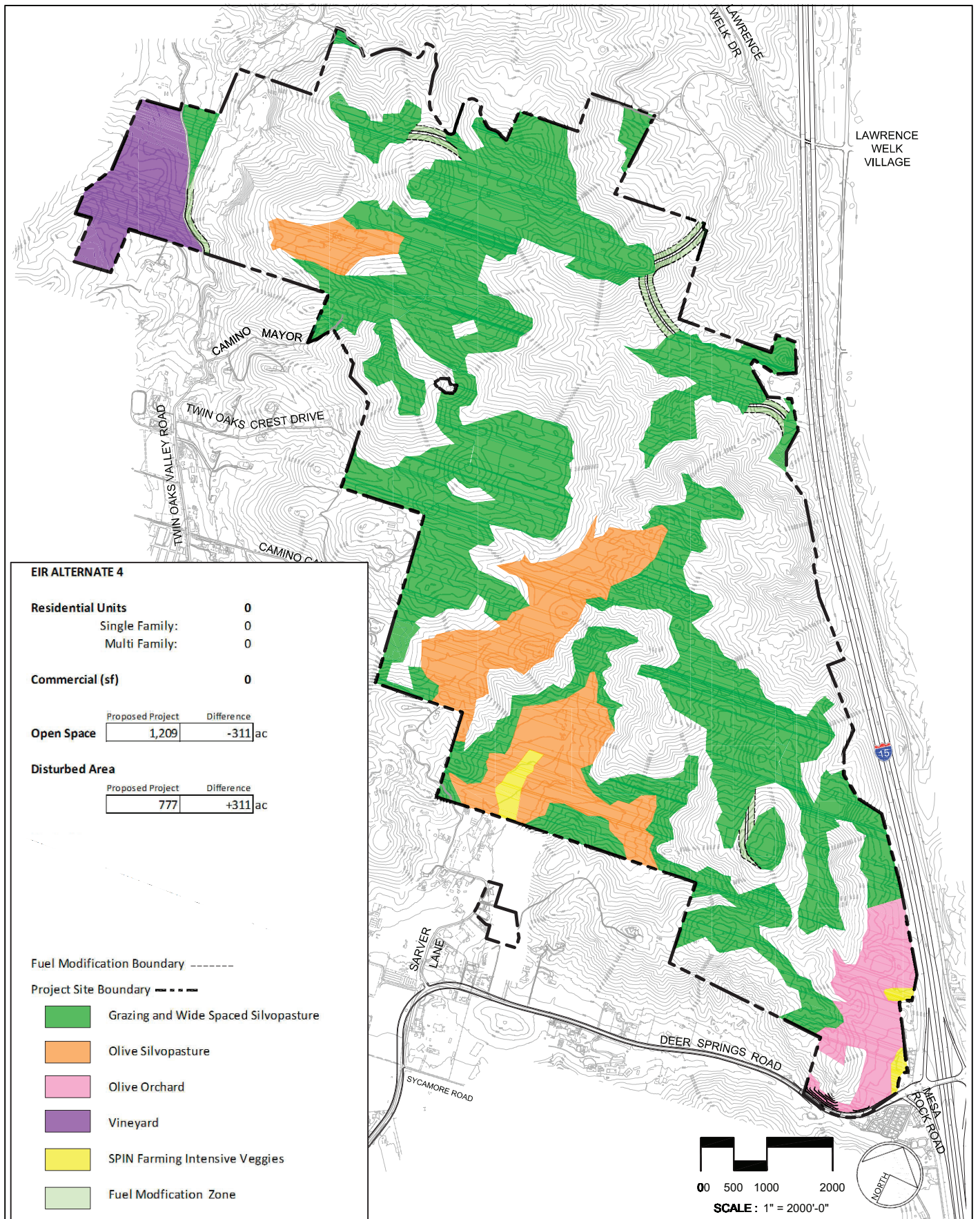
— Alternative is likely to result in similar impacts to issue when compared to proposed project.

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

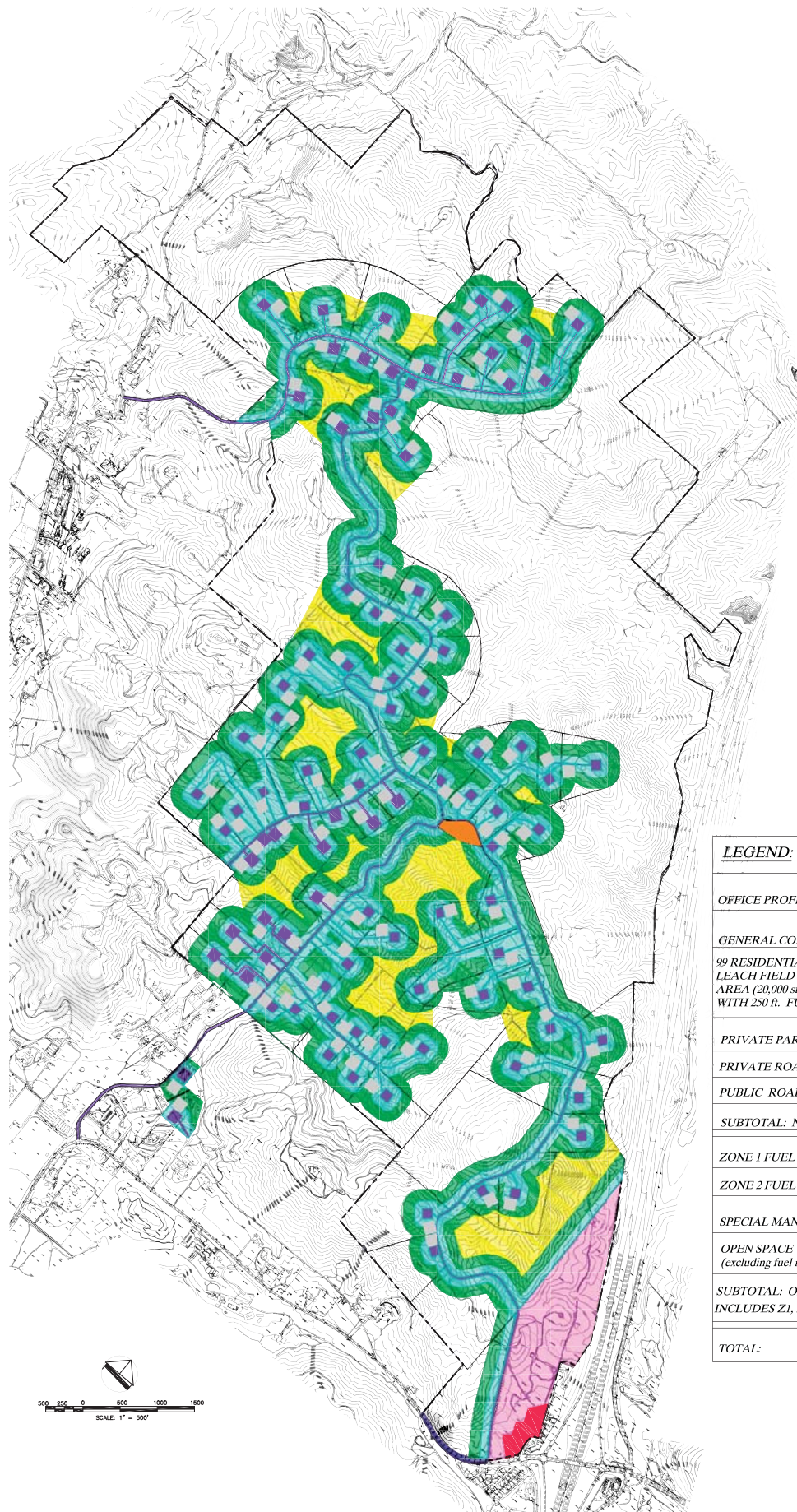
NS Not a potentially significant impact

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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