CHAPTER 4.0 PROJECT ALTERNATIVES

The California Environmental Quality Act (CEQA) requires in Section 15126.6 of the CEQA Guidelines that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the proposed project or to the proposed project location that would feasibly attain most of the project objectives but would avoid or lessen any significant environmental impacts. An EIR should evaluate the environmental impacts of the alternatives compared to the proposed project. This chapter of the EIR describes and evaluates project alternatives and is intended to implement the requirements set forth in the CEQA Guidelines. This chapter also identifies the Environmentally Superior Project Alternative as required by CEQA Guidelines Section 15126.6(e)(2).

4.1 Rationale for Alternative Selection

The following discussion covers a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening any significant effects of the project, even if these alternatives would not attain all of the project objectives or would be more costly. The discussion shall focus on alternatives to the project that are capable of meeting most of the project objectives identified in Chapter 1.0 of this EIR. According to the CEQA Guidelines, many factors may be taken into account when addressing the feasibility of alternatives, such as environmental impacts, site suitability as it pertains to various land use designations, economic viability, availability of infrastructure, regulatory limitations, and jurisdictional boundaries. Also according to CEQA guidelines, discussion of each alternative should be sufficient "to allow meaningful evaluation, analysis, and comparison with the proposed project" (14 CCR 15000 et seq.). Therefore, the significant effects of each alternative are discussed in less detail than those of the proposed project, but in enough detail to provide decision makers with perspective and a reasoned choice among alternatives to the proposed project.

Additionally, a No Project Alternative is required to be included in the range of alternatives. An EIR need not consider an alternative whose effects cannot be reasonably identified, whose implementation is remote or speculative, or one that would not achieve most of the basic project objectives. Finally, the Environmentally Superior Alternative shall be identified and if it is the No Project Alternative, the next Environmentally Superior Alternative shall be identified.

The proposed project would result in potentially significant and unavoidable adverse impacts for which feasible mitigation measures would not reduce the impacts to below a level of significance for the following issues: aesthetics, agriculture, air quality, biology, cultural resources, hazards and hazardous materials, land use and planning, noise, and transportation and circulation. Potential impacts to the following were determined not to be significant after further evaluation: greenhouse gas and hydrology and water quality. The following issues were determined to be not

significant or have no impact in the Initial Study process: geology and soils, mineral resources, population and housing, public services, recreation, and utilities.

The project alternatives evaluated are addressed in subsections 4.2, 4.3, 4.4, and 4.5 in this chapter and include:

- Limited Small Wind Turbine Alternative
- Limited Large Wind Turbine Alternative
- No Project (No Zoning Ordinance Amendment) Alternative.

The above alternatives were selected to reduce significant impacts associated with the proposed project while still meeting the majority of project objectives. These alternatives represent a reasonable range of alternatives as required by CEQA. The alternatives are compared to the impacts of the proposed project and are assessed relative to their ability to meet the basic objectives of the proposed project. As described in Chapter 1.0, the project objectives include the following:

1. Facilitate the use of renewable wind energy within the County of San Diego (County) pursuant to existing and future statewide goals.
2. Maximize the production of energy from renewable wind sources to assist the County in furthering federal goals under Section 211 of the Energy Policy Act of 2005.
3. Reduce the potential for energy shortages and outages by facilitating local energy supply.
4. Streamline and clarify the approval process for the development and operation of small wind turbines.
5. Minimize the potential for land use conflicts that may arise through the development of wind turbines.
6. Allow the development of small wind turbines without a discretionary permit.
7. Allow temporary Meteorological Testing (MET) facilities that comply with the height designator of the zone to be permitted without a discretionary permit.
8. Update regulations for large wind turbines to be consistent with current wind turbine technology and designs.

4.2 Alternatives Considered but Rejected

In addition to the project alternatives, four alternatives were considered but rejected from further analysis in the EIR because they did not accomplish most of the basic project objectives, they would be infeasible to analyze, and/or they deviated from the direction given by the County Board of Supervisors. This section describes those four alternatives.

Increased Setbacks/Reduced Height

During the Notice of Preparation (NOP) process, some stakeholders requested that greater restrictions be placed on wind turbines. The Boulevard Planning Group commented that large-scale wind turbines should have setbacks of "…at least 1.5 to 2 miles from occupied buildings, recreation areas, public roads, protected habitat and wildlife, and more." In addition, the Boulevard Planning Group requested that small turbines be limited to 65 feet in height. Similar suggestions were made on behalf of Backcountry against Dumps ("BAD"), the Protect Our Communities Foundation ("POC"), and East County Community Action Coalition ("ECCAC"). Environmental impacts would be substantially avoided or reduced if these restrictions were evaluated as a project alternative. However, these project components would directly conflict with some of the project objectives listed in Section 1.1 of this EIR. CEQA Guideline 15126.6(c) states: "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." The Increased Setback/Reduced Height Alternative would conflict with the following objectives: (1) Facilitate the use of renewable wind energy within the County pursuant to existing and future statewide goals, (4) Streamline and clarify the approval process for the development and operation of small wind turbines, and (7) Update regulations for large wind turbines to be consistent with current wind turbine technology and designs. Therefore, this alternative would not feasibly accomplish most of the basic objectives of the project and was rejected from further analysis.

No Limitations for Large Turbine MUPs

During the NOP process, some stakeholders requested that fewer restrictions be placed on large wind turbines. Many proponents of large wind energy projects have reasoned that since large turbine projects require Major Use Permits (MUP) with project-specific environmental analyses, the limits of those projects should be determined on a case-by-case basis, depending on the particular issues associated with those projects. For example, some NOP letters suggested that minimum setbacks, height restrictions, and noise limitations for large turbine projects be removed from County regulations, or that a waiver process be established, to allow the opportunity for these projects to conduct site-specific analysis to determine suitable design standards. Since the Zoning Ordinance and Noise Ordinance currently have set limitations for setbacks, and height and noise generation, the removal or waiver of such provisions would potentially result in significant environmental effects, above what is currently estimated for the proposed project. Thus, this would not be a reduced alternative but would have to be included in the scope of the proposed project to be adequately considered and evaluated. The difficulty with expanding the project to remove regulatory limitations for large wind turbines is twofold. First, the foreseeable environmental impacts would be extremely difficult for the County to analyze given the uncertainty associated with the size, placement, and noise output of future wind energy MUPs. Secondly, this expanded project description would greatly exceed the direction given by

the County Board of Supervisors and the overall objectives of the project. Since the No Limitations for Large Turbine MUPs would neither facilitate achievement of the project objectives nor reduce environmental impacts, this alternative was rejected from consideration.

Administrative Permit for Large Wind Turbines

Similar to the above No Limitations Alternative, the County received requests to change the permitting process for large wind turbine projects so that an Administrative Permit could be issued rather than a MUP. The Administrative Permit is a discretionary permit that still requires full environmental review. However, under this process there would be fewer findings of compatibility, fewer application fees, and less oversight (director's decision instead of Planning Commission decision) when compared to the MUP process. Whether or not this process would result in additional environmental impacts is uncertain. When determining the scope of the project, County staff presented this option to the Board of Supervisors for consideration. The Board's direction to staff was to maintain the MUP process for large wind energy projects. Therefore, this alternative is rejected from further analysis.

Distributedive Generation Policy

During the NOP process, some stakeholders requested that the County develop a policy that ranks renewable energy projects in a manner that gives preferences to, or otherwise incentivizes, distributed generation projects in urbanized areas. Proponents of this policy believe that distributed generation in urbanized areas would have fewer environmental impacts because transmission requirements would be reduced and urbanized areas are already developed/disturbed and, therefore, less impacted by the introduction of wind turbine generators. The difficulty with this approach is twofold. First, while the County regulates land uses and development within its jurisdiction, it does not regulate energy distribution on a global level. The Californian Public Utility Commission would be the appropriate authority to implement a distributedive generation policy~~,~~ since it has the global oversight to rank and incentivize renewable energy projects. Second, the County has limited wind resource areas, which lie predominately outside of urbanized areas. Incentivizing distributed generation in urbanized areas would discourage wind projects away from the areas of the County with the greatest wind resource potential. As such, the Distributedive Generation Policy Alternative is outside the scope of this project and is not conducive to achieving the project objectives; it has, therefore, been rejected from further consideration.

4.3 Analysis of the Limited Small Wind Turbine/MET Facility Alternative

4.3.1 Limited Small Wind Turbine Alternative Description and Setting

The Limited Small Wind Turbine Alternative involves three components. For each component, this analysis will focus on only the environmental issue areas for which significant impacts from

small wind turbines were identified for the proposed project. The components of the Limited Small Wind Turbine Alternative are described as follows:

- Reduced Project Area – Small wind turbines permitted without discretionary review would only be allowed in previously disturbed/developed areas.
- Reduced Height – The wind turbine tower height, defined as the distance from existing grade at the base of the wind turbine tower to the top of the tower, excluding the turbine, shall not exceed 65 feet.
- Fewer turbines – A maximum of two small wind turbines would be allowed on a legal lot as an accessory use to the primary use of the lot in accordance with the following requirements in Section 6951 of the Zoning Ordinance. One additional wind turbine (three total) would be allowed when all turbines are mounted on an existing permitted structure, such as an accessory structure allowed pursuant to the Accessory Use Regulations in Section 6150, and when all wind turbines comply with the height limit of the zone and main building setbacks.

For the reduced project area component described above, it would have to be determined by decision makers that disturbed and developed areas can be identified under a ministerial process. The County's definition of "Developed Land" is land that has been constructed upon or otherwise covered with a permanent unnatural surface. Areas where no natural land is evident due to a large amount of debris or other materials being placed upon it may also be considered "Developed" (e.g. car recycling plant, active quarry, etc.). The County's definition of "Disturbed Land" is land in which the vegetative cover comprises less than 10 percent of the surface area (disregarding natural rock outcrops) and where there is evidence of soil surface disturbance and compaction from previously legal human activity; or where the vegetative cover is greater than 10 percent, there is soil surface disturbance and compaction, and the presence of building foundations and debris (e.g., irrigation piping, fencing, old wells, abandoned farming or mining equipment) resulting from legal activities (as opposed to illegal dumping). Although non-native grasses may be present on disturbed land, they do not dominate the vegetative cover. Examples of disturbed land include the following activities, if performed under legal means: recently graded firebreaks, graded construction pads, construction staging areas, off-road vehicle trails, and old home sites.

4.3.2 Comparison of the Effects of the Limited Small Wind Turbine Alternative to the Proposed Project

4.3.2.1 Aesthetics

Scenic Vistas

Similar to the proposed project, the Limited Small Wind Turbine Alternative proposes the development of small wind turbines that would have the potential to obstruct, interrupt, or detract from scenic vistas. When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of small turbines. Less development would potentially result in fewer obstructions or distractions to scenic vistas. Therefore, impacts would be lessened as compared to the proposed project. Additionally, small turbines would only be permitted within areas that are previously developed/disturbed.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. Shorter structures would result in fewer obstructions or distractions from scenic vistas. Therefore, impacts would be lessened as compared to the proposed project.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in fewer obstructions and distractions from scenic vistas. Therefore, impacts would be lessened as compared to the proposed project.

Similar to the proposed project, however, impacts would still be considered significant since the alternative would potentially introduce vertical elements within close proximity to the viewshed of a scenic vista and would have the potential to interrupt or detract from a scenic vista that previously did not include infrastructure. Mitigation measures would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and Limited Small Wind Turbine Alternative.

Scenic Resources

Similar to the proposed project, the Limited Small Wind Turbine Alternative proposes the development of small wind turbines that would have the potential to result in removal or substantial adverse change to features that contribute to the valued visual character or image of a neighborhood, community, State Scenic Highway, or localized area, including landmarks, (designated) historic resources, trees, and rock outcroppings. Additionally, if future development is inconsistent with surrounding scenic resources, it would detract from the visual quality of the resources. When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development

of small turbines. Development of small wind turbines would be confined to areas that are previously developed/disturbed and, therefore, would not block viewsheds that were previously undisturbed. Therefore, impacts would be lessened as compared to the proposed project.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. Shorter structures would result in fewer impacts to scenic resources. Therefore, impacts would be lessened as compared to the proposed project.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in fewer impacts to scenic resources. Therefore, impacts would be lessened as compared to the proposed project.

Although the Limited Small Wind Turbine alternative would not block viewsheds that were previously undisturbed and would lessen impacts as compared to the proposed project, impacts would still be considered significant since small turbines could potentially block viewsheds that were previously available for viewing. Mitigation measures would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and Limited Small Wind Turbine Alternative.

Visual Character or Quality

Similar to the proposed project, the Limited Small Wind Turbine Alternative proposes the development of small wind turbines that would have the potential to degrade the existing visual character or quality of a community. When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of small turbines. Because the development of small wind turbines would be confined to areas that were previously developed/disturbed, they would not block viewsheds that were previously undisturbed. As a result, impacts would be lessened as compared to the proposed project.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. Shorter structures would result in fewer impacts to visibility of increased visual contrasts, view blockage, or skylining from sensitive viewing locations. Therefore, impacts would be lessened as compared to the proposed project.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in fewer impacts to visual character and quality. Therefore, impacts would be lessened as compared to the proposed project.

Although the Limited Small Wind Turbine alternative would not block viewsheds that were previously undisturbed and would lessen impacts as compared to the proposed project, impacts would still be considered significant since small turbines could potentially degrade existing visual character or quality. Mitigation measures would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and Limited Small Wind Turbine Alternative.

4.3.2.2 Biological Resources

Special-Status Plant and Wildlife Species

When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of small turbines. Development of small wind turbines would be confined to areas that are previously developed/disturbed and, therefore, would not impact special-status plant and wildlife species as the proposed project would.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. Shorter structures would result in fewer risks of raptor collision. Therefore, impacts would be lessened as compared to the proposed project.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in less ground disturbance. For purposes of evaluating small wind turbines, a worst-case ground disturbance footprint was developed based on CEQA assumptions described in Project Description, Section 1.4.2. For a single small wind turbine, the worst-case footprint utilizes a foundation size of approximately 441 square feet and excavation of roughly 61 cubic yards. Two small wind turbine towers would amount to approximately 882 square feet of ground disturbance and excavation of roughly 122 cubic yards. This compares to 1,323 square feet of ground disturbance and roughly 183 cubic yards of excavation for the proposed project. The reduction in ground disturbance would lessen impacts to special-status plant and wildlife species. While potential impacts to sensitive species and their habitats would be greatly reduced under the Limited Small Wind Turbine Alternative, potential bird or bat strikes would still potentially result in significant impacts to candidate, sensitive, or special-status species. Mitigation measures would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and Limited Small Wind Turbine Alternative.

Riparian Habitat and Other Sensitive Natural Communities

When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of

small turbines. Development of small wind turbines would be confined to areas that are previously developed/disturbed and, therefore, would not impact riparian habitat and other sensitive natural communities.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. Shorter structures would not affect the significance of impacts to riparian habitat and other sensitive natural communities.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in less ground disturbance. Because small wind turbines would only be permitted on developed/disturbed areas in this alternative, riparian and other sensitive habitat would not be significantly impacted by small wind turbines under this alternative. Therefore, the Limited Small Wind Turbine Alternative would result in less-than-significant impacts to riparian habitat and other sensitive natural communities. However, impacts from future large wind turbines would remain significant. Refer to Section 4.4.2.4 for a discussion of reduced impacts to riparian habitat and other sensitive natural communities for large wind turbine projects.

Wildlife Movement

When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of small turbines. Development of small wind turbines would be confined to areas that are previously developed/disturbed and, therefore, are less likely to impact wildlife movement as compared to the proposed project.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. Shorter structures would result in fewer risks of raptor collision. Therefore, impacts would be lessened as compared to the proposed project.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in less ground disturbance. For purposes of evaluating small wind turbines, a worst-case ground disturbance footprint was developed based on CEQA assumptions described in Project Description, Section 1.4.2. For a single small wind turbine, the worst-case footprint utilizes a foundation size of approximately 441 square feet and excavation of roughly 61 cubic yards. Two small wind turbine towers would amount to approximately 882 square feet of ground disturbance and excavation of roughly 122 cubic yards. This compares to 1,323 square feet of ground disturbance and roughly 183 cubic yards of

excavation for the proposed project. The reduction in ground disturbance would lessen impacts to wildlife movement.

Although the Limited Small Wind Turbine Alternative would reduce impacts to wildlife movement, it would still introduce a new vertical element that may impact a wildlife corridor, such as a flight path for birds. Therefore, similar to the proposed project, the Limited Small Wind Turbine Alternative would result in potentially significant impacts to wildlife movement and corridors. Mitigation measures for the proposed project would not reduce potentially significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and Limited Small Wind Turbine Alternative.

4.3.2.3 Cultural Resources

Historical Resources

When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of small turbines. Development of small wind turbines would be confined to areas that are previously developed/disturbed, which would reduce potential impacts to historic resources from ground disturbance.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. Shorter towers may reduce potential impacts from the physical alteration of a historical resource or the alteration of the setting of resources when the setting contributes to the resources' significance.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in less ground disturbance. In addition, fewer turbines may reduce the potential alteration of a historic structure or reduce the potential alteration of the setting in which significant historical resources occur.

Because the Limited Small Wind Turbine Alternative would result in less ground disturbance and would only be permitted on previously disturbed/developed areas, impacts to historic resources would be substantially reduced. However, significant impacts may still result from small wind turbines due to the physical demolition, destruction, relocation, or alteration of historical resources or the alteration of the setting of the resources when the setting contributes to the resources' significance. The mitigation identified in Section 2.5.6.1 of this EIR would further reduce potential impacts but not to a level below significance. Therefore, impacts would remain significant and unavoidable for both the proposed project and Limited Small Wind Turbine Alternative.

Archaeological Resources

When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of small turbines. Development of small wind turbines would be confined to areas that are previously developed/disturbed and, therefore, would not impact archaeological resources.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. However, shorter structures would not affect the significance of impacts to archaeological resources.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in less ground disturbance. For purposes of evaluating small wind turbines, a worst-case ground disturbance footprint was developed based on CEQA assumptions described in Project Description, Section 1.4.2. For a single small wind turbine, the worst-case footprint utilizes a foundation size of approximately 441 square feet and excavation of roughly 61 cubic yards. Two small wind turbine towers would amount to approximately 882 square feet of ground disturbance and excavation of roughly 122 cubic yards. This compares to 1,323 square feet of ground disturbance and roughly 183 cubic yards of excavation for the proposed project. The reduction in ground disturbance would further decrease the potential for significant impacts to archaeological resources.

Because the Limited Small Wind Turbine Alternative would result in less ground disturbance and would only be permitted on previously disturbed/developed areas, impacts to archaeological resources would be substantially reduced. Therefore, the Limited Small Wind Turbine Alternative would result in less-than-significant impacts to archaeological resources, whereas the proposed project could result in a significant, unavoidable impact to archaeological resources.

Human Remains

When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of small turbines. Development of small wind turbines would be confined to areas that were previously developed/disturbed and, therefore, would not damage or destroy human remains.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. However, shorter structures would not affect the significance of impacts to human remains.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in less ground disturbance. For purposes of evaluating small wind turbines, a worst-case ground disturbance footprint was developed

based on CEQA assumptions described in Project Description, Section 1.4.2. For a single small wind turbine, the worst-case footprint utilizes a foundation size of approximately 441 square feet and excavation of roughly 61 cubic yards. Two small wind turbine towers would amount to approximately 882 square feet of ground disturbance and excavation of roughly 122 cubic yards. This compares to 1,323 square feet of ground disturbance and roughly 183 cubic yards of excavation for the proposed project. The reduction in ground disturbance would further decrease the potential for significant impacts to human remains.

Because the Limited Small Wind Turbine Alternative would result in less ground disturbance and would only be permitted on previously disturbed/developed areas, impacts to human remains would be substantially reduced. Therefore, the Limited Small Wind Turbine Alternative would result in less-than-significant impacts to human remains, whereas the proposed project could result in a significant, unavoidable impact to human remains.

Paleontological Resources

When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of small turbines. Development of small wind turbines would be confined to areas that were previously developed/disturbed and, therefore, would have substantially less impact on paleontological resources.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. However, shorter structures would not affect the significance of impacts to paleontological resources.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in less ground disturbance. For purposes of evaluating small wind turbines, a worst-case ground disturbance footprint was developed based on CEQA assumptions described in Project Description Section 1.4.2. For a single small wind turbine, the worst-case footprint utilizes a foundation size of approximately 441 square feet and excavation of roughly 61 cubic yards. Two small wind turbine towers would amount to approximately 882 square feet of ground disturbance and excavation of roughly 122 cubic yards. This compares to 1,323 square feet of ground disturbance and roughly 183 cubic yards of excavation for the proposed project. The reduction in ground disturbance would further decrease the potential for significant impacts to paleontological resources.

Because the Limited Small Wind Turbine Alternative would result in less ground disturbance and would only be permitted on previously disturbed/developed areas, impacts to paleontological resources would be substantially reduced. Therefore, the Limited Small Wind Turbine

Alternative would result in less-than-significant impacts to paleontological resources, whereas the proposed project could result in a significant, unavoidable impact to paleontological resources.

4.3.2.4 Hazards and Hazardous Materials

Wildland Fires

When compared to the proposed project, the Limited Small Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of small turbines. Development of small wind turbines would be confined to areas that are previously developed/disturbed. As such, there would be less potential for small turbines to be near wildland areas, and this alternative would result in fewer impacts related to wildland fires as compared to the proposed project.

The Limited Small Wind Turbine Alternative reduces the maximum wind turbine tower height to 65 feet, as compared to the proposed project with a maximum height of 80 feet. Shorter structures would not affect the significance of impacts related to wildland fires.

The Limited Small Wind Turbine Alternative would reduce the number of small wind turbines allowed on a legal lot. Fewer wind turbines would result in less ground disturbance. However, the reduction in ground disturbance does not affect the significance of impacts related to wildland fires.

Although the Limited Small Wind Turbine Alternative would lessen the potential for wildland fires compared to the proposed project, it would still potentially result in significant impacts due to potential risk of wildfire ignition and spread associated with the operation of wind turbines. Mitigation measures for the proposed project would not reduce potential significant impacts to below a significant level; therefore, impacts would remain significant and unavoidable for both the proposed project and Limited Small Wind Turbine Alternative.

4.4 Analysis of the Limited Large Wind Turbine/MET Facility Alternative

4.4.1 Limited Large Wind Turbine Alternative Description and Setting

The Limited Large Wind Turbine Alternative would involve three substantial changes as compared to the proposed project. For each component, this analysis will focus on only the environmental issue areas for which significant impacts from large wind turbines were identified for the proposed project. First, this alternative would reduce the project area and shift development away from village areas by limiting turbine development to rural and semirural areas, as designated by the General Plan, and requiring a 2,000-foot setback from Interstate highways. Second, large wind turbines would be permitted within wind resource areas classified as “fair” through “superb” and would not be permitted within “marginal” wind resource areas as

they are with the proposed project (see Figure 4-1). Approximately 807,984 acres within the County, under the County's jurisdiction, are designated as "marginal" through "superb," of which approximately 405,100 acres are "marginal" (NREL 2009). Therefore, this alternative would substantially reduce the potential area for large wind turbine development by about half (approximately 402,884 acres). Third, the Limited Large Wind Turbine Alternative would retain the existing policies and language of the General Plan; in particular, those policies of the Boulevard chapter of the Mountain Empire Subregional Plan (Boulevard Community Plan), which include strict regulations and processing requirements specifically for large wind turbines projects, and the Borrego Springs Community Plan, which prohibits wind turbine power generation towers in areas where viewsheds would be adversely impacted. No General Plan Amendment is proposed as a part of this alternative.

4.4.2 Comparison of the Effects of the Limited Large Wind Turbine Alternative to the Proposed Project

4.4.2.1 Aesthetics

Scenic Vistas

Similar to the proposed project, the Limited Large Wind Turbine Alternative proposes the development of large wind turbines that would have the potential to obstruct, interrupt, or detract from scenic vistas. When compared to the proposed project, the Limited Large Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of large turbines. Less development would potentially result in fewer obstructions or distractions to scenic vistas. Therefore, impacts would be lessened as compared to the proposed project. Additionally, the Limited Large Wind Turbine Alternative would not change the Boulevard and Borrego Springs community plan language, and therefore, scenic vistas in the Boulevard and Borrego Springs planning areas would be better protected. Nonetheless, impacts would still be considered significant since the alternative would potentially introduce vertical elements within close proximity of the viewshed of a scenic vista and would have the potential to interrupt or detract from a scenic vista that previously did not include infrastructure or development. Mitigation proposed in Section 2.1.6.1 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts to scenic vistas would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Scenic Resources

Similar to the proposed project, the Limited Large Wind Turbine Alternative proposes the development of large wind turbines that would have the potential to result in the removal or substantial adverse change to features that contribute to the valued visual character or image of a neighborhood, community, State Scenic Highway, or localized area, including landmarks,

(designated) historic resources, trees, and rock outcroppings. Additionally, if future large turbines are inconsistent with surrounding scenic resources, they would detract from the visual quality of the resources. When compared to the proposed project, the Limited Large Wind Turbine Alternative would propose a smaller project area, which would result in fewer potential areas for the development of large wind turbines and potentially fewer impacts to scenic resources. Additionally, the Limited Large Wind Turbine Alternative would not change the Boulevard and Borrego Springs community plan language, and therefore, scenic resources in these planning areas would be better protected. However, impacts would still be considered significant since the alternative could still potentially introduce wind turbine towers that could block viewsheds that were previously available for viewing and/or previously undisturbed. Mitigation proposed in Section 2.1.6.2 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts to scenic resources would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Visual Character or Quality

Similar to the proposed project, the Limited Large Wind Turbine Alternative proposes the development of large wind turbines that would have the potential to result in the degradation of the existing visual character or quality of a community. When compared to the proposed project, the Limited Large Wind Turbine Alternative would propose a smaller project area, which would result in fewer potential areas for the development of large wind turbines and potentially fewer impacts to visual character or quality. Additionally, the Limited Large Wind Turbine Alternative would not change the Boulevard and Borrego Springs community plan language, and therefore, visual character or quality in these communities would be better protected. However, impacts would still be considered significant since the alternative could still potentially introduce wind turbine towers that could affect visual character or quality. Mitigation proposed in Section 2.1.6.3 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts to scenic resources would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Light and Glare

Similar to the proposed project, the Limited Large Wind Turbine Alternative proposes the development of large wind turbines that would have the potential to result in significant impacts associated with lighting and shadow flicker. When compared to the proposed project, the Limited Large Wind Turbine Alternative would propose a smaller project area, which would result in fewer potential areas for the development of large wind turbines and potentially fewer lighting impacts. Additionally, the Limited Large Wind Turbine Alternative would not change the Boulevard and Borrego Springs community plan language, and therefore, potential lighting or shadow flicker impacts in these planning areas would be reduced. However, impacts would still be considered significant since the alternative could still potentially result in future large turbine

projects that require specific lighting per Federal Aviation Administration (FAA) regulations or occasional instances of shadow flicker. Mitigation proposed in Section 2.1.6.4 of this EIR would further reduce impacts, but not to a level below significant. Therefore, lighting and shadow flicker impacts would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

4.4.2.2 Agricultural Resources

Conversion of Farmland

Similar to the proposed project, the Limited Large Wind Turbine Alternative proposes the development of large wind turbines that require large foundations and result in substantial ground-disturbing activities that may result in the permanent conversion of Important Farmland to a non-agricultural use. When compared to the proposed project, the Limited Large Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of large turbines. Less development would potentially result in less conversion of farmland. Additionally, the Limited Large Wind Turbine Alternative would not change the Boulevard and Borrego Springs community plan language, and therefore, Important Farmland in this community would be potentially reduced through the current policies. As such, impacts would be lessened as compared to the proposed project. However, because there is ultimately no guarantee that the reduced project area and conformance with current policies will reduce impacts to a level below significant, the Limited Large Wind Turbine Alternative may still result in significant impacts related to Farmland. Mitigation proposed in Section 2.2.6.1 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts related to conversion of Farmland would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Conflict with Agricultural Zoning or Williamson Act Contracts

Similar to the proposed project, the Limited Large Wind Turbine Alternative proposes the development of large wind turbines that require large foundations and result in substantial ground-disturbing activities that may interfere with existing agricultural operations on agriculturally zoned lands or lands entered into Williamson Act contracts. When compared to the proposed project, the Limited Large Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of large turbines. Less development would potentially result in fewer impacts to agricultural lands. Additionally, the Limited Large Wind Turbine Alternative would not change the Boulevard and Borrego Springs community plan language. Pursuant to the current policies, there may be fewer potential conflicts with agricultural zoning or Williamson Act contracts in the Boulevard and Borrego Springs communities. Therefore, impacts would be lessened as compared to the proposed project. However, because there is ultimately no guarantee that the reduced project area and conformance

with current policies will reduce impacts to a level below significant, the Limited Large Wind Turbine Alternative may still result in significant impacts related to conflicts with agricultural zoning or contracts. Mitigation proposed in Section 2.2.6.2 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts related to conflicts with agricultural zoning and Williamson Act contracts would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Loss or Conversion of Forest Land

Similar to the proposed project, the Limited Large Wind Turbine Alternative proposes the development of large wind turbines that require large foundations and result in substantial ground-disturbing activities that may result in the permanent conversion of Forest Land. When compared to the proposed project, the Limited Large Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of large turbines. Less development would potentially result in less conversion of forest land. Additionally, the Limited Large Wind Turbine Alternative would not change the Boulevard and Borrego Springs community plan language. Pursuant to the current policies, there may be a reduced potential for forest land conversion from large turbine projects in the communities of Boulevard and Borrego Springs. Therefore, impacts would be lessened as compared to the proposed project. However, because there is ultimately no guarantee that a reduced project area or conformance with current community plan policies will reduce impacts to a level below significant, the Limited Large Wind Turbine Alternative may still result in significant impacts to forest lands. Mitigation proposed in Section 2.2.6.4 of this EIR would further reduce impacts, but not to a level below significant. Therefore, potential impacts to forest lands would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Indirect Conversion of Farmland or Forest Land

Similar to the proposed project, the Limited Large Wind Turbine Alternative proposes the development of large wind turbines that require large foundations and result in substantial ground-disturbing activities that may result in indirect conversion of Important Farmland or forest lands. When compared to the proposed project, the Limited Large Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for development of large turbines. Less development would potentially result in less conversion of farmland or forest land from indirect effects. Additionally, the Limited Large Wind Turbine Alternative would not change the Boulevard and Borrego Springs community plan language. Pursuant to the current policies, there may be a reduced potential for indirect impacts to farmland and forest land in the Boulevard and Borrego Springs planning areas. Therefore, impacts would be lessened as compared to the proposed project. However, because there is ultimately no guarantee that the reduced project area or conformance with current community plan policies will reduce impacts to a level below significant, the Limited Large Wind Turbine Alternative

may still result in significant impacts related to the indirect conversion of farmland and forest lands. Mitigation proposed in Section 2.2.6.5 of this EIR would further reduce impacts, but not to a level below significant. Therefore, potential indirect impacts to farmland and forest lands would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

4.4.2.3 Air Quality

Conformance to Federal and State Air Quality Standards

Impacts related to emissions from future large wind turbines due to traffic and construction may violate air quality standards or contribute substantially to an existing or projected air quality violation. When compared to the proposed project, the Limited Large Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of large turbines. Less development would potentially result in fewer impacts from construction activities and traffic. Therefore, impacts would be lessened as compared to the proposed project. However, impacts would still be considered significant since the alternative could still allow for large wind turbine projects with significant traffic and construction impacts in exceedance of air quality standards. Mitigation proposed in Section 2.3.6.2 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts related to air quality standards would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Non-Attainment Criteria Pollutants

Future large wind turbines developed under the Limited Large Wind Turbine Alternative may result in impacts due to emissions (specifically volatile organic compounds (VOC), oxides of nitrogen (NOx), carbon monoxide (CO), particulate matter less than or equal to 10 microns (PM_{10}), and particulate matter less than or equal to 2.5 microns in size ($PM_{2.5}$)) from construction activities. When compared to the proposed project, the Limited Large Wind Turbine Alternative has a reduced project area and, therefore, has less potential areas allowed for the development of large turbines. Less development would potentially result in fewer impacts from construction activities and traffic. Therefore, impacts would be lessened as compared to the proposed project. However, impacts would still be considered significant since the alternative could still allow for large wind turbine projects with significant traffic and construction impacts related to non-attainment criteria pollutants. Mitigation proposed in Section 2.3.6.3 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts related to non-attainment criteria pollutants would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

4.4.2.4 Biological Resources

Special-Status Plant and Wildlife Species

The Limited Large Wind Turbine Alternative would decrease the acreage of land within the County that could potentially be developed with large wind turbines. Additionally, the alternative would not include a General Plan Amendment to change the Boulevard and Borrego Springs community plan language, and therefore, special-status species would be better protected within these community planning areas. When compared to the proposed project, the Limited Large Wind Turbine Alternative would result in fewer direct and indirect impacts to habitat and fewer potential bird or bat strikes. However, even with a reduced project area and conformance with current community plan policies, there may be significant direct or indirect impacts to special-status species or their habitats. Mitigation proposed in Section 2.4.6.1 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts to special-status plant and wildlife species would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Riparian Habitat and Other Sensitive Natural Communities

The Limited Large Wind Turbine Alternative would decrease the acreage of land within the County that could potentially be developed with large wind turbines. Additionally, the alternative would not include a General Plan Amendment to change the Boulevard and Borrego Springs community plan language, and therefore, riparian habitat and sensitive natural communities may be better protected within the communities of Boulevard and Borrego Springs. When compared to the proposed project, the Limited Large Wind Turbine Alternative would result in fewer direct or indirect impacts to riparian habitat or other sensitive natural communities. However, because there is ultimately no guarantee that the reduced project area or conformance with current community plan policies will reduce impacts to a level below significant, the Limited Large Wind Turbine Alternative may still result in significant impacts related to riparian habitat and other sensitive natural communities. Mitigation proposed in Section 2.4.6.2 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts to riparian habitat or other sensitive natural communities would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Wildlife Movement

The Limited Large Wind Turbine Alternative would decrease the acreage of land within the County that could potentially be developed with large wind turbines. Additionally, the alternative would not include a General Plan Amendment to change the Boulevard and Borrego Springs community plan language, and therefore, wildlife movement paths and nursery sites may be better protected within these planning areas. When compared to the proposed project, the

Limited Large Wind Turbine Alternative would result in fewer direct and indirect impacts to wildlife movement paths and nursery sites. However, because there is ultimately no guarantee that the reduced project area or the current community plan policies will reduce impacts to a level below significant, the Limited Large Wind Turbine Alternative may still result in significant impacts relative to wildlife movement and nursery sites. Mitigation proposed in Section 2.4.6.4 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts to wildlife corridors and nursery sites would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

4.4.2.5 Hazards and Hazardous Materials

Wildland Fires

Similar to the proposed project, the Limited Large Wind Turbine Alternative proposes the development of large wind turbines that would have the potential to result in wildland fire hazards. When compared to the proposed project, the Limited Large Wind Turbine Alternative has a reduced project area and, therefore, has fewer potential areas allowed for the development of large turbines. Less development would potentially result in fewer turbines and, therefore, a reduced potential for wildland fires. Additionally, the Limited Large Wind Turbine Alternative would not change the Boulevard and Borrego Springs community plan language, and therefore, the potential for wildland fires in Boulevard and Borrego Springs would be potentially reduced through the current policies. However, a majority of the unincorporated County is located in High or Very High fire-threat hazard areas, and there is no guarantee that the reduced project area or the current community plan policies would bring impacts to a level below significant. Mitigation proposed in Section 2.6.6.7 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts related to wildland fires would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

4.4.2.6 Land Use and Planning

Physically Divide a Community

Similar to the proposed project, the Limited Large Wind Turbine Alternative does not include any new railroad tracks, airports, or other features that would physically divide a community. However, future roadway development for access to the facilities may have the potential to physically divide an established community. The Limited Large Wind Turbine Alternative would decrease the acreage of land within the County that could potentially be developed with large wind turbines. Additionally, the alternative would not include a General Plan Amendment to change the Boulevard and Borrego Springs community plan language, and therefore, the potential to physically divide the Boulevard and Borrego Springs communities would be reduced under the current policies. When compared to the proposed project, the Limited Large Wind Turbine

Alternative would result in less land in the County's jurisdiction that could be impacted by future roadway development. However, because there is ultimately no guarantee that the reduced project area will reduce impacts to a level below significant, the Limited Large Wind Turbine Alternative may still result in significant impacts related to the physical division of a community. No feasible mitigation was identified for the proposed project to reduce potential impacts. Therefore, land use impacts related to the physical division of a community would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

4.4.2.7 Noise

Noise Exposure

Similar to the proposed project, the Limited Large Wind Turbine Alternative could potentially increase noise. All future large wind turbines would be required to comply with the County's Noise Compatibility Guidelines, the County's General Plan Noise Element Noise Standards, the County's Noise Ordinance, and C-weighted regulations in the Wind Energy Ordinance prior to approval. However, it is possible for a C-weighted noise waiver to be granted subject to specific conditions, as discussed in Section 2.8.3.1 of this EIR.

The Limited Large Wind Turbine Alternative would decrease the acreage of land within the County that could potentially be developed with large wind turbines. When compared to the proposed project, the Limited Large Wind Turbine Alternative would result in fewer wind turbines developed within the County's jurisdiction and, therefore, fewer potential impacts related to C-weighted noise. However, since individual projects may still qualify for the C-weighted noise waiver, significant impacts may still result under this alternative. No feasible mitigation was identified for the proposed project to reduce potential impacts. Therefore, noise impacts related to C-weighted noise exposure would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Permanent Increase to Ambient Noise

Similar to the proposed project, the Limited Large Wind Turbine Alternative could potentially increase noise. All future large wind turbines would be required to comply with the County's Noise Compatibility Guidelines, the County's General Plan Noise Element Noise Standards, the County's Noise Ordinance, and C-weighted regulations in the Wind Energy Ordinance prior to approval. However, it is possible for a C-weighted noise waiver to be granted subject to specific conditions, as discussed in Section 2.8.3.3 of this EIR.

The Limited Large Wind Turbine Alternative would decrease the acreage of land within the County that could potentially be developed with large wind turbines. When compared to the proposed project, the Limited Large Wind Turbine Alternative would result in fewer wind turbines developed within the County's jurisdiction and, therefore, fewer potential impacts

related to C-weighted noise. However, since individual projects may still qualify for the C-weighted noise waiver, significant impacts may still result under this alternative. No feasible mitigation was identified for the proposed project to reduce potential impacts. Therefore, impacts related to a permanent C-weighted noise increase above ambient noise would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Temporary or Periodic Increase to Ambient Noise

Similar to the proposed project, the Limited Large Wind Turbine Alternative could potentially increase noise. All future large wind turbines would be required to comply with the County's Noise Compatibility Guidelines, the County's General Plan Noise Element Noise Standards, the County's Noise Ordinance, and C-weighted regulations in the Wind Energy Ordinance prior to approval. However, it is possible for a C-weighted noise waiver to be granted subject to specific conditions, as discussed in Section 2.8.3.4 of this EIR.

The Limited Large Wind Turbine Alternative would decrease the acreage of land within the County that could potentially be developed with large wind turbines. When compared to the proposed project, the Limited Large Wind Turbine Alternative would result in fewer wind turbines developed within the County's jurisdiction and, therefore, fewer potential impacts related to C-weighted noise. However, since individual project may still qualify for the C-weighted noise waiver, significant impacts may still result under this alternative. No feasible mitigation was identified for the proposed project to reduce potential impacts. Therefore, impacts related to temporary increases in C-weighted noise above ambient would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

4.4.2.8 Transportation and Traffic

Conflict with Transportation Plan, Policy, or Ordinance

Similar to the proposed project, the Limited Large Wind Turbine Alternative could potentially increase traffic or exceed Level of Service (LOS) levels during construction or operation and maintenance, thereby conflicting with an applicable transportation plan, policy, or ordinance. The Limited Large Wind Turbine Alternative would decrease the acreage of land within the County that could potentially be developed with large wind turbines. Additionally, the alternative would not include a General Plan Amendment to change the Boulevard and Borrego Springs community plan language, and therefore, potential traffic impacts may be reduced within the Boulevard and Borrego Springs planning areas. When compared to the proposed project, the Limited Large Wind Turbine Alternative would result in less land within the County's jurisdiction that could be impacted by development, and therefore, impacts as a result of future roadway development and traffic would be lessened. However, because there is ultimately no guarantee that the reduced project area or the current community plan policies will reduce

impacts to a level below significant, the Limited Large Wind Turbine Alternative may still result in significant impacts. Mitigation proposed in Section 2.9.6.1 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts related to increased traffic levels would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

Conflict with Congestion Management Program (CMP)

Similar to the proposed project, the Limited Large Wind Turbine Alternative could potentially increase traffic or exceed LOS levels during construction or operation and maintenance, thereby conflicting with the CMP. The Limited Large Wind Turbine Alternative would decrease the acreage of land within the County that could potentially be developed with large wind turbines. Additionally, the alternative would not include a General Plan Amendment to change the Boulevard and Borrego Springs community plan language, and therefore, potential traffic impacts may be reduced within these planning areas. When compared to the proposed project, the Limited Large Wind Turbine Alternative would result in less land within the County's jurisdiction that could be impacted by development, and therefore, impacts as a result of future roadway development and traffic would be lessened. However, because there is ultimately no guarantee that the reduced project area or the current community plan policies will reduce impacts to a level below significant, the Limited Large Wind Turbine Alternative may still result in significant impacts. Mitigation proposed in Section 2.9.6.2 of this EIR would further reduce impacts, but not to a level below significant. Therefore, impacts related to conflicts with the CMP would remain significant and unavoidable for both the proposed project and Limited Large Wind Turbine Alternative.

4.5 Analysis of the No Project Alternative

4.5.1 No Project Alternative Description and Setting

The No Project Alternative assumes that the existing Zoning Ordinance would remain in effect. The main differences between the No Project Alternative and the proposed project is that the proposed project provides an updated set of definitions, procedures, and standards for review and permitting of wind turbines and MET facilities. The proposed project includes allowing a temporary MET facility that complies with the height designator of the zone to be permitted without an Administrative Permit. Currently, an Administrative Permit is required. The proposed project also includes the allowance of small wind turbines that meet the definition and specifications of the Zoning Ordinance to be developed without discretionary review, meaning that so long as they meet the requirements of the Zoning Ordinance, no individual land use permits would be required.

Amendments to the Zoning Ordinance related to large wind turbines are included as a part of the proposed project to bring development parameters up to date with technological changes that affect design standards of wind turbines. Under the No Project Alternative, development parameters would remain the same. Additionally, with respect to large wind turbines, the proposed project includes a General Plan Amendment that would modify the Boulevard and Borrego Springs Community Plans to allow for more flexible permitting of large wind turbine projects through the Major Use Permit Process. Under the No Project Alternative, the existing General Plan (Boulevard Community Plan and Borrego Springs Community Plan) would remain unchanged, thereby making it difficult for large wind turbines to be developed in the communities of Boulevard and Borrego Springs.

4.5.2 Comparison of the Effects of the No Project Alternative to the Proposed Project

4.5.2.1 Aesthetics

Compared to the proposed project, the No Project Alternative would likely result in fewer wind turbine projects. This is because the processing requirements would not change, and therefore, they would not be as streamlined. Additionally, the development parameters would be outdated relative to the latest technologies, which would require additional permits and processing in order for projects to be approved. For this reason, the proposed project would likely result in fewer small and large wind turbines as well as MET facilities. Although fewer facilities would result in fewer impacts to aesthetics, impacts to scenic vistas, scenic resources, and visual character from large and small turbines would still remain significant and unavoidable. Potential lighting impacts from large wind turbines would likely be less than significant since the height limitations under the current Zoning Ordinance may not result in the need for specific FAA lighting requirements. As with the proposed project, no significant lighting or glare impacts would result from small wind turbines under this alternative.

4.5.2.2 Agricultural Resources

Compared to the proposed project, the No Project Alternative would likely result in fewer wind turbine and MET facility projects and less ground disturbance. This is because the processing requirements would not change, and therefore, they would not be as streamlined. Additionally, the development parameters would be outdated relative to the latest technologies, which would require additional permits and processing in order for projects to be approved. For this reason, the proposed project would likely result in fewer small and large wind turbines as well as MET facilities. Similar to the proposed project, no significant impacts to agricultural or forestry resources would result from small turbines under this alternative. Although fewer large turbine facilities would result in fewer impacts to agricultural resources, there is still a potential that the No Project Alternative could result in significant impacts related to the conversion of farmland, the

conversion of forest lands, and indirect conversion of farmland/forest lands from large wind turbines, similar to the proposed project. Small wind turbines/MET facilities under the No Project Alternative would not conflict with agricultural zoning or the Williamson Act as they would not preclude agricultural operations on agriculturally zoned lands or lands entered into Williamson Act contracts. Large wind turbine projects, however, could include disestablishment of Williamson Act contracts (similar to the proposed project), thereby resulting in significant impacts related to Williamson Act conflicts.

4.5.2.3 Air Quality

Compared to the proposed project, the No Project Alternative would likely result in fewer wind turbine and MET facility projects and fewer vehicle miles traveled (VMT). Fewer VMT would result in fewer air quality impacts. Similar to the proposed project, no significant impacts to air quality would result from small turbines under this alternative. However, the No Project Alternative could still result in significant impacts relative to conformance to federal and state air quality standards and non-attainment criteria pollutants from large wind turbines. The No Project Alternative would not result in a significant impact associated with conflicts with air quality plans, sensitive receptors, or objectionable odors, similar to the proposed project.

4.5.2.4 Biological Resources

Compared to the proposed project, the No Project Alternative would likely result in fewer wind turbine and MET facility projects and less ground disturbance. Additionally, the No Project Alternative would not allow for multiple small wind turbines or MET facilities to be developed without discretionary review. One small wind turbine is currently allowed ministerially as an accessory use under the current zoning regulations. In addition, large wind turbines would still be permitted with a Major Use Permit; however, they would be subject to greater setbacks and reduced height. Similar to the proposed project, no significant impacts to federally protected wetlands or to local policies, HCPs, or NCCPs would occur under this alternative. However, the No Project Alternative could still result in significant impacts to sensitive species, riparian and other sensitive natural communities, wildlife corridors, and nursery sites from both small and large wind turbines.

4.5.2.5 Cultural Resources

Compared to the proposed project, the No Project Alternative would likely result in fewer wind turbine and MET facility projects and less ground disturbance. Additionally, the No Project Alternative would only allow for one small wind turbine as an accessory use without discretionary review. Similar to the proposed project, the No Project Alternative could result in significant impacts to historical resources due to alteration of a historical structure or alteration of the setting in which historical resources occur. Unlike the proposed project, this alternative would not likely

result in significant impacts to archaeological or paleontological resources, or to human remains. As with the proposed project, this alternative would not result in significant impacts to cultural resources from large wind turbines.

4.5.2.6 Hazards and Hazardous Materials

Similar to the proposed project, compliance with existing regulations would reduce impacts related to accidental release of hazardous materials, hazards to schools, and existing hazardous material sites to a level less than significant. The No Project Alternative would also result in potentially significant impacts related to wildland fire from large and small turbines, just as the proposed project does.

4.5.2.7 Land Use and Planning

Similar to the proposed project, the No Project Alternative would not conflict with land use plans, polices and regulations. The No Project alternative would potentially result in the physical division of an established community due to roadways or road expansions from large turbine projects, just as the proposed project does.

4.5.2.8 Noise

Compared to the proposed project, the No Project Alternative would likely result in fewer wind turbine and MET facility projects. A-weighted noise impacts would still be less than significant due to existing regulations in the County General Plan and Noise Ordinance. However, no C-weighted restrictions currently exist in the County. Under the proposed project, C-weighted noise regulations would be included in the County Zoning Ordinance to address low frequency noise output from large wind turbines. Therefore, low frequency noise impacts could potentially be greater under the No Project Alternative. The No Project Alternative may result in significant unavoidable impacts associated with C-weighted noise from future large wind turbines, just as the proposed project does.

4.5.2.9 Transportation and Traffic

Compared to the proposed project, the No Project Alternative would likely result in fewer wind turbine and MET facility projects and fewer VMT. Therefore, impacts as a result of future roadway development and traffic would be lessened. However, similar to the Proposed Project, the No Project Alternative may still result in significant unavoidable impacts associated with conflicts with a plan, policy, or ordinance that establishes measures of the effectiveness of the performance of the circulation system, and associated with potential conflicts with the CMP, due to the construction of large wind turbines.

4.6 Environmentally Superior Project

As compared to the proposed project, the Limited Small Wind Turbine Alternative, Limited Large Wind Turbine Alternative, and No Project Alternative would result in reduced environmental impacts. The Limited Small Wind Turbine Alternative consists of three components, which when combined would decrease environmental impacts as compared to the proposed project. Specifically, this alternative would reduce impacts related to archaeological resources, paleontological resources, and human remains to less than significant. The Limited Large Wind Turbine Alternative would reduce the potential areas where large wind turbines could be developed and would retain the existing policies in the Boulevard Community Plan. Although this alternative would lessen environmental impacts as compared to the proposed project, many of the same impacts would remain significant and unavoidable. The No Project Alternative would decrease environmental impacts by continuing to require discretionary review for most small wind turbines/MET facilities; however, this alternative would not meet any of the project objectives. Therefore, the Limited Small Wind Turbine Alternative is the environmentally preferred alternative.

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Riverside County

Imperial County

Salton Sea

MEXICO

Project Area
Freeways
Highways
Incorporated Cities
Ocean/Lakes

General Plan/Land Use Designations

Rural
Semi-Rural
Village

Wind Power Classification

Resource Potential

Marginal
Fair
Good
Excellent
Outstanding
Superb

0 5 10 Miles

SOURCE: Wind Data: NREL 2009; SanGIS, SANDAG; USGS

DUDEK

6281-01

FIGURE 4-1

Limited Large Wind Turbine Alternative

Wind Energy Ordinance Draft EIR

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