CHAPTER 4.0 – PROJECT ALTERNATIVES

4.1 Rationale for Alternative Selection

4.1.1 CEQA Alternatives

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The Proposed Project was determined to result in potentially significant and unmitigable short-term impacts related to aesthetics. The Project also was determined to result in potentially significant and unmitigated direct and/or cumulative impacts for transportation/ traffic and air quality. (Although appropriate mitigation is identified to reduce these impacts to less than significant levels, and it is fully anticipated that mitigation will appropriately occur, the mitigation would be implemented by another lead CEQA agency. Therefore, the County is unable to guarantee mitigation implementation. As a result, for the purposes of this document, these impacts are identified as significant and unmitigated.) The Project was also determined to have significant (or potentially significant) direct, indirect and/or cumulative but mitigated impacts to aesthetics, biological resources, cultural resources, noise, transportation/traffic, and greenhouse gas emissions.

Section 15126.6(f) of the CEQA Guidelines states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The State CEQA Guidelines provide several factors that should be considered in regard to the feasibility of an alternative. Those factors include: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site (if an off-site alternative is evaluated).

This EIR analyzes a total of six alternatives; the No Project/No Development Alternative, as well as a total of four full development alternatives and two sewer options (combined under one alternative), are evaluated in Subchapters 4.3 through 4.8 of this chapter, and briefly summarized below.

The CEQA Guidelines require the evaluation of a No Project Alternative. The discussion of the No Project Alternative may proceed along two lines:

1. If the project is a development proposal, the No Project Alternative is the circumstance under which the project does not proceed, and

2. When the project is the revision of an existing land use or regulatory plan, the No Project Alternative is the continuation of the existing plan.

In the case of the Project described in this EIR, both types of No Project Alternative apply and are discussed. The first No Project Alternative is the circumstance under which the Project does not proceed. The second No Project Alternative is addressed as the two General Plan Consistent

alternatives described below. The No Project/No Development Alternative allows retention of the site as it currently exists and thereby avoids both construction-period and long-term unmitigable or unmitigated impacts (i.e., to aesthetics, air quality and transportation/traffic) associated with development of the Proposed Project.

The General Plan Consistent alternatives (General Plan Consistent with Septic Alternative [49 SFR]; and General Plan Consistent with Sewer Alternative [119 SFR]) would not require a GPA relative to residential density. They also comply with County RPO requirements for wetlands and wetland buffers, as well as avoiding steep slopes, to a greater extent than the Proposed Project. Most steep slopes and sensitive biological resources would be preserved within open space easements. These development alternatives also reflect lower intensity development on site close to a County Scenic Highway (Harmony Grove Road) and Escondido Creek.

The Senior Care Traffic Reduction Alternative is intended to provide a development pattern that would increase density adjacent to the existing HGV Village through a GPA, while being able to substantially reduce impacts associated with traffic. This alternative incorporates the unique design requirements for this type of development.

The Biologically Superior Alternative was included to reduce direct and indirect impacts to sensitive biological resources and provide increased connectivity for local wildlife movement, as well as reduce Project footprint and related grading.

The Off-site and Combined On-/Off-site Sewer Options Alternative was included to disclose the impacts that would occur if either of these two sewer options were to be approved instead of constructing a stand-alone plant within the Project. The analysis of these two options includes all of the issue areas that are needed to allow the decision maker to adopt either of the options in lieu of the stand-alone plant without the need for additional analysis. The adoption of either of these options would eliminate the need for, or reduce the scale of, an on-site WTWRF and, therefore, reduce potential environmental effects associated with potential land use conflicts and noise. This sewer service alternative includes one potential off-site option (connection to the HGV WRF in lieu of the proposed on-site WTWRF and related facilities, as well as a combined on-/off-site treatment option. The on-/off-site option includes on-site treatment at a scaled-down WTWRF and off-site solids treatment at the Harmony Grove WRF.

These alternatives represent a reasonable range of alternatives, as defined in the State CEQA Guidelines, because they present feasible alternate development patterns that would reduce and/or eliminate significant impacts associated with the Proposed Project, would improve existing Village function and use to the community, or were designed to be responsive to community interest in inclusion of only single-family residential uses on a minimum lot size. These alternatives are compared to the impacts of the Proposed Project (with an overview of Proposed Project and alternative impacts provided in Table 4-1, *HGV South Full-build Alternative*s *Comparison of Impacts*), and are assessed relative to their ability to meet the basic objectives of the Proposed Project.

4.1.2 Project Objectives

The underlying purpose of the Project is to accommodate a portion of the projected population growth and housing needs in San Diego County by expanding an existing village that will further enhance and support the success of that village and create a complete and vibrant pedestrian-oriented sustainable community that provides a variety of housing types for a diverse range of incomes and lifestyles. As described in Subchapter 1.1 of this EIR, the Proposed Project includes the following overall objectives.[1]

1. Efficiently[2] develop property in close proximity to an existing village consistent with the Community Development Model to create one complete and vibrant community that would enhance and support the economic and social success of the village and Project by increasing the number and diversity of residential opportunities.

2. Contribute to the establishment of a community that encourages and supports multi-modal forms of transportation, including walking and bicycling, by locating near regional employment and transit centers.

3. Preserve and enhance sensitive biological resources, habitats, and landforms in dedicated open space easements.

4. Provide a variety of passive and active recreational opportunities in support of the County's goals to encourage healthy and active lifestyles through the creation of public and private parks, pathways, and trails that provide connectivity to the area's preserved natural lands and nearby village uses.

5. Provide a mix of residential uses that will provide a broad range of housing choices which support a diversity of resident and land uses within the Project.

6. Create a mixed-use development that is compatible with existing and planned development in the immediate vicinity of the property while optimizing the operational effectiveness of public facilities and services of the Project and the existing village by increasing the number and diversity of residents within the Project.

7. Create a destination gathering place that provides a variety of land uses that encourage walkability, social interaction and economic vitality for the Project, and with the existing village and the surrounding areas.

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[1] Although a lead agency may not give a project's purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal. For example, if the purpose of the project is to build an oceanfront resort hotel (Goleta, supra, 52 Cal.3d at p. 561) or a waterfront aquarium (Save San Francisco Bay Assn. v. San Francisco Bay Conservation etc. Com. (1992) 10 Cal. App. 4th 908, 924–925 [13 Cal. Rptr. 2d 117]), a lead agency need not consider inland locations.

[2] Merriam-Webster defines "efficiently" as: "in a way that achieves maximum productivity with minimum wasted effort or expense."

8. Encourage adaptive grading, whenever feasible, that utilizes grading techniques such as selectively placing development in a manner that visually and physically responds to the site's physical variables (such as steep slopes, views, streams, etc.), preserving significant topographic features and taking advantage of existing site features.

4.1.3 Alternatives Considered But Rejected from Further Study

Alternative Location

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative project site location should be considered if development of another site is feasible, and if development of another site would avoid or substantially lessen significant impacts of the proposed project. Factors that may be considered when identifying an alternative site location include the size of the site, its location, the General Plan (or Community Plan) land use designations, and availability of infrastructure. CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in looking at an off-site alternative is "…whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." Further, CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternative locations are whether the project proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

An effort was made to identify an alternative location for the Project. The selection criteria were developed to identify potential alternative project sites that would be fairly easy to acquire, and large enough to accommodate the proposed uses. When looking for the alternative sites, the following criteria were used:

- Alternative site had to be within the identified market area
- Land had to be privately owned
- Alternative site had to feasibly accomplish most of the basic objectives of the project

The Project objectives require that the Project be sited in an area adjacent to an existing village consistent with the CDM and in proximity to employment opportunities and transit options; and that it would also offer amenities to the surrounding existing and planned residential uses and development.

No other similarly sized, undeveloped, property was known to be available for development within the County adjacent to an existing village, and near existing major transportation routes and employment centers. At the time that the property was purchased, the search covered Harmony Grove, Elfin Forest, Eden Valley, Bonsall, Fallbrook and Ramona areas, as well as locations in southern San Diego County. This condition continues as of early 2017. Specific to the Harmony Grove area, given the semi-rural nature of the valley, if one were to become available, development would be likely to result in impacts similar to those identified for the Proposed Project. This includes effects resulting from development of an open space parcel, including the issues of aesthetics, biological resources, cultural resources, noise, transportation/traffic, and anticipated utilities upgrades. In fact, the impacts related to agriculture and cultural resources in particular

could potentially be greater as remaining undeveloped parcels in this part (as well as other areas with potential for large parcel development) of the County often have some active agricultural feature or ability to retain cultural resources.

Therefore, an alternative location was considered but rejected because: (1) it is unlikely that an alternative site in the County would substantially reduce significant environmental effects relative to the Proposed Project given the size of the parcel and type of development; and (2) the property was purchased with the intention of completing the existing HGV village. Therefore, the need for additional evaluation of an off-site alternative was rejected from further consideration.

Steep Slope Avoidance Alternative

During the planning phase beginning in 2014, a number of potential project footprints were evaluated. A primary initial plan laid out site uses consistent with schematic representations of development patterns; i.e., incorporating denser uses in the heart of the site and less-dense uses on the site perimeters. This alternative also largely avoided all encroachment into RPO-defined steep slope areas, regardless of whether exceptions or waiver under the ordinance might be applicable. As a result, the development footprint of that plan was less consolidated than the ultimate Proposed Project–it extended through lower elevations throughout the site. Planned uses included a central recreational/limited commercial area, 427 lots, and sewer elements. The development would have had sewage treated by an on-site WTWRF located in the northernmost portion of the site.

Although all terrain exceeding 25 percent slope and the majority of coast live oak woodland would have been avoided, residential lots would have been located in the southern third of the site, within approximately 200 feet of the southern property boundary, which is shared with the DDHP. Under that plan, the potential for preservation of on-site biological open space was diminished due to the "fingers" of development extending southerly, which also would have resulted in edge effects. Large swaths of sensitive biological resources would not have been conserved by setting aside land within a planned and integrated preserve area through clustering development within the Project site. In addition, and based on the proposed number of lots, traffic impacts (with any associated traffic-related noise effects) were preliminarily projected to be roughly commensurate with those of the Proposed Project.

The ability to avoid steep slopes while still providing development density necessary to enhance the Village Core, contribute to the economic and social success of the Project and help support public service facilities used by residents of both the Project and HGV, were considered positive elements of this potential alternative design. Those aspects, however, were not assessed as outweighing the combination of encroachment closer to DDHP, anticipated traffic impacts, and satisfying the underlying elements of the Project to provide a pedestrian-oriented sustainable community that complements the natural environment, protects the community character.

The potential to design alternatives with development located further from preserve areas located south of the site, and minimizing potential edge effects through clustering of development out of the southern third of the site (while still providing the housing counts necessary to support on-site sewage treatment) led to rejection of the Steep Slope Avoidance Alternative.

4.2 Analysis of the No Project/No Development Alternative

In accordance with Section 15126.6(e) of the State CEQA Guidelines, a "no project" alternative shall be evaluated, along with its impact. The No Project/No Development Alternative assumes the proposed development would not occur and the existing conditions at the Project site as of the date that the NOP was published would continue over the long-term.

4.2.1 No Project/No Development Alternative Description and Setting

Under the No Project/No Development Alternative, the Project site would remain in its current condition. The native and non-native habitat throughout the site would remain intact. The above-ground transmission line that currently bisects the property, the paved and dirt roads providing access to single-family residential uses east of the Project, and the unimproved trail access to DDHP, would continue to exist. Some encroachment into the property by abutting parcels along Cordrey Drive, with related uncontrolled runoff into Escondido Creek, also would be likely to continue.

The Proposed Project residential and commercial uses would not be constructed; nor would supporting infrastructure such as improved road elements, the WTWRF, and other utility upgrades. In addition, the Project-proposed BOS preserve, and HOA-maintained landscaped areas (as well as larger community serving amenities such as pathway and trail connections and the destination gathering location at the Center House and multiple park areas) would not be created.

4.2.2 Comparison of the Effects of the No Project/No Development Alternative to the Proposed Project

The anticipated environmental effects resulting from the No Project/No Development Alternative are described below, along with comparisons of these impacts to the Proposed Project (refer to Table 4-1).

Aesthetics

Under the No Project/No Development Alternative, the Project site would continue to appear as a disturbed, but primarily undeveloped, area. Significant and unmitigable short-term adverse visual impacts would be avoided under this alternative. In addition, significant but mitigable aesthetic impacts related to fresh-cut rock would not occur. When compared to the Proposed Project, impacts to aesthetics would be less under this alternative.

Transportation/Traffic

No existing trips are associated with this disturbed, but undeveloped, parcel, and therefore no significant transportation/traffic impacts would occur with implementation of the No Project/No Development Alternative. This alternative would thus avoid the significant (but mitigable) direct and cumulative transportation impacts identified for the Proposed Project within the County and the conservatively-identified significant (but unmitigated) direct and cumulative transportation impacts within the City of Escondido. When compared to the Proposed Project, impacts to transportation/traffic would be less under this alternative.

Biological Resources

The No Project/No Development Alternative would avoid the significant direct impacts to biological resources identified for the Proposed Project. In summary, specific biological impacts identified for the Proposed Project, which would be avoided by this alternative include: (1) loss of sensitive habitats including Diegan coastal sage scrub (supporting one California coastal gnatcatcher nest), southern mixed chaparral (including some wart-stemmed ceanothus), coast live oak woodland, southern [willow] riparian forest, and non-native grassland; (2) potential loss of least Bell's vireo birds/habitat; (3) loss of habitat for raptors (foraging habitat); (4) potential for substantial noise impacts during construction that could significantly impact coastal California gnatcatcher, least Bell's vireo and raptors; (5) loss of USACE, CDFW and County RPO wetlands/ waters; and (6) displacement of nesting migratory birds during their breeding season.

The No Project/No Development Alternative would be expected to generally retain biological resources in their existing condition; therefore, there would be no direct impacts and overall impacts to biological resources associated with this alternative would be less than with the Project.

Cultural Resources and Tribal Cultural Resources

As discussed in detail in Subchapter 2.4, no known significant impacts would occur within the Project site or off-site road/utility upgrade areas proposed as part of the Project. As a result, no known impacts associated with the Proposed Project would occur. Unknown subsurface resources could be present, but because no grading activities (which might uncover unknown resources) at all would occur on the Project site with the No Project/No Development Alternative, no significant impacts to cultural resources would occur. When compared to the Proposed Project, impacts to cultural resources could be less under this alternative.

Noise

The lack of current activities on the site results in a lack of site-generated noise that could affect off-site sensitive noise receptors. Accordingly, no significant noise effects would occur as a result of the No Project/No Development Alternative. This alternative would therefore avoid the potentially significant but mitigable noise impacts projected to occur during on-site Project construction (associated with potential blasting and noticing issues). It also would avoid the mitigable operational impacts identified for the site in one location (Lots 123 and 124), relative to transportation noise and potential noise associated with the WTWRF generator.

Noise effects associated with bridge construction over Escondido Creek currently would not be expected to occur. This construction activity would result in significant noise related to the potential for pile driving for bridge supports. Noise impacts associated with bridge construction would be greater for the Proposed Project as they would not occur under the No Project/ No Development Alternative. When compared to the Proposed Project, impacts to noise would be less under this alternative.

Air Quality

The elimination of development on, or new uses of, the Project site would result in no new air quality impacts. The site would remain empty and would, therefore, not have homes placed upon

it that would exceed projections in the 2011 General Plan. Significant and unmitigated air quality impacts associated with exceedance of the 2016 RAQS due to proposed placement of more lots on site than are currently anticipated under the adopted General Plan would not occur. When compared to the Proposed Project, impacts to air quality would be less under this alternative.

Greenhouse Gas Emissions

The elimination of development on, or new uses of, the Project site would result in no new GHG emissions impacts. The site would remain empty, and would therefore not have homes placed upon it. As described for the Proposed Project, however, all cumulative impacts associated with Project emissions would be mitigated to net zero through on-site reductions and implementation of M-GHG-1 (addressing construction and operational emissions exceeding reductions achieved through Project PDFs). Because no cumulative impacts would occur under the No Project Alternative, and because the Project would be mitigated to carbon neutral net zero (equivalent to No Project), when compared to the Proposed Project, cumulative GHG emissions impacts would be similar under this alternative.

Conclusions

The No Project/No Development Alternative would avoid a number of significant impacts associated with the Proposed Project, including: (1) significant and unmitigated aesthetics, air quality and transportation/traffic impacts; and (2) significant but mitigated impacts related to aesthetics, biological resources, cultural resources, noise, and transportation/traffic. The No Project/No Development Alternative would fail to meet all of the Proposed Project objectives listed above in Subchapter 4.1, however, relative to provision of housing and support of facilities and services provided by HGV, provision of mixed residential uses to support diversity of resident and land uses, or creation of a mixed-use development (Objectives 1, 5 and 6, respectively). It also would not provide any of the amenities offered to the community at large relative to support of multi-modal transportation options, provision of a variety of passive and active recreational opportunities, or provision of a destination gathering place for the Project and surrounding areas (Objectives 2, 4 and 7, respectively). Permanent set aside of important and managed biological resources that would contribute to the block of preserved habitat located in the DDHP and EFRR, also would not occur, contrary to Objective 3. Specifically, the long-term preservation of resources could not be assured as would occur under the Project, which would include dedication of land in permanent open space. Also, the management of conservation values including large segments of coast live oak woodland and southern mixed chaparral (containing wart-stemmed ceanothus), that would result from the permanent preservation of open space on the site, would not occur under this alternative. Improvements to potential wildlife movement by Project implementation of the bridge over Escondido Creek (allowing wildlife to pass under the bridge rather than crossing the vehicular travel way), as well as improvements to creek water quality resulting from removal of the at-grade crossing and underlying culverts and re-creation of a free-flowing creekbed, also would not be expected to occur. In addition, improvement of Country Club Drive roadbed and pathway and related improvement of emergency access to areas south of the creek would not occur, and off-sets to the north and south approaches to the Harmony Grove Road and Country Club Drive intersection would continue, retaining this awkward formation.

4.3 Analysis of the General Plan Consistent with Septic Alternative

4.3.1 Description of the General Plan Consistent with Septic Alternative

The General Plan Consistent with Septic Alternative would be consistent with the existing General Plan land use designation of Semi-Rural. As shown on Figure 4-1, *General Plan Consistent with Septic Alternative,* this alternative includes 49 single-family residential homes on 1-acre or greater lots. Larger lot sizes are needed in order to meet the County's septic system requirements with respect to the Project's unique geologic/soils characteristics. The residential lots would have approximately 5,000-square foot pads that would be sited throughout the property in a dispersed, rather than consolidated, pattern that is based upon the soils characteristics found on the site. This alternative assumes an advanced on-site wastewater treatment septic system, requiring approximately 3,500 sf per lot.

The manufactured slope located along Country Club Drive south of the WTWRF would not be built, and grading quantities overall are expected to total approximately 660,000 cubic yards (22 percent less than the Proposed Project grading of 850,000 cy). This alternative would initially grade approximately 56 acres (50 percent of the site), and develop on approximately 56 acres (or 50 percent of the site). Approximately 55 acres (also approximately 50 percent of the site) would be placed into open space set-aside containing some steep slopes and biological resources associated with each lot. This open space would not be placed into a preserve managed by an independent land manager, but would be restricted in use on each individual lot.

This alternative would not include any commercial, parks, or other recreational uses, including a community gathering locale, given the small number of residential units on site. While there are fewer homes under this alternative, larger lots spread over the entire site would still require an extensive road system and utility lines (e.g., potable water).

The purpose of this alternative would be to provide consistency with the existing general plan land use designation and to reduce traffic and air quality impacts.

4.3.2 Comparison of the Effects of the General Plan Consistent with Septic Alternative to the Proposed Project

The anticipated environmental effects resulting from the General Plan Consistent with Septic Alternative are described below. A comparison of the impacts identified for this alternative as compared to the Proposed Project is shown in Table 4-1.

Aesthetics

The alternative would grade individual residence pads, and place structures in general consistency with the underlying topography. The lot sizes would be compatible with some immediately abutting parcels to the west and east, and less compatible with HGV development patterns to the north. The views to this alternative would show fewer, and more widely spaced individual structures than would occur under the Proposed Project. There would be a range of structure size, with some being larger and some being smaller than under the Proposed Project. Because the units are dispersed throughout the site, however, some lots would be located at higher elevations than the Proposed Project, thereby increasing the potential to alter distant off-site views.

The General Plan Consistent with Septic Alternative would result in a reduction in initial grading quantity and surface disturbance. As a result, this alternative would conform more closely to existing site topography than the Proposed Project (i.e., the smaller amount of soil movement would allow for greater retention of existing topography). As noted above, however, the alternative would ultimately place 50 percent of the site into lots and streets, compared with 29 percent of the site being in lots and streets under the Proposed Project. Therefore, the alternative would not be perceived as visibly having less grading, and would appear to modify a greater part of the site. The dispersed development pattern of the alternative would site building pads closer to the southern Project boundary with the DDHP, and would introduce additional grading for pads and roads, with associated removal of native habitat, into a portion of the site identified for BOS under the Proposed Project. Visual open space connecting to DDHP without pads and homes interspersed within it would be less than under the Proposed Project, where a solid 34.8-acre block of habitat south of the development footprint would be protected.

Although a substantial amount of the site (approximately 55 acres) would be placed into open space easements under the alternative, the fragmentation of the habitat would result in additional visual changes to the southern slope that would not occur under the Project. The placement of the easement on those parcels also would result in the extent of the residential development remaining visible over the long term. Even if substantial landscaping/vegetative screening is provided on the pad, the requirement to maintain the interspersed open space in its natural state would result in homes being placed within areas of low-growing scrub habitats, and therefore always remaining highly visible. This would be visually consistent with development in the area, but also would minimize the perception of topographic feature preservation, and would encroach further into the feature of existing site open space preserved under the Project.

Similar to the Proposed Project, this alternative would be anticipated to result in significant short-term visual effects related to the construction period and for some years of Project use. The intensity of those adverse effects could be greater when compared to the Proposed Project, because the placement of a number of lots would be at a higher elevation than the Proposed Project and therefore more visible. Similar to the Proposed Project, there would not be significant long-term impacts. Overall, when compared to the Proposed Project, this alternative would result in similar impacts to aesthetics.

Transportation/Traffic

This alternative assumes 12 daily trips per residence, based on SANDAG's 2002 *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, which identifies use rates by type of use/density. The 49 units proposed for this alternative, therefore, would generate a total of 588 ADT. This is 87 percent fewer trips than the 4,350 ADT projected for the Proposed Project. Based on these figures, potential transportation/traffic impacts from this alternative would have lower overall a.m. and p.m. peak period volumes and lighter distribution overall to the area roadway system than under the Proposed Project.

Seven impacts identified for the Proposed Project would not occur under this alternative. In addition, four segment impacts would not occur. These segments include direct and cumulative impacts to Country Club Drive between Auto Park Way to Hill Valley Drive in the City of Escondido. They also include cumulative impacts to Harmony Grove Road between Harmony

Grove Village Parkway and Kauana Loa Drive, and to Harmony Grove Village Parkway between Harmony Grove Road and Citracado Parkway, as well as Country Club Drive Hill Valley Drive and Kauana Loa Drive. Only two segments of Harmony Grove Road would experience CEQA-significant impacts (cumulative only) from traffic generated by 49 residential units. These impacts would occur between Country Club Drive and Harmony Grove Village Parkway, and between Kauana Loa Drive and Enterprise Street, both within County jurisdiction. Mitigation is available, and cumulative impacts would be addressed through payment into the TIF program and/or direct improvements, as described in Section 2.2 of this EIR.

Cumulative impacts to two intersections within City of Escondido jurisdiction assessed to the Proposed Project also would not occur under this alternative, which would eliminate significant and unmitigated impacts identified for the Proposed Project due to the inability to ensure implementation of proposed mitigation within this neighboring jurisdiction. Similarly, the Proposed Project cumulative impact to the unsignalized intersection at Harmony Grove Road and Kauana Loa Drive would not occur under this alternative. The Proposed Project direct impact at the Country Club Drive and Harmony Grove Road signalized intersection that is being cured through M-TR-2a (incorporated into Project design for the Proposed Project), would be addressed through a similar mitigation measure requiring a new lane and dedicated right-turn lane with an overlap phase, as described for the Project. The cumulative impact would be addressed through M-TR-2b, TIF payment, and that would also be required for this alternative.

Overall, the transportation impacts associated with the General Plan Consistent with Septic Alternative would be less than the Proposed Project due to a notable reduction in project ADT.

Biological Resources

Due to reduced grading and surface disturbance, the General Plan Consistent with Septic Alternative would impact fewer acres of habitat than the Proposed Project. It would include lots further to the south than the Proposed Project, however, would result in additional impacts to wart-stemmed ceanothus and potentially coast live oak woodland, and would bring residential units closer to DDHP. This alternative would result in a greater level of fragmentation to preserved open space than the Proposed Project. This is because the retained habitats would contain dispersed housing and roads to access them, resulting in fingers of preserve being located within and throughout the alternative development scenario. These interspersed preserve areas would be subject to greater levels of edge effects than under the Proposed Project, where the BOS would consist of contiguous open space abutting development on only one side, and that limited to the southern extent of the development bubble.

Off-site impacts to Escondido Creek jurisdictional wetlands would be similar to the Proposed Project because a bridge would be installed over Escondido Creek. Construction-period effects also would occur due to potential for on-site blasting in non-rippable areas during grading and potential for pile-driving requirements at the Escondido Creek bridge. Another creek-related issue would be potential failure of the planned alternative septic system. Review of the County's Environmental Health website (http://www.sandiegocounty.gov/content/sdc/deh/lwqd/lu_septic_systems.html) indicates that issues with leach fields and failure of other septic system elements are known to result in groundwater contamination. If such failure occurred under this alternative, downstream pollution also could occur in Escondido Creek.

Overall, impacts to biological resources under this alternative could be considered less than those of the Proposed Project due to the reduction in the grading quantity and initial surface disturbance, resulting in fewer habitat impacts. The increased fragmentation of that habitat, however, would result in reduced biological function and an overall assessment of greater biological impact when compared to the Proposed Project.

Cultural Resources and Tribal Cultural Resources

As discussed in detail in Subchapter 2.4, no known significant impacts would result from Project implementation. Although considered unlikely, there is potential for significant direct impacts related to discovery of unknown buried archaeological resources or burials. As with the Proposed Project, impacts to cultural resources under this alternative would be reduced below a level of significance through applicable mitigation measures requiring an archaeological monitoring and data recovery program, described in Subchapter 2.4 under M-CR-1 and 2. When compared to the Proposed Project, this alternative would result in similar impacts to cultural resources.

Noise

Although there would be a reduced amount of grading required for the General Plan Consistent with Septic Alternative, the further encroachment to the south could require additional blasting.

Construction noise associated with potential blasting in non-rippable areas could result in significant construction-period noise impacts, similar to the Proposed Project. If such activities are identified within these thresholds during final design, design considerations as described in Chapter 1.0, and mitigation as described in Subchapter 2.5, would be required, which would lower these construction-period noise effects to less than significant levels. Noise effects associated with bridge construction over Escondido Creek would remain.

Off site, the reduction in number of residences associated with this alternative would result in a related smaller number of vehicle trips due to the reduced generation of vehicle trips per day (588 ADT for this alternative versus the 4,530 ADT for the Proposed Project). The reduced trip generation would result in a decrease in traffic-related noise impacts to two on-site residences. Potential operational effects associated with the Proposed Project WTWRF would not occur as sewage would be dealt with on the individual lots, further reducing impacts related to noise.

Overall, impacts to noise under this alternative would be less than those of the Proposed Project due to the decrease in vehicle trips per day and a reduction in associated off-site noise impacts.

Air Quality

Short-term construction-related air quality impacts associated with the General Plan Consistent with Septic Alternative would be less than the (less than significant) effects associated with the Proposed Project, because of the reduced amount of required grading. Impacts also would be less than the (less than significant) Proposed Project's operations, due to fewer associated vehicular trips. In addition, the significant and unmitigable air quality impact associated with the Proposed Project's exceedance of the 2016 RAQS would not occur for this alternative as the RAQS modeling assumes land uses proposed under the 2011 General Plan and this alternative proposes fewer homes than allowed under the adopted General Plan.

As a result, impacts to air quality under the General Plan Consistent with Septic Alternative would be reduced compared to the Proposed Project.

Greenhouse Gas Emissions

This alternative would have a smaller grading footprint, would not implement an on-site WTWRF, and would have substantially fewer residences with associated vehicular trips. As it is assumed these homes would be built in accordance with the General Plan and compliance with the Climate Action Plan,[3] this alternative would not have a significant cumulative impact. As described for the Proposed Project, however, all cumulative impacts associated with Proposed Project emissions would be mitigated to carbon neutral net zero through implementation of M-GHG-1 (addressing construction and operational emissions exceeding reductions achieved through PDFs) as well as on-site reductions and sequestration provided through the landscaping plan. Although initial GHG emissions under the General Plan Consistent with Septic Alternative would be less than those of the Proposed Project, implementation of mitigation identified in Subchapter 2.7 for the Proposed Project would result in similarly less than significant cumulative impacts.

Conclusions

The General Plan Consistent with Septic Alternative would result in reduced impacts to transportation/traffic, noise and air quality when compared with the Proposed Project. Impacts would be similar for long-term aesthetics, cultural resources, and GHGs. As explained above, biological resources impacts would be less for habitat impacts and greater for biological function.

Although this alternative would reduce some impacts and be consistent with the General Plan, it would not achieve the underlying purpose of the Project of accommodating a portion of the projected population growth and housing needs in San Diego County by expanding an existing village that will further enhance and support the success of that village. Also, the alternative would not meet the Project objectives to the same degree as the Proposed Project, as described below.

The low density, dispersed pattern of development provided in this alternative would limit the ability to fully meet Objective 1 because it would not provide an efficient development pattern in close proximity to an existing village consistent with the Community Development Model (CDM). The General Plan Consistent with Septic Alternative has a limited ability to support the economic and social success of the existing village (Objective 1) when compared to the Proposed Project because the substantial decrease in number of residents would not provide the same level of support to HGV's commercial uses and the alternative would lack the diversity in land uses needed to promote social interaction. Similarly, the General Plan Consistent with Septic Alternative's land use pattern (dispersed large-lot single-family) is inferior to the Proposed Project in meeting Objectives 5 and 6 which encourage a mix of residential units and a broad range of housing choices which result in a diversity of residents and land uses. With substantially fewer units, this alternative

[3] In late February 2018, the County adopted the Climate Action Plan (CAP). For purposes of this analysis, it is assumed that because this alternative is General Plan compliant, implementation of this alternative would be able to rely on the CAP Checklist compliance rather than mitigation as proposed for the Proposed Project. Regardless, the GHG conclusions remain the same: the Proposed Project would result in similarly less than significant cumulative impacts.

would be less effective in optimizing the operational effectiveness of public facilities and services of the alternative or the existing village.

The low density dispersed land use pattern represented in this alternative is contrary to Objective 2 because the auto-dependent development pattern proposed would not contribute to the establishment of a community that encourages and supports multi-modal transportation including walking or bicycling. Similarly, this alternative would not meet Objective 7 because it would not create a destination gathering place with a variety of land uses, such as the Project's Center House, that encourages walkability, social interaction and economic vitality. When compared to the full range of passive and active recreational opportunities provided by the Proposed Project, this alternative would be less effective in meeting Objective 4. The alternative appears to better realize the Objective 8 goal of physically responding to the site's physical variables through use of less grading, but would encroach into visible areas that would be retained as open space by the Proposed Project as a site feature. On balance, and for different reasons, the alternative is considered to achieve Objective 8 to the same extent as the Project.

Similar to the Proposed Project, the General Plan Consistent with Septic Alternative would meet Objective 3 because it does preserve and enhance biological habitat and landforms in dedicated open space easements. It would not, however, enhance sensitive biological resource function to the same extent as the Proposed Project.

4.4 Analysis of the General Plan Consistent with Sewer Alternative

4.4.1 Description of the General Plan Consistent with Sewer Alternative

The General Plan Consistent with Sewer Alternative would allow development in accordance with the General Plan Land Use designation of the Semi-Rural Regional Category. Approximately 110 acres is designated Semi-Rural Residential (SR-0.5) and the remaining portion of the Project site is designated Rural Lands (RL-20). This alternative would implement the County's Conservation Subdivision Program (CSP) over the 110 acres designated as SR-0.5 in conjunction with Planned Development Regulations. The remaining approximately 1 acre would remain outside the CSP and be maintained as open space.

The intent of the CSP is to encourage residential subdivision design that improves the preservation of sensitive environmental resources and community character. Planned Development Regulations allow for reductions in lot size and other design restrictions for conservation subdivisions when a certain percentage of open space is provided. Under Planned Development regulations, all properties within SR designations must contain a minimum of 40 percent of conservation/group open space. In addition, each lot must contain a minimum of 1,000 s.f. of private usable open space.

As shown on Figure 4-2, *General Plan Consistent with Sewer Alternative*, the CSP and PD Regulations would apply to the 110 acres designated as SR-0.5. This alternative would yield 119 single-family homes constructed on minimum 6,500-s.f. lots and sited to preserve sensitive biological resources and steep slopes. Some lots in the north of the alternative, all along the eastern and southern extents, and along the western site boundary south of the curve in Country Club Drive, would be larger, ranging from approximately 0.5 acre to 2.0 acres in size. Approximately

738,000 cy of cut and fill soil would be required for this alternative. This is approximately 13 percent less than the 850,000 cy assumed for the Proposed Project. This alternative would grade approximately 62 acres (59 percent of the site) and develop approximately 49 acres (approximately 44 percent). Approximately 44 percent of the site (49 acres of open space) also would be dedicated for conservation/preservation, and each of the lots would be required to include 1,000 s.f. of private open space. Although steep natural slopes outside the development footprint would be preserved to a greater degree than under the Proposed Project, a waiver for encroachment into insignificant RPO steep slopes as well as an exception for roadways would be required, similar to the Proposed Project.

Due to the fewer number of units, this alternative would not include trails, a community center or commercial mixed use. Six parks would be provided, however, consistent with the County PLDO and Subdivision Ordinance requirements. Because of the efficient footprint within the heart of the alternative, benching and retaining walls would be required to support alternative pads. All internal roadways would be private and would be constructed to the same standard as the Proposed Project.

The General Plan Consistent with Sewer Alternative would require connection to a WRF because the smaller lot sizes make individual septic units impossible. Because the HGV Specific Plan and Community Plan currently require that HGV's WRF be used only for HGV to provide sewage service to Village homes, this alternative would require a GPA to allow for connection to the HGV sewage treatment facility and also would require an amendment to the HGV Specific Plan and an Elfin Forest/Harmony Grove Community Plan Amendment to allow sewer services to be provided to Semi-rural designated areas beyond the HGV Village boundaries.

The purpose of this alternative would be to avoid or reduce impacts to sensitive resources (steep slopes and biology) in the block of open space surrounded on two sides by DDHP, as well as steep slope impacts in the northeast portion of the alternative, traffic impacts, and aesthetic impacts associated with the Proposed Project. It also would provide consistency with the existing general plan land use designation with a greater number of units through utilization of the CSP and PD regulations.

4.4.2 Comparison of the Effects of the General Plan Consistent with Sewer Alternative to the Proposed Project

The anticipated environmental effects resulting from the General Plan Consistent with Sewer Alternative are described below. A comparison of the impacts identified for this alternative and the Proposed Project is shown in Table 4-1.

Aesthetics

Similar to the Proposed Project, implementation of the General Plan Consistent with Sewer Alternative would introduce structures to the valley floor and slopes of the hills in the northerly portion of the property. This is the area that is most visible from off-site locations, and as such, would contain visible built uses.

Within the building envelope, and similar to the Proposed Project, homes aligned north-south in the northern part of the property would turn to follow a more east-west direction around the curve of the hill where lots would be smaller. This alternative would result in fewer residential dwelling

units than the Proposed Project. Larger lots (each approximately 0.5 acre in size) would be located within the northern portion of the alternative close to Harmony Grove Road, along most of the western perimeter, and along the southern portion of the development footprint. Lots ranging up to 2.0 acres in size would be aligned along the northeastern portion of the property. These residences would be the closest on-site uses to the estate lots located east of the property in the County. Placing the larger lots along the perimeter would provide a softer transition to adjacent open space and existing residences on abutting parcels. Within the heart of the alternative, benching and retaining walls would be required to support alternative lots. Those cut slopes would be potentially steeper and more abrupt than the adaptive grading implemented under the Proposed Project. Their modified nature may remain visible, even after landscaping, due to the more engineered design and the required use of additional retaining walls over those proposed for the Proposed Project. This would somewhat counteract the visual benefits provided by the reduced grading along the southern perimeter. The larger lots also allow for flexibility and avoidance of steep slope impacts related to grading. As shown on Figure 4-2, the alternative is very responsive to RPO-protected steep slope avoidance. Where protected slopes cannot be avoided, no more than 10 percent of the lot would be encroached upon, consistent with the ordinance. As a result, portions of steep slopes in the northeastern part of the alternative that the Proposed Project would impact for road right-or-way or residential lots (as part of Lot 2), would be less affected by this alternative.

As indicated above, this alternative would allow a reduction in grading quantity and initial visible footprint of approximately 13 and 8 percent, respectively, when compared to the Proposed Project. The reduced grading quantity and footprint would result in reduced views to modified slopes in certain locations, with smaller amounts of raw soil and broken rock being visible in the short term during project grading. As cut slopes would be fewer than under the Proposed Project, issues with raw cut rock could be commensurately less as well. The Proposed Project, however, would only develop on approximately 29 percent of the site, preserving the remaining areas into open space, parks and landscaped areas as compared to this alternative that would develop on approximately 44 percent of the site.

Similar to the Proposed Project, the General Plan Consistent with Sewer Alternative would be anticipated to result in significant short-term visual effects related to the construction period and for some years of Project use. The intensity of those short-term adverse effects would be less when compared to the Proposed Project because of the smaller footprint. Because a bridge would be built over Escondido Creek, the loss of vegetation (and subsequent revegetation) would be expected to be similar for both the Project and this alternative.

In conclusion, balancing the more intensive in-development building pattern, including additional benching and retaining walls, against the fewer number of dwelling units and reduced footprint to the south, and the size of the northeastern residential lots (which may be considered more visually consistent with off-site single-family residential uses to the east), the aesthetic impacts under this alternative would be incrementally less than the Proposed Project.

Transportation/Traffic

Assuming an ADT of 10 per DU (based on SANDAG's 2002 *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, which identifies use rates by type of use/density), this alternative would generate a total of 1,190 ADT, which is approximately

26 percent of the 4,530 ADT that would be generated by the Proposed Project, or a reduction of 74 percent. Potential transportation/traffic impacts from this alternative are therefore anticipated to be less than those identified for the Proposed Project; with lower overall a.m. and p.m. peak period volumes and lighter distribution overall to the area roadway system. Seven significant impacts identified for the Proposed Project would not occur under this alternative. These segments include direct and cumulative impacts to Country Club Drive between Auto Park Way to Hill Valley Drive in the City of Escondido. They also include cumulative impacts to Harmony Grove Road between Harmony Grove Village Parkway and Kauana Loa Drive, and to Harmony Grove Village Parkway between Harmony Grove Road and Citracado Parkway, as well as Country Club Drive Hill Valley Drive and Kauana Loa Drive.

Only two segments of Harmony Grove Road would experience impacts (cumulative only) from traffic generated by 119 residential units. These cumulative impacts would occur on Harmony Grove Road between Country Club Drive and Harmony Grove Village Parkway, and between Kauana Loa Drive and Enterprise Street, both within County jurisdiction. As for the Project, mitigation is available, and cumulative impacts would be addressed through payment into the TIF program and/or direct improvements, as described in Section 2.2 of this EIR. Direct and cumulative impacts identified for the Proposed Project on Country Club Drive between Auto Park Way and Hill Valley Drive, on Harmony Grove Road between Harmony Grove Village Parkway and Kauana Load Drive, and on Harmony Grove Village Parkway between Harmony Grove Road and Citracado Parkway, all would be avoided under this alternative.

Similarly, significant cumulative impacts identified for the Proposed Project would not be triggered at the signalized intersections of Country Club Drive and Auto Park Way or Valley Parkway and Citracado Parkway in the City of Escondido; or at the unsignalized County intersection of Harmony Grove Road and Kauana Loa Drive, under this alternative. Mitigation measure M-TR-2a would mitigate the Proposed Project's direct impact to the Country Club Drive and Harmony Grove Road intersection; similar mitigation would be implemented under this alternative requiring a new lane and dedicated right-turn lane with an overlap phase. The cumulative impact would be addressed through M-TR-2b, TIF payment, and that would also be required for this alternative.

Overall, the transportation/traffic impacts under this alternative would be less than the Proposed Project due to the fewer number of units and reduced traffic generation.

Biological Resources

Due to the reduced grading and initial surface disturbance, this alternative would impact fewer biological resources than the Proposed Project.

Differences between this alternative and the Proposed Project focus on upland habitat impacts. Impacts to Escondido Creek jurisdictional wetlands would be similar because a bridge would be installed over Escondido Creek.

The grading footprint for this alternative would total approximately 62 acres, which would be less than the Proposed Project at approximately 71 acres. All areas not within lots would be conserved as part of this conservation subdivision, and placed into BOS under this alternative. The solid block

of preserved habitat in the southern extent of the property would be larger than that preserved under the Proposed Project at approximately 49 (approximately 44 percent of the site) rather than approximately 35 acres.

Impacts to habitat on the east side of the property would be generally the same as for the Proposed Project. This alternative would impact a portion of Intermediate Value Diegan coastal sage scrub habitat known to support one California gnatcatcher breeding pair recorded along the eastern boundary of the site in 2014. These impacts would be significant and would be mitigated through the mitigation identified in Subchapter 2.3.

Although homes would be set further to the west compared to the Project, lessening potential for indirect noise and light impacts, there could be reduced on-site area for wildlife movement. A direct, north-south connection of core scrub and chaparral habitat between DDHP and Escondido Creek does not exist through the Project site due to patchy habitat and some existing development; but areas along the eastern boundary of the site could facilitate north-south movement to and from Escondido Creek. (Areas farther to the east of the site also are less constrained, where a direct connection of scrub and chaparral habitat occurs along West Ridge.) Because the eastern portion of the alternative layout would be in lots commensurate with the larger single-family homes under this alternative, area under the Proposed Project provided as on-site corridor would not occur under this alternative. The existing corridor would continue off site, with a width of approximately 700 feet (the corridor would be approximately 1,000 feet in width under the Proposed Project).

As noted above, the General Plan Consistent with Sewer Alternative would provide additional preserved open space along the south side of the development footprint when compared to the Proposed Project. This would allow for increased preservation of chaparral habitat that has notable sensitive plant species, such as wart-stemmed ceanothus and summer holly. The additional acreage in conserved open space would contribute to the open space set-aside that connects directly to the DDHP on both its east and south side, providing a larger block of contiguous habitat next to this existing preserve. Also, although the Proposed Project would not directly impact on-site (non-RPO) jurisdictional waters, some brush management impacts south of the Project build footprint are anticipated to occur. These would not occur under this alternative, which has a southern development boundary slightly further to the north.

Similar to the Proposed Project, design features identified in Table 1-2 for biological resources would be applicable to this alternative. Also similar to the Proposed Project, all CEQA-identified biological impacts under this alternative would be reduced below a level of significance through mitigation measures M-BI-1a through M BI-9 such as construction timing restrictions, and appropriate habitat preservation (through purchase of off- site properties or existing credits) and/or creation.

Overall, the biological impacts under this alternative would be generally similar to the Proposed Project. This is based on balancing the similar impacts to Diegan coastal sage scrub and associated species, the increased open space to the south, and the narrower wildlife movement corridor.

Cultural Resources and Tribal Cultural Resources

As discussed in detail in Subchapter 2.4, no known significant impacts would result from Project implementation. Although considered unlikely, there is potential for significant direct impacts related to discovery of unknown buried archaeological resources or burials. As with the Proposed Project, impacts to cultural resources under this alternative would be reduced below a level of significance through applicable mitigation measures requiring an archaeological monitoring and data recovery program, described in Subchapter 2.4 under M-CR-1 and 2. When compared to the Proposed Project, this alternative would result in similar impacts to cultural resources.

Noise

Short-term construction-related noise impacts associated with this alternative would be less than those associated with the Proposed Project, because of the reduced amount of grading and smaller footprint. Regardless, construction noise associated with potential blasting in non-rippable areas could result in significant construction-period noise impacts, similar to the Proposed Project. The likelihood of such impacts would be less than for the Proposed Project, because the southern boundary of the construction envelope would be located farther north than under the Proposed Project, and therefore farther away from some existing homes along the western Project parcels. If such activities are identified within these thresholds during final design, design considerations as described in Chapter 1.0, and mitigation as described in Subchapter 2.5, would be required, which would lower these construction-period noise effects to less than significant levels. Noise effects associated with bridge construction over Escondido Creek would remain.

The proposed 119 homes under the alternative generate fewer vehicle trips per day (1,190 ADT for this alternative [assuming 10 ADT per home] versus 4,530 ADT for the Proposed Project). The reduced trip generation would result in a decrease in off-site traffic-related noise impacts.

Overall, the construction and operations noise impacts under this alternative would be less than the Proposed Project due to the reduced footprint and fewer vehicular trips.

Air Quality

Short-term construction-related air quality impacts associated with the General Plan Consistent with Sewer Alternative would be less than the (less than significant) effects associated with the Proposed Project, because of the reduced amount of required grading. Impacts also would be less than the (less than significant) Proposed Project's operations, due to fewer associated vehicular trips. The significant and unmitigated air quality impact associated with exceedance of the 2016 RAQS would not occur for this alternative as the RAQS modeling assumes land uses proposed under the 2011 General Plan and this alternative proposes fewer residential lots than allowed under the adopted General Plan.

As a result, impacts to air quality under the General Plan Consistent with Sewer Alternative would be reduced compared to the Proposed Project.

Greenhouse Gas Emissions

This alternative would have a smaller grading footprint, would not implement an on-site WTWRF, and would have substantially fewer residences with associated vehicular trips. As it is assumed these homes would be built in accordance with the General Plan and compliance with the CAP,[4] this alternative would not have a significant cumulative impact. As described for the Proposed Project, however, all impacts associated with Proposed Project emissions would be mitigated to carbon neutral net zero through implementation of M-GHG-1 (addressing construction and operational emissions exceeding reductions achieved through PDFs) as well as on-site reductions and sequestration provided through the landscaping plan. Although initial GHG emissions under the General Plan Consistent with Sewer Alternative would be less than those of the Proposed Project, implementation of mitigation identified in Subchapter 2.7 for the Proposed Project would result in similarly less than significant cumulative impacts.

Conclusions

The General Plan Consistent with Sewer Alternative would result in less aesthetic, transportation/traffic, air quality, and noise impact than the Proposed Project. Impacts to biological resources, cultural resources, and GHGs would be similar.

Although this alternative would reduce impacts it does not achieve all of the Project objectives to the same degree as the Proposed Project. The alternative would not meet Objective 1 because it would not provide an efficient development pattern in close proximity to an existing village consistent with the CDM that creates one complete and vibrant village community and enhances and supports the economic and social success of the existing village and the alternative. The low density single-family pattern represented in this alternative has limited ability to support the economic and social success of the existing village and the alternative because it would not increase the number and diversity of residents and land uses when compared to the Proposed Project.

The single-family land use pattern represented in this alternative, as evidenced by developing on approximately 44 percent of the site, would be contrary to Objective 2 because the reduced number of units and auto-dependent development pattern (no trails and pathways) would not contribute to the establishment of a community that encourages and supports multi-modal transportation. Similarly, this alternative's land use pattern (single family) is inferior to the Proposed Project in meeting Objectives 5 and 6 which encourage a mix of residential units and a broad range of housing choices which result in a diversity of residents. Also as a result of having substantially fewer units when compared to the Project, this alternative is less effective in optimizing the operational effectiveness of public facilities and services of the existing village. When compared to the full range of passive and active recreational opportunities provided by the Proposed Project, including the Center House community area and multiple parks throughout the Proposed Project, as well as trail heads and trails, the alternative would be less effective in meeting Objective 4. This alternative would not meet Objective 7 because it would not create a destination gathering place

[4] See footnote 3, above.

with a variety of land uses, such as the Project's Center House, that would encourage walkability, social interaction and economic vitality.

Relative to Objective 8, within the development footprint in the heart of the alternative, the more intensive engineered nature of the grading–with additional benching and retaining walls, and lessened contour/adaptive grading–would not respond to the site's physical variables to the extent of the Proposed Project. Topographic variation and visibility to existing site characteristics would be lessened from that achieved by the Proposed Project. Views to developed lots and streets would be increased under the alternative and sight-lines into the site and between structures afforded by the Proposed Project would be reduced, although balanced somewhat by a reduction in building on steep slopes in the northeastern portion of the property, and the potential for some sight-lines between homes on the larger lots on the central bench. Overall, this alternative would not be as responsive to Objective 8 as the Proposed Project in selectively placing development in a manner that visually and physically responds to the site's physical variables.

This alternative would meet Objective 3 because it does preserve and enhance biological resources. A larger conservation area adjacent to DDHP would result under this alternative than under the Proposed Project.

4.5 Analysis of the Senior Care Traffic Reduction Alternative

4.5.1 Description of the Senior Care Traffic Reduction Alternative

The Senior Care Traffic Reduction Alternative is intended to substantially reduce impacts associated with traffic in the context of providing a development pattern that would increase density adjacent to the existing HGV Village through a GPA. As shown on Figure 4-3, *Senior Care Traffic Reduction Alternative*, this alternative consists of a senior citizen community made up of 266 single-family age-restricted residences and five two-story structures totaling 120 units of managed care facility. The trip generation rates for-age restricted residential units and a managed care facility are substantially less than non-age-restricted residential units. The Proposed Project is projected to result in 4,530 ADT based on 10 trips per residence (based on SANDAG's 2002 *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, which identifies use rates by type of use/density). The trip rates for age-restricted and managed care facilities are 4 trips per residence and 2.5 trips per unit, respectively. Using this generation rate, development under the Senior Care Traffic Reduction Alternative would result in 1,364 ADT, or 3,166 (70 percent) fewer trips than the Proposed Project per day.

This alternative would incorporate the unique design requirements for this type of development. All 266 single-family residences would be one story due to the age-related nature of the development. Also, given the demand for security features in such projects, the single-family residential units as well as the managed care units would be clustered into discrete gated neighborhoods. Public pedestrian access between the neighborhoods and provision of a sense of connection between the neighborhoods and HGV would be provided. Each of the neighborhoods, including the numerous **(**17) small parks, would be located in a manner that complies with the County's PLDO requirements and allows accessibility to the public.

No commercial uses or community gathering locale would be provided because the fewer number of single-family dwelling units in this alternative would not be able to support such uses on site. This alternative would include an on-site WTWRF and all roads within the community would be private, similar to the Proposed Project. A landscaping plan would be implemented as part of this alternative. Due to the lower-density design (generally single-story residences that appeal to the age-restricted market) the grading footprint would be greater than the Proposed Project. This alternative would grade approximately 82 acres (74 percent of the site), and develop on approximately 66 acres (60 percent) of the site. This alternative also would have greater grading quantities (1,450,000 cy) than the Proposed Project, or approximately 71 percent more than the Proposed Project at 850,000 cy.

Area retained in undisturbed open space would be approximately 30 acres, or 27 percent, of the site. Adding this to the park and other internal open space (approximately 15 acres overall) would result in a total of approximately 45 acres (41 percent of the site) in open space. In order to accommodate the alternative's more dispersed development design, two of the gated neighborhoods would be extended into a small portion of the area that is preserved as open space by the Proposed Project and on the portion of the project that contains insignificant RPO steep slopes; this would extend into a large block of open space in the southern part of the site that would be avoided by the Proposed Project. The alternative would also require a waiver under RPO. Similar to the Proposed Project, the Senior Care Traffic Reduction Alternative would require a GPA, rezone and approval of a Specific Plan.

4.5.2 Comparison of the Effects of the Senior Care Traffic Reduction Alternative to the Proposed Project

Aesthetics

This alternative would primarily consist of 266 single-family homes of a consistent height. The building heights of these homes would be compatible with existing development in the Project vicinity generally located to the west (generally one story in height) and less so to the east of the site (generally estate housing exceeding one story). The uniform small lots with the individual homes would appear less consistent in lot size with uses to the west, east and north (HGV) of the site; excluding the HGSA, approximately 0.25 mile to the west. Although the managed care facility would introduce a different land use to the surrounding area, the 120 units of managed care facility would be located in two-story buildings which would be similar in height to some of the structures located in HGV immediately adjacent to the alternative and with some of the large estate-style homes with multiple stories that surround portions of the project site. These two-story structures would be sited generally more internal to the alternative, with only one structure aligned along nearby Country Club Drive.

As indicated above, this alternative would result in increased grading quantity and footprint when compared to the Proposed Project, including homes sited in the area preserved as open space by the Proposed Project, as well as a small increased number of homes on the northeastern knoll.

Similar to the Proposed Project, the Senior Care Traffic Reduction Alternative would be anticipated to result in significant short-term and unmitigable visual effects related to construction and for some years of Project use until the landscaping required as part of alternative design

reaches maturity. At that time, temporary visual impacts associated with views to raw soil and immature landscaping would be reduced to less than significant levels. Although the CEQA impact would be the same, the intensity of those short-term adverse effects, would be greater for this alternative because of the larger footprint.

The increased grading quantity and footprint also could result in increased views to modified slopes in certain locations, with larger amounts of raw soil and broken rock potentially being visible from certain locales. Impacts relative to broken rock would be mitigated similar to the Proposed Project as described in M-AE-1, in Subchapter 2.1 of this EIR. Because a bridge would still be installed over Escondido Creek, the loss of vegetation (and subsequent revegetation) would be expected to be similar for both the Project and this alternative.

It is expected that upon buildout and full vegetative maturity of both HGV and HGV South, this alternative would blend with the village to the north, similar to the Proposed Project. Overall, this alternative would be similar to the Proposed Project relative to encroachment into steep slopes. As noted above, however, and as indicated in a comparison of Figure 4-3 for this alternative with Figure 1-6a depicting the Proposed Project, the alternative would have a larger grading footprint, and, ultimately, develop on more area in long-term lots and streets than the Proposed Project. This alternative would grade more area (approximately 74 percent of the site), and ultimately build approximately 60 percent of the site out in lots and streets, with less space allotted to exterior or interior revegetated slopes. Adding the area retained in undisturbed open space (approximately 30 acres) to the park uses and other internal open space (approximately 15 acres overall) would result in a total of approximately 45 acres (41 percent of the site) in open space; much less than the 75 acres (68 percent of the site) under the Proposed Project.

Structural development would be generally lower (one- versus two-to-three-story structures for single-family residential uses when compared to the limited three- to four-story multi-family uses under the Proposed Project), which may result in some increased visibility over the development to hills southerly of the alternative. The surrounding heights of rimming ridge lines and topographic features to the southeast and south, however, would minimize the visual difference in these heights (refer to Figure 2.1-8a). The more regular lot layout (more consistent lot sizing and distribution over the site relative to more traditional single-family detached subdivision design and grouped rectangular care units) would not provide open sight lines into the site's interior slopes. This would contrast with the Proposed Project interior slopes, which, due to wider swaths of undeveloped area, would allow for substantial vegetation, and a greater visible link to the underlying topography along these open areas. The amount of topographic variation and visibility to existing site characteristics would be lessened from that achieved by the Proposed Project due to the substantially greater grading quantities, greater acreage allotted to lots and streets under the alternative, the obscuring of site soils with structures, and the reduced sight-lines into the site and between structures afforded by the Proposed Project.

Overall, the alternative would provide greater contiguous structural massing and less visual open space from off-site locations, but the visual effect of the larger footprint would be off-set over the long-term by the lower height of the residences, and implementation of the landscape plan combined with set back of the lots from public Country Club Drive. As a result, the ultimate aesthetic impacts under this alternative overall would be different from, but an equal level to, impacts assessed to the Proposed Project.

Transportation/Traffic

As described above, the Senior Care Traffic Reduction Alternative would result in 1,364 ADT, or 3,166 (70 percent) fewer trips than the Proposed Project per day. The decrease in the numbers of trips would be substantial, and as a result, the related transportation/traffic impacts under this alternative would be anticipated to be substantially less than those of the Proposed Project. There would be lower overall a.m. and p.m. peak period volumes and lighter distribution overall to the area roadway system. Five significant impacts would be eliminated.

The cumulative traffic impacts to Harmony Grove Road between Harmony Grove Village Parkway, and Kauana Loa Drive, and to Country Club Drive between Hill Valley Drive and Kauana Load Drive, would be eliminated under this alternative. Even where significant impacts remain, they would be reduced from the Proposed Project. County segments remaining significant would be mitigated to below a level of significance as described under M-TR-3, -4, -6, and -7 through focused improvements or TIF payments. Similar to the Proposed Project, the segment of Country Club Drive within the City of Escondido's jurisdiction would be mitigated to below a level of significance through physical improvements as described under Subchapter 2.2 M-TR-1a and -1b (including widening and re-striping) for direct impacts and through reduced fair-share fees for the cumulative impact.

Proposed Project cumulative impacts to the signalized intersections of Country Club Drive/Auto Park Way and Valley Parkway/Citracado Parkway in the City of Escondido and to the unsignalized County intersection at Harmony Grove Road and Kauana Load Drive, would be eliminated under this alternative. The direct impact at the Country Club Drive and Harmony Grove Road intersection that is being cured through M-TR-2a (incorporated into Project design for the Proposed Project), would be addressed through a similar mitigation measure requiring a new lane and dedicated right-turn lane with an overlap phase, as described for the Project. The cumulative impact would be addressed through M-TR-2b, TIF payment, and that would also be required for this alternative.

All impacts in the County would be fully mitigated. Relative to the City of Escondido, the City is the lead agency under CEQA for impacts within their jurisdiction, and has responsibility for approval/assurance of implementation of those improvements. As such, the County cannot guarantee ultimate implementation or timing of City of Escondido-approved mitigation in this County EIR. As a result, and similar to the Proposed Project, although mitigation identified in Subchapter 2.2 (M-TR-1a and -1b) has been identified to lower the single segment within the City with significant impacts to less than significant levels under CEQA, impacts within Escondido are identified as remaining significant and unavoidable pending City action.

Overall, the transportation/traffic impacts under this alternative would be less than the Proposed Project due to the lower ADT generation rates attributed to this land use category.

Biological Resources

Due to increased grading and surface disturbance, the Senior Care Traffic Reduction Alternative would impact more biological resources than the Proposed Project. Although some of the southern portion of the site would be avoided by this alternative and placed in BOS, the alternative's

dispersed development plan would result in the need for a greater grading footprint than the Proposed Project; resulting in an impact to the large block of open space in the southern part of the Project area that would be avoided by the Proposed Project. This area includes a number of resources as shown on Figure 2.3-1, including chaparral containing numerous sensitive wart-stemmed ceanothus and limited San Diego sagewort. Although some areas containing wart-stemmed ceanothus and ashy spike-moss would be avoided in the alternative that would be impacted by the Proposed Project, the alternative would impact other areas preserved under the Proposed Project (see Figure 2.3-5 for areas impacted and retained in open space under the Proposed Project) and would additionally fragment retained open space as a result of necessary access roads.

This alternative would initially grade approximately 11 acres more than the Proposed Project, and also would preserve associated less acreage than the Proposed Project in open space. For the Proposed Project, 34.8 acres, or 31 percent of the site would be placed into BOS. For the alternative, approximately 30 acres, or 27 percent of the site, would be placed into open space containing BOS and steep slopes.

Differences between this alternative and the Proposed Project focus on upland habitat impacts, and specifically to chaparral impacts in areas containing wart-stemmed ceanothus. Similar to the Proposed Project, this alternative would impact intact Diegan coastal sage scrub habitat where a coastal California gnatcatcher breeding pair was observed in 2014. Impacts to Escondido Creek jurisdictional wetlands would be similar because a bridge would still be installed over Escondido Creek. Similar to the Proposed Project, this alternative would require design features such as open space set-aside containing wart-stemmed ceanothus and other construction and operational measures identified on Table 1-2 of this EIR, as well as mitigation measures M-BI-1a through M-BI-9.

Following implementation of the design considerations and mitigation measures, all impacts would be mitigated to less than significant levels, similar to the Proposed Project. Overall, however, the biological impacts under this alternative would be greater than the Proposed Project due to the increased footprint and limited biological resource conservation area, as well as additional fragmentation of open space set aside.

Cultural Resources and Tribal Cultural Resources

As discussed in detail in Subchapter 2.4, no known significant impacts would result from Project implementation. Although considered unlikely, there is potential for significant direct impacts related to discovery of unknown buried archaeological resources or burials. As with the Proposed Project, impacts to cultural resources under this alternative would be reduced below a level of significance through applicable mitigation measures requiring an archaeological monitoring and data recovery program, described in Subchapter 2.4 under M-CR-1 and 2. When compared to the Proposed Project, impacts to cultural resources under this alternative would be similar.

Noise

Short-term construction-related noise impacts associated with this alternative would be greater than those associated with the Proposed Project, because of the increased amount of grading and

larger footprint. Construction noise associated with potential blasting in non-rippable areas could result in significant construction-period noise impacts, similar to the Proposed Project. The likelihood of such impacts would be greater than for the Proposed Project, because the southern boundary of the construction envelope would be located farther south than under the Proposed Project, and therefore closer to some existing homes along the western Project boundary. If such activities are identified within these thresholds during final design, design considerations as described in Chapter 1.0 in Table 1-2, and mitigation as described in Subchapter 2.5 M-N-4 through -6 related to rock breaking and blasting, would be required, which would lower these construction-period noise effects to less than significant levels. Noise effects associated with bridge construction over Escondido Creek would remain.

The proposed 266 homes and managed care facility under this alternative would generate fewer vehicle trips per day (1,364 ADT for this alternative versus 4,530 ADT for the Proposed Project). The reduced trip generation would result in a decrease in off-site traffic-related noise impacts, which would eliminate need for the on-site sound wall. Similar to the project, interior noise levels would comply with Title 24 standards, and be documented through application of mitigation measure M-N-2, that would require interior testing.

The construction noise impacts under this alternative would be greater than the Proposed Project due to the increased footprint. Operational noise impacts would be less, however, than the Proposed Project for off-site traffic related noise due to a substantial reduction in ADT. Operational noise effects associated with the WTWRF would be similar and also would be addressed through implementation of M-N-3 as discussed for the Proposed Project. Overall, the noise impacts for this alternative would be less than the Proposed Project because the potentially greater construction noise impacts would be short term and the lesser vehicular noise impacts would be long term.

Air Quality

Although grading emissions would be restricted per day and would be less than significant, short-term construction-related air quality impacts associated with the Senior Care Traffic Reduction Alternative would be greater than the less-than-significant effects associated with the Proposed Project, because of the additional amount of required grading. Operational impacts would be less than the (less than significant) Proposed Project, due to fewer associated vehicular trips. The significant and unmitigated air quality impact associated with exceedance of the 2016 RAQS also would occur for this alternative as the RAQS modeling includes the 2011 General Plan assumptions for site development (approximately 220 lots), but not the GPA associated with the Project or the alternative. Ultimately, it is expected that implementation of Subchapter 2.6 M-AQ-1 requiring transmittal of a revised forecast to SANDAG, followed by updates to the RAQS and SIP would lower this impact to less than significant levels.

Overall, impacts to air quality under the Senior Care Traffic Reduction Alternative would be increased during the construction period, but reduced over the long-term compared to the Proposed Project. Impacts to air quality impacts under this alternative would be less than those under the Proposed Project.

Greenhouse Gas Emissions

This alternative would have substantially fewer residences and a population with fewer associated vehicular trips. It would, however, exceed the General Plan development assumptions for the property. Nonetheless, as described for the Proposed Project, all impacts associated with Proposed Project emissions would be mitigated to carbon neutral net zero through implementation of M-GHG-1 (addressing construction and operational period emissions exceeding reductions achieved through PDFs) as well as on-site reductions and sequestration provided through the landscaping plan. Although initial GHG emissions under the Senior Care Traffic Reduction Alternative would be less than those of the Proposed Project, implementation of mitigation identified in Subchapter 2.7 for the Proposed Project would result in similarly less than significant impacts as both the Project and the alternative would be mitigated to net zero.

Conclusions

Overall, the Senior Care Traffic Reduction Alternative reduces several impacts, but also increases several impacts, in comparison to the Proposed Project. The alternative would result in substantially less transportation/traffic, which would have related decreases in noise, and reduced air quality and GHG emissions, from the Proposed Project. Biological resources impacts would be greater than the Proposed Project. Cultural resources and aesthetic impacts would be similar for this alternative in comparison to the Proposed Project.

The Senior Care Traffic Reduction Alternative does not achieve all of the Project objectives to the same degree as the Proposed Project. The alternative would not fully meet Objective 1. The alternative would not provide an efficient development pattern in close proximity to an existing village because of its dispersed development pattern. Also, when compared to the Proposed Project, the alternative offers a substantially fewer number of units and a singular product type, which limits the ability to fully support the economic and social success of the existing village and this alternative. Although the alternative would be located near regional employment and transit centers, the lower density and dispersed land use pattern represented in this alternative would not meet Objective 2. The auto-dependent development pattern proposed by this alternative would not contribute to the establishment of a community that encourages and supports multi-modal transportation through walking and bicycling. Similarly, the alternative's limited product offering would not meet Objectives 5 and 6, which encourage a mix of residential units and a broad range of housing choices. The alternative would not support a greater diversity of residents or provide a wider range of housing opportunities to complement the adjacent village's land uses. Also, with substantially fewer units, the alternative is less effective in optimizing the operational effectiveness of public facilities and services of the existing village. When compared to the full range of passive and active recreational opportunities provided by the Proposed Project, this alternative also is less effective in meeting Objective 4. The increased grading footprint for the alternative is inferior to the Proposed Project in achieving Objective 3 because there would be reduced preservation and enhancement of biological resources, as well as increased fragmentation of that open space when compared to the Proposed Project.

This alternative would not meet Objective 7 because it would not create a destination gathering place with a variety of land uses, such as the Project's Center House, that would encourage walkability, social interaction and economic vitality. Finally, relative to Objective 8, the alternative

would require modification of 600,000 cy of soil more than the Proposed Project, have a larger grading footprint, and, ultimately, result in more area developed long-term in lots and streets than the Proposed Project. As a result, the amount of topographic variation and visibility to existing site characteristics would be lessened from that achieved by the Proposed Project due to the greater acreage allotted to lots and streets under the alternative, the obscuring of site soils with structures, and the reduced sight-lines into the site and between structures afforded by the Proposed Project.

4.6 Analysis of the Biologically Superior Alternative

4.6.1 Description of the Biologically Superior Alternative

As shown on Figure 4-4, *Biologically Superior Alternative*, this alternative utilizes the densities of the Village designation while addressing the issues relative to Diegan coastal sage scrub and Diegan coastal sage scrub-dependent species that were raised by the wildlife agencies during Project batching meetings and an on-site meeting held in 2015. The alternative does not extend the development footprint as far to the east as the Proposed Project, and would preserve a larger portion of Diegan coastal sage scrub than would be preserved by the Proposed Project.

In order to accommodate the densities of the Village designation within a restricted development footprint, the Biologically Superior Alternative would locate 425 multi-family residential units within 54 three-story buildings. The westernmost of the buildings would be sited closer to Country Club Drive than the Proposed Project. Particularly along the northern portion of the Project, there would be a correspondingly lesser breadth of landscaping between the public street and alternative structures. All of the 54 buildings would be similar in height to the tallest buildings in the Proposed Project. An HOA building (including a pool and small structure) is located in the center of the development footprint and would only be available to the residents of the alternative. Landscaping would be provided throughout the alternative site. Public parks would be located within this alternative, and would be consistent with the County PLDO and Subdivision Ordinance, but no public destination gathering space would be provided because of the lack of space afforded this development footprint. All internal roads would be private, the same as the Proposed Project. Assumptions for the WTWRF and off-site utilities also would be the same as for the Proposed Project. Approximately 46.5 acres of BOS (approximately 42 percent of the site) would be permanently preserved under this alternative.

This alternative would also reduce steep slope impacts from those of the Proposed Project due to the footprint eliminating some northeastern portions of the Project, and generally being north of most on-site RPO steep slope areas. Despite this, a waiver for encroachment into insignificant RPO steep slopes as well as an exception for roadways would be required, similar to the Proposed Project. Grading would require cut and fill of approximately 710,000 cy (approximately 16 percent less than the Proposed Project). This alternative would grade approximately 65 acres (59 percent of the site), and develop approximately 50 acres (45 percent) of the site. Under this alternative, specific development locales would be additionally graded to provide the most efficient use of the limited development footprint on the site. As a result, topographic variation would remain, but not to the same extent as under the Proposed Project. Although this alternative could additionally modify more steep slopes within the development footprint than the Project, the encroachment per lot could be restricted to 10 percent. Similar to the Proposed Project, this alternative would require a GPA, rezone and approval of a Specific Plan.

4.6.2 Comparison of the Effects of the Biologically Superior Alternative to the Proposed Project

Aesthetics

In order to be able to accommodate the 425 residential units in a smaller footprint, this alternative would place fewer but more uniform structures within the development area, all of which would be similar in massing and height. The consistent height and uniform massing of structures under this alternative and their proximity to public roadway would directly contrast with the existing community as well as the variable height and massing of the homes proposed under the Proposed Project.

As indicated above, this alternative would allow a reduction in grading quantity and surface disturbance of approximately 16 and 5 percent, respectively, when compared to the Proposed Project. This alternative, however, would be graded to provide for a more efficient use of the limited footprint and specific areas would not conform to the existing site topography to the same level as the Proposed Project. This is because within the development footprint, larger building pads of uniform elevation would be graded to support the larger structures. However, the overall reduced grading quantity and footprint would result in reduced views to modified slopes in certain locations, with smaller amounts of raw soil and broken rock being visible in the short term during alternative grading. As cut slopes would be minimized from the Proposed Project, potential issues with raw cut rock could be commensurately minimized as well. Because ultimately a bridge would be built over Escondido Creek, the loss of vegetation (and subsequent revegetation) would be expected to be similar for both the Project and this alternative.

Similar to the Proposed Project, this alternative would result in significant short-term and unmitigable visual effects related to construction and for some years of Project use until the landscaping required as part of alternative design reaches visual maturity. At that time, temporary visual impacts associated with views to raw soil and immature landscaping would be reduced to less than significant levels. Although the CEQA impact would be the same, the intensity of those adverse effects could be lesser for the alternative because of the smaller footprint.

The more dominant massing of the alternative's structures could seem more visually consistent with the regimented and tight village core design and geometric grid layout of HGV that are visible from elevated viewpoints to the south.

It would, however, have a notable difference from the Proposed Project's visual continuity with the existing less dense development to the west and east of the site. Under the Proposed Project, single-family residences would be placed so as to transition into the less dense existing development to the west and east. "Feathering" would also be accomplished through the use of open space swaths within the Project, providing notable swaths of landscaped area between housing groupings. The Biologically Superior Alternative would not provide the same feathering as the Proposed Project because of the consistent massing created by its three-story structures. Therefore, aesthetic impacts to existing development to the east and west of the site would be slightly greater than the Project. The alternative also would be less consistent with HGV than the Proposed Project, due to the uniform nature of all alternative structures. Long-term visual impacts also would be increased from those of the Proposed Project due to structural massing sited adjacent

to a public roadway (Country Club Drive) at grade, and the thinner swaths of intervening landscaping along this area.

The increase in developed area (lots and streets) under this alternative over the acreage allotted to development by the Proposed Project (respectively, approximately 45 percent versus 29 percent) would render the alternative less visually open than the Proposed Project. Although landscaping controls would soften the visual impacts of these alternative structures, limitations on the type and placement of landscaping in this area would affect the ability of the alternative to visually shield the developed areas. The lack of massing variation between structures, the limited landscaping area, and the need to provide spacing between canopies and plants within a narrow band that does not allow for shielding through depth of planting, would result in greater long-term aesthetic impacts relative to the dominance, scale and diversity as viewed from the public roadway than compared to the Proposed Project.

Transportation/Traffic

The Proposed Project is projected to result in 4,530 ADT based on 10 trips per residence (based on SANDAG's 2002 *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, which identifies use rates by type of use/density). Using this same generation rate, the Biologically Superior Alternative would result in 4,250 ADT, or 280 (six percent) fewer trips per day less than the Proposed Project. Distributed over the roadway network, the decrease in the number of trips would be negligible.

The transportation/traffic impacts associated with this alternative would be similar to the Proposed Project. As described in Subchapter 2.2, roadway segment impacts within the County would include one direct and five cumulative impacts to five roadway segments, one direct and one cumulative impact at a signalized intersection, and one cumulative impact at an unsignalized intersection. The direct impact at the Country Club Drive and Harmony Grove Road intersection that is being cured through M-TR-2a (incorporated into Project design for the Proposed Project), would be addressed through a similar mitigation measure requiring a new lane and dedicated right-turn lane with an overlap phase, as described for the Project. The cumulative impact would be addressed through M-TR-2b, TIF payment, and that would also be required for this alternative.

All remaining impacts within County jurisdiction would be cumulative in nature and would be mitigated to less than significant levels through payment of the TIF or through focused road improvements (M-TR-3 through -7, and M-TR-10).

One direct and cumulative segment impact, as well as two cumulative intersection impacts, would occur in the City of Escondido. Mitigation has been identified for each of these impacts in Subchapter 2.2 (M-TR-1a and -1b, and M-TR-8 and -9), which, if implemented, would lower the impacts to less than significant levels. Because these impacts and mitigation would occur in the City of Escondido, the City is the lead agency under CEQA for impacts within their jurisdiction, and has responsibility for approval/assurance of implementation of those improvements. As such, the County cannot guarantee ultimate implementation or timing of City of Escondido-approved mitigation in this County EIR. As a result, and similar to the Proposed Project, although mitigation identified in Subchapter 2.2 has been identified to lower all Project-related impacts within the City

to less than significant levels under CEQA once implemented, impacts within Escondido are identified as remaining significant and unavoidable pending City action.

Overall, traffic impacts under this alternative would be similar to those described for the Proposed Project.

Biological Resources

Due to reduced grading and surface disturbance, this alternative would impact fewer biological resources than the Proposed Project. Based on comments received from CDFW and USFWS, the alternative was specifically designed to protect a stand of Intermediate Value habitat (sage scrub) in the eastern portion of the site that included one breeding pair of California Gnatcatchers found along the eastern boundary of the site in 2014. Therefore, differences between this alternative and the Proposed Project primarily focus on upland habitat impacts, and specifically to the Intermediate Value habitat (sage scrub), in the eastern portion of the site. The alternative also provides a broader on-site corridor for wildlife movement as described below. Impacts to Escondido Creek jurisdictional wetlands would be similar because a bridge would be installed over Escondido Creek. Approximately 46.5 acres (42 percent) would be placed in permanently preserved and managed BOS under this alternative, as opposed to approximately 34.8 acres, or 31 percent of the Project under the Proposed Project.

The Biologically Superior Alternative would have the same impact neutral (areas where impacts are not assessed, but the area cannot be included as mitigation or to off-set impacts) and off-site impacts as the Proposed Project (see Subchapter 2.3). On-site impacts, however, would be lessened. The lesser impacts resulting from this alternative are depicted on Figure 4-5, *Biologically Superior Alternative Vegetation and Sensitive Resources/Impacts* (c.f., Figure 2.3-5 of this EIR). On-site impacts would total 64.6 acres: 0.1 acre of coast live oak woodland, 2.7 acres of coastal sage-chaparral transition, 7.3 acres of Diegan coastal sage scrub, 3.0 acres of disturbed habitat, 8.7 acres of southern mixed chaparral, 41.1 acres of non-native grassland, 0.8 acre of non-native vegetation, and 0.8 acre of urban/developed.

Approximately 6.3 acres of on-site Diegan coastal sage scrub is identified as being of Intermediate Value because it is characterized by intact stands and a portion was confirmed to be used for breeding by a single pair of gnatcatcher. It also facilitates dispersal and movement functions, along with the surrounding scrub and chaparral located along the eastern edge of the site and additional habitat extending off site to the east. Although the Project site overall is located in a disturbed area, this alternative would preserve 3.5 acres of the Intermediate Value sage scrub habitat in this eastern area, and would avoid impacts to a portion of the habitat supporting the gnatcatcher nest location and surrounding foraging and dispersal habitat. The Biologically Superior Alternative would, however, impact 4.1 acres of coastal sage scrub, most of which consists of small, fragmented and isolated stands.

As noted, the Proposed Project identifies a significant impact for loss of Diegan coastal sage scrub supporting the nesting pair. Implementation of mitigation measure M-BI-1b in Subchapter 2.3 would reduce that impact to less than significant levels. This alternative would reduce impacts to on-site Diegan coastal sage scrub in this same area by approximately 66 percent (2.8 acres impacted versus 6.3 acres) from those expected under the Proposed Project. Remaining impacts

would be mitigated through the mitigation identified in Subchapter 2.3 but would still be significant.

Similar to the Proposed Project, the Biologically Superior Alternative would separate open space from the homes by cut slopes that would discourage the residents from approaching the open space, and would be protected by fencing and signage. The Biologically Superior Alternative could improve wildlife movement along the northeastern boundary by providing an additional 200 feet of on-site BOS (i.e., up to 500 feet wide as opposed to 300 feet wide under the Proposed Project); including the majority of the chaparral, coastal sage scrub, and coastal sage-chaparral habitat on that side of the site.

Core habitat for gnatcatcher does not exist on or in the vicinity of the Project. Previous human activity eliminated much of the coastal sage scrub, and the upland habitat that remains is mostly chaparral and grassland. The limited number and scattered locations of documented gnatcatcher occurrences in the area would indicate that the area does not support a critical, self-sustaining population of gnatcatchers, and that gnatcatcher movement through the area is limited because there is not an abundance of coastal sage scrub habitat to support multiple breeding territories. Also, a direct, north-south connection of core habitat between DDHP and Escondido Creek does not exist through the Project site due to the large area of non-native grassland, which serves as an exposed break in the scrub and chaparral. Areas along the eastern boundary of the site could facilitate north-south movement to and from Escondido Creek, although the habitat is patchy and constrained by existing development. Areas along further to the east of the site are less constrained, where a direct connection of scrub and chaparral habitat occurs along West Ridge. By preserving the coastal sage-chaparral habitat found along the slopes in BOS, however, the alternative could provide an additional 200 feet for gnatcatcher movement between the DDHP and Escondido Creek, relative to the Proposed Project. (The corridor would be about 1,200 feet wide at the widest point, versus 1,000 feet with the Proposed Project.)

Similar to the Proposed Project, design features identified in Table 1-2 for biological resources would be applicable to this alternative. Also similar to the Proposed Project, all CEQA-identified biological impacts under this alternative would be reduced below a level of significance through mitigation measures M-BI-1a through M BI-9, and described in Subchapter 2.3. These include mitigative measures such as construction timing restrictions, and appropriate habitat preservation (on site for chaparral impacts, and through purchase of off- site properties or existing credits) and/or creation for impacts to other habitats.

Although the Project would reduce all CEQA-identified biological impacts to below a level of significance through mitigation measures M-BI-1a through M BI-9, the biological impacts under this alternative would be less than the Proposed Project due to the reduced footprint relative to Diegan coastal sage scrub and associated California gnatcatcher impacts and wider wildlife movement corridors.

Cultural Resources and Tribal Cultural Resources

As discussed in detail in Subchapter 2.4, no known significant impacts would result from Project implementation. Although considered unlikely, there is potential for significant direct impact related to discovery of unknown buried archaeological resources or burials. As with the Proposed

Project, impacts to cultural resources under this alternative would be reduced below a level of significance through applicable mitigation measures requiring an archaeological monitoring and data recovery program, described in Subchapter 2.4 under M-CR-1 and 2. When compared to the Proposed Project, this alternative would result in similar impacts to cultural resources.

Noise

Short-term construction-related noise impacts associated with this alternative would be less than those associated with the Proposed Project, because the smaller footprint would result in a reduced amount of grading and associated rock breaking. Regardless, construction noise associated with potential blasting in non-rippable areas could result in significant construction-period noise impacts, similar to the Proposed Project. The likelihood of such impacts would be less than for the Proposed Project, because the eastern boundary of the construction envelope would be located farther west than under the Proposed Project, and therefore farther away from some existing homes near the northeastern Project boundary. Design considerations as described in Chapter 1.0 on Table 1-2, and mitigation as described in Subchapter 2.5 in M-N-4 through -6 relative to rock breaking and blasting, would be implemented if required, which would lower these construction-period noise effects to less than significant levels, similar to the Proposed Project. Noise effects associated with bridge construction would remain. The construction noise impacts under this alternative would be less than the Proposed Project due to the reduced footprint.

The proposed 425 homes under this alternative would generate similar vehicular ADT as the Proposed Project. Because the alternative would build multi-family housing, however, the threshold for CEQA-significant exterior impacts would be higher (65 dBA CNEL as opposed to 60 dBA CNEL for single-family residences.) The higher threshold would not be attained because the number of trips that would be generated by this alternative would result in six percent fewer trips per day less than the Proposed Project. Therefore, no long-term operational effects to exterior use areas would occur. Title 24 interior noise levels, however, would still require confirmation and mitigation, resulting in a similar mitigation measures for interior noise effects related to vehicular noise and WTWRF noise. These impacts would be mitigated to less than significant (similar to the Proposed Project) through implementation of M-N-2 and -3, respectively. Similar to the Proposed Project, long-term noise impacts would be significant but mitigated.

Overall, impacts to noise under this alternative would be less when compared to the Proposed Project.

Air Quality

Short-term construction-related air quality impacts associated with the Biologically Superior Alternative would be less than the less-than-significant effects associated with the Proposed Project, because of the reduced amount of required grading. Operational impacts also would be incrementally less than the (less-than-significant) Proposed Project's operations, due to incrementally fewer associated vehicular trips. The Project's significant and unmitigable air quality impact associated with exceedance of the 2016 RAQS also would occur for this alternative as the RAQS modeling includes the 2011 General Plan assumptions for site development (approximately 220 lots), but not the GPA associated with the Project or the alternative. Ultimately, it is expected that implementation of Subchapter 2.6 M-AQ-1 requiring transmittal of

a revised forecast to SANDAG, followed by updates to the RAQS and SIP would lower this impact to less than significant levels. Overall, impacts to air quality under the Biologically Superior Alternative would be slightly reduced compared to the Proposed Project.

Greenhouse Gas Emissions

This alternative would have slightly fewer residences and a smaller grading footprint with additional retained existing vegetation. As described for the Proposed Project, however, all impacts associated with Proposed Project emissions would be mitigated to net zero through implementation of M-GHG-1 (addressing construction and operational emissions exceeding reductions achieved through PDFs) as well as on-site reductions and sequestration provided through the landscaping plan. Although initial GHG emissions under the Biologically Superior Alternative could be slightly less than those of the Proposed Project, implementation of mitigation identified in Subchapter 2.7 for the Proposed Project would result in similarly less than significant cumulative impacts as both the Project and the alternative would be mitigated to net zero.

Conclusions

The Biologically Superior Alternative would result in fewer impacts to biological resources, noise and air quality than the Proposed Project. Impacts to cultural resources would remain the same (unlikely but mitigable if occurring), as would GHG impacts. Aesthetic impacts would be greater for this alternative in comparison to the Proposed Project.

The Biologically Superior Alternative would not achieve all of the Project objectives to the same degree as the Proposed Project. The number of units and clustering provided in this alternative meets Objective 1 to some extent because it would provide an efficient development pattern by utilizing a compact form of development adjacent to an existing village. However, the alternative would not comply with the Community Development Model because of the consistent massing created by its three-story structures and the lack of notable swaths of landscaped areas, providing no transition into the less dense existing development to the west and east. The alternative also would provide only a singular product type (stacked multi-family flats), with no commercial uses incorporated into the HOA building. Therefore, this alternative would not encourage development of a complete and vibrant community that would enhance and support the economic and social success of HGV village and the Project by providing a diversity of residents and land uses to the same extent as the Proposed Project.

The Biologically Superior Alternative may contribute to some extent to supporting Objective 2 due to the higher density clustered development pattern, which is one attribute of a community that encourages and supports multi-modal transportation. It would be inferior to the Proposed Project, however, due to the lack of alternative trails or inclusion of a commercial component into the HOA building that would provide additional incentives for biking and walking within the community. This alternative would not meet Objective 5 because it does not provide a mix of residential uses that would which encourages a broad range of housing choices to support a diversity of residents and land uses.

This alternative may contribute to some extent to Objective 6 by optimizing the operational effectiveness of public facilities and services of the existing village through increasing the number

of residents. The alternative would not meet the Objective 6 element of increasing the diversity of its residents, however, because it would provide only one type of housing product. Nor would it be compatible with existing development to the east and west of the site. The massing created by the alternative's three-story structures would not provide the same transition into existing uses as the Proposed Project. Long-term visual impacts also would result due to the structural massing of buildings located immediately adjacent to Country Club Drive that would be visible from the immediate vicinity of the property.

When compared to the full range of passive and active recreational opportunities provided by the Proposed Project (reduced recreation facilities to accommodate the smaller construction footprint), this alternative is less effective in meeting Objective 4. This alternative would not meet Objective 7 because it would not create a destination gathering place with a variety of land uses, such as the Project's Center House, that would encourage walkability, social interaction and economic vitality. Relative to Objective 8, although the alternative would have a smaller footprint than the Proposed Project, the alternative would have less topographic variation and visibility of existing site characteristics than the Proposed Project. This is the result of greater acreage allotted to development under the alternative, the need for focused additional grading to attain the most efficient development pattern within the reduced site envelope, and the reduced sight-lines into the site and between structures.

The Biologically Superior Alternative would meet Objective 3 because although all biological impacts under the Proposed Project would be addressed through Project design measures identified in Table 1-2 and mitigation measures identified in Subchapter 2.3, this alternative would preserve and enhance biological resources to a greater extent than the Proposed Project.

4.7 Analysis of the Off-site and Combined On-/Off-site Sewer Options Alternative

This alternative provides two sewer scenarios for the Project. Each of the scenarios described below would require annexation into a sewer district with ability to serve the Project, as described in Chapter 1.0 of this EIR. The Off-site and Combined On-/Off-site Sewer Options Alternative was included to disclose the impacts that would occur if either of these two sewer options were to be approved instead of constructing a stand-alone plant within the Project. The analysis of these two options includes all of the issue areas that are needed to allow the decision maker to adopt either of the options in lieu of the stand-alone plant without the need for additional analysis under CEQA.

The existing conditions, methodology, and significance determination information for the environmental analysis below is the same as was used for the Proposed Project (see Chapter 2.0). Both of these scenarios analyze the differences of the stand-alone plant within the Project with the options proposed under the alternative. The analyses are based on information obtained for the Project that is applicable for the alternative, including site visits and technical reports.

4.7.1 Off-site and Combined On-/Off-site Sewer Options Alternative Description and Setting

The Off-site and Combined On-/Off-site Sewer Options Alternative includes an optional design scenario for the provision of off-site sewer service, in lieu of the proposed on-site WTWRF and

related facilities (as described in Subchapter 1.2 of this EIR), as well as an optional design scenario to provide a combined on- and off-site wastewater treatment program. All other components of the Proposed Project would remain the same, and the wastewater treatment options would be incorporated within the overall build program. These potential options are summarized below, with the off-site pipeline/utility options as well as the location of the approved HGV lift station west of Country Club Drive and the approved HGV WRF immediately to the north of Harmony Grove Road shown on Figures 4-6, *Off-site Connection to the HGV WRF*, and 4-7, *Off-site Connections of Combined On-/Off-site Wastewater Treatment to HGV*, respectively.

Regardless of treatment location, approach to biosolids and reclaimed water would be the same as identified for the Proposed Project. Biosolids are a byproduct of wastewater treatment. Due to the small size of HGV South, it is likely that the Project would truck liquids solids to another wastewater treatment plant for dewatering regardless of sewer option selected. This would require transport to that facility by an estimated one truck per week. Once biosolids are dewatered, they would be trucked to a landfill for final disposal, estimated to require one truck per month. Similar to the Proposed Project, and regardless of the location of treatment facility, all Project wastewater is proposed to be reclaimed and reused for irrigation of on-site parks, parkways, and common areas (excluding the community gardens) in accordance with standards set by Rincon MWD.

Connection to the HGV WRF

HGV's facility is located at the northeast corner of Harmony Grove Road and Country Club Drive, only approximately 550 feet north of the Project's northern boundary. The existing HGV WRF could be used to serve the Proposed Project if actual use rates at the HGV WRF demonstrate that it could accommodate the flows from both the Proposed Project and HGV as it is currently built. There are two conditions under which the HGV South wastewater flows could be accommodated by the existing HGV WRF:

- Scenario A: The original design of the plant is based on an estimate of future flows. If these flows turn out to be lower than the original estimate based on actual use rates, there may be additional permitted capacity for accommodation of HGV South flows.

- Scenario B: Based on the ability of the facility to treat the flows received, it may become apparent that the WRF as designed could appropriately and safely handle additional flows, and the permit could be updated to specify that the plant has increased capacity.

Because the option would only be exercised if one of the above scenarios occurs (less sewage is being treated at HGV than was expected, or the capacity of that plant proves to be greater than originally expected) the sizing of the existing HGV facility, or its site, would not be increased. This option would only be utilized if it could accommodate both projects under its current design. In order to utilize the same wastewater treatment facility, HGV South would either annex into HGV's existing community financing district or establish another financing mechanism that would provide additional funding to support the services required for HGV and this project. More payers would result in savings for the rate payers of both projects during facility operations.

The full Project WTWRF (approximately 0.4 acre in size) would not be constructed under these scenarios. Project sewage would be transferred to the HGV pump station located west of

Country Club Drive on the south side of Harmony Grove Road. An 8-inch gravity-flow pipeline would be extended from the Project within Country Club Drive to Harmony Grove Road. The lines would cross Escondido Creek via installation into a bridge structure to be built commensurate with the Project. Incorporation into the bridge structure would occur from pavement on either side of the bridge, and would not require entry into the drainage.

At the junction of Country Club Drive with Harmony Grove Road, the lines would turn west to the HGV pump station, all within Harmony Grove Road and Country Club Drive road sections, and sited between two existing force main sewer lines in Harmony Grove Road. The construction period would require excavation and installation within existing roadbed followed by re-cover of the pipeline and removal of any excess soil along the pipeline right-of-way. Construction activities would move along the right-of-way (cut, install, cover) as installation occurs.

The HGV pump station was designed for 500 gpm. That facility sizing also would accommodate the Project. The existing emergency generator is also considered large enough to accommodate any additional Project flow. No changes are proposed to the emergency generator at the pump station. From the existing HGV pump station, an existing redundant system (two force mains, only one of which would be active at any one time) extending from the pump station within Harmony Grove Road to Country Club Drive and then northerly along Country Club Drive to enter the Harmony Grove WRF on the east side of Country Club Drive would be utilized.

As for the Proposed Project, 8,127,000 gallons of wet weather storage may be needed. This storage would be provided through use of the on-site storage proposed for the Project. Alternatively, other scenarios could be explored in the future, as appropriate, such as expanding the existing wet weather storage on HGV, or it could be on another site. The existing storage utilized by the HGV is a reconditioned quarry modified for use as a reservoir. The reservoir is designed to hold 84 days of recycled water from the HGV project. It is likely that reassessment of the reservoir would allow for additional storage as only a portion of the available volume available in the reconditioned quarry will be utilized by that project. If that facility is used, the emergency outflow outlet would be raised through use of a riser pipe. This pipe would be located within the existing reservoir footprint and would not expand the horizontal footprint. It is possible that this would also require an amendment to the permit or a permit from the California Division of Dams. As noted, storage also could be provided at other facilities as deemed necessary by Rincon MWD. As an example, Rincon MWD has a 3-million gallon tank on the hill just north of the Village Road, east of Country Club Drive. That facility currently only stores up to one million gallons. Pipes to access it are in Country Club Drive.

Combined On-/Off-site Wastewater Treatment

Each of the specifics described above regarding the HGV WRF existing facilities and capacities applies to this scenario as well. This design scenario would integrate HGV South facilities into the existing HGV WRF, but not assume full transfer of all operations to the existing facility. It would increase the efficiencies of both facilities by avoiding redundancies that would result in constructing identical facilities that would not be needed to serve the additional sewage generated by the Project, such as an operations or administration building. Thus, the Project would construct only those facilities that would complement the existing system in place at HGV and that may be needed to serve the additional sewage generated by the Project.

This approach would be able to utilize existing solids processing facilities on the HGV site, reducing the volume of solids to be delivered by truck elsewhere. Under this option, the existing laboratory at the Harmony Grove WRF would also be utilized by the on-site facility (similar to the Proposed Project). A pump station would be included within the on-site facilities, and off-site utilities would include the gravity feed lines to the existing pump station on Harmony Grove Road, as well as a sewage solids line and potential fiber optics line extending from the Project north along Country Club Drive into the HGV WRF. The fiber optics line is conservatively assumed – it would not be necessary if a radio-based system is implemented.

Additional operational studies, as well as design plans and specifications, would be required for all of the facilities described above. These studies and plans are not expected to affect the environmental analyses below. The Proposed Project analyzed the largest potential facility, with the associated largest footprint. As such, it represents a worst-case footprint and potential alternative elements adequate to complete environmental analyses on site, and otherwise would place lines into already disturbed paved street (also affected by placement of Proposed Project utilities). Refinement of the alternative scenarios would not worsen environmental impacts associated with these lesser design scenarios.

4.7.2 Comparison of the Effects of the Off-site and Combined On-/Off-site Sewer Options Alternative to the Proposed Project

Aesthetics (Less than Significant Impact)

Connection to the Harmony Grove WRF

As described above, the WTWRF would not be constructed on site, and the less than significant long-term visual effects assessed to the Proposed Project would be eliminated under this scenario. Construction activities associated with the connecting pipelines would be visible along short segments of Country Club Drive (south of Harmony Grove Road only) and Harmony Grove Road during the installation process. These effects would vary from the existing condition, but would be temporary in effect. Once installed within Country Club Drive and Harmony Grove Road, there would be no surficial elements that would modify area views. Based on (1) the temporary nature of the construction impact; (2) the small footprint of the linear construction right-of-way; and (3) the lack of permanent visual change associated with the pipelines and tie-in to the Harmony Grove pump station, less than significant visual impacts would result. When compared to the Proposed Project full WTWRF, impacts to aesthetics would be incrementally less under this design scenario.

Combined On-/Off-site Treatment

On-site elements would be minimized compared to the facilities described for the Proposed Project. Some functions would remain at facilities on the HGV South site, others would be transferred to existing facilities at the HGV WRF. Regardless of final build decisions and including an additional small pump station, this scenario would be expected to build fewer or smaller facilities at HGV South, which would lessen the already less than significant long-term visual effects assessed to the Proposed Project for the WTWRF. Screening landscaping would be required as described in Section 1.2.2.5, *Landscape*, and on Table 1-1 specific to shrubs and vines.

Construction activities associated with the connecting pipelines would be visible along a short segment of Country Club Drive from the Project to the HGV WRF entrance, as well as along Harmony Grove Road during the installation process. These effects would vary from the existing condition, but would be temporary in effect. Once installed within the roadways, there would be no surficial elements that would modify area views. Based on (1) the temporary nature of the construction impact; (2) the small footprint of the linear construction right-of-way; and (3) the lack of permanent visual change associated with the pipelines and tie-in to the Harmony Grove pump station and WRF, less than significant visual impacts would result. When compared to the Proposed Project full WTWRF, impacts to aesthetics would be incrementally less under this design scenario.

Transportation/Traffic (Less than Significant Impact)

Connection to the Harmony Grove WRF

Construction and operation of off-site pipelines would not contribute additional long-term ADT to analyzed roadways and intersections above the ADT calculated for the Proposed Project. It could, however, cause additional traffic congestion along Country Club Drive and Harmony Grove Road due to temporarily reduced road capacity during pipeline installation. As with the Project, potential short-term construction effects under this sewer option would be addressed by a Traffic Control Plan identified for the Proposed Project as a Project Design Feature and described in Table 1-2 of this EIR. The Traffic Control Plan would be prepared by the Construction Contractor and approved by County DPW prior to initiation of construction. Among other controls, it would include measures to reduce traffic delays and minimize public safety impacts, such as the use of flag persons, traffic cones, detours and advanced notification signage. Implementation of this plan would address this traffic effect during construction of the pipeline and associated facilities. When compared to the Proposed Project full WTWRF, impacts to transportation/traffic in the long-term would be similar under this design scenario.

Combined On-/Off-site Treatment

Construction and operation of off-site pipelines and related utility (fiber optic) lines would not contribute additional ADT to analyzed roadways and intersections above the ADT calculated for the Proposed Project. It could, however, cause additional traffic congestion along Country Club Drive and Harmony Grove Road due to temporarily reduced road capacity during pipeline installation. As with the Project, potential short-term construction effects under this sewer option would be addressed by a Traffic Control Plan identified for the Proposed Project as a Project Design Feature and described in Table 1-2 of this EIR. The Traffic Control Plan would be prepared by the Construction Contractor and approved by County DPW prior to initiation of construction. Among other controls, it would include measures to reduce traffic delays and minimize public safety impacts, such as the use of flag persons, traffic cones, detours and advanced notification signage. Implementation of this plan would address this traffic effect during construction of the pipeline and associated facilities. When compared to the Proposed Project full WTWRF, impacts to transportation/traffic in the long-term would be similar under this design scenario.

Biological Resources (No Impact and Significant Mitigated Impact)

Connection to the Harmony Grove WRF (No Impact)

The infrastructure required to construct this sewer option would be located completely within existing County roadways and areas identified as impacted by the Proposed Project. Where sewage lines associated with this option would cross Escondido Creek immediately south of the Harmony Grove Road/Country Club Drive intersection, they would do so within a bridge structure. The sewage lines would be added to water lines integrated into the base of the bridge deck, and would not result in separate or increased impacts to either habitat or jurisdictional waters during stream crossing. No new biological impacts would be expected to result from placement of additional off-site facilities into existing disturbed and paved roadway. If not constructed commensurate with bridge construction, once construction specifics are identified, a qualified biologist would be required to review those plans to confirm if nesting season timing restrictions would be required for alternative modifications of the bridge, consistent with seasonal avoidance identified in Subchapter 2.3.

There also would be no treatment plant elements on site. Space allocated to a plant facility on site under the Proposed Project could be retained in its existing condition. Accordingly, this sewer option would be expected to result in a reduced impact to on-site non-native grassland impacts than the Proposed Project. When compared to the Proposed Project full WTWRF, impacts to biological resources would be less under this design scenario.

Combined On-/Off-site Treatment (Significant Mitigated Impact)

Under this option, potential impacts to biological resources would be essentially the same as the Proposed Project (significant but mitigable), based on the following considerations: (1) the disturbance footprint for the on-site treatment elements would be similar to but smaller than the Proposed Project full WTWRF; and (2) the pipelines/utility lines would be confined to previously developed/disturbed areas, with no new associated impacts to biological resources. Utility lines associated with this option (sewage, fiber optic, etc.) would be placed into existing roadway. No biological impacts are anticipated from placement of additional off-site facilities into existing disturbed and paved roadway. If not constructed commensurate with bridge construction, once construction specifics are identified, a qualified biologist would be required to review those plans to confirm if nesting season timing restrictions would be required for alternative modifications of the bridge, consistent with seasonal avoidance identified in Subchapter 2.3.

Accordingly, this sewer option would be expected to result in a reduced impact to on-site non-native grassland and any associated species. The reduced impact would be mitigated in accordance with mitigation measure M-BI-2b in Subchapter 2.3 of this EIR, including a mix of potential on- and off-site preservation (or purchase of credits) at an approved bank of grassland habitat and/or other like-functioning habitat at a 0.5:1 ratio. Full details are provided in Subchapter 2.3 in Section 2.3.5. When compared to the Proposed Project full WTWRF, impacts to biological resources would be incrementally less under this design scenario.

Cultural Resources and Tribal Cultural Resources (Significant Mitigated Impact)

Connection to the Harmony Grove WRF

The infrastructure required to construct this sewer option would be located completely within existing County roadways, or the Proposed Project disturbance footprint (which is included in the Project site impacts). No previously recorded sites are located within the proposed alignment, and the sewer lines would be located between existing lines in Harmony Grove Road. Given the amount of disturbance (including existing sewer, water, etc. utilities) under these new roads, the potential for identification of new cultural resources or burials is considered unlikely, but possible, similar to the Proposed Project. As identified for the Proposed Project, these potential impacts would be significant but mitigable. This alternative would implement mitigation measure M-CR-1 and 2 (a combined measure) in Subchapter 2.4 that provides for (among other specifics) monitoring of construction activities by a qualified archaeologist and Luiseño monitor, halting of excavation in case of a find, retrieval of artifacts or human remains, coordination with the most likely descendant, etc. in accordance with state law to reduce significant impacts to below a level of significance. Full details are provided in Subchapter 2.4 in Section 2.4.5. When compared to the Proposed Project full WTWRF, impacts to cultural resources could be incrementally less under this design scenario.

Combined On-/Off-site Treatment

Potential impacts to cultural resources under this alternative would be slightly greater than those identified for the Proposed Project, as there would be additional ground disturbance within Country Club Drive north of the Harmony Grove Road intersection. Undiscovered archaeological resources could be located beneath the off-site force main corridors in Harmony Grove Road and in Country Club Drive. No previously recorded sites are located within the proposed alignments, and the sewer/utility lines would be located either between, or in the immediate vicinity of, existing lines in Harmony Grove Road and in Country Club Drive. Given the amount of disturbance (including existing sewer, water, etc. utilities) under these new roads, the potential for identification of new cultural resources or burials is considered possible, but unlikely, similar to the Proposed Project. As identified for the Proposed Project, these potential impacts would be significant but mitigable. M-CR-1 and 2 (a combined measure) in Subchapter 2.4) provides for (among other specifics) monitoring of construction activities by a qualified archaeologist and Luiseño monitor, halting of excavation in case of a find, retrieval of artifacts or human remains, coordination with the most likely descendant, etc. in accordance with state law to reduce significant impacts to below a level of significance. Full details are provided in Subchapter 2.4 in Section 2.4.5. When compared to the Proposed Project full WTWRF, impacts to cultural resources could be incrementally greater under this design scenario.

Noise (Less than Significant Impact and Potential Significant Mitigated Impact)

Connection to the Harmony Grove WRF (Less than Significant Impact)

Because the Proposed Project WTWRF would not be constructed, mitigable noise associated with the WTWRF would not occur under this sewer option; operational noise impacts associated with this sewer option would be less than the mitigable impact identified for the Proposed Project.

Construction noise could increase as the Proposed Project does not propose off-site construction of sewer lines. Under this alternative scenario, lines would be installed in short segments of Country Club Drive (south of Harmony Grove Road only) and Harmony Grove Road adjacent to the County Equestrian Park located at the southwest side of those roads' intersection. Construction-noise related to these short-term cut and cover activities would not be expected to be in excess of the County allowed levels, and if necessary, could be shielded by temporary barriers. Overall, these impacts would be considered less than significant due to compliance with the County noise ordinance and very temporary nature, as described for utility line installation in Subchapter 2.5, Section 2.5.2.3. When compared to the Proposed Project full WTWRF, impacts to long-term noise would be less under this design scenario.

Combined On-/Off-site Treatment (Potential Significant Mitigated Impact)

Although only a portion of the Proposed Project WTWRF would be constructed under this scenario, the combined facility may include the on-site generator. If the generator is not part of the on-site components, potential noise associated with that element would be less than the noise of the Proposed Project. If a generator is placed on site, similar to the Proposed Project, associated noise levels could exceed the nighttime allowable limit and therefore could require mitigation. Mitigation would be the same as for the Proposed Project – this alternative would implement Mitigation Measure M-N-3, requiring a final noise impact analysis as part of facilities design demonstrating that exterior noise levels from all stationary WTWRF elements combined would not exceed the one-hour exterior noise level at the property line based on implementation of a 6-foot on-site sound wall at the facility. Additional information is provided in Subchapter 2.5, Section 2.5.2.4.

As described for utility line installation in Subchapter 2.5, Section 2.5.2.3, construction noise could increase as the Proposed Project does not propose off-site construction of sewer lines. Under this alternative scenario, sewer/utility lines would be installed in short segments of Country Club Drive and Harmony Grove Road adjacent to the County Equestrian Park located at the southwest side of those roads' intersection, as well as for a short section in Country Club Drive north of Harmony Grove Road in order to tie directly into the HGV WRF. Construction-noise related to these short-term cut and cover activities would not be expected to be in excess of the County-allowed levels, and if necessary, could be shielded by temporary barriers where adjacent to the park. North of Country Club Drive, the use on the east side of the road primarily would be the HGV WRF, which is not a noise-sensitive use. On the west side of the road, some HGV slopes and homes would be sited, but the homes would be behind an existing permanent noise wall installed by HGV, which would be expected to block the construction noise. Overall, potential impacts would be considered less than significant due to compliance with the County noise ordinance and very temporary nature. Impacts to long-term noise would be similar or incrementally less under this design scenario.

Air Quality (Less than Significant Impact)

For both sewer scenarios, short-term construction-related air quality impacts would be expected to be similar or less than the less-than-significant effects associated with the Proposed Project. This is because the on-site grading footprint would be smaller than assessed as part of the Project for the full-sized plant, and potential off-site roadway disturbance generally would occur within streets already being impacted for other Project utilities. Operational impacts also could be incrementally

less than the (less-than-significant) Proposed Project's operations, due to incrementally fewer associated vehicular trips. The Project's significant and unmitigable air quality impact associated with exceedance of the 2016 RAQS would not be associated with either of the sewer alternatives. That impact is associated with exceeding the 2011 General Plan assumptions for site development (approximately 220 lots) and the associated modeling completed for the RAQS, but is not directly related to utilities provision. Conformance or non-conformance with the RAQS is addressed above for each of the full-build alternatives, and is not further addressed here. Overall, when compared to the Proposed Project full WTWRF, impacts to air quality under either of the sewer options would be similar or incrementally reduced under these design scenarios.

Greenhouse Gas Emissions (Less than Significant Impact)

Connection to the Harmony Grove WRF

Construction impacts to Country Club Drive would already be occurring as improvements (including other pipelines) would be installed at that location. With respect to installing pipe within Harmony Grove Road, the GHG emissions would be less than what was analyzed for Project implementation of the WTWRF. Cumulative GHG emissions would be less-than-significant, associated only with emissions resulting from implementing the connection point from Project lines to off-site utility lines, and excavation and placement of utility lines within existing roads. Operational impacts would not occur because there would be no additional facilities and the existing facilities would remain the same at the HGV WRF and there would not be new vehicular trips made on an intermittent basis to the WRF. Accordingly, there would be no additional cumulative GHG impacts and no additional mitigation measures would be required.

Combined On-/Off-site Treatment

Construction impacts to Country Club Drive would already be occurring as improvements (including other pipelines) would be installed at that location south of Harmony Road, but also would include pipelines into the HGV WRF north of Harmony Grove Road. While there would still be some level of construction on site, it would still be a smaller facility. Therefore cumulative construction GHG emissions would be expected to be less than analyzed for the Proposed Project. Operational impacts also could be less because there would be smaller and shared facilities and the existing facilities would remain the same at the HGV WRF. Because of the shared facilities, it is possible that existing trips would be split between the two facilities. If there are additional trips, they would be minimal, associated with intermittent employee checks. Accordingly, there would be no additional cumulative GHG impacts and no additional mitigation measures would be required.

Growth Inducement (Less than Significant Impacts)

Connection to Harmony Grove WRF

This option would result in the construction of a sewer pipeline off site and extending north and west that would connect to the HGV WRF pump station, which would not be expanded. The Proposed Project would only be allowed to connect if there is capacity available at this site without requiring expansion. The presence of a Project-related sewer line adjacent to entitled and building out portions of HGV would not encourage growth. Future projects would be required to conform

to the density within the County's General Plan or to obtain a GPA and would be limited due to the capacity of the HGV WRF. Regardless, future projects would be required to complete additional studies regarding impacts to the environment, including growth inducement.

Combined On-/Off-site Treatment

This option would result in the construction of a sewer pipeline off site and extending north and west to connect to HGV WRF facilities, which would not be expanded. The option would only be allowed to connect if there is capacity available at this site without requiring expansion. The presence of a Project-related sewer lines adjacent to entitled and building out portions of HGV would not encourage growth. Future projects would be required to conform to the density within the County's General Plan or to obtain a GPA and would be limited due to the capacity of the HGV WRF; the shared nature of the facility and the facility on site would be sized only to serve the Project in light of its sharing the existing HGV WRF. Regardless, future projects would be required to complete additional studies regarding impacts to the environment, including growth inducement.

Conclusions

Potential impacts of the sewage treatment options would be largely short-term (construction-related) in nature and otherwise subsidiary to the larger impacts of the development alternatives. The off-site sewer option, which would replace the on-site WTWRF, as well as the combined on-site/off-site option, would be expected to result in generally similar impacts to those described for the Proposed Project when combined with the residentially related portions of the Project. Specifically, this would include potentially significant and unmitigable impacts related to aesthetics, traffic and air quality, as well as significant (or potentially significant) but mitigated impacts for the issues of aesthetics, biological resources, cultural resources, noise, and transportation/traffic.

Potential operational impacts identified for noise associated with operation of the WTWRF, and to non-native grassland impacts, would be eliminated for the off-site option included under this alternative, but would remain for the combined on-/off-site option. Unlikely, but potential cultural resources impacts would remain for both options. A number of these impacts may vary slightly from those identified for the Proposed Project; however, these variations would be relatively minor and would not alter overall Project impact levels or associated need for mitigation or implementation of specified Project Design Features. Both of the sewer options identified under this alternative would meet the identified Project objectives when combined with the Proposed Project, and would differ from the Proposed Project to the same level as each of the three development alternatives addressing sewer, if combined with those development alternatives.

4.8 Environmentally Superior Alternative

Although the No Project alternative would result in reduced environmental impacts, Section 15126.6(e)(2) of the State CEQA Guidelines requires identification of an alternative other than the No Project as the environmentally superior alternative.

Based on the above CEQA requirement, the General Plan Consistent with Sewer Alternative is identified as the environmentally superior alternative. When compared to the Proposed Project this

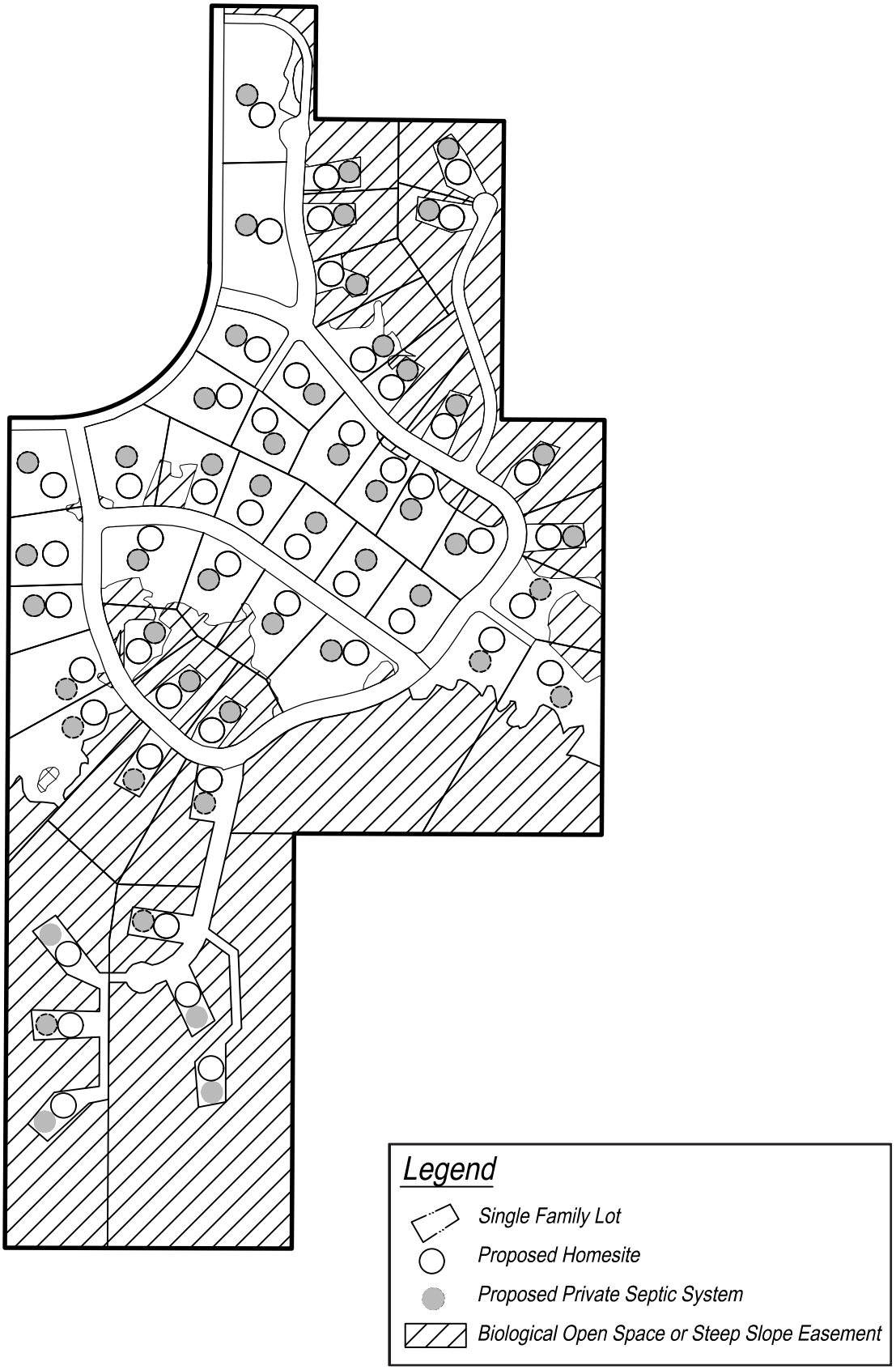
alternative would have similar or reduced impacts to aesthetics, biological resources, transportation/traffic, cultural resources and tribal cultural resources, noise, air quality and GHGs; it would also reduce the Proposed Project's significant and unavoidable impact to traffic and air quality. This is the result of the lessened encroachment into sensitive biological habitat both on the southern extent of the Project, minimization of steep slopes impacts associated with eastern and southern extents of the Project, conformance with the RAQS, and fewer projected daily vehicular trips associated with the alternative, resulting in no significant and unmitigated traffic impacts in the City of Escondido and fewer significant and mitigable impacts in the County.

4.9 Summary of Alternatives

Table 4-1, below, summarizes the potential impacts identified for alternatives in comparison with those identified for the Proposed Project. The table addresses each of the full-build alternatives (i.e., those alternatives that would result in substantially different development patterns and uses as a whole for the Project property). As detailed above, the potential sewer treatment design scenarios are limited in geographic scope, and only would be implemented as part of one of the full-build alternatives. As such, they are not included in the table below.

Table 4-1
HGV SOUTH FULL-BUILD ALTERNATIVES COMPARISON OF IMPACTS

Environmental Issue	Proposed Project (453 SFR and MFR)	No Project/ No Development	General Plan Consistent with Septic Alternative (49 SFR)	General Plan Consistent with Sewer Alternative (119 SFR)	Senior Care Traffic Reduction Alternative (386 units)	Biologically Superior Alternative (424 MFR)
Aesthetics	SU Construction Period, SM Long-term	Less	Similar	Less	Similar	Greater
Transportation/Traffic	SU (City of Escondido), SM (County of San Diego)	Less	Less	Less	Less	Similar
Biological Resources	SM	Less	Greater	Similar	Greater	Less
Cultural Resources and Tribal Cultural Resources	SM	Less	Similar	Similar	Similar	Similar
Noise	SM	Less	Less	Less	Less	Less
Air Quality	LTS Construction Period, SU Long-term	Less	Less	Less	Less	Less
Greenhouse Gas Emissions	SM	Similar	Similar	Similar	Similar	Similar



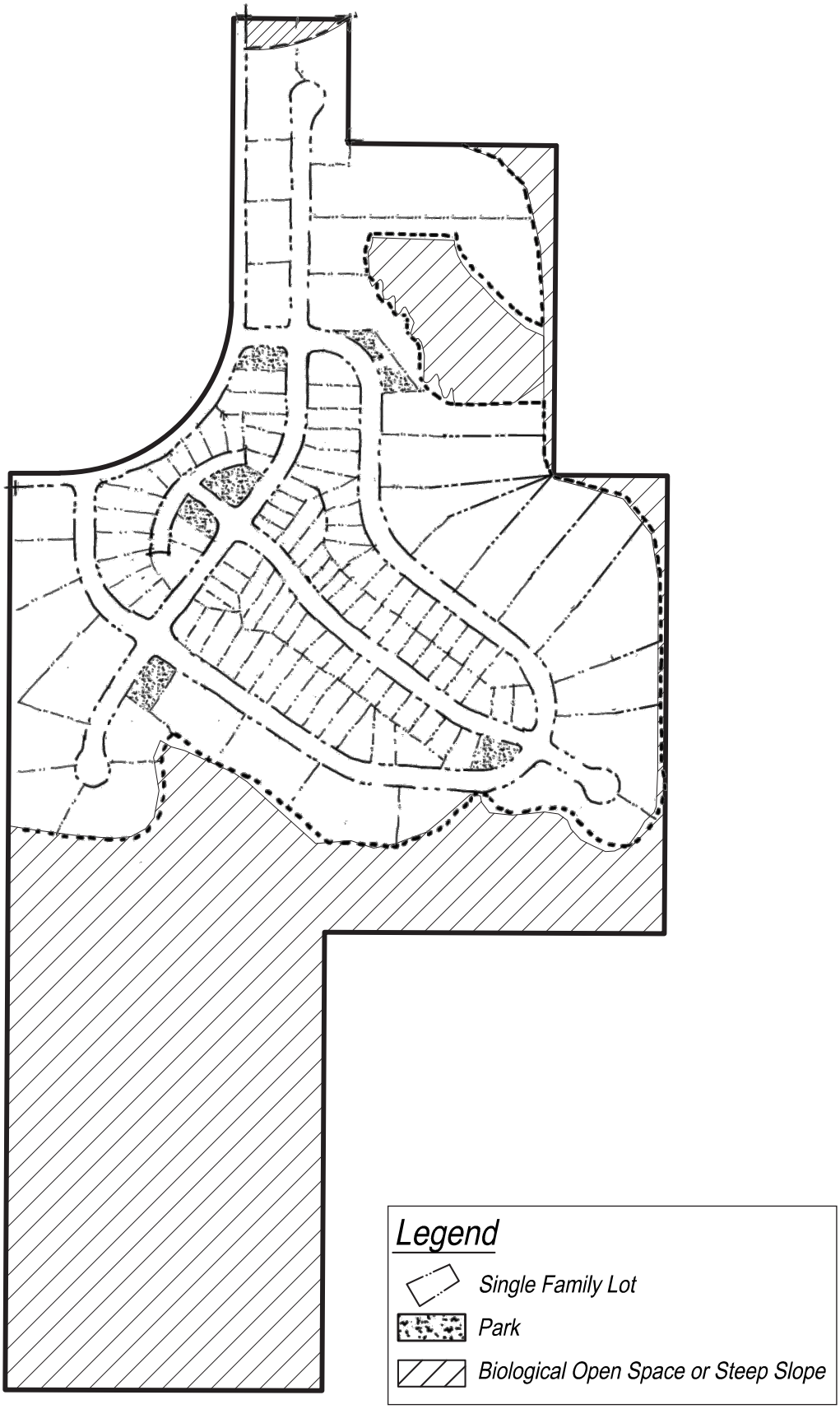
Source: PDC 2016

General Plan Consistent with Septic Alternative

HARMONY GROVE VILLAGE SOUTH

Figure 4-1

HELIX Environmental Planning



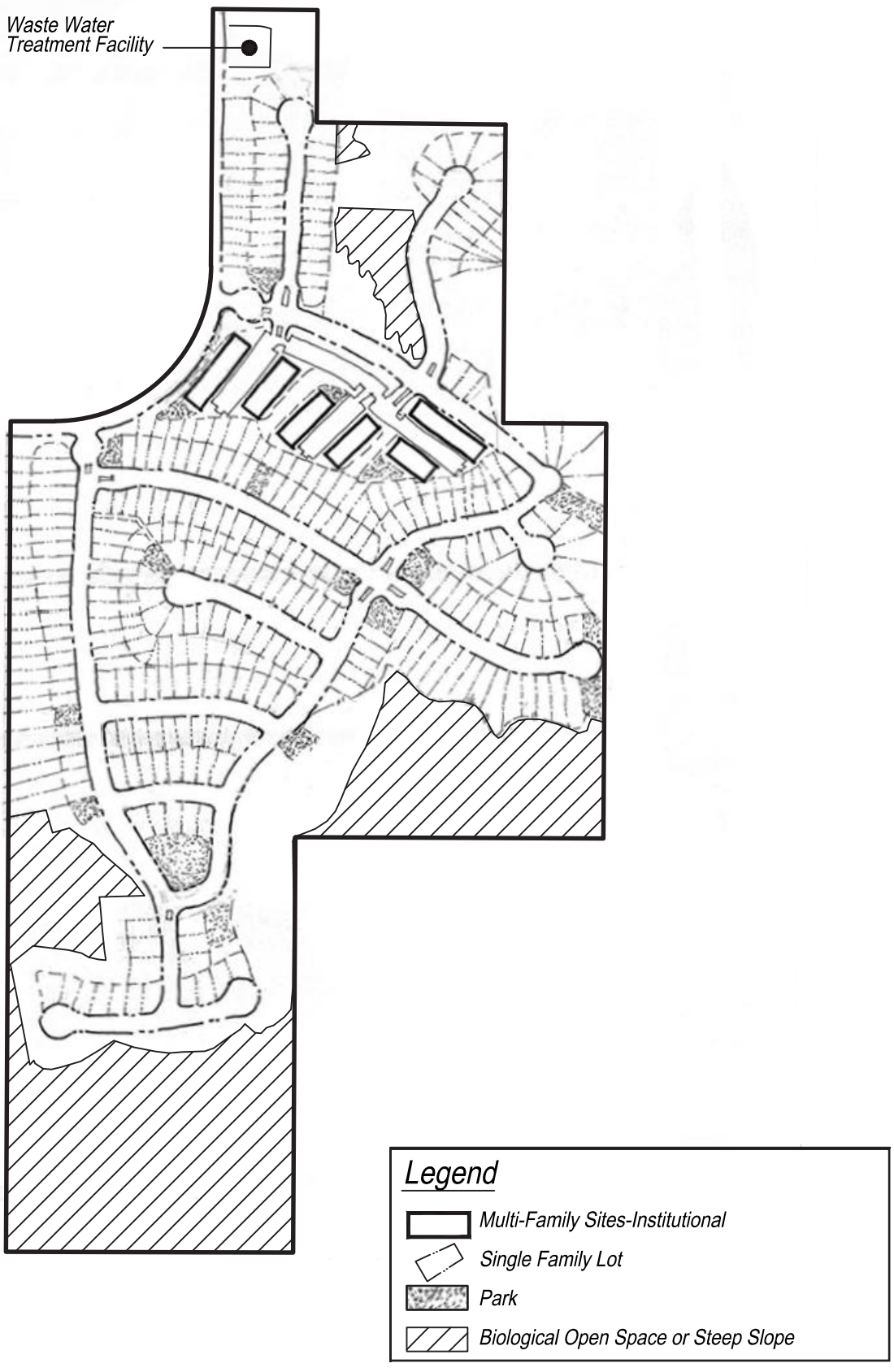
Source: PDC

General Plan Consistent with Sewer Alternative

HARMONY GROVE VILLAGE SOUTH

Figure 4-2

HELIX Environmental Planning



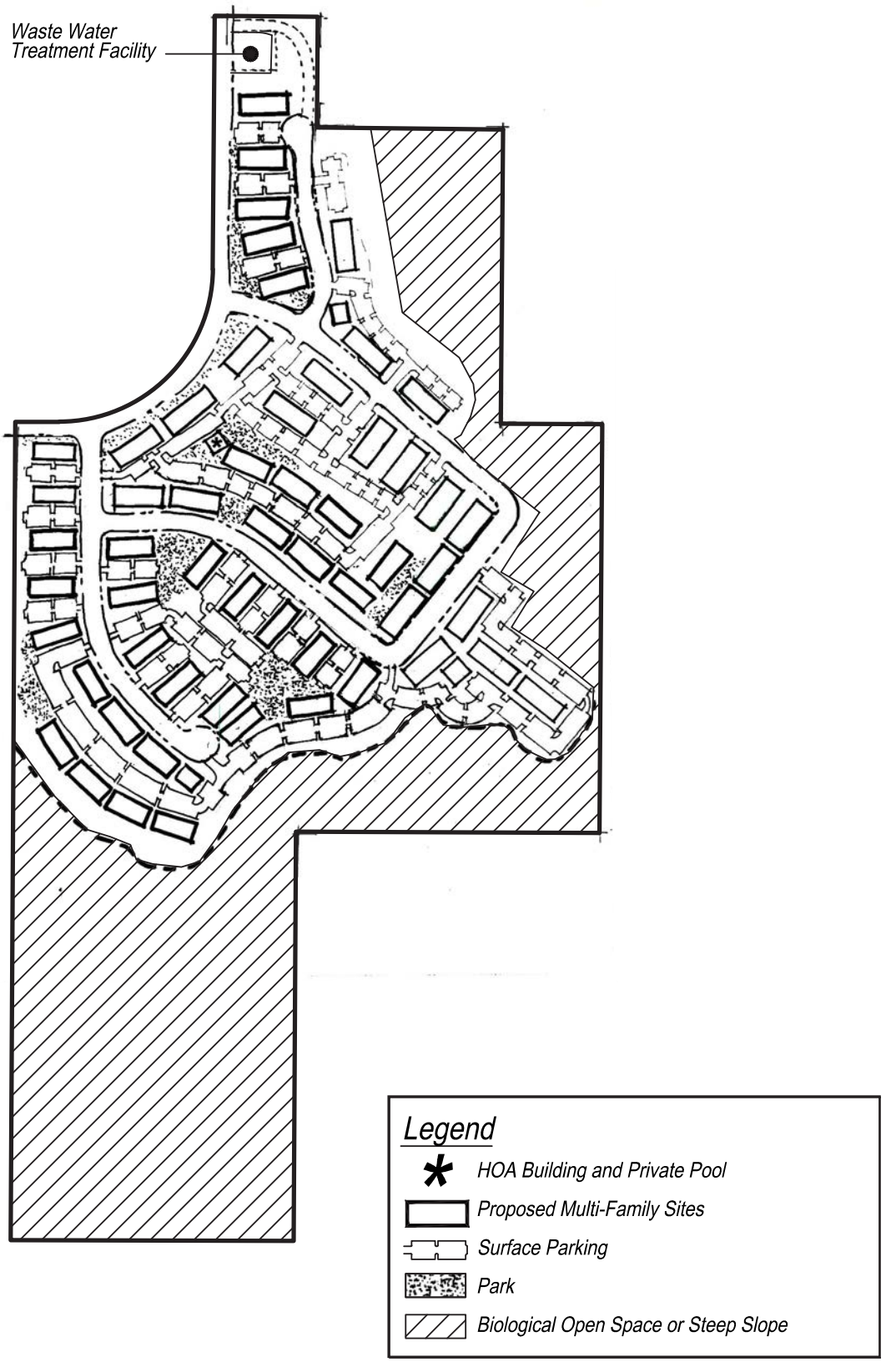
Source: PDC 2016

Senior Care Traffic Reduction Alternative

HARMONY GROVE VILLAGE SOUTH

Figure 4-3

HELIX Environmental Planning



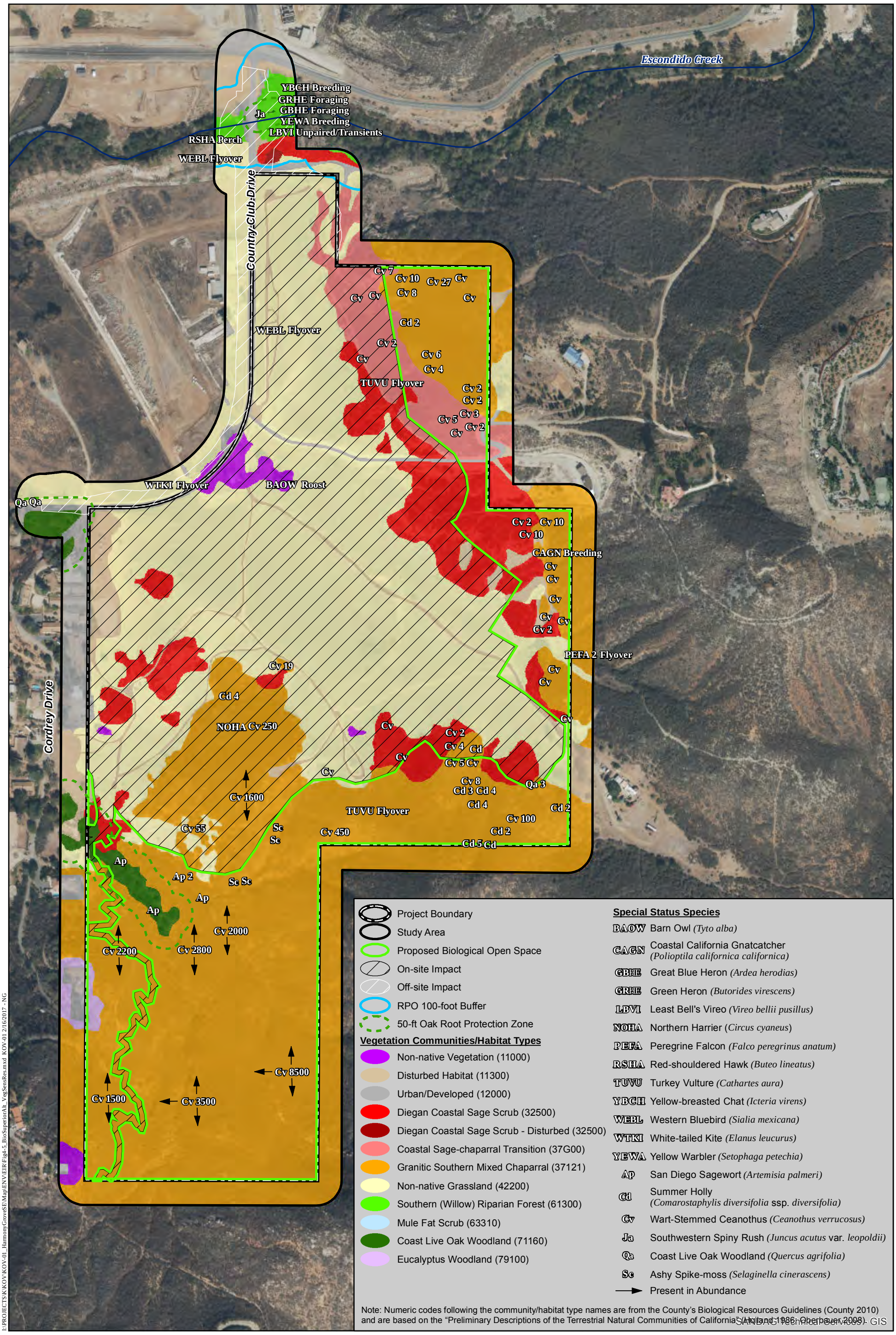
Source: PDC 2016

Biologically Superior Alternative

HARMONY GROVE VILLAGE SOUTH

Figure 4-4

HELIX Environmental Planning



Project Boundary
Study Area
Proposed Biological Open Space
On-site Impact
Off-site Impact
RPO 100-foot Buffer
50-ft Oak Root Protection Zone

Vegetation Communities/Habitat Types

- Non-native Vegetation (11000)
- Disturbed Habitat (11300)
- Urban/Developed (12000)
- Diegan Coastal Sage Scrub (32500)
- Diegan Coastal Sage Scrub - Disturbed (32500)
- Coastal Sage-chaparral Transition (37G00)
- Granitic Southern Mixed Chaparral (37121)
- Non-native Grassland (42200)
- Southern (Willow) Riparian Forest (61300)
- Mule Fat Scrub (63310)
- Coast Live Oak Woodland (71160)
- Eucalyptus Woodland (79100)

Special Status Species

- BAOW Barn Owl *(Tyto alba)*
- CAGN Coastal California Gnatcatcher *(Polioptila californica californica)*
- GBHE Great Blue Heron *(Ardea herodias)*
- GRHE Green Heron *(Butorides virescens)*
- LBVI Least Bell's Vireo *(Vireo bellii pusillus)*
- NOHA Northern Harrier (*Circus cyaneus*)
- PEFA Peregrine Falcon *(Falco peregrinus anatum)*
- RSHA Red-shouldered Hawk *(Buteo lineatus)*
- TUVU Turkey Vulture *(Cathartes aura)*
- YBCH Yellow-breasted Chat *(Icteria virens)*
- WEBL Western Bluebird *(Sialia mexicana)*
- WTKI White-tailed Kite *(Elanus leucurus)*
- YEWA Yellow Warbler *(Setophaga petechia)*
- Ap San Diego Sagewort *(Artemisia palmeri)*
- Cd Summer Holly *(Comarostaphylis diversifolia* ssp. *diversifolia)*
- Cv Wart-Stemmed Ceanothus *(Ceanothus verrucosus)*
- Ja Southwestern Spiny Rush *(Juncus acutus* var. *leopoldii)*
- Qa Coast Live Oak Woodland *(Quercus agrifolia)*
- Sc Ashy Spike-moss *(Selaginella cinerascens)*
- Present in Abundance

Note: Numeric codes following the community/habitat type names are from the County's Biological Resources Guidelines (County 2010) and are based on the "Preliminary Descriptions of the Terrestrial Natural Communities of California" (Holland 1986, Oberbauer 2008).

SANDAG Technical Services - GIS

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Biologically Superior Alternative Vegetation and Sensitive Resources/Impacts

HARMONY GROVE VILLAGE SOUTH

HELIX Environmental Planning

N 0 350 Feet

Figure 4-5

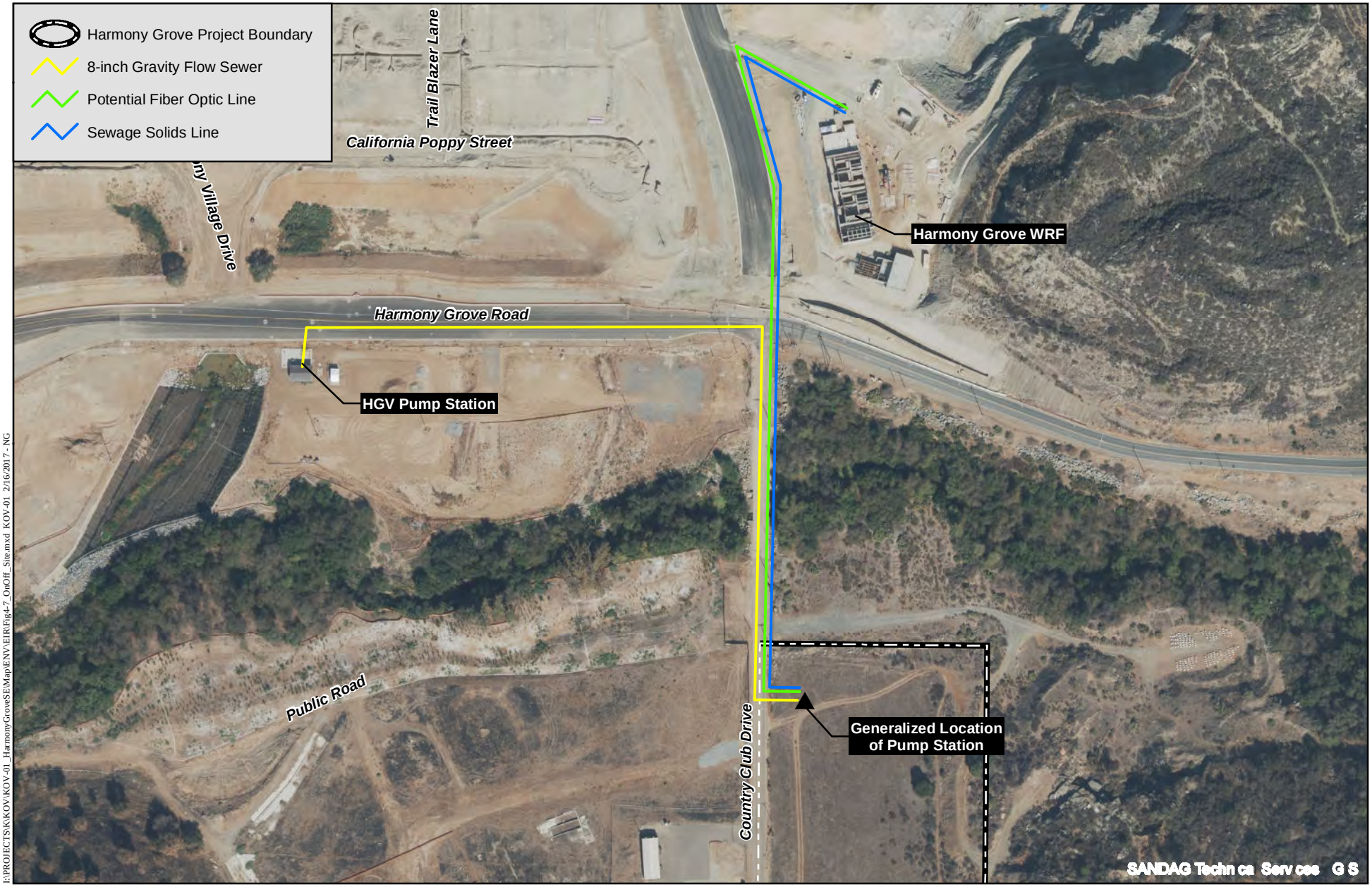
Off-site Connection to the HGV WRF

HARMONY GROVE VILLAGE SOUTH

HELIX Environmental Planning

N 0 200 Feet

Figure 4-6



Off-site Connections of Combined On-/Off-site Wastewater Treatment to HGV

HARMONY GROVE VILLAGE SOUTH

HELIX Environmental Planning

0 200 Feet

Figure 4-7