CHAPTER 4.0 PROJECT ALTERNATIVES

CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the proposed project or to the proposed 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 alternative land use maps and is intended to implement the requirements set forth in the CEQA Guidelines. This chapter also identifies the Environmentally Superior Map Alternative as required by CEQA Guidelines Section 15126.6(e)(2).

The following discussion covers a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening any significant effects of the Proposed Project, even if these alternatives would not attain all of the project objectives, and are designed to foster meaningful public participation and informed decision making. The discussion shall focus on alternatives to the Proposed Project that are capable of meeting most of the project objectives identified in Chapter 1.0 of this SEIR. According to the CEQA Guidelines, there are many factors that are considered 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 limitation, and jurisdictional boundaries. The alternatives analysis need not be as detailed as that conducted for the Proposed Project. 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. The No Project Alternative is required to be included in the range of alternatives. 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 alternatives analysis below meets the requirements of CEQA Section 15126.6. The analysis includes sufficient information about each alternative to provide meaningful evaluation, analysis and comparison with the proposed project.

4.1 Rationale for Alternative Selection

As discussed in Section 1.1 of this SEIR, during the County BOS hearing for the General Plan Update conducted between October 2010 and August 2011, a number of individual property owners petitioned the BOS to consider changes to the proposed General Plan land use designations for their properties. Following public testimony, the BOS directed staff to review the PSRs made during the hearings.

Beginning in the spring of 2016, County staff attended community planning/sponsor group meetings in the CPAs and Subregional Planning Areas (Subregions) affected by the Proposed Project. During these meetings, staff provided existing and proposed PSR Analysis Area maps, constraint maps, and other information for the planning group members and other attendees. Staff shared information on preliminary analysis and proposals for possible map alternatives for SEIR analysis. The County facilitated a workshop process at each meeting, so that planning group members and other attendees could participate on the process of developing alternatives.

A rationale is provided below for the alternatives provided in this EIR.

PSR Analysis Areas

A reduced density alternative that would avoid or substantially lessen the significance of the environmental effects of the Proposed Project has been prepared for each of the PSR Analysis Areas, except for FB19+ and ME26.

The PSR Analysis Area FB19+ consists of steep slopes throughout. Other constraints in this analysis area include biological constraints such as sensitive habitat, PAMA, and wetlands. In the proposed SR-10 designation, allowed density is the same as the existing RL-20 within the areas of steep slopes (25 percent and greater) – 1 dwelling unit per 20 acres. Due to existing parcellation patterns and the presence of steep slopes throughout most of this analysis area, the Proposed Project is only estimated to result in one additional potential dwelling in comparison to the existing General Plan. As such, there isn't opportunity for a reduced density alternative that would be somewhere in the middle between the Proposed Project and the existing General Plan. In addition, there is little opportunity to differentiate between portions of the analysis area, in terms of constraints, infrastructure availability and General Plan consistency issues. Therefore, this analysis area only compares the Proposed Project and the No Project Alternative.

For the PSR Analysis Area ME26, there is no land use designation between the existing RL-20 designation and the proposed SR-10 designation. As such, any alternative map would have to look at changing only a portion of the analysis area. This analysis area does not lend itself to an alternative that would maintain the current land use designation in the most constrained area. The western portion is the closest to a public road (Buckman Springs Road) and closest to the village, but it is more constrained by very steep slopes (limiting access improvements) than the eastern portion. Therefore, this analysis area only considers the Proposed Project and the No Project Alternative.

The alternatives for PSR Analysis Areas NC37 and VC67 are considered to be reduced intensity alternatives. For PSR Analysis Area NC37, the alternative map is estimated to result in the same potential units as the Proposed Project map (see explanation below). For PSR Analysis Area VC67, the alternative map would reduce the area of Industrial land use in comparison to the Proposed Project map.

In addition, PSR Analysis Area SD15 has two project alternatives, including the Reduced Density Alternative and the 2012 BOS Letter Alternative. The 2012 BOS Letter Alternative proposes to change the land use designation from SR-1 to General Commercial with no additional density.

Revision to the Valley Center Community Plan Residential Policy 8

As discussed in Section 1.3.3 of this SEIR, the Valley Center community planning group recommended including a policy revision to Residential Policy 8 of the Valley Center Community Plan as part of the Proposed Project. The proposed policy revision would include the following: (1) change the lowest minimum lot size allowed for SR-2 from 1 acre to 0.5 acre, and (2) change the lowest minimum lot size allowed in the SR-4 designation from 2 acres to 1 acre (but only in the portions of the Valley Center Community Planning Area that are within the wastewater service boundary). This revision would allow for further clustering of future residential development on the subject properties, while avoiding sensitive resources in the area. No feasible alternatives were identified for this project component that would further reduce the significance of the environmental effects identified for the Proposed Project. Therefore, this SEIR only considers the Proposed Project and the No Project Alternative for this project component.

Former Champagne Gardens Specific Plan Area

Two reduced density alternatives for the former CGSP Area are described in the analysis below: Preliminary Staff Recommendation Map (i.e., the Reduced Density Alternative) and Environmentally Superior Map.

4.2 Analysis of the Reduced Density Alternatives for the PSR Analysis Areas

Below is a summary of the land uses proposed for the Reduced Density Alternative for each of the PSR Analysis Areas, except for FB19+ and ME26. Table 4-1 provides a comparison of the existing land use designations and maximum dwelling units allowed under the Proposed Project and the Reduced Density Alternatives.

BO18+ Analysis Area: The Reduced Density Alternative for the BO18+ Analysis Area would keep the existing General Plan land use designation as SR-10 in the western and southern portions of the analysis areas, and proposes to change the General Plan land use designation from SR-10 to SR-4 in the northeastern portion of the analysis area (Figure 4-1). This alternative would result in reduced impacts as compared to the Proposed Project associated with traffic, agricultural resources, steep slopes, sensitive vegetation, GHG emissions, wildlife corridors, and wildfire hazards. The northeastern portion that would change to SR-4 in this alternative is the flattest portion of the analysis area, with the best existing road access, and lowest level of habitat constraints. This alternative is estimated to result in 165 potential dwelling units, which is an increase of 36 dwelling units as compared to the existing General Plan, but a decrease of 31 dwelling units in comparison to the Proposed Project.

CD14 Analysis Area: The CD14 Analysis Area Reduced Density Alternative would change the General Plan land use designation in the western portion of the analysis area from RL-20 and SR-1 to SR-2 in the western portion of this analysis area. While this is the same land use change as identified for the Proposed Project, the proposed area of SR-2 has been reduced and adjusted for this alternative (Figure 4-2). As with the Proposed Project, the eastern portion and northernmost portion of the analysis area would remain unchanged from the existing RL-20 designation. The Reduced Density Alternative would reduce impacts associated with traffic, steep slopes, fire hazards, and biological resources. The alternative would consolidate the SR-2 more toward existing access roads and away from ridgelines. The alternative is estimated to result in 14 potential dwelling units, which represents a net increase of 4 dwelling units from the existing General Plan, but a decrease of 3 dwelling units as compared to the Proposed Project.

DS8 Analysis Area: The Reduced Density Alternative for the DS8 Analysis Area would change the existing General Plan land use designation from VR-2 to VR-2.9 throughout the entire analysis area (Figure 4-3). This alternative would reduce impacts as compared to the Proposed Project associated with traffic, floodplains, groundwater use, GHG emissions, and biological resources. This alternative is estimated to result in 489 potential dwelling units which is an increase of 152 dwelling units as compared to the General Plan, but a reduction of 237 dwelling units in comparison to the Proposed Project.

DS24 Analysis Area: The Reduced Density Alternative for the DS24 Analysis Area would change the General Plan land use designation for 20 acres in the northeastern corner of the analysis area from SR-10 to SR-1. The remainder of the analysis area would keep the existing General Plan land use designation of SR-10 (Figure 4-4). This alternative would reduce impacts associated with traffic, floodplains, groundwater use, air quality, biological resources, aesthetics, GHG

emissions, and emergency response times. This alternative is estimated to result in 34 potential dwelling units which is an increase of 18 dwelling units as compared to the General Plan, but a decrease of 135 dwelling units in comparison to the Proposed Project.

FB2+ Analysis Area: The Reduced Density Alternative for the FB2+ Analysis Area would change the General Plan land use designation from RL-40 to RL-20 for all of the FB18 PSR Analysis Area, which covers the majority of the Analysis Area This alternative would also maintain the current RL-20 designation in the northwestern portion of the Analysis Area, covering FB2 and the associated Study Area to the north and south of FB2 (Figure 4-5). This alternative would reduce impacts to traffic, agricultural resources, wetlands, other biological resources, wildlife corridors, fire hazards, GHG emissions, and emergency response times. This alternative is estimated to result in 37 potential dwelling units which is an increase of 11 dwelling units as compared to the existing General Plan, but a decrease of 5 dwelling units in comparison to the Proposed Project.

FB17 Analysis Area: The Reduced Density Alternative for the FB17 Analysis Area would change the land use designation in the northeastern portion of the Analysis Area from SR-2 to SR-1. This alternative does not propose any changes to the remainder of the Analysis Area (Figure 4-6). This alternative results in a 46-acre reduction in the area proposed as SR-1, as compared to the Proposed Project. This alternative would reduce impacts associated with traffic, access limitations, agricultural resources, wetlands, other biological resources, steep slopes, septic systems, fire hazards, GHG emissions, and emergency response times. This alternative is estimated to result in 64 potential dwelling units which is an increase of 15 dwelling units as compared to the existing General Plan, and a decrease of 18 dwelling units in comparison to the Proposed Project.

FB21+ Analysis Area: The Reduced Density Alternative for the FB21+ Analysis Area would change the land use designation in the eastern portion of the analysis area from RL-20 to SR-10. This alternative would only change the designation on the properties east of Sandia Creek Drive, with the rest of the analysis area remaining RL-20 (Figure 4-7). This alternative would reduce impacts associated with traffic, access limitations, agricultural resources, wetlands, other biological resources, wildlife corridors, GHG emissions, and emergency response times. This alternative is estimated to result in 63 potential dwelling units which is an increase of 2 additional dwelling units as compared to the existing General Plan, and a decrease of 5 dwelling units in comparison to the Proposed Project.

ME30A Analysis Area: The Reduced Density Alternative for the ME30A Analysis Area would change the land use designation from RL-40 to SR-10 in the southern half of this analysis area (south of the area of wetlands and floodplain), instead of the SR-4 proposed for this southern half in the Proposed Project map. The northern half of the analysis area would retain the existing General Plan designation of RL-40 (Figure 4-8). This alternative would reduce impacts associated with traffic, biological resources, wildlife corridors, groundwater use, GHG emissions, and steep slopes. This alternative is estimated to result in 16 potential dwelling units, which is an increase of 10 dwelling units in comparison to the existing General Plan, and a decrease of 19 dwelling units in comparison to the Proposed Project.

NC3A Analysis Area: The Reduced Density Alternative for the NC3A Analysis Area would change only the southern approximately 360 acres of the analysis area from RL-20 to SR-10. The remainder of the analysis area would retain the existing General Plan land use designation of RL-20 (Figure 4-9). This alternative would reduce impacts associated with traffic, steep slopes, fire hazards, GHG emissions, biological resources, and wildlife corridors. This alternative is estimated to result in 69 potential dwelling units within this Analysis Area which represents an increase of 3

dwelling units in comparison to the existing General Plan, and a decrease of 8 dwelling units in comparison to the Proposed Project.

NC18A Analysis Area: The Reduced Density Alternative for the NC18A Analysis Area would change the land use designation from SR-2 to SR-1 within only the westernmost parcel of the analysis area. The rest of the analysis area would remain unchanged from the existing General Plan land use designation of SR-2 (Figure 4-10). This alternative would reduce impacts to traffic, steep slopes, agricultural resources, GHG emissions, wetlands, and other biological resources. This alternative is estimated to result in 57 potential dwelling units which is an increase of 14 dwelling units in comparison to the existing General Plan, and a decrease of 20 dwelling units in comparison to the Proposed Project.

NC22 Analysis Area: The Reduced Density Alternative for the NC22 Analysis Area would change the land use designation in the southwestern portion of the analysis area from SR-10 to SR-4; with the SR-4 proposed in this map covering the same area as the SR-1 in the Proposed Project map. The northeastern portion of the analysis area would remain unchanged from the existing General Plan land use designation of SR-10 (Figure 4-11). This alternative would reduce impacts associated with traffic, GHG emissions, access limitations, fire hazards, steep slopes, wetlands, other biological resources, and wildlife corridors. This alternative is estimated to result in 28 potential dwelling units which is an increase of 7 dwelling units in comparison to the existing General Plan and a decrease of 45 dwelling units in comparison to the Proposed Project.

NC37 Analysis Area: The NC37 Analysis Area Reduced Intensity Alternative would change the General Plan land use designation in the eastern portion (approximately 90 acres) of the analysis area from SR-10 to SR-4. The western portion of the analysis area (approximately 68 acres) would remain unchanged from the existing General Plan land use designation of SR-10 (Figure 4-12). This alternative would reduce impacts associated with steep slopes, prime soils, biological resources, and wildlife corridors. This alternative is estimated to result in 31 potential dwelling units, an increase of 12 dwelling units in comparison to the General Plan. The number of potential dwelling units for this alternative is the same as the Proposed Project due to existing parcelization patterns and extensive steep slopes in the portion proposed to remain within the slope-dependent SR-10 designation. Keeping the SR-10 in this portion provides a greater level of consistency in mapping patterns with consideration of constraints (more prevalent in this portion). In addition, if one owner were to consolidate ownership in this portion, an additional dwelling unit or two could be possible, as General Plan requires rounding down density calculations to the nearest whole number for any contiguous ownership area to be subdivided.

NC38+ Analysis Area: The Reduced Density Alternative for the NC38+ Analysis Area would change the General Plan land use designation only in the areas outside of the FEMA 100-year floodplain. As such, approximately 57 acres of the analysis area (outside the floodplain) would change from SR-2 to SR-1 in this alternative (Figure 4-13). This alternative would reduce impacts associated with traffic, GHG emissions, agricultural resources, and floodplains. This alternative is estimated to result in 64 potential dwelling units. This would result in an increase of 27 additional dwelling units in comparison to the existing General Plan, and a decrease of 11 dwelling units in comparison to the Proposed Project.

PP30 Analysis Area: The Reduced Density Alternative for the PP30 Analysis Area would change the land use designation in the northeastern half of the analysis area from RL-40 to SR-10, with the SR-10 covering the same area as the SR-2 in the Proposed Project map. Like the Proposed Project map, the land use designation in the southwestern half of the analysis area would remain unchanged from the existing General Plan land use designation of RL-40 (Figure 4-14). This alternative would reduce impacts associated with traffic, GHG emissions, access limitations,

wetlands (including blue line streams), other biological resources, wildlife corridors, groundwater use, agricultural resources, and mineral resources. This alternative is estimated to result in 31 potential dwelling units. This represents an increase of 19 additional dwelling units in comparison to the existing General Plan, and a decrease of 103 dwelling units in comparison to the Proposed Project.

SD15 Analysis Area: The Reduced Density Alternative for the SD15 Analysis Area would change the land use designation from SR-1 to 30 acres of SR-10 and 39 acres of General Commercial, with a C34 mixed use zone applied under the General Commercial at 2 dwelling units per acre (Figure 4-15). With the 30 acres of SR-10 that requires a Conservation Subdivision design, this alternative would reduce impacts associated with steep slopes, emergency response times, fire hazards, biological resources, and wildlife corridors. However, this alternative would be anticipated to increase traffic impacts, due to the larger area of General Commercial. This alternative is estimated to result in 80 potential dwelling units and 39 acres of commercial and/or mixed use land uses. This would result in an increase of 19 dwelling units and 39 acres of commercial/mixed use as compared to the existing General Plan, but a decrease of 282 dwelling units and an increase of 19.7 acres of commercial/mixed use in comparison to the Proposed Project.

SD15 2012 Board Letter Alternative: The SD15 Board Letter Alternative is a second alternative map for SD15. This alternative would change the land use designation from SR-1 to General Commercial for the entire analysis area (Figure 4-15), but density applied in zoning would not be increased above the current density associated with SR-1, which is estimated to be 61 dwelling units. As such, this alternative would result in the same residential density as the existing General Plan, but a decrease of 301 dwelling units in comparison to the Proposed Project. The change in land use designation from SR-1 to General Commercial would increase the potential intensity of the land use for SD15, by allowing 69 acres of General Commercial uses. In comparison to the Proposed Project, this alternative would allow just over three times the area of General Commercial, with 69 acres of General Commercial as opposed to 19.3 acres of General Commercial in the Proposed Project Map. With no area designated for lower intensity in this alternative, it would be anticipated to increase impacts associated with traffic, steep slopes, biological resources, and wildlife corridors.

VC7+ Analysis Area: The Reduced Density Alternative for the VC7+ Analysis Area would change approximately half of the analysis area from SR-4 to SR-2, covering the area south of West Lilac Road and north of Jay Jay Way/Rodriguez Road (approximately 750 acres). The land use designation for the remainder of the analysis area would remain unchanged from the existing General Plan land use designation of SR-4 (Figure 4-16). This alternative would reduce impacts associated with traffic, GHG emissions, agricultural resources, fire hazards, steep slopes, wetlands, other biological resources, and wildlife corridors. This alternative would allow up to 507 potential dwelling units within this Analysis Area which is an increase of 141 dwelling units in comparison to the General Plan, and a decrease of 112 dwelling units in comparison to the Proposed Project.

VC51 Analysis Area: The Reduced Density Alternative for the VC51 Analysis Area would change the land use designation in the northern portion of this analysis area (covering three large parcels) from RL-20 to SR-4. The remainder of the analysis area would remain unchanged from the existing General Plan land use designation of RL-20 (Figure 4-17). This alternative would reduce impacts associated with traffic, GHG emissions, steep slopes, agricultural resources, wetlands, other biological resources, and fire hazards. This alternative is estimated to result in ~~19~~17 potential dwelling units which is an increase of ~~5~~3 dwelling units in comparison to the existing General Plan, and a decrease of ~~8~~10 dwelling units in comparison to the Proposed Project.

VC57+ Analysis Area: The VC57+ Analysis Area Reduced Density Alternative would change the analysis area from SR-4 to SR-2 for approximately 850 acres of this 1,337-acre analysis area (Figure 4-18). The farthest eastern portion (east of Sunset Road), the southwestern portion of floodplain and some wetlands, and the steep southernmost parcel of VC64 in this analysis area would all remain SR-4 in the alternative. This alternative would reduce impacts associated with traffic, GHG emissions, agricultural resources, steep slopes, wetlands, other biological resources, and floodplain/floodway. This alternative would is estimated to result in 524 potential dwelling units which is an increase of 150 dwelling units in comparison to the existing General Plan, and a decrease of 81 dwelling units in comparison to the Proposed Project.

VC67 Analysis Area: The Reduced Intensity Alternative for the VC67 Analysis Area would change the land use designation from SR-2 to I-2 (Medium Impact Industrial) for the area starting at a 100-foot buffer from the edge of Keys Creek, which runs along the southern boundary of the analysis area (Figure 4-19). This would result in approximately half of the analysis area to be designated I-2 (approximately 6 acres). The southern portion of this analysis area would remain unchanged with a land use designation of SR-2. As the Proposed Project map would change the entire analysis area to I-2, this alternative would reduce impacts associated with traffic, GHG emissions, water quality, wetland buffers, other biological resources, and floodplain/floodway.

Former CGSP Area: The Preliminary Staff Recommendation Map for Champagne Gardens is the Reduced Density Alternative for the Proposed Project. This alternative would change the General Plan land use designations from SPA and RL-20 to SR-4, SR-10, and RC (Figure 4-20a). This alternative would reduce impacts associated with traffic, GHG emissions, steep slopes, wetlands, other biological resources, and floodplain/floodway. These land use changes are estimated to result in 20 potential dwelling units for this alternative, which is a reduction of 12 dwelling units in comparison to the Proposed Project (Table 4-3). As with the Proposed Project, this alternative would also result in a zone change from SPA and A70 to A70, C42, RC, and RR (Table 4-4 and Figure 4-20b).

4.2.1 Comparison of the Effects of the Reduced Density Alternative to the Proposed Project

4.2.1.1 Aesthetics

Scenic Vistas

Scenic vistas in PSR Analysis Areas BO18+, CD14, DS8, DS24, FB2+, FB17, FB19+ (No Reduced Density Alternative), FB21+, ME26 (No Reduced Density Alternative), ME30A, NC3A, NC18A, NC22, NC37, NC38+, PP30, SD15, VC7+, VC51, VC57+, VC67, and each of the former CGSP Subareas could be negatively impacted as a result of development of future land uses associated with the Proposed Project; however, the Proposed Project would result in less than significant direct and cumulative impacts after mitigation.

Under the Reduced Density Alternatives, the affected PSR Analysis Areas and former CGSP Subareas listed above are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,826 potential dwelling units beyond the adopted General Plan in areas where increased densities could negatively impact scenic vistas. While the reduction in dwelling units would decrease the impact to scenic vistas from public scenic roadways which include, but are not limited to: I-15, S22, SR-76, SR-78, the alternatives would still result in significant impacts to scenic vistas. The Reduced Density Alternatives for PSR Analysis Areas BO18+, CD14, DS8, DS24, FB2+, FB17, FB21+, ME30A,

NC3A, NC18A, NC22, PP30, SD15, VC7+, VC57+, and each of the former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with scenic vistas.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in potential increased intensity due to the increase in commercial land use. Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with scenic vistas; however, the impact would be reduced to less than significant after mitigation.

Scenic Resources

Scenic resources in PSR Analysis Areas BO18+, CD14, DS8, DS24, FB2+, FB17, FB19+ (No Reduced Density Alternative), FB21+, ME26 (No Reduced Density Alternative), ME30A, NC3A, NC18A, NC22, NC37, NC38+, PP30, SD15, VC7+, VC51, VC57+,VC67, and each of the former CGSP Subareas could be negatively impacted as a result of development of future land uses associated with the Proposed Project; however, the Proposed Project would result in less than significant direct and cumulative impacts after mitigation.

Under the Reduced Density Alternatives, the affected PSR Analysis Areas and former CGSP Subareas listed above are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. While the reduction in dwelling units would decrease the impact to scenic resources which include, but are not limited to: Burnt Ranch, Keys Creek, Sandia Creek, and the San Luis Rey River, the alternatives would still result in potential impacts to scenic resources. The Reduced Density Alternatives for BO18+, CD14, DS8, DS24, FB2+, FB17, FB21+, ME30A, NC3A, NC18A, NC22, NC37, NC38+, PP30, SD15, VC7+, VC51, VC57+,VC67, and each of the former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with scenic resources.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in potential increased intensity due to the increase in commercial land use. Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with scenic resources; however, the impact would be reduced to less than significant after mitigation.

Visual Quality or Character

Implementation of the Proposed Project would result in potential impacts to visual quality or character in PSR Analysis Areas BO18+, DS8, DS24, FB2+, FB17, ME26 (No Reduced Density Alternative), ME30A, NC18A, NC22, NC38+, PP30, SD15, VC7+, VC51, VC57+, VC67, and each of the former CGSP Subareas. The Proposed Project would result in significant and unavoidable impacts associated with visual quality or character.

Under the Reduced Density Alternatives, the affected PSR Analysis Areas listed above are estimated to result in 1,145 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,788 potential dwelling units beyond the adopted General Plan in areas that negatively impact visual quality or character. While the reduction in dwelling units would decrease the impacts to visual quality or character by retaining more of the affected area's visual character or quality, the alternatives would still result in potential impacts to visual quality or character. The Reduced Density Alternatives for BO18+, DS8, DS24, FB2+,

FB17, ME30A, NC18A, NC22, NC38+, PP30, SD15, VC7+, VC51, VC57+, VC67, and each of the former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but the impact would remain significant and unavoidable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with visual quality or character.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in potentially increased intensity due to the increase in commercial land use. **Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with visual character. The impact would be significant and unavoidable.**

Light or Glare

PSR Analysis Areas BO18+, DS8, DS24, FB2+, FB17, FB19+ (No Reduced Density Alternative), FB21+, ME26 (No Reduced Density Alternative), ME30A, NC3A, NC18A, NC22, NC37, NC38+, PP30, SD15, VC7+, VC51, VC57+, VC67, and each of the former CGSP Subareas would result in potential impacts associated with lighting. In addition, PSR Analysis Areas SD15 and VC67 would result in potential impacts associated with glare due to implementation of the Proposed Project. The Proposed Project would result in significant and unavoidable impacts associated with light or glare.

Under the Reduced Density Alternatives, the affected PSR Analysis Areas and former CGSP Subareas listed above are estimated to result in 1,159 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,819 potential dwelling units beyond the adopted General Plan. While the amount of impacts to light or glare would be lessened due to reduced development, the alternatives would still result in potential impacts to light or glare. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but the impact would remain significant and unavoidable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with light or glare.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in potential increased intensity due to the increase in commercial land use. **Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated light and glare. The impact would be significant and unavoidable.**

4.2.1.2 Agricultural Resources

Direct Conversion of Agricultural Resources

As shown in Tables 2.2-2 and 2.2-4, the Proposed Project would have the potential to result in the direct conversion of 5,473 and 6,830 acres of FMMP designated agricultural resources and County identified agricultural resources, respectively, within the PSR Analysis Areas. The Proposed Project would result in a significant and unavoidable impact related to the direct conversion of agricultural resources.

All PSR Analysis Areas and former CGSP Subareas, except for DS24, contain FMMP designated agricultural resources or County identified agricultural resources. The Reduced Density Alternatives for the PSR Analysis Areas and former CGSP Subareas containing FMMP designated agricultural resources or County identified agricultural resources are estimated to result in 1,027 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,673 potential dwelling units beyond the adopted General Plan in areas that contain agricultural resources. While the amount of direct impacts to agricultural resources

would be lessened due to reduced development density, the alternatives would still have the potential to result in the direct conversion of agricultural lands. Additionally, the Reduced Density Alternatives for PSR Analysis Areas BO18+, FB2+, FB17, NC3A, NC18A, NC37, NC38+, VC7+ VC51, and VC57+ are designed in part to limit the amount of direct impact to agricultural resources by retaining the existing land use designations from the adopted General Plan in portions of each Analysis Area. The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas, except DS24 (which contains no agricultural resources), would reduce density in areas that contain agricultural resources compared to the Proposed Project and would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with the direct conversion of agricultural resources.**

PSR Analysis Area SD15 does not contain FMMP designated agricultural resources; however, this Analysis Area contains six acres of County identified agricultural resources. **Implementation of the Reduced Density Alternative and the 2012 Board Letter Alternative for PSR Analysis Area SD15 would also result in a greater impact than the Proposed Project. The impacts associated with the direct conversion of agricultural resources would remain significant and unavoidable.**

Conflict with Existing Zoning for Agricultural Use, or a Williamson Act Contract

PSR Analysis Areas BO18+, NC18A, and VC51 contain a total of 94 acres of land under Williamson Act Contracts. The remaining PSR Analysis Areas and former CGSP Subareas do not contain land under a Williamson Act Contract. The Williamson Act contracts within these PSR Analysis Areas do not allow subdivisions that would create a new lot of less than 15 acres. Based on current lot sizes within the Williamson Act contract areas, none of the Analysis Area properties under Williamson Act contracts would be able to subdivide (until/if a 10-year non-renewal process is complete), regardless of the applicable General Plan land use designation. Therefore, the Proposed Project would not result in significant direct or cumulative impacts associated with existing zoning for agricultural use or a Williamson Act Contract.

The Reduced Density Alternatives for BO18+, NC18A and VC51 are designed in part to limit the designation changes to lands under a Williamson Act Contract, among other environmental constraints addressed in the alternative maps for these Analysis Areas. In addition, the Reduced Density Alternatives would not further regulate or restrict the location of agricultural operations. Therefore, under the Reduced Density Alternatives, impacts associated with land use conflicts would be less than significant.

As mentioned above, PSR Analysis Area SD15 does not contain Williamson Act Contract lands. As with the Proposed Project and Reduced Density Alternative, impacts associated with land use conflicts would also be less than significant for the SD15 2012 Board Letter Alternative.

Indirect Conversion of Agricultural Resources

As stated above, PSR Analysis Areas and former CGSP Subareas contain a total of 5,473 acres of FMMP designated agricultural resources and 6,830 acres of County identified agricultural resources. The Proposed Project would allow higher density development in PSR Analysis Areas and former CGSP Subareas containing FMMP designated agricultural resources or County identified agricultural resources. This would potentially cause some indirect conversion of agricultural resources to non-agricultural use due to the land use conflicts; therefore, the Proposed Project would result in a significant and unavoidable impact associated with the indirect conversion of agricultural resources.

All PSR Analysis Areas and former CGSP Subareas, except for DS24, contain FMMP designated agricultural resources or County identified agricultural resources. In PSR Analysis Areas containing agricultural resources, the Reduced Density Alternatives are estimated to result in 1,027 fewer potential dwelling units. The Proposed Project is estimated to result in 1,673 potential dwelling units beyond the adopted General Plan in areas that contain agricultural resources. While the amount of indirect impacts to agricultural land would be lessened due to the reduced development density in FMMP designated agricultural resources and County identified agricultural resources, the alternatives would still result in the indirect conversion of agricultural lands. The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas, except for DS24 which does not contain agricultural resources, would reduce density in areas containing agricultural resources compared to the Proposed Project and would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with the indirect conversion of agricultural resources.**

PSR Analysis Area SD15 does not contain land FMMP designated agricultural resources; however, it does contain six acres of County identified agricultural resources. **As with the Proposed Project, implementation of the Reduced Density Alternative and the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in significant and unavoidable impacts associated with the indirect conversion of agricultural resources.**

Direct or Indirect Loss or Conversion of Forestry Resources

As shown in Table 2.4-2, 555 acres of land that meets the forest land definition are located within the PSR Analysis Areas. All PSR Analysis Areas and former CGSP Subareas, except CD14, DS24, NC18A, and NC37, contain forest land. Proposed Project impacts associated with the direct or indirect loss or conversion of forestry resources would be potentially significant; however, impacts were determined to be less than significant after General Plan policies and mitigation measures are applied.

Under the Reduced Density Alternatives, the affected PSR Analysis Areas and former CGSP Subareas are estimated to result in 1,004 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,620 potential dwelling units beyond the adopted General Plan in areas that contain forestry resources. While the amount of impact to forest land would be lessened due to reduced development in areas containing forestry resources, the alternatives would still result in an impact to forest land. As with the Proposed Project, the Reduced Density Alternatives for all affected PSR Analysis Areas and former CGSP Subareas that contain forest land would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce impacts related to direct and indirect loss or conversion of forest land to a level below significant.

As with the Proposed Project, the 2012 Board Letter Alternative for SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce impacts related to direct and indirect loss or conversion of forest land to a level below significant.

4.2.1.3 Air Quality

Conflicts with Adopted Air Quality Plans

The Proposed Project would result in significant and unavoidable impacts associated with compliance with an air quality plan.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,826 potential dwelling units beyond the adopted General Plan in these areas. The amount of additional VOC, NO_x, and CO emissions would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives. **However, the Reduced Density Alternatives would still result in additional density and intensity of development that was not accounted for in the RAQS and SIP and, therefore, would still result in significant and unavoidable impacts associated with air quality plans such as RAQS.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in increased VOC, NO_x, and CO emissions due to an increase in potential development intensity from the increase in commercial land use. **Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with conflicts with adopted air quality plans; therefore, the 2012 Board Letter Alternative would also result in a significant and unavoidable impact associated with adopted air quality plans.**

Air Quality Violations

Construction-related activities associated with the Proposed Project were determined to be under the maximum daily emission thresholds for criteria pollutants. Operational emissions of the Proposed Project would exceed the threshold for VOC in PSR Analysis Areas BO18+, DS8, DS24, NC22, PP30, SD15, VC7+, and VC57+. The threshold for CO would be exceeded in PSR Analysis Areas DS8, and SD15. The threshold for PM_{10} would be exceeded in PSR Analysis Areas DS8 and SD15, and the threshold for $PM_{2.5}$ would be exceeded in PSR Analysis Areas DS8, SD15, VC7+, and VC57+. Therefore, the Proposed Project would result in significant and unavoidable impacts associated with air quality violations.

The Reduced Density Alternatives for the affected PSR Analysis Areas (BO18+, DS8, DS24, NC22, PP30, SD15, VC7+, and VC57+) are estimated to result in 1,026 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,568 potential dwelling units beyond the adopted General Plan in these analysis areas. The former CGSP Subareas would not result in impacts associated with air quality violations. While the Reduced Density Alternatives would result in a reduced impact due to reduced development intensity, the alternatives would still result in a potentially significant impact. Similar to the Proposed Project, the Reduced Density Alternatives would implement adopted General Plan policies and 2011 PEIR mitigation measures; however, the impact would remain significant and unavoidable. **Therefore, the Reduced Density Alternatives would result in significant and unavoidable impacts associated with air quality violations.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with emissions thresholds for criteria pollutants due to an increase in potential development intensity from the increase in commercial land use. **Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with air quality violations; therefore, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in significant and unavoidable impacts associated with air quality violations.**

Nonattainment of Criteria Pollutants

The Proposed Project was determined to result in significant and unavoidable impacts associated with nonattainment criteria pollutants due to exceedance of emission thresholds for CO, PM_{10}, $PM_{2.5}$, and VOC.

The Reduced Density Alternatives for the PSR Analysis Areas that would result in emission threshold exceedance (BO18+, DS8, DS24, NC22, PP30, SD15, VC7+, VC57+, and VC67) are estimated to result in 1,026 fewer potential dwelling units and a reduction in the amount of industrial land use (VC67) compared to the Proposed Project. The former CGSP Subareas would not result in impacts associated with nonattainment criteria pollutants. While the Reduced Density Alternatives would result in a reduced impact due to reduced development intensity, the alternatives would still result in a potentially significant impact. Similar to the Proposed Project, the Reduced Density Alternatives would implement adopted General Plan policies and 2011 PEIR mitigation measures; however, the impact would remain significant and unavoidable. **Therefore, the Reduced Density Alternatives would result in significant and unavoidable impacts associated with nonattainment criteria pollutants.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with nonattainment criteria pollutants due to an increase in potential development intensity from the increase in commercial land use. **Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with nonattainment criteria pollutants; therefore, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in significant and unavoidable impacts associated with nonattainment criteria pollutants.**

Sensitive Receptors

PSR Analysis Areas DS8, NC37, and VC67 are located close to or contain toxic air contaminant sources; PSR Analysis Areas BO18+, CD14, DS8, FB19+ (No Reduced Density Alternative), NC3A, NC18A, NC22, NC38+, PP30, SD15, VC57+, and VC67 are located within one mile of a school; and all PSR Analysis Areas and former CGSP Subareas are located within one mile of residences where sensitive receptors may be located. Therefore, the Proposed Project would result in a significant and unavoidable impact associated with sensitive receptors.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project in areas within one mile of a sensitive receptor. While the amount of additional potential development near sensitive receptors would be reduced due to reduced development intensity, the alternatives would still result in development near sensitive receptors and toxic air contaminant sources. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but the impact would not be reduced to a level below significant. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with sensitive receptors.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in increased emissions near sensitive receptors due to an increase in potential development intensity from the increase in commercial land use. **Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with sensitive receptors; therefore, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in a significant and unavoidable impact associated with sensitive receptors.**

Objectionable Odors

As shown in Figure 2.3-2, there are three sources of objectionable odors near PSR Analysis Areas (FB19+ [No Reduced Density Alternative], NC22, VC57+, and VC67); there are no sources of objectionable odors near former CGSP Subareas. Additionally, both the Proposed Project map and alternative map for VC67 would include a medium impact industrial designation (for only

approximately half the Analysis Area in the alternative map) which could result in a new source of objectionable odor; however, any development would be required to comply with existing regulations to mitigate any objectionable odor. Therefore, the Proposed Project would result in a less than significant impact associated with objectionable odors.

The Reduced Density Alternatives for the affected PSR Analysis Areas are estimated to result in 126 fewer potential dwelling units than the Proposed Project. While the amount of additional potential development near sensitive receptors would be reduced due to reduced development intensity, the alternatives would still result in the placement of sensitive receptors near objectionable odors. Additionally, approximately half of PSR Analysis Area VC67 would be designated as medium impact industrial. The Reduced Density Alternatives for NC22, VC57+, and VC67 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with objectionable odors.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would potentially result in an increase in objectionable odor sources due to an increase in potential development intensity from the increase in commercial land use. Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with objectionable odors; however, this alternative would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to less than significant.

4.2.1.4 Biological Resources

Special Status Plants and Wildlife Species

As shown in Table 2.4-1, PSR Analysis Areas contain approximately 8,465 acres of land that could potentially support special status species. The Proposed Project would result in a significant and unavoidable impact associated with special status plants and wildlife species.

All PSR Analysis Areas and former CGSP Subareas are estimated to contain special status plant and wildlife species or contain vegetation communities that have the potential to host special status plant and wildlife species. The Reduced Density Alternatives are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,826 potential dwelling units beyond the adopted General Plan in areas that potentially contain special status plants and wildlife species. Portions of PSR Analysis Areas and former CGSP Subareas would retain land uses of the Proposed Project; however; the Reduced Density Alternative would generally allow overall lower density land uses within PSR Analysis Areas and former CGSP Subareas. While the amount of direct impacts to special status plant and wildlife species would be reduced due to lower development density, the alternatives would still result in a substantial adverse effect, either directly or through habitat modifications, to special status plant and wildlife species. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impacts associated with special status plant and wildlife species.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would potentially result in an increase in impacts associated with special status plants and wildlife species due to an increase in potential development intensity from the increase in commercial land use. **Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative for**

PSR Analysis Area SD15 would have a greater impact associated with special status plants and wildlife species. The impact would be significant and unavoidable.

Riparian Habitat and Other Sensitive Natural Communities

As shown in Table 2.4-4, PSR Analysis Areas and former CGSP Subareas contain approximately 546 acres of riparian habitat, based on GIS data. The Proposed Project would result in significant and unavoidable impacts associated with riparian habitat and other sensitive natural communities.

The presence, amount, and location of riparian habitat and other sensitive natural communities have been identified as major constraints in PSR Analysis Areas BO18+, FB2+, FB17, FB19+ (no Reduced Density Alternative), FB21+, ME30A, NC18A, NC22, PP30, VC7+, VC51, VC57+, VC67, and former CGSP Subareas CG2, CG3, CG4, and CG5. The Reduced Density Alternatives for these areas were developed in part to limit the impacts by retaining the existing General Plan land use designations in many of the areas containing riparian habitat and other sensitive natural communities. While the amount of potential direct impacts to riparian habitat and other sensitive natural communities would be reduced due to reduced development intensity, the alternatives would still have the potential to result in a substantial adverse effect on riparian habitat or other sensitive natural communities. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with riparian habitats and other sensitive natural communities.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would potentially result in an increase in impacts associated with riparian habitat and other sensitive natural communities due to an increase in potential development intensity from the increase in commercial land use. **Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a greater impact associated with riparian habitat and other sensitive natural communities. The impact would be significant and unavoidable.**

Federally Protected Wetlands

As shown in Table 2.4-6, it is estimated that PSR Analysis Areas and the former CGSP Subareas CG2, CG3, CG4, and CG5 contain approximately 548 acres of federally protected wetlands. It is important to note that the GIS data used for this programmatic level analysis may not be entirely up to date and may show more or less area of wetlands than what is currently present. Wetland delineations would be required at the development review stage for areas with potential wetlands, to determine the actual extent of wetlands. Due to compliance with existing regulations and implementation programs, and mitigation measures, the Proposed Project would result in less than significant direct and cumulative impacts to federally protected wetlands after mitigation.

Available GIS data indicates that all PSR Analysis Areas and former CGSP Subareas, except CD14, DS8, DS24, ME26 (no Reduced Density Alternative), NC3A, NC37, SD15, and former CGSP Subareas CG1, CG6, CG7, and CG8, contain federally protected wetlands. The location and amount of wetlands within PSR Analysis Areas BO18+, FB2+, FB17, FB21+, ME30A, NC18A, NC22, VC57+, and VC67 have been identified as major constraints. The Reduced Density Alternatives are estimated to result in 471 fewer potential dwelling units in areas estimated to contain federally protected wetlands; the Proposed Project would result in an estimated 920 additional potential dwelling units (beyond the current General Plan) in areas that contain federally protected wetlands. The Reduced Density Alternatives would reduce impacts in this category by retaining portions of the existing land use designations from the adopted General Plan, where

anticipated federally protected wetlands have been identified. PSR Analysis Area Reduced Density Alternatives that will retain portions of the existing General Plan land use designations include BO18+, FB2+, FB17, FB21+, ME30A, NC18A, NC22, VC7+, VC51, VC57+, and VC67. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the impacts to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with federally protected wetlands.

As mentioned above, current GIS data does not show federally protected wetlands in PSR Analysis Area SD15. As with the Proposed Project, implementation of the Reduced Density Alternative and the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not be anticipated to result in impacts associated with federally protected wetlands.

Wildlife Movement Corridors and Nursery Sites

As discussed in Section 2.4.3.4, the Proposed Project would have the potential to result in development within wildlife corridors. Additionally, nursery sites could potentially be impacted by development within areas containing sensitive natural habitats. The Proposed Project would result in a significant and unavoidable impact to wildlife movement corridors and nursery sites.

PSR Analysis Areas that are located partially within a wildlife movement corridor include BO18+, CD14, FB2+, FB19+ (no Reduced Density Alternative), FB21+, ME26 (no Reduced Density Alternative), ME30A, NC3A, NC18A, NC22, NC37, PP30, SD15, VC7+, and former CGSP Subareas CG1, CG2, CG3, CG4, CG5, CG6, and CG8. The Reduced Density Alternatives would result in up to 662 fewer potential dwelling units than the Proposed Project in these Analysis Areas. All PSR Analysis Areas and former CGSP Subareas are estimated to contain special status plant and wildlife species or contain vegetation communities that have the potential to host special status plant and wildlife species. Additionally, these areas have the potential to serve as nursery sites. The Reduced Density Alternatives would result in up to 1,162 fewer potential dwelling units than the Proposed Project in areas with the potential to serve as nursery sites. The reduced development intensity would reduce impacts in areas containing wildlife movement corridors or nursery sites. The Reduced Density Alternatives for PSR Analysis Areas and former CGSP Subareas within wildlife movement corridors (BO18+, CD14, FB2+, FB21+, ME30A, NC3A, NC18A, NC22, NC37, PP30, SD15, VC7+, and CG1, CG2, CG3, CG4, CG5, CG6, and CG8) and nursery sites (all PSR Analysis Areas and former CGSP Subareas) would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures; but impacts would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with wildlife movement corridors and nursery sites.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would potentially result in an increase in impacts associated with wildlife movement corridors and nursery sites due to an increase in potential development intensity from the increase in commercial land use. **Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a greater impact associated with wildlife movement corridors and nursery sites. The impact would be significant and unavoidable.**

Local Policies and Ordinances

Protective measures are included in the County's local policies and ordinances that protect biological resources. As with the Proposed Project, the Reduced Density Alternative proposes changes to the density or intensity of existing residential and commercial land use designations. The Biological Mitigation Ordinance, Habitat Loss Permit, and RPO are intended to address

projects with a specific development plan and are not intended for 'stand-alone' general plan amendments (with no development proposed). However, it should be noted that the Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Area would reduce the density or intensity of the land uses by up to 1,162 potential dwelling units, thereby reducing the amount of impact to biological resources that these policies are intended to protect. As with the Proposed Project, the Reduced Density Alternative would result in less than significant direct and cumulative impacts associated with consistency with local policies and ordinances protecting biological resources.

The 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use. Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated to biological resources that these policies are intended to protect; however, the impact would remain less than significant.

Habitat Conservation Plans and Natural Community Conservation Plans

The Proposed Project would result in less than significant direct and cumulative impacts associated with conflicting with applicable HCPs or NCCPs for the PSR Analysis Areas.

The Reduced Density Alternatives for PSR Analysis Areas BO18+, CD14, FB2+, FB21+, NC3A, NC22, NC37, PP30, SD15, VC7+ VC57+, and all former CGSP Subareas are estimated to reduce the proposed density potential by 687 potential dwelling units, including in PAMA designated areas (draft PAMA for North County Plan [NCMSCP]). Similar to the Proposed Project, the Reduced Density Alternatives would also result in less than significant impacts associated with conflicting with applicable HCPs and NCCPs. Regulatory processes are in place to ensure implementation of, and conformance with applicable HCPs and NCCPs in the unincorporated County for future development projects within the Analysis Areas. The Reduced Density Alternatives would also incorporate the same adopted General Plan policies that would further support implementation of and conformance with applicable HCPs and NCCPs.

Although the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use as compared to the Proposed Project map for SD15, this alternative would also have a less than significant impact with regard to conflicting with applicable conservation plans, as any future projects would be required to comply with the plans.

4.2.1.5 Cultural and Paleontological Resources

Historical Resources

No known historical resources have been identified in the PSR Analysis Areas or former CGSP Subareas; except for PSR Analysis Area VC7+. As discussed in Section 2.5, there are four known historic structures within PSR Analysis Area VC7+. Additionally, there are unknown historical resources that could be impacted by the Proposed Project. The Proposed Project would result in less than significant direct and cumulative impacts associated with historical resources after mitigation.

The Reduced Density Alternative for PSR Analysis Area VC7+ is estimated to result in 112 fewer potential dwelling units in areas known to contain historic resources, in comparison to the Proposed Project map for VC7+. While the amount of direct impacts to historical resources, known and unknown, would be reduced due to reduced land use density/intensity, the alternative would still result in a potential impact associated with historical resources. The Reduced Density

Alternative for VC7+ would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with historical resources.

As mentioned above, PSR Analysis Area SD15 does not contain historic structures. As with the Proposed Project, implementation of the Reduced Density Alternative and the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in impacts associated with historic structures.

Archaeological Resources

There are 64 known archaeological resource sites within PSR Analysis Areas and former CGSP Subareas that would potentially be impacted by development associated with the Proposed Project. The Proposed Project would result in less than significant direct and cumulative impacts associated with archaeological resources after mitigation.

PSR Analysis Areas BO18+, DS24, FB2+, FB21+, ME30A, NC3A, NC18A, PP30, and SD15, and former CGSP Subareas are known to contain archaeological resources. In addition, there is a potential for the remaining PSR Analysis Areas to contain archaeological resources. The Reduced Density Alternatives are estimated to result in 646 fewer potential dwelling units than the Proposed Project, in these areas known to contain archaeological resources. The Proposed Project is estimated to result in 797 potential dwelling units beyond the adopted General Plan in areas known to contain archaeological resources. While the amount of direct impacts to archaeological resources, known and unknown, would be reduced due to reduced land use density/intensity, the alternatives would still result in a substantial adverse effect on archaeological resources. The Reduced Density Alternative for BO18+, DS24, FB2+, FB21+, ME30A, NC3A, NC18A, PP30, SD15 (or any PSR Analysis Area where an archaeological resource is identified), and former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with archaeological resources.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would potentially result in an increased impact associated with archaeological resources due to an increase in potential development intensity from the increase in commercial land uses. Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with archaeological resources; however, the impact would be reduced to less than significant after mitigation.

Paleontological Resources

As shown in Table 2.5-1, PSR Analysis Areas DS8, DS24, FB2+, FB17, FB19+ (no Reduced Density Alternative), ME30A, NC3A, NC22, NC37, NC38+, PP30, SD15, VC57+, and VC67 have at least a portion of the area with a marginal or low potential to contain paleontological resources, and the remaining PSR Analysis Areas and former CGSP Subareas have zero potential to contain paleontological resources. The Proposed Project would have less than significant direct and cumulative impacts associated with paleontological resources after mitigation.

The Reduced Density Alternatives for the affected PSR Analysis Areas listed above are estimated to result in 944 fewer potential dwelling units than the Proposed Project, in areas potentially containing paleontological resources. While the amount of direct impacts to paleontological resources would be reduced due to reduced development density/intensity, the alternatives would

still result in a potentially significant effect on paleontological resources. The Reduced Density Alternative for Areas DS8, DS24, FB2+, FB17, ME30A, NC3A, NC22, NC37, NC38+, PP30, SD15, VC57+, and VC67 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with paleontological resources.

The 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in the same less than significant impact as the Proposed Project.

Human Remains

Construction activities associated with the Proposed Project have the potential to disturb human remains, and any disturbance would be considered a significant impact. The Proposed Project would result in less than significant direct and cumulative impacts associated with human remains after mitigation.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas are estimated to result in 1,162 fewer potential dwelling units compared to the Proposed Project. The Proposed Project is estimated to result in 1,826 potential dwelling units beyond the adopted General Plan. While the amount of direct impacts to human remains would be lessened due to the reduced development intensity, the alternatives would still have the potential to result in disturbance of human remains. The Reduced Density Alternative for all PSR Analysis Areas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with disturbance of human remains.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would potentially result in an increase in impacts associated with human remains due to an increase in potential development intensity from the increase in commercial land uses. Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater potential impact associated with human remains; however, the impact to human remains would be reduced to less than significant after mitigation.

Tribal Cultural Resources

Tribal consultation did not result in the identification of any cultural, religious, or spiritual resources that would be impacted by the Proposed Project. However, tribal cultural resource impacts cannot be determined on a geographic scale such as the Proposed Project. Future development in the PSR Analysis Areas and former CGSP Subareas would have the potential to result in potential impacts to unknown tribal cultural resources from ground-disturbing activities during construction. The Proposed Project would result in less than significant direct and cumulative impacts associated with tribal cultural resources after mitigation.

The Reduced Density Alternatives for all PSR Analysis areas and former CGSP Subareas are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. Therefore, similar to the Proposed Project, the Reduced Density Alternatives would result in a less than significant impact after mitigation, associated with tribal cultural resources.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in development intensity from the increase in commercial land use. Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would potentially have a

greater impact associated with tribal cultural resources; however, the impact would be reduced to less than significant after mitigation.

4.2.1.6 Geology and Soils

Exposure to Seismic-related Hazards

Adherence to CBC and recommendations following site specific geotechnical investigations would reduce the impacts associated with the Proposed Project to a level below significant; therefore, the Proposed Project would result in less than significant direct and cumulative impacts related to fault rupture, seismic ground shaking, liquefaction, and landslides.

No active faults are known to occur within or adjacent to any of the PSR Analysis Areas or the former CGSP Subareas. As shown in Figure 2.6-1, PSR Analysis Areas CD14, DS8, DS24, and FB2+ abut or are bisected by pre-quaternary faults (faults that are inactive and have not slipped in the past 1.6 million years or longer); BO18+, DS8, DS24, FB2+, FB21+, ME26 (no Reduced Density Alternative), ME30A, NC3A, NC38+, PP30, VC7+, VC57+, and VC67 are located in areas at risk for liquefaction; and CD14, FB2+, FB17, FB19+ (no Reduced Density Alternative), FB21+, NC3A, NC18A, NC22, NC37, NC38+, SD15, VC57+, VC67, and former CGSP Subareas are located in areas identified as having high landslide susceptibility. The Reduced Density Alternatives are estimated to result in 1,154 fewer dwelling units compared to the Proposed Project in areas with seismic related hazards. The Proposed Project is estimated to allow 1,813 potential dwelling units beyond the adopted General Plan, in areas with seismic related hazards. While the amount of impacts associated with seismic related hazards would be reduced due to reduced development intensity, the alternatives would still have the potential to result in adverse effects associated with seismic-related hazards. However, adherence to the CBC and recommendations following site specific geotechnical investigations would reduce the impacts associated with the Reduced Alternatives to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with seismic related hazards.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in development intensity from the increase in commercial land use. However, as with the Proposed Project, adherence to CBC and recommendations following site specific geotechnical investigations would reduce the impacts associated with the 2012 Board Letter Alternative for PSR Analysis Area SD15 to a level below significant.

Soil Erosion or Topsoil Loss

The Proposed Project would result in less than significant direct and cumulative impacts associated with soil erosion and topsoil loss due to compliance with the policies and mitigation measures identified in Sections 2.8 (Hydrology and Water Quality) and Section 2.9 (Land Use), as well as all applicable regulations including the NPDES, CBC, Watershed Protection Ordinance and the County Grading Ordinance.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in up to 1,162 fewer potential dwelling units than the Proposed Project. Although the Reduced Density Alternatives for all the PSR Analysis areas and former CGSP Subareas would result in reduced impacts due to reduced development intensity, the alternatives would still result in potential adverse effects associated with soil erosion and top soil loss. Adherence to the same policies and mitigation measures identified for Sections 2.8 (Hydrology and Water Quality) and Section 2.9 (Land Use), as well as all applicable regulations listed above, would reduce the

Reduced Density Alternatives impacts associated with soil erosion and topsoil loss to a level below significant.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in development intensity from the increase in commercial land use. However, as with the Proposed Project, adherence to all applicable regulations would reduce the impacts associated with the 2012 Board Letter Alternative for PSR Analysis Area SD15 to a level below significant.

Soil Stability

Compliance with federal, State, and local building standards and regulations, including the CBC and County-required geotechnical reconnaissance reports and investigations, would reduce the impacts associated with soil stability; therefore, the Proposed Project was determined to result in less than significant direct and cumulative impacts associated with soil stability.

Table 2.6-1 identifies PSR Analysis Areas BO18+, DS8, DS24, FB2+, FB21+, ME26 (no Reduced Density Alternative), ME30A, NC3A, NC38+, PP30, VC7+, VC57+, and VC67 as located in areas identified as at risk of liquefaction. The Reduced Density Alternatives in these areas are estimated to result in 914 fewer potential dwelling units than the Proposed Project. Table 2.6-2 identifies PSR Analysis Areas CD14, FB2+, FB17, FB19+ (no Reduced Density Alternative), FB21+, NC3A, NC18A, NC22, NC37, NC38+, SD15, VC57+, VC67, and former CGSP Subareas as located in areas identified as having a high risk of landslides. The Reduced Density Alternatives in these areas are estimated to result in 506 fewer dwelling units than the Proposed Project. The Reduced Density Alternatives for these PSR Analysis Areas (except for ME26 and NC38+) would shift some of the additional development potential away from the steep slopes. In addition, the County RPO greatly limits the allowed development encroachment into steep slope areas. The allowed encroachment varies depending on the percentage of a property in steep slopes, but within all the PSR Analysis Areas the allowed encroachment would be about 10 to 12 percent. While the Reduced Density Alternatives would result in reduced impacts due to reduced development intensity, the alternatives would still result in potential impacts associated with soil stability. Compliance with federal, State, and local building standards and regulations, including the CBC and County-required geotechnical reconnaissance reports and investigations, would reduce the impacts associated with soil stability to a level below significant. Therefore, the Reduced Density Alternatives would result in less than significant impacts associated with soil stability.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in development intensity from the increase in commercial land use. However, as with the Proposed Project, adherence to CBC and recommendations following site specific geotechnical investigations would reduce the impacts associated with the 2012 Board Letter Alternative for PSR Analysis Area SD15 to a level below significant.

Expansive Soils

As shown in Table 2.6-3, PSR Analysis Areas contain approximately 690 acres of expansive soils. The Proposed Project was determined to have less than significant direct and cumulative impacts associated with expansive soils due to compliance with the requirements for geotechnical investigation, following any resulting construction recommendations, and compliance with building code requirements.

PSR Analysis Areas identified as containing expansive soils include BO18+, CD14, FB2+, FB17, FB19+, NC37, SD15, VC7+, VC57+, and VC67. Former CGSP Subareas do not contain areas with expansive soils. The Reduced Density Alternatives are estimated to result in 533 fewer

potential dwelling units in areas with expansive soils than the Proposed Project. While the Reduced Density Alternatives would result in a reduced impact due to reduced development density/intensity, the alternatives would still be considered to have potentially adverse effects associated with expansive soils. However, compliance with the requirements for geotechnical investigation, following any resulting construction recommendations, and compliance with building code requirements would reduce the impacts to a level below significant. Therefore, the Reduced Density Alternatives would result in less than significant impacts associated with expansive soils.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use. However, as with the Proposed Project, adherence to CBC and recommendations following site specific geotechnical investigations would reduce the impacts associated with the 2012 Board Letter Alternative for PSR Analysis Area SD15 to a level below significant.

Waste Water Disposal Systems

The only PSR Analysis Areas that are within sewer service areas are DS8 (only southern portion), NC22 (only Study Area parcels), NC38+ (3 of the parcels in the western portion), SD15, and former CGSP Subareas CG2, CG3, CG4, and CG5. Former CGSP Subarea CG5 is the only area with a current sewer service connection. Compliance with all applicable federal, State, and local regulations related to septic tanks and waste water disposal would reduce any potential impacts to below significant. The Proposed Project was determined to result in less than significant direct and cumulative impacts associated with waste water disposal systems.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas, except DS8 (portion), NC22 (portion), NC38+ (portion), SD15, and former CGSP Subareas CG2, CG3, CG4, and CG5 would utilize individual septic systems to fulfill wastewater requirements. While the amount of impacts associated with waste water disposal systems would be reduced due to reduced development density/intensity, the alternatives would still result in potentially adverse effects associated with waste water disposal systems. Land Use designations of SR-1, or higher density, could potentially necessitate a need for sewer service; however, the Reduced Density Alternatives significantly reduce the amount of areas proposed to be designated as SR-1 or higher. Future development projects would be required to comply with all applicable federal, State and local regulations related to septic tanks and waste water disposal, including County Department of Environmental Health standards. Compliance with such regulations would reduce the potential for septic systems to be located in soils incapable of supporting such systems. Therefore, impacts would be less than significant.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use. As noted above, SD15 is within a sewer service area and would not be anticipated to utilize septic systems; therefore, this alternative would also have a less than significant impact related to waste water disposal systems.

Unique Geologic Features

Future development is unlikely to affect a unique geologic feature; therefore, the Proposed Project would result in less than significant direct and cumulative impacts associated with unique geologic features.

Two unique geologic features, the Pinyon Mountains and Borrego Badlands, are located near PSR Analysis Areas DS8 and DS24; however, these features are more than seven miles away

and would not be impacted by development within these Analysis Areas. There is always a potential to uncover a previously undocumented unique geologic feature. While the amount of impacts associated with any undocumented unique geologic features would be lessened due to reduced development intensity, the alternatives could still result in a potentially adverse effect associated with unique geologic features. Future development associated with the Reduced Density Alternatives would be required to follow all applicable regulatory processes, including compliance with the County Guidelines for Determining Significance for Unique Geology, which could require the completion of a geological reconnaissance report to evaluate the significance of any suspected unique geologic features on a given project site. Adherence to these guidelines and regulatory processes would reduce the level of impact to a level below significant; therefore, the Reduced Density Alternatives would result in a less than significant impact associated with unique geologic features.

PSR Analysis Area SD15 is not located in an area known to contain unique geologic features; however, there is always a potential to uncover a previously undocumented unique geologic feature. As with the Proposed Project, implementation of the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in a less than significant impact associated with unique geologic features.

4.2.1.7 Hazards and Hazardous Materials

Transport, Use, and Disposal of Hazardous Materials

Implementation of the Proposed Project would result in land uses that lead to an increase in hazardous material storage; however, existing General Plan policies and compliance with applicable regulations would reduce the impact to a level below significant. Therefore, the Proposed Project would result in less than significant direct and cumulative impacts associated with the transport, use, and disposal hazardous materials.

Although hazardous materials can be found in all land uses, PSR Analysis Areas SD15 and VC67 and former CGSP Subareas CG6 and CG8 have a greater potential to transport, use, or dispose of hazardous materials due to the proposed Medium Impact Industrial, General Commercial, and Rural Commercial land use designations. The Reduced Density Alternative for PSR Analysis Area VC67 would reduce the amount of industrial land use (as compared to the Proposed Project), and the Reduced Density Alternative for CG6 and CG8 would not change the amount of commercial land use. The Reduced Density Alternative for PSR Analysis Area SD15 would increase the total amount of commercial land use within the Analysis Area. The amount of impacts associated with transport, use, and disposal of hazardous materials would be reduced for PSR Analysis Area VC67 and would remain the same for PSR Analysis Areas CG6 and CG8. As compared to the Proposed Project, the alternatives could still result in a potentially significant impact associated with the transport, use, and disposal of hazardous materials. The Reduced Density Alternative for SD15 would increase the potential for impacts associated with the transport, use, and disposal of hazardous materials, as compared to the Proposed Project. The Reduced Density Alternatives for PSR Analysis Areas SD15, VC67, and former CGSP Subareas CG6 and CG8 would incorporate the same adopted General Plan policies and compliance with applicable regulations which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with the transport, use, and disposal of hazardous materials.

The 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in the transport, use, and disposal of hazardous materials due to an increase in potential development intensity from the increase in commercial land use. Compared to the Proposed Project map for

SD15, the 2012 Board Letter Alternative would have a greater potential impact associated with the transport, use, and disposal of hazardous materials; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and compliance with applicable regulations which would reduce the impact to a level below significant.

Accidental Release of Hazardous Materials

An accidental release of hazardous materials would potentially occur as a result of development in all the PSR Analysis Areas and former CGSP Subareas; however, SD15, VC67, CG6, and CG 8 have a higher risk of an accidental release of hazardous materials due to proposed commercial or industrial land uses that regularly handle large quantities of hazardous materials. Implementation of existing regulations, policies, plans and guidelines addressing accidental release of hazardous materials would reduce the impacts to a level below significant. Therefore, the Proposed Project would result in less than significant direct and cumulative impacts associated with the accidental release of hazardous materials.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would incorporate the same adopted General Plan policies, plans, and regulations which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with the accidental release of hazardous materials.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in the potential for accidental release of hazardous materials due to an increase in potential development intensity from the increase in commercial land use. Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with the accidental release of hazardous materials; however, 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies, plans, and regulations which would reduce the impact to a level below significant.

Hazards to Schools

The Proposed Project would result in less than significant direct and cumulative impacts associated with hazard to schools. Only PSR Analysis Area VC57+ is located within a quarter-mile of a school or day care facility; however, the proposed SR-2 designation is not associated with the regular use of high quantities of hazardous materials. There are no former CGSP Subareas within a quarter-mile of a school or day care facility.

PSR Analysis Area VC57+, proposed for land use designation SR-2 surrounding Valley Center Middle School, is unlikely to store and use high quantities of hazardous materials. The Reduced Density Alternatives would not increase the level of impact identified by the Proposed Project; therefore, the Reduced Density Alternative would result in less than significant impacts associated with hazards to schools or day care facilities.

PSR Analysis Area SD15 is not located within one-quarter mile of schools or day care facilities. As with the Proposed Project, implementation of the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in impacts associated with hazards to schools or day care facilities.

Existing Hazardous Materials Sites

The Proposed Project would increase development in areas that are within or near sites listed pursuant to CGC Section 65962.5(b), burn dump sites, closed landfills, FUDS, historic agriculture sites, and petroleum contamination sites; however, impacts associated with development in these areas is considered less than significant with compliance with existing policies, regulations, plans, and guidelines.

PSR Analysis Areas BO18+, CD14, DS8, FB2+, FB17, FB19+ (no Reduced Density Alternative), FB21+, ME26 (no Reduced Density Alternative), ME30A, NC3A, NC18A, NC22, NC37, NC38+, PP30, SD15, VC7+, VC51, VC57+, and VC67, and all former CGSP Subareas are located in or near a hazardous material site category listed above. The Reduced Density Alternatives are estimated to result in 996 fewer potential dwelling units in areas in or near a hazardous material site. The Proposed Project is estimated to result in 1,640 potential dwelling units beyond the adopted General Plan in areas in or near a potential hazardous material site. While the impact would be reduced due to reduced development density/intensity, the Reduced Density Alternatives would result in potential impacts associated with existing hazardous material sites. The Reduced Density Alternatives for PSR Analysis Areas BO18+, CD14, DS8, FB2+, FB17, FB21+, ME30A, NC3A, NC18A, NC22, NC37, NC38+, PP30, SD15, VC7+, VC51, VC57+, VC67, and all former CGSP Subareas would incorporate the same adopted General Plan policies, plans, and regulations which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with the existing hazardous material sites.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use. This alternative would incorporate the same adopted General Plan policies, plans, and regulations which would reduce the impact to a level below significant. Therefore, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in a similar impact associated with existing hazardous material sites.

Public Airports

PSR Analysis Areas DS8, FB21+, NC22, and NC38+ are located within two miles of a public airport. No former CGSP Subareas are located within two miles of a public airport. Development within the AIA would be required to comply with an adopted ALUCP. Therefore, the Proposed Project would result in less than significant direct and cumulative impacts associated with public airports.

The Reduced Density Alternatives for DS8, FB21+, NC22, and NC38+ are estimated to result in 298 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 486 potential dwelling units beyond the adopted General Plan in these areas. Any development within these areas would require compliance with an adopted ALUCP. Therefore, similar to the Proposed Project, the Reduced Density Alternatives would result in less than significant impacts associated with public airports.

PSR Analysis Area SD15 is not located within two miles of a public airport. As with the Proposed Project, implementation of the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in impacts associated with pubic airports.

Private Airports

PSR Analysis Areas PP30, VC7+, and VC57+ are located within two miles of a private airport. No former CGSP Subareas are located within two miles of a private airport. FAA regulations would

limit the potential impacts associated with private airport hazards. Therefore, the Proposed Project would result in less than significant direct and cumulative impacts associated with private airports.

The Reduced Density Alternatives for PP30, VC7+, and VC57+ are estimated to result in 296 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 606 potential dwelling units beyond the adopted General Plan in these areas. As stated above, any development within PSR Analysis Areas PP30, VC7+, and VC57+ would require compliance with FAA regulations. Therefore, similar to the Proposed Project, the Reduced Density Alternatives would be required to comply with FAA regulations to reduce potential impacts associated with private airports to less than significant impact.

PSR Analysis Area SD15 is not located within two miles of a private airport. As with the Proposed Project, implementation of the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in impacts associated with private airports.

Emergency Response and Evacuation Plans

The growth associated with the Proposed Project is not accounted for in current emergency response planning documents, which would potentially need updating; however, the Proposed Project would result in less than significant direct and cumulative impacts after mitigation.

It is anticipated that PSR Analysis Areas DS8, DS24, FB2+, FB17, FB19+ (No Reduced Density Alternative), FB21+, ME26 (No Reduced Density Alternative), ME30A, PP30, and SD15 may experience effects to emergency response due to a lack of infrastructure needed to provide adequate emergency response; no former CGSP Subareas would experience effects to emergency response. The Reduced Density Alternatives for the affected PSR Analysis Areas are estimated to result in 846 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,077 potential dwelling units beyond the adopted General Plan. While the amount of impact associated with emergency response and evacuation plans would be lessened due to reduced development intensity, the alternatives would still result in an impact to emergency response and evacuation plans. The Reduced Density Alternatives for DS8, DS24, FB2+, FB17, FB21+, ME30A, PP30, and SD15 would incorporate the same adopted General Plan policies to reduce the level of impact to below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with emergency response and evacuation plans.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would potentially result in an increased impact associated with emergency response plans due to an increase in potential development intensity from the increase in commercial land uses. Compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a greater impact associated with emergency response plans; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies to reduce the level of impact to below significant.

Wildland Fires

As shown in Table 2.7-3, the majority of PSR Analysis Areas are located at least partially in very high fire hazard severity zones. The Proposed Project would result in a significant and unavoidable impact associated with wildland fires.

PSR Analysis Areas BO18+, CD14, FB2+, FB17, FB19+ (No Reduced Density Alternative), FB21+, ME26 (No Reduced Density Alternative), ME30A NC3A, NC18A, NC22, NC37, NC38+, PP30, SD15, VC7+, VC57+, VC67, and all former CGSP Subareas are located completely or

partially within a very high fire hazard severity zone. The Reduced Density Alternatives for the affected PSR Analysis Areas and former CGSP Subareas are estimated to result in 782 fewer potential dwelling units than the Proposed Project in these Analysis Areas. The Proposed Project is estimated to result in 1,271 potential dwelling units beyond the adopted General Plan. While the amount of impacts associated with wildland fires would be lessened due to reduced development density/intensity, the alternatives would still result in a substantial impact associated with wildland fires. The Reduced Density Alternative for PSR Analysis Areas BO18+, CD14, FB2+, FB17, FB21+, ME30A, NC3A, NC18A, NC22, NC37, NC38+, PP30, SD15, VC7+, VC57+, and VC67 and all former CGSP Subareas would reduce density or intensity (compared to the Proposed Project) in some of the areas of very high fire risk and would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with wildland fires.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use. However, compared to the Proposed Project map for SD15, the 2012 Board Letter Alternative would have a lesser impact associated with wildland fires, as the Proposed Project would include a substantially higher residential density. **The 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable.**

Vectors

Implementation of the Proposed Project would not propose new vector breeding sources, but would allow increased development which may result in additional vector breeding sources. PSR Analysis Areas BO18+, CD14, FB2+, FB17, FB19+ (No Reduced Density Alternative), ME30A, NC3A, NC18A, NC22, NC37, NC38+, SD15, VC7+, VC57+, and former CGSP Subareas CG1, CG2, CG3, CG4, CG5, CG6, CG7, and CG8 are located within two miles of an existing off-site vector breeding source. Existing regulations would reduce the impacts associated with vectors; therefore, the Proposed Project would result in less than significant direct and cumulative impacts.

The Reduced Density Alternatives for PSR Analysis Areas BO18+, CD14, FB2+, FB17, ME30A, NC3A, NC18A, NC22, NC37, NC38+, SD15, VC7+, VC57+, and former CGSP Subareas CG1, CG2, CG3, CG4, CG5, CG6, CG7, and CG8 are estimated to result in 648 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,116 potential dwelling units beyond the adopted General Plan in these areas. While the impact associated with additional potential vector sources would be reduced due to reduced development intensity, the alternatives would still result in an impact associated with vectors. The Reduced Density Alternative for all PSR Analysis Areas would incorporate the same adopted General Plan policies and existing regulations to reduce the level of impact below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with vectors.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative would have a greater impact associated with vectors; however, 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and existing regulations to reduce the impact to a level below significant.

4.2.1.8 Hydrology and Water Quality

Water Quality Standards and Requirements

Development associated with the Proposed Project would result in a significant and unavoidable impact associated with water quality standards and requirements due to the project's contribution of additional pollutants to surface and groundwater resources.

The Reduced Density Alternatives are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. While the amount of additional potential impacts associated with water quality standards and requirements would be lessened due to reduced development intensity, the alternatives would still result in a significant impact associated with water quality standards and requirements. The Reduced Density Alternatives for all PSR Analysis Areas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with water quality standards and requirements.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use. **Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a greater impact associated with water quality standards and requirements. The impact would be significant and unavoidable**.

Groundwater Supplies and Recharge

PSR Analysis Areas DS8, DS24, a portion of FB2+, ME26 (No Reduced Density Alternative), ME30A, and PP30 would be required to utilize groundwater to fulfill water supply needs; no former CGSP Subareas would be required to utilize groundwater. Implementation of the Proposed Project would result in a significant and unavoidable impact associated with groundwater supplies and recharge.

The Reduced Density Alternatives for PSR Analysis Areas DS8, DS24, portions of FB2+, ME30A, and PP30 are estimated to result in 499 fewer potential dwelling units than the Proposed Project in areas required to utilize groundwater. The Proposed Project is estimated to result in up to 709 potential dwelling units beyond the adopted General Plan in areas required to utilize groundwater. While the amount of impacts associated with groundwater supplies and recharge would be lessened due to reduced development density/intensity, the alternatives would still result in a significant impact associated with groundwater supplies and recharge. The Reduced Density Alternatives for PSR Analysis Areas DS8, DS24, portion of FB2+, PP30, and ME30A would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with groundwater supplies and recharge~~water quality standards and requirements~~.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in development intensity from the increase in commercial land use, but it is not groundwater dependent. The 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in an impact associated with groundwater supplies and recharge.

Erosion or Siltation

Development of land uses designated as part of the Proposed Project would result in alterations to existing drainage patterns in a manner that could result in substantial erosion or siltation on and off site; however, the Proposed Project would result in less than significant direct and cumulative impacts after mitigation.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. While the amount of impacts associated with erosion or siltation would be lessened due to reduced development density/intensity, the alternatives would still result in an impact associated with erosion or siltation. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with erosion or siltation.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative would have a greater impact; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant.

Flooding

The conversion of land uses under the Proposed Project would increase impermeable surfaces, such as roofs, concrete, and asphalt which would alter existing drainage patterns and potentially increase the level of peak flood flows through reduced infiltration. However, the Proposed Project would result in less than significant direct and cumulative impacts associated with flooding after mitigation.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. While the amount of impacts associated with flooding would be lessened due to reduced development intensity, the alternatives would still result in an impact associated with flooding. The Reduced Density Alternative for all PSR Analysis Areas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with flooding.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative would have the potential for an increased area of impermeable surfaces, which would alter drainage patterns and potentially increase the level of peak flood flows. Therefore, this alternative would result in a greater impact than the Proposed Project; however, 2012 Board Letter Alternative for PSR Analysis Area SD15, would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures; which would reduce the impact to a level below significant.

Exceed Capacity of Storm Water Systems

The Proposed Project was determined to result in less than significant direct and cumulative impacts associated with the exceedance of stormwater systems capacity after mitigation.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. While the amount of additional impacts to stormwater systems would be lessened due to reduced development density/intensity, the alternatives would still result in a potentially significant impact to storm water systems. The Reduced Density Alternatives for all PSR Analysis Areas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with the exceedance of a stormwater system.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land uses. Compared to the Proposed Project, the 2012 Board Letter Alternative would have a greater impact associated with the exceedance of stormwater systems capacity; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant.

Housing within a 100-Year Flood Hazard Area

Development of land uses associated with the Proposed Project could result in the siting of housing within a 100-year flood hazard area; however, the Proposed Project would result in less than significant direct and cumulative impacts associated with housing within a 100-year flood hazard area after mitigation. PSR Analysis Areas that contain a FEMA or County 100-year floodplains are DS8, DS24, FB2+, ME30A, NC38+, PP30, VC57+, VC67, and former CGSP Subareas CG2, CG3, CG4, CG5, CG6, and CG7.

The Reduced Density Alternative for PSR Analysis Area DS8 would reduce the density allowed for the entire analysis area which is located within an alluvial floodplain, although it would still result in an increase in density from the existing General Plan land use designation, and therefore, would result in the potential for increased impacts as compared to the current General Plan land use designation. The Reduced Density Alternative for PSR Analysis Area DS24 would change the land use designation from SR-10 to SR-1 but only in the northeastern 20 acres of the analysis area, which is mostly outside the alluvial floodplain, so as to reduce placement of housing in the floodplain. Therefore, this alternative would reduce impacts associated with flooding in PSR Analysis Area DS24. The Reduced Density Alternatives for FB2+ would continue to propose the RL-20 land use designation within the existing floodplain; therefore, this alternative would result in the same impacts to potential placement of housing in the floodplain as the Proposed Project. As with the Proposed Project, the Reduced Density Alternative for PSR Analysis Area ME30A does not propose land use changes in the area of the floodplain; therefore, as with the Proposed Project, no new impacts associated with housing in a floodplain would result. The Reduced Density Alternatives for PSR Analysis Area NC38+ would maintain the current designation (SR-2) in the entire floodplain area; therefore, no new impacts associated with housing in a floodplain would result. As with the Proposed Project, the Reduced Density Alternative would maintain the current designation in the floodplain area associated with PSR Analysis Area PP30; therefore, no new impacts associated with housing in a floodplain would result. The Reduced Density Alternative for PSR Analysis Area VC57+ would maintain the current designation in all FEMA or County floodplain areas with the exception of approximately 15 acres of the floodplain north of Valley Center Road, with almost all of the 15 acres in the location of the future Star Valley Park. As such, any new impact associated with housing in the floodplain would be minimal, if any. The entire PSR Analysis Area for VC67 is located within a floodplain, and almost all is within a County floodway. The Reduced Density Alternative for PSR Analysis Area VC67 proposes to change the

land use designation from SR-2 to I-2; but only for the northern half of the analysis area. In this alternative, the portion proposed to remain SR-2 is entirely within the floodway. The Reduced Density Alternative for former CGSP Subareas CG2, CG3, CG4, and CG5 reduces the proposed land use densities within the flood hazard area. Compared to the Proposed Project, this alternative would result in 9 fewer dwelling units.

The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with housing within a 100-year floodplain.

PSR Analysis Area SD15 is not located within a 100-year floodplain. Implementation of the 2012 Board Letter Alternative would not result in impacts associated with placing housing within a 100-year floodplain.

Impeding or Redirecting Flood Flows

Development associated with the Proposed Project has the potential to contain structures that would impede or redirect flood flows; however, the Proposed Project would result in less than significant direct and cumulative impacts associated with impeding or redirecting flood flows after mitigation.

PSR Analysis Areas located in a floodplain include DS8, DS24, FB2+, ME30A, NC38+, PP30, VC57+, VC67, and former CGSP Subareas CG2, CG3, CG4, CG5, CG6, and CG7. The Reduced Density Alternatives are estimated to result in 600 fewer potential dwelling units than the Proposed Project. The alternatives would still result in potential impacts associated with impeding or redirecting flows. As discussed above, the Reduced Density Alternatives for PSR Analysis Areas DS8, DS24, FB2+, ME30A, NC38+, PP30, VC57+, and VC67 are specifically designed to limit impacts by retaining existing General Plan land use designations in most of the floodplain areas.

The Reduced Density Alternatives for these PSR Analysis Areas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with impeding or redirecting flows.

PSR Analysis Area SD15 is not located within a floodplain. Similar to the Proposed Project, implementation of the 2012 Board Letter Alternative would not result in impacts associated with impeding or redirecting flood flows.

Dam Inundation and Flood Hazards

The Proposed Project would result in increased density within dam inundation areas; however, the Proposed Project would result in less than significant direct and cumulative impacts associated with dam inundation and flood hazards.

PSR Analysis Areas FB2+ and PP30 are located in the Henshaw Dam inundation area. No former CGSP Subareas are located within a dam inundation area. The Reduced Density Alternatives for the affected PSR Analysis Areas are estimated to result in 108 fewer potential dwelling units than the Proposed Project. While the amount of impacts associated with dam inundation and flood hazards would be lessened due to reduced development density/intensity, the alternatives would still result in an impact associated with dam inundation and flood hazards. The Reduced Density Alternatives for PSR Analysis Areas FB2+ and PP30 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a

level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with dam inundation and flood hazards.

PSR Analysis Area SD15 is not located within a dam inundation area. Similar to the Proposed Project, implementation of the 2012 Board Letter Alternative would not result in impacts associated with dam inundation and flood hazards.

Seiche, Tsunami, and Mudflow Hazards

The PSR Analysis Areas are not located in areas at risk of seiche or tsunami; however, PSR Analysis Areas BO18+, CD14, FB2+, FB17, FB19+ (No Reduced Density Alternative), FB21+, ME26 (No Reduced Density Alternative), ME30A, NC3A, NC18A, NC22, NC37, PP30, SD15, VC7+, VC51, and VC57+, and former CGSP Subareas CG1, CG3, CG4, CG5, and CG6 are identified as areas at high risk of mudflow. The Proposed Project was determined to result in less than significant direct and cumulative impacts associated with mudflows.

The Reduced Density Alternatives for the affected PSR Analysis Areas and CGSP Subareas are estimated to result in 779 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,246 potential dwelling units beyond the adopted General Plan. While the amount of impacts associated with mudflows would be lessened due to reduced development intensity, the alternatives would still result in an impact associated with mudflows. The Reduced Density Alternatives for PSR Analysis Areas BO18+, CD14, FB2+, FB17, FB21+, ME30A, NC3A, NC18A, NC22, NC37, PP30, SD15, VC7+, VC51, VC57+, and former CGSP Subareas CG1, CG3, CG4, CG5, and CG6 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with mudflows. The Reduced Density Alternatives would not result in impacts associated with seiche or tsunami.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in development intensity from the increase in commercial land uses. Compared to the Proposed Project, the 2012 Board Letter Alternative would have a greater impact associated with mudflows; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. The 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in impacts associated with seiche or tsunami.

4.2.1.9 Land Use

Physical Division of an Established Community

Development associated with the Proposed Project does not include the construction of major roadways, railways, airports, or the establishment of open space; therefore, it is unlikely that the Proposed Project would result in the physical division of an established community. The Proposed Project would result in less than significant direct and cumulative impacts associated with the physical division of an established community.

The Reduced Density Alternatives of all PSR Analysis Areas and former CGSP Subareas are estimated to result in 1,162 fewer potential dwelling units than the Proposed Project. Similar to the Proposed Project, the Reduced Density Alternatives do not include the construction of major roadways, railways, airports, or the establishment of open space. Therefore, the Reduced Density Alternatives would also result in a less than significant impact associated with the physical division of an established community.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in development intensity from the increase in commercial land uses. Similar to the other alternatives, this alternative would not involve the construction of major roadways, railways, airports, or the establishment of open space. Therefore, as with the Proposed Project, the 2012 Board Letter Alternative would have a less than significant impact associated with the physical division of an established community.

Conflicts with Land Use Plans, Policies, and Regulations

Development associated with the Proposed Project would include an increase in dwelling units in rural areas (and semi-rural areas that are not in close proximity to villages), which would conflict with the adopted San Diego Forward: The Regional Plan, and the increased density of development has not been accounted for in the RAQS. The Proposed Project would result in significant and unavoidable direct and cumulative impacts after mitigation.

The Reduced Density Alternatives for PSR Analysis Areas BO18+, FB2+, FB17, FB21+, NC37, PP30, VC7+, and VC51 are estimated to result in 282 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 523 potential dwelling units beyond the adopted General Plan. The former CGSP Subareas would not conflict with the adopted San Diego Forward: The Regional Plan. Although the impact associated with land use plans, policies, and regulations would be lessened due to reduced development intensity, the alternatives would result in increased density in rural areas which would conflict with the adopted San Diego Forward: The Regional Plan. **Therefore, the Reduced Density Alternatives also result in potentially significant impacts associated with land use plans, policies, and regulations that remain significant and unavoidable even after mitigation**.

PSR Analysis Area SD15 is not identified as conflicting with the adopted San Diego Forward: The Regional Plan; therefore, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in impacts associated with land use plans, policies, and regulations.

County of San Diego General Plan and Community Plans

Chapter 2.9 (Land Use) of this SEIR provides a review of the General Plan policies and community plan policies that apply to this type of stand-alone GPA/Rezone, with no development proposed. This review includes a discussion of the policy review methodology and applicable General Plan policies that were relied on in the 2011 PEIR to reduce environmental impacts. Provided below is a review of the Reduced Density Alternatives for each component of the Project, with regard to impacts associated with conflicts with applicable policies of the County's General Plan and community plans. As with the Land Use chapter, a discussion is provided for each component of the alternatives in relation to the policies that apply to stand-alone GPAs/Rezones *and* that served the purpose of reducing potential impacts in certain environmental categories, as discussed in the 2011 PEIR.

This discussion is based upon an analysis provided by County staff and takes the conservative position that there are inconsistencies requiring analysis and disclosure. Such analysis does not limit the ultimate discretion of the County Board of Supervisors to determine whether an alternative map for any particular Analysis Area (or other project component) is in fact consistent with the General Plan when it considers whether to approve proposed changes. Where staff has found an inconsistency with a General Plan policy as it relates to a particular Analysis Area or other component of the project; that finding is followed by findings of any significant impacts associated with the policy inconsistency. In these cases of inconsistency findings, if the Board of Supervisors instead finds consistency with the noted policy as it relates to the particular Analysis

Area (or other project component), then there will be no need to supplement the SEIR because the decision would not result in any additional impacts that were not already disclosed.

BO18+ Analysis Area: The Analysis Area is comprised of 120 parcels totaling approximately 921 acres in the northeastern portion of Bonsall. Considering existing parcelization, the proposed change from SR-10 to SR-4 is anticipated to increase potential dwelling units by 67 (estimated 129 potential units under the current designations and 196 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-1) would only change the northeastern portion to SR-4, leaving the rest of the Analysis Area designated SR-10. This change is estimated to result in an increase of 36 potential dwelling units (estimated 129 potential units under the current designation and 165 under the Reduced Density Alternative Map).

The BO18+ Proposed Project Map was found to be inconsistent with General Plan Policy LU-6.11, which calls for assigning land uses and densities in a manner that minimizes development in extreme, very high, and high fire hazard areas and other unmitigable hazardous areas. This Proposed Project Map was also found to be inconsistent with General Plan Policy S-1.1 which calls for minimizing the population exposed to hazards by assigning land use designations and density allowances that reflect site-specific constraints and hazards. These policies cover similar issues and the noted inconsistencies were not determined to constitute a significant impact because there is some room for judgement for decision makers in consideration of the proposed SR-4 density as it relates to the parameters of the policy. The Reduced Density Alternative Map option would consolidate the area of density increase in the northeastern portion of the area, with multiple access roads built to fire protection access standards, where the Fire Hazard Severity Zone (FHSZ) is Moderate, and there is very little steep slope or other constraints that could limit fire protection access improvements and clearing. Therefore, the Reduced Density Alternative Map for BO18+ has been determined to be consistent with Policies LU-6.11 and S-1.1.

The Proposed Project Map for BO18+ was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Bonsall Community Plan. The Reduced Density Alternative Map for BO18+ would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Bonsall Community Plan, as it would include a much smaller area of proposed land use designation change, in comparison to the Proposed Project Map.

CD14 Analysis Area: The Analysis Area is comprised of 10 parcels covering approximately 101 acres of rolling topography in the western portion of the planning area, just outside the City of El Cajon. The proposed change from a combination of SR-1 and RL-20 to SR-2 (substantially more acreage of SR-2 than the current SR-1 area) and RL-20 is estimated to result in an increase of seven potential dwelling units (estimated 10 potential units under the current designations and 17 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-2) would reduce the area proposed to change to SR-2 in the northwest portion (leaving that area RL-20). This change is estimated to result in an increase of four potential dwelling units (estimated 10 potential units under the current designation and 14 under the Reduced Density Alternative Map).

While no clear General Plan or Crest/Dehesa Community Plan policy inconsistencies were identified for the Proposed Project Map for CD14 in this programmatic approach, the Reduced Density Alternative Map would demonstrate a greater level of consistency with certain policies applicable to a stand-alone GPA/Rezone and that were relied upon in the 2011 PEIR to reduce impacts. In comparison to the Proposed Project Map, the Reduced Density Alternative Map would

reduce the area proposed to change from RL-20 to SR-2 in the northwestern and central portions of the Analysis Area (by approximately 9 acres), where there is less existing disturbance from access roads and more intact coastal sage scrub. Reducing the area of change in these portions would demonstrate greater consistency with General Plan Policy LU-6.2, which calls for assigning lower densities in areas with sensitive natural resources, and with Crest-Dehesa Community Plan Policy COS-1.1.1, which seeks to maximize areas left in natural coastal sage scrub. The alternative map would also demonstrate a greater level of consistency with General Plan Policies LU-6.11 and S-1.1, which deal with land use mapping with consideration of fire hazards. The reduction in the area proposed to change to SR-2 is in the northwestern portion of the Analysis Area, which is further from current fire access options than the rest of the proposed SR-2 area, and adding homes in that northwestern portion could be challenging in terms of meeting dead-end road length requirements and developing secondary access, in order to meet fire protection access requirements.

DS8 Analysis Area: The Analysis Area is comprised of three parcels totaling approximately 169 acres within the Village area of Borrego Springs. The proposed change from VR-2 to VR-4.3 is estimated to result in an increase of 389 potential dwelling units (estimated 337 potential units under the current designations and 726 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-3) would instead change the entire Analysis Area to VR-2.9. This change is estimated to result in an increase of 152 potential dwelling units (estimated 337 potential units under the current designation and 489 under the Reduced Density Alternative Map).

The Proposed Project Map for DS8 was found to be inconsistent with General Plan Policies LU-2.3 and LU-6.2. Policy LU-2.3 directs to assign densities and minimum lot sizes in a manner that is compatible with the character of the applicable community. Policy LU-6.2 calls for assigning lower densities in areas with sensitive natural resources. The inconsistency with LU-6.2 was determined to constitute a significant impact. The inconsistency with LU-2.3 was not determined to constitute a significant impact as there is room for discretion in considering factors such as the Village location, alongside the situation of extensive vacant lots and groundwater overdraft. The Reduced Density Alternative Map for DS8 has also been determined to be inconsistent with LU-2.3 and inconsistent with LU-6.2. Issue LU-2.2 of the Community Plan calls for GPAs to consider the extent of existing vacant lots in evaluating density increases. Estimates show that over 10,000 additional dwelling units would be possible when adding legally buildable vacant lots to the additional subdivision and multi-family development potential in the current Land Use Map for the community. This situation is considered in combination with the need to drastically reduce water use in the community associated with an upcoming Groundwater Sustainability Plan. The estimated increase of 152 potential dwelling units by this alternative would also be inconsistent with General Plan Policies LU-2.3 and LU-6.2, which require consideration of community character impacts and natural resource impacts. Following the rationale associated with the Proposed Project Map, the inconsistency with Policy LU-2.3 has not been determined to constitute a significant impact. **The inconsistency with Policy LU-6.2 has been determined to constitute a significant impact and though impacts would be reduced under the Reduced Density Alternative, impacts would remain significant and unavoidable.** The Proposed Project Map for DS8 was not found to be inconsistent with any of the other policies of the General Plan applicable to CEQA review (as discussed in Chapter 2.9-Land Use) and the same finding holds true for the Reduced Density Alternative Map. In addition, the Proposed Project Map for DS8 was not found to be inconsistent with applicable policies of the Borrego Springs Community Plan, and the same finding holds true for the Reduced Density Alternative Map.

This finding of policy inconsistency should not be interpreted to conclude that any development project at the proposed VR-2.9 designation density (in the Reduced Density Alternative Map) in

this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

DS24 Analysis Area: The Analysis Area is comprised of 2 parcels covering approximately 169 acres south of the Village and in close proximity to state park lands. The proposed change from SR-10 to SR-1 is estimated to result in an increase of 153 potential dwelling units (estimated 16 potential units under the current designations and 169 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-4) would only change approximately 20 acres in the northeast portion to SR-1, leaving the rest of the Analysis Area designated SR-10. This change is estimated to result in an increase of 18 potential dwelling units (estimated 16 potential units under the current designation and 34 under the Reduced Density Alternative Map).

The Proposed Project Map for DS24 was found to be inconsistent with General Plan Policies LU-2.3, LU-6.2, and COS-14.1. Policy LU-2.3 directs to assign densities and minimum lot sizes in a manner that is compatible with the character of the applicable community. Policy LU-6.2 calls for assigning lower densities in areas with sensitive natural resources. Policy COS-14.1 calls for development to be located and designed to reduce vehicular trips by utilizing compact regional and community-level development patterns while maintaining community character. The inconsistencies with Policies LU-2.3 and LU-6.2 were determined to constitute significant impacts. As discussed above for DS8, the issues of excessive amounts of unbuilt available density in the community (existing buildable vacant lots, additional subdivision potential, and additional multi-family development potential on the current Land Use Map), and forthcoming reductions in groundwater use present difficult hurdles to overcome with regard to making community consistency findings for increasing densities. Beyond groundwater resources, the highly sensitive habitats within DS24 are discussed in the review of LU-6.2 for the Proposed Project Map, and this issue remains with the Reduced Density Alternative Map, as the sensitive habitats are also within the SR-1 area of the Reduced Density Alternative Map. **Therefore, the Reduced Density Alternative Map is also inconsistent with Policies LU-2.3 and LU-6.2, and though impacts would be reduced under the Reduced Density Alternative Map, impacts would remain significant and unavoidable.**

The Proposed Project Map for DS24 was also found to be inconsistent with General Plan Policy COS-14.1. However, the COS-14.1 inconsistency was not determined to constitute a significant impact, due to the fact that the policy allows for substantial discretion in considering several factors, including the extent of jobs and commercial in the community, and community character consistency. The Reduced Density Alternative Map for DS24 would limit the area of proposed SR-1 to the northeastern 20 acres, which is adjacent to some existing homes, public roads, and water lines, thus decreasing the distance for road travel to the Village, fire response, and infrastructure expansion for the higher density SR-1. Therefore, the Reduced Density Alternative Map for DS24 has been determined to be consistent with Policy COS-14.1.

The Proposed Project Map for DS24 was found to be inconsistent with Borrego Springs Community Plan Policies LU-1.1.1 and LU-2.1.1 which discourage development on undisturbed and substantially undisturbed desert native habitat and call for these areas to be conserved to the greatest extent possible. These policies cover similar issues to General Plan Policy LU-6.2 and the inconsistencies would carry forward to the Reduced Density Alternative Map, for the same reason as noted for LU-6.2.

These findings of policy inconsistencies should not be interpreted to conclude that any development project under the designation outlines of the Reduced Density Alternative Map in this subject area would be inconsistent with these policies. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designations.

The Proposed Project Map for DS24 was not found to be inconsistent with any of the other policies of the General Plan applicable to CEQA review (as discussed in Chapter 2.9-Land Use) or other applicable policies of the Borrego Springs Community Plan, and the same finding holds true for the Reduced Density Alternative Map.

FB2+ Analysis Area: The Analysis Area is comprised of 23 parcels over 491 acres in the southeastern portion of the Fallbrook CPA. The proposed change from a combination of RL-20 and RL-40 to a combination of SR-4 and RL-20 is estimated to result in an increase of 16 potential dwelling units (estimated 26 potential units under the current designations and 42 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-5) would only change the FB18 portion and one Study Area parcel that are currently RL-40, to RL-20. The FB2 portion and Study Area parcels west of Rice Canyon Road would remain RL-20 and not change to SR-4. Thus, under this Reduced Density Alternative Map, the entire Analysis Area would be designated RL-20. This change is estimated to result in an increase of 11 potential dwelling units (estimated 26 potential units under the current designation and 37 under the Reduced Density Alternative Map).

The FB2+ Proposed Project Map was found to be inconsistent with General Plan Policy LU-2.5, which serves to identify and maintain greenbelts between communities to reinforce the identity of individual communities. This inconsistency was not determined to constitute a significant impact, as there is room for discretion in determining whether a greenbelt (per the General Plan definition) is sufficiently maintained. The Reduced Density Alternative Map has not been found to be inconsistent with Policy LU-2.5, as it would maintain the very low density Rural Lands 20 designation throughout this Analysis Area at the edge of the community, including the portion proposed for SR-4 in the Proposed Project Map. The Proposed Project Map was also found to be inconsistent with General Plan Policy LU-6.2, which calls for assigning lower densities in areas with sensitive resources. As discussed in the review of this policy in the Land Use Chapter, the western portion (proposed for SR-4 in the Proposed Project Map) would have the best wildlife corridor potential as it is on a hillside of coastal sage scrub adjacent to over 1,000 acres of undeveloped similar native habitat to the north and northwest (with the majority in open space preserves). The Reduced Density Alternative Map for FB2+ has been found to be consistent with Policy LU-6.2, as this western portion would remain RL-20. The Proposed Project Map for FB2+ was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Fallbrook Community Plan. The Reduced Density Alternative Map for FB2+ would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Fallbrook Community Plan, as it would include a much smaller area of proposed land use designation change, in comparison to the Proposed Project Map.

FB17 Analysis Area: The Analysis Area is comprised of six parcels totaling approximately 107 acres along Reche Road near I-15. The proposed change from SR-2 to a combination of SR-1 and SR-2 is estimated to result in an increase of 33 potential dwelling units (estimated 49 potential units under the current designations and 82 under the Proposed Project Map). The Reduced

Density Alternative Map (shown in Figure 4-6) would only change approximately 25 acres in the northeastern portion to SR-1. This change is estimated to result in an increase of 15 potential dwelling units (estimated 49 potential units under the current designation and 64 under the Reduced Density Alternative Map).

The FB17 Proposed Project Map was found to be inconsistent with General Plan Policy LU-6.2, which calls for assigning lower densities in areas with sensitive resources. This inconsistency was determined to constitute a significant impact mostly due to the extensive wetlands covering much of the central portion of the Analysis Area, including along the Reche Road (public road) frontage. The Reduced Density Alternative Map would leave this central portion unchanged at SR-2, changing only approximately 25 acres in the northeastern portion to SR-1. This northeastern portion includes a small area of estimated wetlands, but not along the road frontage and not spreading out to nearly the extent that wetlands are found in the central portion. Other much smaller areas of sensitive habitats (including oaks and coastal sage scrub) are found in mostly disconnected pockets outside agricultural uses, throughout the Analysis Area. Therefore, the Reduced Density Alternative Map has been found to be consistent with Policy LU-6.2.

The Proposed Project Map for FB17 was also found to be inconsistent with Policy LU-7.1, which calls for protecting agricultural lands with lower-density land use designations that support continued agricultural operations. The Policy LU-7.1 inconsistency was determined to constitute a significant impact. As discussed in this policy review in the Land Use Chapter, research on the 2011 PEIR, the County's Guidelines for Determining Significance for Agricultural Resources, and other inter-departmental coordination has supported an SR-2 threshold as a 'lower-density land use designation that supports continued agricultural operations.' The Reduced Density Alternative Map would only change the northeastern 25 acres of the 107-acre Analysis Area to SR-1, thus facilitating the clustering of residential uses in that portion and limiting conflicts with agricultural uses in the much larger area proposed to remain SR-2. Therefore, the Reduced Density Alternative Map for FB17 has been determined to be consistent with Policy LU-7.1. The Proposed Project Map for FB17 was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Fallbrook Community Plan. The Reduced Density Alternative Map for FB17 would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Fallbrook Community Plan, as it would include a much smaller area of proposed land use designation change, in comparison to the Proposed Project Map.

FB19+ Analysis Area: The Analysis Area is comprised of 61 parcels totaling approximately 579 acres in the northeastern portion of the CPA, east of I-15. The proposed change from RL-20 to SR-10 is estimated to result in an increase of one potential dwelling unit (estimated 61 potential units under the current designations and 62 under the Proposed Project Map). As the Proposed Project Map would only result in one additional potential dwelling unit, the FB19+ Analysis Area does not include a Reduced Density Alternative Map.

FB21+ Analysis Area: The Analysis Area is comprised of 52 parcels totaling approximately 679 acres on the northern edge of the CPA, adjacent to Riverside County. The proposed change from RL-20 to SR-10 is estimated to result in an increase of seven potential dwelling units (estimated 61 potential units under the current designations and 68 under the Proposed Project Map).

The Reduced Density Alternative Map (shown in Figure 4-7) would only change the properties east of Sandia Creek Drive to SR-10, leaving the rest of the Analysis Area at RL-20. This change

is estimated to result in an increase of two potential dwelling units (estimated 61 potential units under the current designation and 63 under the Reduced Density Alternative Map).

The FB21+ Proposed Project Map was found to be inconsistent with General Plan Policy LU-2.3, which directs to assign densities and minimum lot sizes in a manner that is compatible with the character of the applicable community. This inconsistency was due to the clear mapping pattern in this area, with all private lands north of the Santa Margarita River being under the Rural Lands designations (consistent with community-specific mapping rationales during the General Plan Update process), reflecting the highly sensitive habitats and open space preserves, development constraints and limited road infrastructure in this area. The closest Semi-Rural area is approximately two miles away. The Reduced Density Alternative Map has also been found to be inconsistent with Policy LU-2.3, as it would also place Semi-Rural on the outer edge (adjacent to the border with Riverside County) of a Rural Lands area, with no Semi-Rural nearby to establish community character consistency. The inconsistency with the Proposed Project Map was not found to constitute a significant impact, due to potential consideration of the limited additional density potential, and the same rationale would be applied to the Reduced Density Alternative Map, with less additional density potential.

The Proposed Project Map for FB21+ was also found to be inconsistent with Policy LU-2.5, which directs to identify and maintain greenbelts between communities to reinforce the identity of individual communities. This policy inconsistency addresses similar issues to those discussed above for LU-2.3, in addition to the General Plan definition of 'greenbelt.' The Analysis Area is clearly a greenbelt per the General Plan definition, as it is a very low density area (Rural Lands) at the edge of the County (not just the edge of the community) with surrounding open space preserves, agriculture, and other areas of very low density. **Due to these factors, the Reduced Density Alternative Map has also been found to be inconsistent with this policy and like the Proposed Project Map, the inconsistency has been determined to constitute a significant impact.** Establishing an area of Semi-Rural in the Analysis Area would provide justification for Semi-Rural throughout this constrained area north of the Santa Margarita River, thus leading to the loss of this greenbelt, per the General Plan definition. The Proposed Project Map was also found to be inconsistent with Policy COS-14.1, which addresses similar issues to those discussed in LU-2.3 and LU-2.5, but is more focused on the remote location of the Analysis Area. The policy addresses compact development patterns to reduce vehicle trips. The Reduced Density Alternative Map has also been found to be inconsistent with COS-14.1, as it would also establish an island of Semi-Rural and increase density in a remote location with no public road access. Similar to LU-2.3 the Proposed Project Map inconsistency with COS-14.1 was not determined to constitute a significant impact due to the limited increase in density and the same finding applies to the Reduced Density Alternative Map.

The Proposed Project Map for FB21+ was also found to be inconsistent with Policy LU-6.2, due to the highly sensitive habitats found in the Analysis Area, limiting feasibility of the proposal, and the location within a locally and regionally significant wildlife corridor. The inconsistency was not determined to constitute a significant impact due to the limited additional density potential. The Reduced Density Alternative Map would not change the designation in the western portion where Sandia Creek traverses, with steep canyons and wide wetland corridors. Therefore, the Reduced Density Alternative Map has not been determined to be inconsistent with Policy LU-6.2.

Policies LU-6.11 and S-1.1 cover similar issues; addressing land use mapping that reflects hazards and constraints, particularly fire hazards. The Proposed Project Map for FB21+ was determined to be inconsistent with these policies, with the inconsistencies constituting significant impacts. Changing the designation only in the eastern portion would not remove issues of no public road access, constraint limitations on improving road access to fire standards (sharp

curves, steep roadside drop-offs), the prevalence of surrounding open space preserves with limited fire clearing, and portions of the Analysis Area estimated to be beyond the 20-minute travel time required for subdivisions in both the existing RL-20 and in the proposed SR-10. **Therefore, the Reduced Density Alternative Map has also been determined to be inconsistent with LU-6.11 and S-1.1, with the inconsistencies also constituting significant impacts.**

These findings of policy inconsistencies should not be interpreted to conclude that any development project under the designation outlines of the Reduced Density Alternative Map in this subject area would be inconsistent with these policies. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designations.

The Proposed Project Map for FB21+ was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Fallbrook Community Plan. The Reduced Density Alternative Map for FB21+ would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and Fallbrook Community Plan, as it would include a smaller area of proposed land use designation change, in comparison to the Proposed Project Map.

ME26 Analysis Area: The Analysis Area is comprised of 15 parcels totaling approximately 678 acres just east of the Lake Morena Village. The proposed change from RL-20 to SR-10 is estimated to result in an increase of 26 potential dwelling units (estimated 33 potential units under the current designations and 59 under the Proposed Project Map). A Reduced Density Alternative Map was not included for ME26, as there is little opportunity to differentiate portions of the Analysis Area, in terms of environmental constraints or General Plan policy consistency, and there is no land use designation between the existing RL-20 and the proposed SR-10.

ME30A Analysis Area: The Analysis Area is comprised of one parcel totaling approximately 262 acres in the southern portion of CPA, bisected by SR-94. The proposed change from RL-40 to a combination of SR-4 and RL-40 is estimated to result in an increase of 29 potential dwelling units. The Reduced Density Alternative Map (shown in Figure 4-8) would place an SR-10 designation in the area proposed for SR-4 in the Proposed Project Map (following the same map outline). This change is estimated to result in an increase of 10 potential dwelling units (estimated six potential units under the current designation and 16 under the Reduced Density Alternative Map).

The Proposed Project Map for ME30A was found to be inconsistent with Policy LU-8.1, which requires land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies (with a policy exception noted for the Borrego Valley). This resulted in a finding of a significant impact determination due to the proposed designation's inconsistency with Groundwater Ordinance requirements. The average annual precipitation for this area is 15 to 18 inches. Per the County's Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 8 acres. Therefore, the Proposed Project density would be inconsistent with this requirement, but the Reduced Density Alternative of SR-10 (1 unit per 10 acres, slope dependent) would be consistent with this requirement and would not have a policy inconsistency issue.

The Proposed Project Map for ME30A was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the

2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the Mountain Empire Subregional Plan or the Campo/Lake Morena Community Plan. The Reduced Density Alternative Map for ME30A would also not present any inconsistencies with the remainder of the applicable policies of the General Plan, the Mountain Empire Subregional Plan or the Campo/Lake Morena Community Plan, as it would involve a lower density change, in comparison to the Proposed Project Map.

NC3A Analysis Area: The Analysis Area is comprised of 48 parcels totaling approximately 1,015 acres in the southern portion of Hidden Meadows. The proposed change from RL-20 to SR-10 is estimated to result in an increase of 11 potential dwelling units (estimated 66 potential units under the current designations and 77 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-9) would only change the southern approximately 360 acres of the Analysis Area to SR-10. The rest of the Analysis Area would remain RL-20. This change is estimated to result in an increase of three potential dwelling units (estimated 66 potential units under the current designation and 69 under the Reduced Density Alternative Map).

The Proposed Project Map for NCA was not determined to be inconsistent with any of the General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the North County Metro Subregional Plan. The Reduced Density Alternative Map for NC3A would also not present any inconsistencies with the applicable policies of the General Plan, or the North County Metro Subregional Plan, as it would involve a smaller area of change and less additional density potential.

NC18A Analysis Area: The Analysis Area is comprised of five parcels totaling approximately 93 acres located within an unincorporated ‘island’ surrounded by the City of Escondido on the north and the City of San Diego on the south. The proposed change from SR-2 to a combination of SR-1 and SR-2 is estimated to result in an increase of 34 potential dwelling units (estimated 43 potential units under the current designations and 77 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-10) would only change the westernmost parcel to SR-1. The rest of the Analysis Area would remain unchanged at SR-2. This change is estimated to result in an increase of 14 potential dwelling units (estimated 43 potential units under the current designation and 57 under the Reduced Density Alternative Map).

The Proposed Project Map for NC18A was found to be inconsistent with Policy LU-7.1, which calls for protecting agricultural lands with lower-density land use designations that support continued agricultural operations. The Policy LU-7.1 inconsistency was determined to constitute a significant impact. As discussed in this policy review in the Land Use Chapter, research on the 2011 PEIR, the County’s Guidelines for Determining Significance for Agricultural Resources, and other inter-departmental coordination has supported an SR-2 threshold as a ‘lower-density land use designation that supports continued agricultural operations.’ The Reduced Density Alternative Map would only change the westernmost parcel, covering approximately 30 acres of the 93-acre Analysis Area, thus facilitating the clustering of residential uses in that portion and limiting conflicts with agricultural uses in the much larger area proposed to remain SR-2. In addition, only the southeastern portion of that western parcel contains agricultural operations, and the western end is closest to higher densities of a more suburban land use pattern close to the City of Escondido. As such, additional density in that parcel could be focused in the western end and reduce conflicts with agriculture. Therefore, the Reduced Density Alternative Map for NC18A has been determined to be consistent with Policy LU-7.1. The Proposed Project Map for NC18A was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed

Project Map was not determined to be inconsistent with any applicable policies of the North County Metro Subregional Plan. The Reduced Density Alternative Map for NC18A would also not present any inconsistencies with the remainder of the applicable policies of the General Plan and the North County Metro Subregional Plan, as it would include a smaller area of proposed land use designation change, in comparison to the Proposed Project Map.

NC22 Analysis Area: The Analysis Area is comprised of 17 parcels totaling approximately 154 acres located in the southern end of Twin Oaks (within the North County Metro Subregion). The proposed change from SR-10 to a combination of SR-1 and SR-10 is estimated to result in an increase of 52 potential dwelling units (estimated 21 potential units under the current designations and 73 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-11) would place an SR-4 designation in the area proposed for SR-1 in the Proposed Project Map (following the same map outline). This change is estimated to result in an increase of seven potential dwelling units (estimated 21 potential units under the current designation and 28 under the Reduced Density Alternative Map).

The NC22 Proposed Project Map was found to be inconsistent with General Plan Policy LU-6.2, which calls for assigning lower densities in areas with sensitive resources, and this inconsistency was determined to constitute a significant impact. This area is within an important wildlife corridor between the City of San Marcos and the North County Metro Subregion. Within the undeveloped PSR area (covering 126 acres of the 154-acre Analysis Area), there is a riparian corridor (with a seasonal pond) within the headwaters of Agua Hedionda Creek. Surrounding the riparian corridor are hillsides of high quality coastal sage scrub habitat, with much of the upland habitat on steep slopes. The entire Analysis Area is within a PAMA area of the draft NCMSCP. Though the Reduced Density Alternative Map would substantially reduce additional density potential, it would remove the Conservation Subdivision requirement associated with the existing SR-10 designation in a very high quality habitat area. **Therefore, though the potential density would be reduced, the Reduced Density Alternative Map has also been found to be inconsistent with Policy LU-6.2, resulting in a significant impact.**

This finding of policy inconsistency should not be interpreted to conclude that any development project under the designation outlines of the Reduced Density Alternative Map in this subject area would be inconsistent with this policy. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designations.

The Proposed Project Map for NC22 was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the North County Metro Subregional Plan. The Reduced Density Alternative Map for NC22 would also not present any inconsistencies with the remainder of the applicable policies of the General Plan, or the North County Metro Subregional Plan, as it would involve a lower density change, in comparison to the Proposed Project Map.

NC37 Analysis Area: The Analysis Area is comprised of 15 parcels totaling approximately 158 acres located in the northern portion of Twin Oaks (within the North County Metro Subregion), adjacent to the City of San Marcos. The proposed change from SR-10 to SR-4 is estimated to result in an increase of 12 potential dwelling units (estimated 19 potential units under the current designations and 31 under the Proposed Project Map).

The Reduced Density Alternative Map (shown in Figure 4-12) for NC37 would leave the western 'leg' of the Analysis Area at SR-10, while changing the remainder of the Analysis Area to SR-4. This change is not estimated to affect potential density because this western leg does not have additional density potential under the SR-4 in the Proposed Project Map; however, if ownership were consolidated in this western leg, a subdivision reconfiguration of this area could yield an additional lot. Under the current situation of different ownerships, only a situation of separate subdivisions is assumed in the density estimates, which does not result in additional density potential under SR-4 (thus the same situation for remaining SR-10 in the alternative). In addition, this western leg is more slope constrained than the rest of the Analysis Area and transitions to a more mountainous area further west, so the SR-10 in the alternative would maintain consistency and a lower density transition area.

The Proposed Project Map for NC37 was not determined to be inconsistent with any of the General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the North County Metro Subregional Plan. The Reduced Density Alternative Map for NC37 would also not present any inconsistencies with the applicable policies of the General Plan, or the North County Metro Subregional Plan, as it would involve a smaller area of change.

NC38+ Analysis Area: The Analysis Area is comprised of eight parcels totaling approximately 77 acres located in the southeastern portion of Twin Oaks, adjacent to the City of San Marcos. The proposed change from SR-2 to SR-1 is estimated to result in an increase of 38 potential dwelling units (estimated 37 potential units under the current designations and 75 under the Proposed Project Map). The Reduced Density Alternative Map for NC38+ (shown in Figure 4-13) would only change the area outside the FEMA floodplain to SR-1. The area of the floodplain would remain unchanged at SR-2. This change is estimated to result in an increase of 27 potential dwelling units (estimated 37 potential units under the current designation and 64 under the Reduced Density Alternative Map).

The Proposed Project Map for NC38+ was found to be inconsistent with Policy LU-7.1, which calls for protecting agricultural lands with lower-density land use designations that support continued agricultural operations. The Policy LU-7.1 inconsistency was determined to constitute a significant impact. As discussed in this policy review in the Land Use Chapter, research on the 2011 PEIR, the County's Guidelines for Determining Significance for Agricultural Resources, and other inter-departmental coordination has supported an SR-2 threshold as a 'lower-density land use designation that supports continued agricultural operations.' The Reduced Density Alternative Map would only change the area outside the floodplain to SR-1. In addition to addressing floodplain hazards and water quality considerations associated with the floodplain area, this alternative would maintain the SR-2 in this area of the highest quality soils for agricultural operations. This alternative would facilitate the clustering of residential uses away from the floodplain area while reducing the additional density potential, thus supporting continued agricultural operations. Therefore, the Reduced Density Alternative Map for NC38+ has been determined to be consistent with Policy LU-7.1.

The Proposed Project Map for NC38+ was also determined to be inconsistent with Policy S-1.1, which seeks to minimize the population exposed to hazards by assigning land use designations and densities that reflect site-specific constraints and hazards; and inconsistent with Policies S-9.2 and S-9.5, which restrict development in floodplains. These inconsistencies were not determined to result in significant impacts, as there is room for consideration of clustering possibilities (away from the floodplain) and adherence to mitigation measures and existing regulations. These inconsistencies are related to increasing density within a floodplain area per

the Proposed Project Map. The Reduced Density Alternative Map for NC38+ would be consistent with these policies, as it would leave the floodplain area unchanged at SR-2.

The Proposed Project Map for NC38+ was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any applicable policies of the North County Metro Subregional Plan. The Reduced Density Alternative Map for NC38+ would also not present any inconsistencies with the remainder of the applicable policies of the General Plan, or the North County Metro Subregional Plan, as it would reduce the area proposed for a designation change, in comparison to the Proposed Project Map.

PP30 Analysis Area: The Analysis Area is comprised of eleven parcels totaling approximately 518 acres located in the southern portion of Pala/Pauma, adjacent to SR-76. The proposed change from RL-40 to a combination of SR-2 and RL-40 is estimated to result in an increase of 122 potential dwelling units (estimated 12 potential units under the current designations and 134 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-14) would place an SR-10 designation in the area proposed for SR-2 in the Proposed Project Map (following the same map outline). This change is estimated to result in an increase of 19 potential dwelling units (estimated 12 potential units under the current designation and 31 under the Reduced Density Alternative Map).

The PP30 Proposed Project Map was found to be inconsistent with General Plan Policy LU-6.2, which calls for assigning lower densities in areas with sensitive resources, and this inconsistency was determined to constitute a significant impact. This inconsistency was due to the extensive sensitive habitats present in the area proposed for SR-2, including riparian areas, oak woodlands, and coastal sage scrub; in addition to the wildlife corridor potential, draft PAMA, and Critical Habitat Areas for endangered species within the Analysis Area. The Reduced Density Alternative Map would place SR-10 in the area proposed for SR-2 in the Proposed Project Map, thus maintaining a Conservation Subdivision requirement in that area, providing greater assurance of protection for the most sensitive areas and a substantially lower density. Therefore, the Reduced Density Alternative Map for PP30 has been determined to be consistent with Policy LU-6.2. The Proposed Project Map for PP30 was also found to be inconsistent with Land Use Policy 4 and Conservation Policy 1 of the Pala/Pauma Subregional Plan, which call for applying low density (Conservation Policy 1 refers to ‘very low density’) designations to areas within Resource Conservation Areas, which include the PP30 Analysis Area. As with General Plan Policy LU-6.2, the Reduced Density Alternative Map would be consistent with these policies, under the SR-10 designation in the eastern portion.

The Proposed Project Map for PP30 was found to be inconsistent with Policy LU-8.1, which requires land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies (with a policy exception noted for the Borrego Valley), which resulted in a finding of a significant impact determination, due to the proposed designation’s inconsistency with Groundwater Ordinance requirements. The average annual precipitation for this area is 18 to 21 inches. Per the County’s Groundwater Ordinance, this results in a Groundwater Ordinance minimum lot size of 5 acres. Therefore, the Proposed Project density would be inconsistent with this requirement, but the Reduced Density Alternative of SR-10 (1 unit per 10 acres, slope dependent) would be consistent with this requirement and would not have a policy inconsistency issue.

The Proposed Project Map for PP30 was found to be inconsistent with Policy COS-10.2, which discourages the establishment of incompatible land uses in MRZ-2 areas. There is a relatively

small area of the MRZ-2 within PP30 that would be a sufficient distance from existing incompatible uses. The Reduced Density Alternative Map for PP30 would be consistent with this policy, as the SR-10 designation proposed (in the area proposed for SR-2 in the Proposed Project Map) in this alternative would be a low enough density to not be inconsistent with potential future mining operations.

The Proposed Project Map for PP30 was also found to be inconsistent with Policy COS-14.1, promoting compact development patterns to reduce vehicle trips. As the Reduced Density Alternative Map would substantially lower the allowed density in this area of limited jobs and commercial goods and services, it has been determined to be consistent with COS-14.1.

The Proposed Project Map for PP30 was determined to be inconsistent with Land Use Policy 5 of the Pala/Pauma Subregional Plan with notes, "Designate existing agricultural areas under the Rural Lands Regional Category, when consistent with parcel sizes, to limit the intrusion of incompatible land uses into existing agricultural areas." However, there is some room for discretion by decision-makers due to the varying parcel sizes and location of agricultural uses in the large Analysis Area. The Reduced Density Alternative would follow a similar rationale and the SR-10 in the eastern portion is very similar to Rural Lands and applies the same density as RL-20 in areas of steep slopes.

The Proposed Project Map for PP30 was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any other applicable policies of the Pala/Pauma Subregional Plan. The Reduced Density Alternative Map for PP30 would also not present any inconsistencies with the remainder of the applicable policies of the General Plan, or the Pala/Pauma Subregional Plan, as it would substantially lower the additional density potential, in comparison to the Proposed Project Map.

SD15 Analysis Area: The Analysis Area is comprised of one 69-acre parcel in the northwestern portion of the San Dieguito CPA, adjacent to portions of the City of San Marcos. The proposed change from SR-1 to a combination of General Commercial (with mixed use zoning at 2 dwelling units per acre), VR-10.9, and SR-0.5 is estimated to result in an increase of 301 potential dwelling units (estimated 61 potential units under the current designations and 362 under the Proposed Project Map).

The Reduced Density Alternative Map (shown in Figure 4-15) would place a General Commercial designation with mixed use zoning at 2 units per acre in the northern portion and would place SR-10 in the southern approximately 30 acres. This change is estimated to result in an increase of 19 potential dwelling units (estimated 61 potential units under the current designation and 80 under the Reduced Density Alternative Map). An additional alternative is being analyzed for SD15, which is referred to as the 2012 Board Letter Alternative for SD15. This option would change the entire Analysis Area to General Commercial, but with no additional density.

While no clear General Plan or San Dieguito Community Plan policy inconsistencies were identified for the Proposed Project for SD15 in this programmatic approach, the Reduced Density Alternative Map would demonstrate a greater level of consistency with certain policies applicable to a stand-alone GPA/Rezone and that were relied upon in the 2011 PEIR to reduce impacts. The Reduced Density Alternative Map would place an SR-10 designation on the southern 30 acres of the Analysis Area, limiting that more constrained portion to two potential dwelling units (slope-dependent designation) and requiring a Conservation Subdivision design in that portion. This would ensure the preservation of the most sensitive habitats and maintaining an effective wildlife

corridor, in consideration of the open space preserves adjacent to the southeast, south, and west. As such, this option would demonstrate a greater level of consistency with Policy LU-2.3 (assign densities and minimum lot sizes in a manner that is compatible with the character of the applicable community), considering the southern end is mostly surrounded by open space and low density designations. This option placing SR-10 in the southern 30 acres would also demonstrate a greater level of consistency with General Plan Policy LU-6.2 and Conservation Policy 2 of the Community Plan (compatible land use mapping in areas adjacent to open space preserves), as it would better reflect the sensitive habitats and wildlife corridor in the southern end. The 2012 Board Letter Alternative (shown in Figure 4-22) would place General Commercial over the entire property and has been determined to be inconsistent with these policies discussed above (General Plan Policies LU-2.3 and LU-6.2; Community Plan Conservation Policy 2), as it would not include a lower density/intensity designation in the southern portion of more sensitive habitat and wildlife corridor connections. **The inconsistency with General Plan Policy LU-6.2 for the 2012 Board Letter Alternative for PSR Analysis Area SD15 has been determined to constitute a significant impact, due to the extent of high intensities uses that could be possible under that map option, and lack of lower intensity transition in the southern portion.**

Policy LU-10.4 seeks to limit the establishment of commercial and industrial areas outside Villages to reduce vehicle trips and environmental impacts. While the Proposed Project Map and the Reduced Density Alternative Map would limit the area of commercial to the northern portion, adjacent to water and sewer lines, a 4-lane road, and nearby high densities and commercial uses in San Marcos, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would apply General Commercial throughout the Analysis Area, and has been determined to be inconsistent with this policy. This inconsistency has not been determined to constitute a significant impact, as the total acreage of commercial can be considered in the context of various factors associated with this corridor of San Elijo Road, which is more suburban with commercial and high densities in the adjacent jurisdiction.

These findings of policy inconsistencies should not be interpreted to conclude that any development project under the 2012 Board Letter Alternative for PSR Analysis Area SD15 in this subject area would be inconsistent with these policies. It is possible that development project-specific mitigation and/or design considerations could be proposed with analysis leading to a consistency finding. In addition to other factors discussed, this policy consistency evaluation considers the project context of a stand-alone GPA/Rezone with no development proposed, and the extent of development that would be possible under the proposed designation.

The Proposed Project Map for SD15 was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any other applicable policies of the San Dieguito Community Plan. The Reduced Density Alternative Map and 2012 Board Letter Alternative Map for PSR Analysis Area SD15 would also not present any inconsistencies with the remainder of the applicable policies of the General Plan, or the San Dieguito Community Plan.

VC7+ Analysis Area: The Analysis Area is comprised of 233 parcels totaling approximately 1,465 acres located in the western portion of Valley Center, just east of I-15. The proposed change from SR-4 to SR-2 is estimated to result in an increase of 253 potential dwelling units (estimated 366 potential units under the current designations and 619 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-16) for the VC7+ Analysis Area would only change approximately half of the analysis area from SR-4 to SR-2, covering the area south of West Lilac Road and north of Jay Jay Way/Rodriguez Road (approximately 750 acres). This

change is estimated to result in an increase of 141 potential dwelling units (estimated 366 potential units under the current designation and 507 under the Reduced Density Alternative Map).

While the Proposed Project Map for VC7+ was not determined to pose clear inconsistencies with applicable General Plan or Valley Center Community Plan policies in this programmatic approach, the Reduced Density Alternative Map would demonstrate a greater level of consistency with certain policies applicable to a stand-alone GPA/Rezone and relied upon in the 2011 PEIR to reduce impacts. The northernmost section and the southern section that would be removed from the area of change under the Reduced Density Alternative Map are part of riparian corridors associated with Keys Creek on the north and a Moosa Creek tributary on the south. The creeks are surrounded by areas of steep slopes with some sensitive upland vegetation, and the northern portion is also in a PAMA area of the draft NCMSCP. Therefore, removing these areas from the proposed changes demonstrates greater consistency with Policy LU-6.2 which calls for lower densities in areas with sensitive resources. The Reduced Density Alternative Map would also demonstrate greater consistency with Policies LU-6.11 and S-1.1, which address land use mapping with consideration of fire hazards and other hazards. These northern and southern areas that would remain SR-4 in this alternative would have limited fire clearing and present greater fire access issues.

VC51 Analysis Area: The Analysis Area is comprised of 14 parcels totaling approximately 166 acres located in the northwestern portion of Valley Center. The proposed change from RL-20 to SR-4 is estimated to result in an increase of 13 potential dwelling units (estimated 14 potential units under the current designations and 27 under the Proposed Project Map). Only six additional units would be possible outside properties currently under Williamson Act Contracts for agricultural preservation. The properties under these contracts could not be subdivided until the Williamson Act contracts are removed (regardless of General Plan designation), due to the 15-acre minimum lot size required in the contract. The Reduced Density Alternative Map (shown in Figure 4-17) for the VC51 Analysis Area would only change the three large parcels on the northern end of the Analysis Area to SR-4, leaving the remainder at RL-20. This change is estimated to result in an increase of five potential dwelling units (estimated 14 potential units under the current designation and 19 under the Reduced Density Alternative Map). Only three additional units would be possible outside Williamson Act properties.

While the Proposed Project Map for VC51 was not determined to pose clear inconsistencies with applicable General Plan or Valley Center Community Plan policies in this programmatic approach, the Reduced Density Alternative Map would demonstrate a greater level of consistency with certain policies applicable to a stand-alone GPA/Rezone and relied upon in the 2011 PEIR to reduce impacts. This alternative would demonstrate greater consistency with Policy LU-7.1, which calls for protecting agricultural lands with lower density designations that support continued agriculture. This is an area dominated by agricultural uses, with Williamson Act contracts on multiple properties, so even though the proposed SR-4 is below the potential SR-2 threshold discussed above, limiting the density increases here demonstrates greater consistency. This alternative would also demonstrate greater consistency with LU-2.3 by applying densities consistent with community character, and with COS-14.1 which seeks compact development patterns to reduce vehicle trips. The Analysis Area is near the outer edge of the community and the area of existing SR-4 to the north is more parcelized than this area.

VC57+ Analysis Area: The Analysis Area is comprised of 217 parcels totaling approximately 1,337 acres located in the eastern portion of Valley Center, just east of the northern Village. The proposed change from SR-4 to SR-2 is estimated to result in an increase of 231 potential dwelling units (estimated 374 potential units under the current designations and 605 under the Proposed Project Map). The Reduced Density Alternative Map (shown in Figure 4-18) for the VC57+

Analysis Area would not change the designation on the floodplain area south of Valley Center Road, so the area proposed to change to SR-2 in this alternative would cover approximately 850 acres of the 1,337 total acres. This change is estimated to result in an increase of 150 potential dwelling units (estimated 374 potential units under the current designation and 524 under the Reduced Density Alternative Map).

While the Proposed Project Map for VC57+ was not determined to pose clear inconsistencies with applicable General Plan or Valley Center Community Plan policies in this programmatic approach, the Reduced Density Alternative Map would demonstrate a greater level of consistency with certain policies applicable to a stand-alone GPA/Rezone and relied upon in the 2011 PEIR to reduce impacts. The area that would remain unchanged at SR-4 in this alternative contains not only a mapped floodplain and floodway, but also riparian/wetland habitats within the floodplain. As such, removing that portion from the area proposed to change to SR-2 would demonstrate greater consistency with Policy LU-6.2, which calls for assigning lower densities in areas with sensitive resources, and with Policies S-9.2 and S-9.5, which call for limiting development in floodplains.

VC67 Analysis Area: The Analysis Area is comprised of six parcels totaling approximately 13 acres located just south of the northern Village of Valley Center. The proposed change is from SR-2 to Medium Impact Industrial (I-2). The Reduced Intensity Alternative Map (shown in Figure 4-19) would only change the designation for the northern end of the Analysis Area, leaving unchanged an approximate 100-foot buffer from the edge of Keys Creek. This alternative would result in approximately half the Analysis Area designated Medium Impact Industrial and half designated SR-2.

The Proposed Project Map for VC67 was found to be inconsistent with Policies S-1.1, which is associated with land use mapping with consideration of hazards. It was also found to be inconsistent with Policies S-9.2, S-9.5, and S-10.1, which limit development in floodplains and floodways, including very restrictive limits (consistent with the Resource Protection Ordinance) for floodways per Policy S-10.1. These inconsistencies were determined to constitute a significant impact. The Proposed Project Map was also found to be inconsistent with Industrial Policy 3 of the Valley Center Community Plan, which covers similar issues. The industrial use would not be in line with the parameters of these policies. **Though the Reduced Intensity Alternative Map would reduce the area proposed for Industrial, it would still be inconsistent with these policies, as a floodway covers almost all of the Analysis Area and the floodplain expands further to cover all of the Analysis Area. Like the Proposed Project Map, the Reduced Intensity Alternative Map's inconsistencies with these policies were determined to constitute significant impacts.**

The Proposed Project Map for VC67 was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map was not determined to be inconsistent with any other applicable policies of the Valley Center Community Plan. The Reduced Density Alternative Map for VC67 would also not present any inconsistencies with the remainder of the applicable policies of the General Plan, or the Valley Center Community Plan, as it would reduce the area proposed to change to industrial.

Former Champagne Gardens Specific Plan Area

The former CGSP area is comprised of 14 parcels totaling approximately 115 acres located at the intersection of three planning areas (Bonsall, Valley Center and Hidden Meadows) along Champagne Boulevard just east of I-15. The proposed change from Specific Plan Area (with no

residential density) and RL-20 to a combination of SR-2, SR-4, SR-10, and Rural Commercial in the Referral Map (analyzed as part of the Proposed Project) is estimated to result in an increase of 31 potential dwelling units (estimated one potential unit under the current designations and 32 under the Proposed Project Map).

The Preliminary Staff Recommendation Map for the former CGSP area (shown in Figure 4-20a) is being analyzed as a component of the Reduced Density Alternatives for the overall project. This option would include the same proposed designations as the Proposed Project Map on the properties west of Champagne Boulevard (referred to as 'Western Champagne Gardens'), but it proposes SR-4 on the properties east of Champagne Boulevard (referred to as 'Eastern Champagne Gardens'). This option is estimated to result in an increase of 19 potential dwelling units (estimated one potential unit under the current designations and 20 under the Preliminary Staff Recommendation Map (analyzed as part of the Reduced Density Alternatives).

The Referral Map/Proposed Project Map for the former CGSP area was found to be inconsistent with Policy LU-6.2, which calls for lower densities in areas with sensitive resources. This was due to the number of lots that would be possible in the Eastern Champagne Gardens area under the SR-2 designation (proposed for each of the Sub-Areas there except CG2), in consideration of the extent of sensitive habitats, including riparian/wetlands, oak woodlands, and coastal sage scrub. The Preliminary Staff Recommendation Map/Reduced Density Alternative Map would reduce the potential units by almost half, and would allow a greater level of avoidance of sensitive resources. Therefore, this option has been determined to be consistent with Policy LU-6.2. The Referral Map/Proposed Project Map was also found to be inconsistent with Policies S-1.1, S-9.2, and S-9.5, which deal with hazards and floodplains. These inconsistencies are due to the density potential in consideration of the floodplain hazards in this area, and consistency with adjacent and nearby properties in the floodplain. As noted, the Preliminary Staff Recommendation Map/Reduced Density Alternative Map would reduce the potential density by almost half and would also place a designation that is the same as adjacent and nearby properties downstream in this floodplain area. Therefore, this option has been determined to be consistent with Policies S-1.1, S-9.2, and S-9.5.

The Proposed Project Map/Referral Map for the former CGSP area was not determined to be inconsistent with any other General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts. In addition, the Proposed Project Map/Referral Map was not determined to be inconsistent with any applicable policies of the Bonsall Community Plan, the North County Metro Subregional Plan, or the Valley Center Community Plan (crosses three planning areas). The Preliminary Staff Recommendation Map/Reduced Density Alternative Map for the former CGSP area would also not present any inconsistencies with the remainder of the applicable policies of the General Plan, or the applicable community/subregional plans, as it would substantially lower the additional density potential, in comparison to the Proposed Project Map/Referral Map.

Conflicts with Habitat Conservation Plans or Natural Community Conservation Plans

The Proposed Project would result in less than significant direct and cumulative impacts associated with conflicting with applicable HCPs or NCCPs for the PSR Analysis Areas.

The Reduced Density Alternatives for PSR Analysis Areas at least partially within adopted or draft PAMA, including BO18+, CD14, FB2+, FB21+, NC3A, NC22, NC37, PP30, SD15, VC7+, VC57+, and all former CGSP Subareas are estimated to reduce proposed density potential by 687 potential dwelling units, including in PAMA designated areas (draft PAMA for NCMSCP). Similar to the Proposed Project, the Reduced Density Alternatives would also result in less than

significant impacts associated with conflicting with applicable HCPs and NCCPs. Regulatory processes are in place to ensure implementation of, and conformance with applicable HCPs and NCCPs in the unincorporated County for future development projects within the Analysis Areas. The Reduced Density Alternatives would also incorporate the same adopted General Plan policies that would further support implementation of and conformance with applicable HCPs and NCCPs.

Although the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increase in potential development intensity from the increase in commercial land use as compared to the Proposed Project map for SD15, this alternative would also have a less than significant impact with regard to conflicting with applicable conservation plans, as any future projects would be required to comply with the plans.

4.2.1.10 Mineral Resources

Mineral Resource Availability

Many of the PSR Analysis Areas and former CGSP Subareas propose land use designation changes in areas that are currently incompatible with mining operations. Land use designation changes from one incompatible use to another incompatible use, whether MRZ-2 or MRZ-3 land use classification, is not considered a new impact. However, the proposed land use changes in PSR Analysis Areas CD14, FB2+, ME30A, and PP30 would reduce the availability of mineral resources in those areas. Therefore, the Proposed Project would result in a significant and unavoidable impact associated with mineral resource availability.

The Reduced Density Alternatives for PSR Analysis Areas CD14, FB2+, ME30A, and PP30 are estimated to result in 140 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 177 potential dwelling units beyond the adopted General Plan. While the amount of impacts associated with mineral resource availability would be lessened due to reduced development density/intensity, the alternatives would still result in an impact associated with mineral resource availability. The Reduced Density Alternatives for CD14, FB2+, ME30A, and PP30 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but the impact would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in significant and unavoidable impacts associated with mineral resource availability.**

PSR Analysis Area SD15 is currently designated for SR-1, which is already considered incompatible with the MRZ-3 designation. Therefore, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in a new or additional impact associated with the loss of availability of mineral resources.

Mineral Resource Recovery Sites

The Proposed Project would result in changes in land use designations in areas classified as MRZ-2 and MRZ-3 that would not be compatible with mineral extraction activities. The only PSR Analysis Areas or former CGSP Subareas to potentially result in an impact associated with mineral resource recovery sites are BO18+, CD14, and PP30, as they are in MRZ-2 or MRZ-3 areas and include proposals for changed densities (in MRZ-2 or MRZ-3 portions) that would not be consistent with mineral resource recovery (where part of the area would be consistent with mineral resource recovery under the current designation).The CD14 area proposed for SR-2 and the BO18+ areas proposed for SR-4 are in close proximity to existing homes and other existing land uses that would preclude a future mining operation. PP30 contains a relatively small area (approximately 20-30 acres) that would be within the area proposed for SR-2, within a MRZ-2

area, and is also a sufficient distance (at least 1,300 feet) from these residences and other uses. This portion of the Analysis Area would be considered as having mining potential, and therefore, the Proposed Project resulted in a significant impact. The Reduced Density Alternative for PP30 would place SR-10 in the area proposed for SR-2 in the Proposed Project Map, with the SR-10 designation being low enough density to not preclude a future mining operation. Therefore, the Reduced Density Alternatives would not result in significant impacts to mineral resource recovery sites.

PSR Analysis Area SD15 is currently designated SR-1, which is already considered incompatible with the MRZ-3 designation. Therefore, similar to the Reduced Density Alternative, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in new impacts associated with mineral resource recovery sites.

4.2.1.11 Noise

Excessive Noise Levels

Implementation of the Proposed Project has the potential to include new noise sensitive land uses that would be accommodated into PSR Analysis Areas. The new noise sensitive land uses would have the potential to be exposed to noise levels in excess of Noise Ordinance standards due to roadways, railroads, extractive industries, industrial and commercial industries, and agricultural operations. However, the Proposed Project would result in less than significant direct and cumulative impacts associated with excessive noise levels after mitigation.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units). While the amount of impact to noise level standards would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives, the alternatives could still result in excessive noise levels to noise sensitive land uses. The Reduced Density Alternatives for all PSR Analysis Areas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with excessive noise levels.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with excessive noise levels due to an increase in development intensity from the increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative would have a greater impact associated with excessive noise levels; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the impact to a level below significant.

Excessive Groundborne Vibration

Construction activities associated with the Proposed Project would result in excessive groundborne vibration throughout all PSR Analysis Areas; however, the Proposed Project would result in less than significant direct and cumulative impacts associated with excessive groundborne vibration after mitigation.

All PSR Analysis Areas and former CGSP Subareas would be exposed to excessive groundborne vibration due to construction activities and ME30A would be exposed to excessive groundborne vibration due to a nearby railroad. The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately one-third the number of

additional potential dwelling units). While the amount of groundborne vibration impact would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives, the alternatives would still result in excessive groundborne vibration. The Reduced Density Alternatives for all PSR Analysis Areas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with excessive groundborne vibration.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with excessive groundborne vibrations due to an increase in development intensity from an increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative would have a greater impact associated with excessive groundborne vibration; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the impact to a level below significant.

Permanent Increase in Ambient Noise Levels

The Proposed Project would result in a significant increase in noise levels on roadways and increased noise due to an industrial or commercial land use within an existing residential area. The Proposed Project was found to result in a significant and unavoidable impact associated with a permanent increase in ambient noise levels.

PSR Analysis Area SD15, proposed for general commercial, is located within the vicinity of existing residential development and would have the potential to accommodate new residential development which could increase exterior noise level standards. New industrial facilities that may be accommodated in the VC67 analysis area may result in a significant impact to adjacent NSLU. Additionally, a significant increase in noise level on roadways would contribute to an increase in ambient noise levels. The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units). While the amount of impact associated with a permanent increase in ambient noise levels would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives, the alternatives could still result in a permanent increase in ambient noise levels. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 adopted PEIR mitigation measures, but the impact would not be reduced to a level below significant. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with a permanent increase in ambient noise levels.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in a permanent increase in ambient noise levels due to an increase in development intensity from the increase in commercial land use. **Compared to the Proposed Project, the 2012 Board Letter Alternative** for PSR Analysis Area SD15 **would have a greater significant and unavoidable impact associated with a permanent increase in ambient noise levels.**

Temporary Increase in Ambient Noise Levels

Construction related activities could result in a temporary increase in ambient noise levels; however, the Proposed Project would result in less than significant direct and cumulative impacts associated with a temporary increase in ambient noise levels.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in lower intensity development than the Proposed Project (approximately one-third the

number of additional potential dwelling units). While the amount of temporary ambient noise levels would be lessened by approximately two-thirds with the Reduced Density Alternatives, the alternatives could still result in a temporary increase in ambient noise levels. The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with a temporary increase in ambient noise levels.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with temporary noise levels due to an increase in development intensity from the increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative would have a greater impact associated with temporary increases in noise levels; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant.

Excessive Noise Exposure from a Public or Private Airport

The Proposed Project was determined to result in less than significant direct and cumulative impacts associated with excessive noise exposure from a public or private airport.

PSR Analysis Areas VC7+ and VC57+ are located 1.5 and 0.5 miles from an airstrip and heliport, respectively; the former CGSP Subareas are not near a public or private airport. It is not anticipated that PSR Analysis Areas VC7+ and VC57+ would experience any excessive noise from the nearby airstrip and heliport. The Reduced Density Alternatives for VC7+ and VC57+ would reduce the number of potential dwelling units near the airstrip and heliport; however, the impact would remain the same as the Proposed Project. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with potential excessive noise exposure from a public or private airport.

As mentioned above, PSR Analysis Area SD15 is not located within two miles of a public or private airport. Similar to the Proposed Project, implementation of the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in impacts associated with excessive noise due to public or private airports.

4.2.1.12 Population and Housing

Population Growth

As shown in Table 2.12-6, implementation of the Proposed Project would result in an increase in the PSR Analysis Areas and former CGSP Subareas of 1,826 potential dwelling units, translating to an estimated 4,946 people. The Proposed Project is consistent with SANDAG population estimates for the region and CPAs containing the PSR Analysis Areas; however, with consideration of cumulative impacts, the Proposed Project would result in a significant and unavoidable cumulative impact after mitigation, associated with population growth.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would reduce the number of additional potential dwelling units and population compared to the Proposed Project by approximately two-thirds. **Similar to the Proposed Project, the population increase would fall within SANDAG estimates for the region and CPAs that contain PSR Analysis Areas; therefore, the Reduced Density Alternatives would result in a less than significant direct impact associated with population growth; however, the cumulative impact would remain significant and unavoidable, similar to the Proposed Project.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in lesser impacts associated with population growth due to the much lower residential density in comparison to the Proposed Project map. Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a reduced impact associated with population growth.

Displacement of Housing

The Proposed Project would result in a net increase of 1,826 potential dwelling units, but does not include any development applications/proposals. As such, the Proposed Project would not directly result in the removal or demolition of any existing residences or other structures currently located within a PSR Analysis Area; therefore, the Proposed Project would result in less than significant impacts associated with the displacement of housing.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in a net increase of 664 potential dwelling units within PSR Analysis Areas and similarly do not include any development applications/proposals. As such, these alternatives would not result in the demolition or displacement of any existing dwelling units; therefore, similar to the Proposed Project, the Reduced Density Alternatives would not result in impacts associated with the displacement of housing.

There are no existing housing units with PSR Analysis Area SD15. Similar to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in impacts associated with the displacement of housing.

Displacement of People

As shown in Table 2.12-6, the Proposed Project would result in an estimated net increase of 4,946 people, but does not include any development applications/proposals. As such, the Proposed Project would not result in the displacement of people; therefore, the Proposed Project would result in less than significant impacts associated with the displacement of people.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in an estimated net increase of approximately 1,810 people and similarly do not include any development applications/proposals. As such, these alternatives would not result in the displacement of people. Therefore, similar to the Proposed Project, the Reduced Density Alternatives would not result in impacts associated with the displacement of people.

There are no existing dwelling units or people located with PSR Analysis Area SD15. Same as with the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would not result in impacts associated with the displacement of people.

4.2.1.13 Public Services

Fire Protection and Emergency Response Services

Under the Proposed Project, increasing allowable land use density within PSR Analysis Areas BO18+, CD14, DS24, FB2+, FB17, ME30A, NC18A, NC22, NC37, NC38+, PP30, SD15, and VC51 would reduce allowed travel response times, in areas where this could result in future development that cannot meet travel response times without the provision of additional access roads and/or new or physically altered facilities. However, the Proposed Project would result in less than significant direct and cumulative impacts associated with fire response times and the construction or expansion of fire protection facilities after mitigation.

The Reduced Density Alternatives for the affected PSR Analysis Areas listed above (the former CGSP Subareas would not result in an impact associated with fire protection or emergency response services) are estimated to result in 678 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 870 potential dwelling units beyond the adopted General Plan for these PSR Analysis Areas. While the amount of impacts associated with fire protection and emergency response services would be reduced due to reduced development density/intensity, the alternatives would still result in a potential impact associated with fire protection and emergency response services. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with fire protection and emergency response services.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in increased development intensity due to the increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a similar impact associated with fire protection services as the Proposed Project would involve a higher residential density; however, this alternative would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant.

Police Protection Services

The Proposed Project would result in land use designation changes that would increase residential densities within the PSR Analysis Areas and former CGSP Subareas, resulting in the need for increased law enforcement services, including the potential need for new facilities to maintain levels of service. However, implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would reduce direct and cumulative impacts to less than significant.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas are estimated to result in 664 additional potential dwelling units beyond the adopted General Plan. The Proposed Project is estimated to result in 1,826 additional potential dwelling units beyond the adopted General Plan in the same areas. While the amount of impacts associated with police protection services would be reduced due to reduced development intensity, the alternatives would still result in an impact associated with police protection services. The alternatives would implement the adopted General Plan policies and 2011 PEIR mitigation measures which would reduce impacts to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with police protection services.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in increased development intensity due to the increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative would have a similar impact on police services as the Proposed Project would involve a higher residential density. However, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would implement the adopted General Plan policies and 2011 PEIR mitigation measures which would reduce impacts to a level below significant.

School Services

The projected population and housing growth in the PSR Analysis Areas would result in an increase in student enrollment, which could cause the need for new or expanded school facilities. Because school districts serve as lead agencies under CEQA for school construction projects,

the County would not have overall permitting authority over those projects, which could result in significant and unavoidable impacts. Therefore, the Proposed Project would result in a significant and unavoidable impact associated with school services.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in lower levels of development than the Proposed Project (approximately one-third the number of additional potential dwelling units and people). While the impact to school services would be reduced by approximately two-thirds with implementation of the Reduced Density Alternatives, the alternatives would still result in potential impacts associated with a need for new or expanded school facilities. The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impacts; however, similar to the Proposed Project, the impact would be significant and unavoidable due to the County's limited authority over school district projects. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with school services.**

Additionally, the 2012 Board Letter Alternative would result in less impacts associated with school services due to the potential residential density being much lower than the Proposed Project map. The 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in a similar impact to the current General Plan (No Project) associated with school services.

Other Public Services

Libraries serving BO18+, CD14, DS8, DS24, FB2+, FB17, FB19 (no Reduced Development Alternative), FB21+, NC3A, NC18A NC22, NC37, and NC38+, PP30, VC7+, VC51, and former CGSP Subarea CG1 would need to be expanded to accommodate the growth associated with the Proposed Project. However, compliance with adopted General Plan policies and 2011 PEIR mitigation measures would reduce direct and cumulative impacts to less than significant.

The Reduced Density Alternatives for the affected PSR Analysis Areas and former CGSP Subareas are estimated to result in 589 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 1,062 potential dwelling units beyond the adopted General Plan. While the amount of impacts to library services would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives, the alternatives would still result in the impacts to library services. The Reduced Density Alternatives for PSR Analysis Areas BO18+, CD14, DS8, DS24, FB2+, FB17, FB21+, NC3A, NC18A, NC22, NC37, NC38+, PP30, VC7+, VC51+, and former CGSP Subarea CG1 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the level of impact below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with library services.

Additionally, the 2012 Board Letter Alternative would result in less impacts associated with library services due to the proposed allowed residential density for this alternative being the same as existing. Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a lessened impact associated with library services.

4.2.1.14 Recreation

Deterioration of Parks and Recreational Facilities

As shown in Table 2.14-4 and Table 2.14-5, CPAs and Subregions that contain PSR Analysis Areas and former CGSP Subareas are currently deficient in local and regional park acreage by 1,506 and 1,997 acres respectively. However, compliance with adopted General Plan policies

and 2011 PEIR mitigation measures would reduce potentially significant direct and cumulative impacts to less than significant.

The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units). While the impacts associated with the deterioration of parks and recreational facilities would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives, the alternatives would still result in potential impacts associated with deterioration of parks and recreational facilities due to a current deficiency in local and regional parks. The Reduced Density Alternatives for all PSR Analysis Areas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the level of impact below significant. Therefore, the Reduced Density Alternatives would result in less than significant impact associated with the deterioration of parks and recreational facilities.

Additionally, the 2012 Board Letter Alternative for SD15 would result in less impacts associated with parks and recreational facilities due to the proposed allowed residential density being much lower than the Proposed Project map. Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a reduced potentially significant impact associated with parks and recreational facilities; however, the impacts would remain less than significant with incorporation of adopted General Plan policies and 2011 PEIR mitigation measures.

Construction of New Recreational Facilities

As stated above, the CPAs and Subregions containing PSR Analysis Areas and CGSP Subareas are deficient in local and regional parks. In order to comply with local and regional park standards new recreational facilities would need to be constructed. However, implementation of adopted General Plan policies and 2011 PEIR mitigation measures would reduce the direct and cumulative impacts to less than significant.

The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units). While the impacts associated with the construction of new recreational facilities would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives, the alternatives would still result in potential impacts associated with construction of new recreational facilities due to a current deficiency in local and regional parks. The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the level of impact below significant. Therefore, the Reduced Density Alternatives would result in less than significant impact associated with the construction of new recreational facilities.

Additionally, the 2012 Board Letter Alternative for SD15 would result in less impact associated with the construction of new recreational facilities due to the proposed allowed residential density for this alternative being the same as existing. Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a reduced impact associated with new recreational facilities, and the impacts would remain less than significant.

4.2.1.15 Transportation and Traffic

Traffic and Level of Service Standards

The Proposed Project would result in four new roadway segments operating at a LOS E or LOS F and would add trips to an additional roadway segment already accepted in the General Plan as

operating at a failing LOS (per the General Plan standards for accepting failing roads). The exceedance of a LOS threshold is considered a significant impact; therefore, the Proposed Project would result in a significant and unavoidable impact associated with traffic and LOS standards. Appendix H contains the proposed amendment to Table M-4 of the General Plan listing the new roadway segments that would need to be accepted at LOS E or LOS F.

A Technical Memorandum regarding traffic impacts (included in Appendix E) was prepared for the Reduced Density Alternatives (Chen Ryan 2017). The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units). However, the Reduced Density Alternatives, when combined for all PSR Analysis Areas, would result in an increase of 36,031 ADT (474 ADT greater than the Proposed Project). Impacts associated with traffic and LOS standards would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives for all PSR Analysis Areas, except SD15. The Reduced Density Alternative for PSR Analysis Area SD15 would result in 26,905 ADT, compared to 16,231 ADT resulting from the Proposed Project. This ADT increase is due to increased area of General Commercial proposed under the Reduced Density Alternative for PSR Analysis Area SD15, in comparison to the Proposed Project map. The Reduced Density Alternatives, combined with the traffic associated with the buildout of the General Plan, would result in three newly deficient segments and would add trips to three additional segments that have already been accepted at failing LOS. Of the three newly deficient segments, two would be considered failing even without the trips associated with the Reduced Density Alternatives. The number of trips added to each road would be enough to reach the threshold of significance. **Therefore, the Reduced Density Alternatives would create new impacts on three roadway segments and impacts would remain significant and unavoidable.**

When considering the traffic impacts due to buildout of the General Plan, the Reduced Density Alternatives, and other General Plan Amendments in process (Tables 1-10 to 1-14), 19 roadway segments would be impacted. The Mobility Element identifies 10 of these roadway segments as currently operating at a failing LOS; therefore the Reduced Density Alternatives for the PSR Analysis Areas and CGSP Subareas would contribute to new cumulative impacts on nine roadway segments. It should be noted that the General Plan Amendments considered in this cumulative analysis are in various stages of the application process and some will likely not be approved or approved for a lower density/intensity than the proposal considered in this analysis.

The Reduced Density Alternatives would result in one less roadway segment operating at a deficient LOS as a result of direct impacts as compared to the Proposed Project. Therefore, the Reduced Density Alternatives would also result in significant and unavoidable impacts associated with traffic and LOS standards. As with the Proposed Project, newly failing roads would be accepted at failing LOS, per the General Plan standards for accepting failing roads.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with traffic and level of service standards due to an increase in development intensity from the increase in commercial land use. A Technical Memorandum regarding traffic impacts (included in Appendix E) was prepared for the 2012 Board Letter Alternative. The 2012 Board Letter Alternative for PSR Analysis Area SD15, combined with the traffic associated with the buildout of the General Plan, would result in 47,290 ADT in PSR Analysis Area SD15, compared to 16,231 ADT resulting from the Proposed Project. This represents an increase of 20,385 ADT beyond the Proposed Project. The 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in four newly deficient segments and would add trips to three additional segments that have already been accepted at failing LOS (per the General Plan standards for accepting failing roads). Of the four newly deficient segments, two

would be considered failing even without the trips associated with the SD15 Board Letter Alternative. The number of trips added to each road would be enough to reach the threshold of significance. **Therefore, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would create new impacts on four roadway segments and impacts would remain significant and unavoidable.** As with the Proposed Project, newly failing roads would be accepted at failing LOS, per the General Plan standards for accepting failing roads.

Road Safety

The Proposed Project would increase the number of trips on two lane roads in rural areas; therefore, the Proposed Project would result in a significant and unavoidable impact associated with road safety.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units). The alternatives would still result in potential impacts associated with road safety. The Reduced Density Alternatives for all PSR Analysis Areas and CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in significant and unavoidable impact associated with the road safety.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with road safety due to increased development intensity associated with the increase in commercial land use. **Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a greater impact associated with road safety. Therefore, this alternative would result in a significant and unavoidable impact.**

Emergency Access

The Proposed Project would increase and add traffic on a roadway network that is incomplete or not fully connected, and on roadways that are dead-end. Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would reduce direct and cumulative impacts to a level less than significant**.**

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in lower intensity of development than the Proposed Project (approximately one-third the number of additional potential dwelling units). The alternatives would also result in potential impacts associated with emergency access; however, the Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the level of impact below significant. Therefore, the Reduced Density Alternatives would result in less than significant impact associated with emergency access.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with emergency access due to increased development intensity associated with the increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a greater impact associated with emergency access; however, this alternative would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the level of impact below significant.

Alternative Transportation

The Proposed Project would not change any roadway, pedestrian or bicycle facilities within the PSR Analysis Areas or former CGSP Subareas; however, the Proposed Project would allow for increased density and population growth in the PSR Analysis Areas that would increase demand for alternative transportation. Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would reduce direct and cumulative impacts to a level less than significant.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units). While the impacts associated with alternative transportation would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives, the alternatives would still result in potential impacts associated with alternative transportation. However, the Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the level of impact below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with alternative transportation.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in less impacts associated with alternative transportation due to the proposed residential density being much lower than the Proposed Project map, thus reducing the demand for alternative transportation. Compared to the Proposed Project, the 2012 Board Letter Alternative would have less impacts associated with alternative transportation. The 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the level of impact below significant.

4.2.1.16 Utilities and Service Systems

Wastewater Treatment Requirements

The only PSR Analysis Areas that are currently within sewer service areas are DS8 (only southern portion), NC22 (only Study Area parcels), NC38+ (3 of the parcels in the western portion), SD15, and former CGSP Subareas CG2, CG3, CG4, and CG5. CG5 are the only areas with a current sewer service connection. The rest of the PSR Analysis Areas and former CGSP Subareas would be required to utilize individual septic systems to fulfill wastewater demands. The Proposed Project was determined to result in less than significant direct and cumulative impacts associated with wastewater treatment requirements due to incorporating adopted General Plan policies and 2011 PEIR mitigation measures.

The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas, except DS8 (portion), NC22 (portion), NC38+ (portion), SD15, and former CGSP Subareas CG2, CG3, CG4, and CG5, would utilize individual septic systems to fulfill wastewater requirements. While the amount of impacts associated with wastewater treatment would be lessened due to reduced development density/intensity, the alternatives would still result in potentially adverse effects associated with wastewater treatment. Land use designations of SR-1, or higher density, could potentially necessitate a need for sewer service; however, the Reduced Density Alternatives significantly reduce the amount of areas proposed to be designated as SR-1 or higher (in comparison to the Proposed Project). Future development projects would be required to comply with all applicable federal, State and local regulations related to individual septic tanks and wastewater disposal, including County Department of Environmental Health standards. Additionally, the alternatives would incorporate adopted General Plan policies and 2011 PEIR

mitigation measures. Compliance with such regulations, policies, and implementation of the mitigation measures would reduce impacts associated with wastewater treatment to a level less than significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with wastewater treatment requirements.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in similar impacts associated with wastewater treatment requirements. The Proposed Project would result in substantially more allowed residential density than this alternative; however, this alternative would allow substantially more commercial land uses than the Proposed Project, and certain commercial uses allowed under the proposed designation could involve high wastewater volumes. As with the Reduced Density Alternatives, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, in addition to compliance with existing regulations, which would reduce impacts to a level less than significant.

New Water or Wastewater Treatment Facilities

The only PSR Analysis Areas that are within sewer service areas are DS8 (only southern portion), NC22 (only Study Area parcels), NC38+ (3 of the parcels in the western portion), SD15, and former CGSP Subareas CG2, CG3, CG4, and CG5. CG5 is the only area with a current sewer service connection. There is a varying level of existing water infrastructure within the Analysis Areas that are in water service areas. Water districts would be required to expand service to accommodate growth in some of these areas. Implementation of the adopted General Plan policies, 2011 PEIR mitigation measures, and required regulations would mitigate the potentially significant impact associated with new water of wastewater facilities to less than significant. Therefore, direct and cumulative impacts associated with new water or wastewater facilities would be less than significant.

While the amount of impacts associated with new water or wastewater treatment facilities would be reduced due to the reduced development intensity for the Reduced Density Alternatives, the alternative would still result in potential impacts associated with new water or wastewater treatment facilities. The Reduced Density Alternatives in the affected PSR Analysis Areas and former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures. Therefore, the Reduced Density Alternatives would result in less than significant impacts associated with new water or wastewater facilities.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in similar impacts associated with new water or wastewater treatment facilities. The Proposed Project would result in substantially more allowed residential density than this alternative; however, this alternative would allow substantially more commercial than the Proposed Project, and certain commercial uses allowed under the proposed designation would involve extensive water infrastructure and/or wastewater volumes. As with the Reduced Density Alternatives, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, in addition to compliance with existing regulations, which would reduce impacts to a level less than significant.

Sufficient Storm Water Drainage Facilities

Development associated with the Proposed Project would have the potential to increase the amount of impermeable surfaces within the PSR Analysis Areas and former CGSP Subareas. This would result in increased stormwater runoff. However, implementation of adopted General Plan policies, 2011 PEIR mitigation measures, and required regulations would mitigate direct and cumulative impacts to less than significant.

The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units). While the amount of impacts associated with stormwater drainage would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives, the alternatives would still result in potential impacts associated with stormwater drainage. The Reduced Density Alternatives for all PSR Analysis Areas and former CGSP Subareas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures. Therefore, the Reduced Density Alternatives would also result in less than significant impacts associated with sufficient storm water drainage facilities.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in similar impacts associated with sufficient storm water drainage facilities. The extent of potential impermeable surfaces associated with the proposed commercial land use under this alternative would be similar to the allowed density under the Proposed Project. The 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the impacts to less than significant.

Adequate Water Supplies

Implementation of the Proposed Project would allow for an increase in the number of dwelling units and population growth within the PSR Analysis Areas, which would increase demand for water supply and potentially require the creation or expansion of water facilities. Groundwater dependent PSR Analysis Areas DS8, DS24, portions of FB2+, ME26 (no Reduced Density Alternative), ME30A, and PP30 would potentially not have an adequate water supply to support the growth associated with the Proposed Project. Therefore, the Proposed Project would result in a significant and unavoidable impact associated with adequate water supplies.

The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units and people). While the amount of impacts associated with water supply would be lessened by approximately two-thirds with the Reduced Density Alternatives, the alternatives would still result in potential impacts associated with water supply in DS8, DS24, portions of FB2+, ME30A, and PP30. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but the water supply impacts would remain significant and unmitigable. **Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with adequate water supply.**

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in similar impacts associated with adequate water supplies. The Proposed Project would result in substantially more allowed residential density than this alternative; however, this alternative would allow substantially more commercial land use than the Proposed Project, and certain commercial uses allowed under the proposed designation would involve high water use. **As with the Reduced Density Alternatives, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, in addition to compliance with existing regulations, but the water supply impacts would remain significant and unmitigable.**

Adequate Wastewater Facilities

The only PSR Analysis Areas that are within sewer service areas are DS8 (only southern portion), NC22 (only Study Area parcels), NC38+ (3 of the parcels in the western portion), SD15, and former CGSP Subareas CG2, CG3, CG4, CG5. CG5 is the only area with a current sewer service

connection. The rest of the PSR Analysis Areas and former CGSP Subareas would be required to utilize individual septic systems to fulfill wastewater demands. The Proposed Project was determined to result in a less than significant impact associated with adequate wastewater treatment facilities due to implementation of adopted General Plan policies and 2011 PEIR mitigation measures.

The Reduced Density Alternatives for the affected PSR Analysis Areas listed in the previous paragraph are estimated to result in 549 fewer potential dwelling units than the Proposed Project. The Proposed Project is estimated to result in 766 potential dwelling units beyond the adopted General Plan in areas that would potentially require an expansion of wastewater facilities. While the amount of impacts associated with wastewater facilities would be reduced due to reduced development density/intensity, the alternatives could still result in potential impacts associated with wastewater facilities. Land Use designations of SR-1, or higher density, would potentially necessitate a need for sewer service; however, the Reduced Density Alternatives significantly reduce the amount of areas designated as SR-1 or higher, in comparison to the Proposed Project. The Reduced Density Alternatives would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, which would reduce the impacts to less than significant.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in similar impacts associated with adequate wastewater facilities. The Proposed Project would result in substantially more allowed residential density than this alternative; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would allow substantially more commercial land use than the Proposed Project, and certain commercial uses that could be allowed under the proposed designation would involve extensive wastewater volumes. As with the Reduced Density Alternatives, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, in addition to compliance with existing regulations, which would reduce impacts to a level less than significant.

Sufficient Landfill Capacity

The landfills that service the County have been determined to have capacity to accommodate the future waste generation associated with the Proposed Project; therefore, the Proposed Project would result in less than significant direct and cumulative impacts associated with landfill capacity.

The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately two-thirds the number of additional potential dwelling units and people). Because the amount of impacts associated with landfill capacity would be lessened by approximately two-thirds with implementation of the Reduced Density Alternatives, the Reduced Density Alternatives would result in less than significant impacts associated with landfill capacity.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would also result in less than significant direct and cumulative impacts associated with landfill capacity.

Solid Waste Regulations

The entire County and all 19 jurisdictions reached and exceeded the per capita disposal targets in 2009. Additionally, the County diverted 66 percent of generated solid waste, which is considered consistent with the effort to achieve a 75 percent diversion rate by 2020. Compliance with goals and policies to reduce solid waste generation and diversion will continue to decrease the amount of waste delivered to landfills that serve the County. The Proposed Project would result in less than significant direct and cumulative impacts associated with solid waste regulations.

The Reduced Density Alternatives for all PSR Analysis Areas would result in lower density/intensity development than the Proposed Project. Therefore, the Reduced Density Alternatives would also result in less than significant impacts associated with solid waste regulations.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would also result in less than significant impacts associated with solid waste regulations.

Energy Conservation

The development of future land uses as designated in the Proposed Project would have the potential to increase the energy demand, and could require the need for energy facilities to be constructed or expanded either within or outside of the County jurisdiction. However, compliance with existing General Plan policies and regulations would reduce energy consumption per capita and avoid wasteful energy use throughout the PSR Analysis Areas. Therefore, the Proposed Project would result in less than significant direct and cumulative impacts after mitigation, associated with energy conservation.

The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately one-third the number of additional potential dwelling units). While the amount of energy consumption and additional necessary production would be lessened by approximately two-thirds with the Reduced Density Alternatives, the alternatives would still result in potentially significant impacts associated with energy production and consumption. The Reduced Density Alternatives for all PSR Analysis Areas would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the Reduced Density Alternatives would result in a less than significant impact associated with energy conservation.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in similar impacts associated with energy demand. The Proposed Project would result in substantially more allowed residential density than this alternative; however, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would allow substantially more commercial land use than the Proposed Project, which would have the potential for similar energy demand. As with the Reduced Density Alternatives, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, in addition to compliance with existing regulations, which would reduce impacts to a level less than significant.

4.2.1.17 Climate Change

Generation of Greenhouse Gas Emissions

The Proposed Project is estimated to result in over 36,000 $MTCO_2e$ of unmitigated construction emissions and over 42,000 $MTCO_2e$/year of unmitigated operational emissions of GHGs at plan buildout in 2050. These emissions would include those resulting from an increased intensity of development in excess of what is currently allowed by the General Plan, and would be inconsistent with the GHG emissions projection contained in the Draft CAP. These additional emissions were determined to result in a less than significant impact after mitigation is implemented through a “D” Special Area Regulation that would be applied to the PSR properties that are approved for increased density.

The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately one-third the number of dwelling units) for all PSR Analysis Areas except for FB19+ and ME26 (reduced density alternatives are not proposed), NC37 (same number of

potential dwelling units), and SD15 (alternatives would result in increased traffic trips). While the amount of GHG emissions would be lessened by approximately two-thirds with the Reduced Density Alternatives, the emissions would still be in excess of the current General Plan and therefore, still pose a potentially significant impact. However, similar to the Proposed Project, GHG emissions could be reduced with implementation of mitigation to a less than significant impact.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with the generation of greenhouse gasses due to increased development intensity associated with the elimination of semi-rural residential land use and increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a greater impact associated with the generation of greenhouse gasses.

Conflict with an Applicable Plan, Policy, or Regulation

The Proposed Project is estimated to result in over 36,000 $MTCO_2e$ of unmitigated construction emissions and over 42,000 $MTCO_2e$/year of unmitigated operational emissions of GHGs at plan buildout in 2050. Development associated with the land use changes of the Proposed Project would potentially increase forecasted emissions above the levels projected by the Draft CAP and therefore, impede attainment of the CAP goals. These emissions would result from an increased intensity of development in excess of what is currently allowed by the General Plan. However, these additional emissions were determined to result in a less than significant impact after mitigation is implemented through a “D” Special Area Regulation that would be applied to the PSR properties that are approved for increased density.

The Reduced Density Alternatives would result in lower intensity development than the Proposed Project (approximately one-third the number of dwelling units) for all PSR Analysis Areas except for FB19+ and ME26 (reduced density alternatives are not proposed), NC37 (same number of potential dwelling units), and SD15 (alternatives would result in increased traffic trips). While the amount of greenhouse gas emissions would be lessened by approximately two-thirds with the Reduced Density Alternatives, the emissions would still be in excess of the current General Plan and therefore, still possibly impede attainment of the CAP goals. However, similar to the Proposed Project, GHG emissions could be reduced with implementation of mitigation to a less than significant impact.

Additionally, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would result in an increased impact associated with consistency with applicable plan, policy, or regulation related to greenhouse gasses due to increased development intensity associated with the elimination of semi-rural residential land use and increase in commercial land use. Compared to the Proposed Project, the 2012 Board Letter Alternative for PSR Analysis Area SD15 would have a greater impact associated with consistency with applicable plan, policy, or regulation related to greenhouse gasses.

4.2.2 Fulfillment of Project Objectives

The project objectives are the Guiding Principles of the General Plan, which are the same as those used in the 2011 PEIR and are listed in Section 1.4 of this SEIR. These Guiding Principles are implemented through the goals and policies of the General Plan. The goals describe future conditions being strived for (through the General Plan) and tend to be general and broad statements. Policies provide guidance to assist in making decisions that will aid in reaching the goals. As such, the level of consistency with the policies of the General Plan is a threshold that

can be used to determine fulfillment of these project objectives for this programmatic approach. Section 4.2.1.9 of this chapter provides a review of applicable policies of the General Plan, in relation to each Reduced Density Alternative and the 2012 Board Letter Alternative for PSR Analysis Area SD15. Like the Proposed Project maps for each Analysis Area and the former CGSP Area, the proposals for the alternatives vary widely between Analysis Areas, with a varying level of consistency with the General Plan policies (and corresponding fulfillment of project objectives).

4.2.3 Analysis of the Environmentally Superior Map Alternative for the Former Champagne Gardens Specific Plan Area

The Environmentally Superior Map Alternative for the former CGSP Area proposes changes to the 2011 General Plan land uses designations from SPA and RL-20 to SR-10 (Figure 4-21a). These land use changes would result in a maximum of 12 potential dwelling units; a reduction of 20 dwelling units in comparison to the Proposed Project and a reduction of 8 dwelling units in comparison to the Preliminary Staff Recommendation Map Alternative (Table 4-3). This alternative would also result in a zone change from SPA to A70, RR, and RC (Figure 4-21b). The proposed C42 zoning of the Referral Map and Preliminary Staff Recommendation Map Alternative in part of Subareas 6 and 8 would not be included in this map.

4.2.3.1 Comparison of the Effects of the Environmentally Superior Map Alternative for the Former Champagne Gardens to the Proposed Project

Aesthetics

Impacts to scenic vistas, scenic resources, visual character or quality, and light or glare from the Environmentally Superior Map Alternative for the Former Champagne Gardens (ESMA-CG) would be similar to the Preliminary Staff Recommendation Map (i.e., the Reduced Density Alternative), but to a lesser degree due to the further reduction in allowed residential and commercial development. This alternative would limit the maximum dwelling units allowed within the former CGSP Area to 12 potential dwelling units. The reduction in commercial development and residential dwelling units would further reduce the impacts to scenic vistas, scenic resources, visual quality and character, and light or glare compared to the Proposed Project by limiting on the ground structures. This alternative does not create as many opportunities for structures to obstruct aesthetic resources in the former CGSP Area. As a result, impacts from scenic vistas, scenic resources, visual character or quality, and light or glare from the ESMA-CG would be considered less than significant.

Agriculture and Forestry Resources

As shown in Tables 2.2-2 and 2.2-4, the Proposed Project would have the potential to result in the direct conversion of FMMP designated agricultural resources and County identified agricultural resources within the former CGSP Area. The Proposed Project would result in a significant and unavoidable impact related to the direct conversion of agricultural resources.

As with the Proposed Project for the former CGSP Area, the ESMA-CG would also allow residential dwelling units within FMMP designated agricultural resources and County identified agricultural resources. With the SR-10 designation proposed in the ESMA-CG, a Conservation Subdivision approach would be required, which requires consolidating development to the

maximum extent practicable to avoid sensitive resources, including agricultural resources. The avoided resources would require conservation easements. With the minimal potential density allowed, the adherence to the Conservation Subdivision requirements, and application of the General Plan policies and 2011 PEIR mitigation measures, impacts associated with agricultural resources would be less than significant under this alternative.

No Williamson Act Contracts or provisions of the Williamson Act are associated with the former CGSP Area; therefore, no land use conflict impacts would result from the ESMA-CG.

As discussed in Section 2.2.3.4, the former CGSP Area consists of approximately 7 acres of forest land. The ESMA-CG would reduce the impacts to forest land, but would not result in no impacts. Therefore, the ESMA-CG could also result in the potential loss or conversion of forestry resources. Similar to agricultural resources, the adherence to the Conservation Subdivision requirements, and application of the General Plan policies and 2011 PEIR mitigation measures, impacts associated with forest land would be less than significant under this alternative.

Air Quality

The Proposed Project would have a significant and unavoidable impact on the obstruction of air quality plans such as the RAQS. In comparison to the Proposed Project for the former CGSP Area, the ESMA-CG would further reduce the density of the allowable dwelling units from 32 to 12 (a reduction of 20 potential dwelling units). However, although this alternative represents a decrease in potential development and associated emissions of VOC, NOx, and CO, a conflict with the RAQS would still occur and result in a significant and unavoidable impact to air quality plans.

The construction and operational activities associated with the Proposed Project for the former CGSP Area would be below the San Diego APCD threshold (Tables 2.3-9 and 2.3-10 respectively). Since the ESMA-CG would result in a further reduction of 12 potential dwelling units, this alternative would also result in less than significant impacts associated with an air quality violation.

While the amount of development near sensitive receptors would be approximately one-third in comparison to the Proposed Project, this alternative would still result in development near sensitive receptors and toxic air contaminant sources. The ESMA-CG would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, and potential impacts to sensitive receptors would be reduced to less than significant.

The ESMA-CG would result in lower levels of development than the Proposed Project for the former CGSP Area (approximately one-third the number of dwelling units). The ESMA-CG would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures. Therefore, the ESMA-CG would result in a less than significant impact associated with objectionable odors.

Biological Resources

Under the ESMA-CG, potential impacts to special status plant and wildlife species, riparian habitat and other sensitive natural communities, federally protected wetlands, wildlife movement corridors and nursery sites, local policies and ordinances, and HCPs and NCCPs would be substantially reduced in comparison to the Proposed Project.

The former CGSP Area contains vegetation communities that may contain special status plant and wildlife species. Wildlife movement corridors are found in all CGSP Subareas. Riparian habitat and estimated federally protected wetlands occur in CGSP Subareas CG3, CG4, and

CG5. The ESMA-CG would result in decreased density in CG2, CG3, CG4, and CG5. In CG6 and CG8 the two areas of proposed Rural Commercial are not in the ESMA-CG map. CG1 and CG7 are proposed for SR-10 in all maps, including the ESMA-CG. The ESMA-CG would result in a reduction of 20 potential dwelling units compared to the Proposed Project (Table 4-2). The amount of potential direct impacts to special status plant and wildlife species, riparian habitat, and wetlands in CG2, CG3, CG4, CG5, CG6, and CG8 would be reduced with implementation of this alternative due to a reduced density; however, it would still result in a potential adverse effect, either directly or through habitat modifications, to special status species, riparian habitat, and federally protected wetlands. The former CGSP Area is located in a wildlife movement corridor; however, the reduced intensity proposed in CGSP Subareas CG2, CG3, CG4, and CG5 would reduce the impacts associated with wildlife movement corridors, as the alternative would result in up to 20 fewer potential dwelling units. With the entire area proposed for SR-10 in this alternative, a Conservation Subdivision would require clustering development to the maximum extent possible in order to conserve the most sensitive resources, including wildlife corridors. With the ESMA-CG option incorporating the Conservation Subdivision requirement and the same adopted General Plan policies and 2011 PEIR mitigation measures, impacts would be reduced below a level of significance. Therefore, the ESMA-CG would result in less than significant impacts associated with special status plants and wildlife species, riparian habitat, and wildlife movement corridors.

The ESMA-CG, similar to the Proposed Project, would result in a less than significant impacts regarding consistency with local policies and ordinances, HCPs, and NCCPs.

Cultural and Paleontological Resources

The ESMA-CG would result in lower levels of development than the Proposed Project for the former CGSP Area (approximately one-third the number of potential dwelling units and removal of the proposed Rural Commercial in CG6 and CG8). While the amount of direct impacts to historical resources, archeological resources, paleontological resources, and human remains would be reduced with the ESMA-CG, this alternative would still have the potential to result in substantial adverse effect on these resources. The ESMA-CG would incorporate the same General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the ESMA-CG would result in a less than significant impact associated with historical resources, archeological resources, paleontological resources, human remains, and tribal cultural resources.

Geology and Soils

The ESMA-CG would result in lower levels of development than the Proposed Project for the former CGSP Area (approximately one-third the number of potential dwelling units and removal of the proposed Rural Commercial in CG6 and CG8) in areas prone to seismic related hazards. The former CGSP Area is located in an area at high risk of for landslides (Table 2.6-2). While the amount of impacts associated with seismic related hazards would be reduced with the ESMA-CG, this alternative would still result in adverse effects associated with seismic-related hazards. Adherence to the CBC and recommendations following site specific geotechnical investigations would reduce the impacts associated with the ESMA-CG to a level below significant. Therefore, the ESMA-CG would result in a less than significant impact associated with seismic related hazards.

As with the Proposed Project, the ESMA-CG would result in less than significant impacts associated with expansive soils, soil erosion, and loss of topsoil due to compliance with federal, state and local building standards and regulations, including the CBC and County-required

geotechnical reconnaissance reports and investigations. Therefore, the ESMA-CG would result in less than significant impacts associated with soil stability, soil erosion and topsoil loss.

CGSP Subareas CG1, CG6, CG7, and CG8 (all on the west side of Champagne Boulevard) are not within a sewer service area, and would have to utilize on-site wastewater disposal systems. Future development projects would be required to comply with all applicable federal, State, and local regulations related to septic tanks and waste water disposal, including County Department of Environmental Health standards. Compliance with such regulations would reduce the potential for septic systems to be located in soils incapable of supporting such systems. Therefore, impacts would be less than significant. Furthermore, no impacts associated with unique geologic features would occur, as no known unique geologic features are located in former CGSP Area.

Hazards and Hazardous Materials

The ESMA-CG would result in lower levels of development than the Proposed Project for the former CGSP Area (approximately one-third the number of potential dwelling units and removal of the proposed Rural Commercial in CG6 and CG8). The former CGSP Area is located within one mile of an area that is known in the past to consist of agricultural activities. However, it is not located within one mile of a known listed hazardous materials site. Compliance with hazardous materials regulations, policies, plans, and guidelines would reduce impacts to a level below significant, similar to the Proposed Project.

The ESMA-CG proposes a reduced amount of commercial land uses, therefore, this alternative would result in less impacts associated with the transport, use, and disposal of hazardous waste as compared to the Proposed Project. Similar to the Proposed Project, compliance with existing regulations would reduce impacts related to the transportation, use, and disposal of hazardous materials to a level less than significant.

The ESMA-CG would include the Residential Commercial (RC) zoning (consistent with existing uses) to go with the proposed SR-10 designation on CG5; however, the amount of land proposed to be zoned for potential commercial use would be reduced compared to the Proposed Project. The ESMA-CG Alternative would result in less impacts than the Proposed Project associated with hazards to schools.

The designations proposed in this map alternative for the CGSP Area would not decrease the maximum allowed emergency response travel time per the General Plan standards for development. Therefore, impacts associated with emergency response and evacuation plans would be less than significant with compliance of the same hazardous materials regulations, policies, plans, and guidelines as the Proposed Project.

The former CGSP Area has been identified as being in a very high fire hazard severity zone (Table 2.7-3). The impacts associated with wildland fires would be reduced due to reduced development allowed under the ESMA-CG, however, this alternative would still result in a substantial impact associated with wildland fires. The ESMA-CG would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures, but impacts would still be considered significant and unmitigable. Therefore, the ESMA-CG would result in significant and unavoidable impacts associated with wildland fires.

Similar to the Proposed Project, the ESMA-CG would result in a less than significant impact associated with vectors because it would allow less development and incorporate the same adopted General Plan policies and existing regulations as the Proposed Project.

Hydrology and Water Quality

The ESMA-CG would result in lower levels of development than the Proposed Project for the former CGSP Area (approximately one-third the number of dwelling units and removal of the proposed Rural Commercial in CG6 and CG8). While the impacts associated with water quality standards and requirements would be lowered due to reduced development potential, this alternative would still result in a potential impact associated with water quality standards and requirements due to construction related activities. The ESMA-CG would incorporate the same General Plan Policies and 2011 PEIR mitigation measures, which would reduce the impacts to a level below significance. Therefore, the ESMA-CG would result in less than significant impacts associated with water quality standards and requirements.

Former CGSP Subareas CG2, CG3, CG4, CG5, CG6, and CG7 are located within FEMA and/or County identified 100-year floodplains; however, this alternative would reduce the potential for impacts to FEMA and County identified 100-year floodplains. While the amount of impacts associated with flooding and impeding or redirecting flood flows would be reduced due to the reduced development intensity, this alternative would still result in potential impacts. The ESMA-CG would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impact to a level below significant. Therefore, the ESMA-CG would result in a less than significant impact associated with flooding, FEMA or County identified 100-year floodplains, and impeding or redirecting flood flows.

As discussed above, the former CGSP Area has a high wildland fire susceptibility, and as a result, this area is susceptible to flash floods and debris flows during rainstorms. The ESMA-CG would result in lower levels of development than the Proposed Project (up to 12 potential dwelling units instead of 32 potential dwelling units and removal of the proposed Rural Commercial in CG6 and CG8). Therefore, the ESMA-CG would result in less than significant impacts associated with mudflows.

The former CGSP Area does not include areas at risk of dam inundation, seiche or tsunami; therefore, similar to the Proposed Project, the ESMA-CG would not result in impacts from dam inundation, seiche, or tsunami.

Land Use

The ESMA CG alternative would reduce the number of dwelling units and remove the proposed Rural Commercial in CG6 and CG8 in the former CGSP Area and would not result in the division of an established community, as the alternative does not include the construction of railways, airports, or the establishment of open space. The ESMA-CG would not conflict with San Diego Forward: The Regional Plan, as the minimal increase in potential dwelling units is in a semi-rural area adjacent to a Village area. The increase in development potential has not been accounted for in the RAQS. Therefore, the ESMA-CG would also result in significant and unavoidable impacts after mitigation.

Similar to the Proposed Project, the ESMA-CG would result in less than significant impacts associated with conflicting with applicable HCPs and NCCPs, as the ESMA-CG Alternative would also incorporate the same adopted General Plan policies that would further support implementation of and conformance with applicable HCPs and HCCPs.

As with the Preliminary Staff Recommendation Map for the former CGSP area (part of the Reduced Density Alternatives – discussed earlier in this Chapter), the ESMA-CG has been determined to be consistent with the General Plan policies that apply to stand-alone GPAs/Rezones and that were relied upon in the 2011 PEIR to reduce environmental impacts, and

with the policies of the applicable community/subregional plans discussed above. This option would place an SR-10 designation throughout the area, requiring a Conservation Subdivision approach.

Mineral Resources

The ESMA-CG would result in approximately one-third of the dwelling units and removal of the proposed Rural Commercial in CG6 and CG8, compared to the Proposed Project for the former CGSP Area. The former CGSP Area does not contain areas within an MRZ-2 designation, but does contain areas within an MRZ-3 designation. The ESMA-CG would re-designate the former CGSP Area to SR-10, which is incompatible density considered low enough to be compatible with mineral resource extraction; therefore, implementation of the ESMA-CG would not alter the existing mineral resource availability or affect a mineral resource recovery site. Therefore, the ESMA-CG would not result in an impact associated with mineral resource availability or mineral resource recovery sites.

Noise

The ESMA-CG would result in one-third the number of dwelling units and removal of the proposed Rural Commercial in CG6 and CG8, compared to the Proposed Project for the former CGSP Area. Implementation of this alternative would reduce the impact associated with excessive noise levels or a permanent increase in ambient noise levels from the proposed increase in land uses, to a level below significant. However, as with the Proposed Project, the ESMA-CG would potentially result in significant impacts to NSLU, specifically new rural and semi-rural residential uses, near and/or within incompatible noise contours associated with vehicular traffic along I-15. However, as with the Proposed Project, the ESMA-CG would be required to comply with the same standards and policies, and would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures. Therefore, the ESMA-CG would result in less than significant impacts associated with excessive noise levels.

Although the development associated with this alternative would be reduced compared to the Proposed Project, impacts associated with excessive groundborne vibrations and temporary increases in ambient noise levels would be considered potentially significant as a result of construction related activities. However, the ESMA-CG would incorporate the same adopted General Plan policies and 2011 PEIR mitigation measures which would reduce the impacts to a level below significant. Therefore, impacts associated with excessive groundborne vibrations and a temporary increase in ambient noise levels would be less than significant.

The CGSP Area is not located near a public or private airport; therefore, similar to the Proposed Project, the Preliminary Staff ESMA-CG would not result in noise related impacts from a public or private airport. Impacts would be less than significant.

Population and Housing

The Proposed Project in combination with other cumulative projects, including development projects that require a General Plan Amendment to increase the allowable number of dwelling units, would have a cumulatively considerable contribution to a regionally significant impact associated with substantial increases in population growth. Although the ECMA-CG would reduce the number of dwelling units and total population as compared to the Proposed Project, it would still contribute additional growth that would constitute a cumulatively considerable contribution to a cumulative impact.

Similar to the Proposed Project, the ESMA-CG would result in a net increase in dwelling units, and would not require the construction of dwelling units elsewhere; therefore, the alternative would result in less than significant impacts associated with the displacement of people and the displacement of housing.

Public Services

The ESMA-CG would reduce the number of potential dwelling units and population increase by approximately 60 percent, in comparison to the Proposed Project for the former CGSP Area; therefore, the amount of impacts associated with fire protection and emergency response services would be reduced with implementation of the ESMA-CG. Additionally, the former CGSP Area is not at risk of reduced maximum emergency response times per General Plan standards. Therefore, this alternative would result in less than significant issues associated with fire protection and emergency response services.

Implementation of the ESMA-CG would result in a 20 fewer potential dwelling units compared to the Proposed Project. Although the impact to police protection services would be reduced (compared to the Proposed Project) due to reduced development intensity and population, the ESMA-CG would still result in a potentially significant impact. Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would reduce potentially significant impacts to a level below significant. In comparison to the Proposed Project, the amount of direct impacts to schools and libraries would be reduced due to reduced development intensity. The potential construction of 12 dwelling units per the allowed density associated with the ESMA-CG would not necessitate the need for expanded school or library services. Therefore, the ESMA-CG would result in less than significant impacts to school and library services.

Recreation

The ESMA-CG would result in lower levels of development than the Proposed Project for the former CGSP Area (approximately one-third the number of dwelling units and removal of the proposed Rural Commercial in CG6 and CG8). The population increase associated with 12 potential dwelling units would not result in a deterioration of parks and recreational facilities or necessitate the construction of new recreational facilities. Therefore, ESMA-CG would result in less than significant impacts to recreation.

Transportation and Traffic

The ESMA-CG would result in changes to the land use designation that would allow up to 12 dwelling units (20 potential dwelling units less than the Proposed Project and removal of the proposed Rural Commercial in CG6 and CG8). The impact associated with circulation, traffic and LOS standards, road safety, emergency access, and alternative transportation would be reduced under the ESMA-CG alternative to a level below significant. Therefore, the ESMA-CG would result in a less than significant impact associated with traffic and LOS standards.

Utilities and Service Systems

The ESMA-CG would result in 20 fewer potential dwelling units than the Proposed Project for the former CGSP Area, in addition to removal of the proposed Rural Commercial in CG6 and CG8.

Properties on the east side of Champagne Boulevard (Subareas CG2, CG3, CG4 and CG5) are in a sewer service area and Subarea CG5 has current sewer service. The properties on the west side of Champagne Boulevard are not in a sewer service area and would be limited to septic. Compliance with existing OWTS regulations and policies regarding the siting and operation would reduce any wastewater treatment requirements to a level below significant. Therefore, the ESMA-

CG would result in less than significant impacts associated with wastewater treatment requirements and adequate wastewater facilities.

The reduction in dwelling units and associated reduction in population compared to the Proposed Project for the former CGSP Area would limit development potential such that the ESMA-CG would not necessitate the need for new water or wastewater facilities. The properties in the sewer service area already have lines underneath for potential connection, with sufficient capacity for the proposed densities. The associated water districts (Vallecitos Water District, Valley Center Municipal Water District, and Rainbow Municipal Water District) would have sufficient water service capacity to serve these subareas. Therefore, this alternative would result in less than significant impacts associated with new water and wastewater facilities, as well as adequate water supplies.

The limited development associated with the ESMA-CG (12 potential dwelling units compared to 32 potential dwelling units and removal of the proposed Rural Commercial in CG6 and CG8) would result in less impermeable surface and less stormwater runoff, less waste generation, and a decreased need for energy production and delivery compared to the Proposed Project for the former CGSP Area. Therefore, the impacts associated with sufficient storm water drainage facilities, sufficient landfill capacity, solid waste regulations, and energy would be less than significant.

Climate Change

Although the ESMA-CG would result in lower levels of development than the Proposed Project (12 potential dwelling units versus 32, respectively) GHG emissions associated with the additional 11 dwellings from what is allowed under the current General Plan would be less than the Proposed Project, but still be in excess of what was included in the Draft CAP projections. However, similar to the Proposed Project, GHG emissions could be reduced with implementation of mitigation to a less than significant impact.

4.2.3.2 Fulfillment of Project Objectives

The project objectives are the Guiding Principles of the General Plan. These Guiding Principles are implemented through the goals and policies of the General Plan. The goals describe future conditions being strived for (through the General Plan) and tend to be general and broad statements. Policies provide guidance to assist in making decisions that will aid in reaching the goals. As such, the level of consistency with the policies of the General Plan is a threshold that can be used to determine fulfillment of these project objectives for this programmatic approach. The ESMA-CG has been determined to be consistent with the applicable polices of the General Plan at this programmatic level. Future development projects in the former CGSP area would include review of additional policies applicable to development projects, which would touch on more components of the Guiding Principles.

4.3 Analysis of the No Project Alternative

The No Project Alternative is provided to allow decision makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. The No Project Alternative presents the existing conditions at the time the NOP is published as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

No Project Alternative for the PSR Analysis Areas

The No Project Alternative for the PSR Analysis Areas and the former CGSP Area would be the continuation of the existing General Plan (adopted in 2011, with the most recent update in 2016). It assumes the existing General Plan land use designations and zoning would continue to guide development in unincorporated areas of the County, including the PSR Analysis Areas, through the forecasted buildout year of 2050. For the former CGSP Area, the No Project Alternative would mean only one potential dwelling unit on CG7 (RL-20 existing) as the other areas are currently designated Specific Plan Area, which has a zero density on the Land Use Map. Uses would be limited to the few that can be allowed in the S88 zone, except residential.

The existing General Plan land use map and environmental analysis is provided in the County's 2011 Final Program EIR Volume IV, Amendment to the PEIR, Description and Analysis of the Recommended Project (County 2011b); and is hereby incorporated by reference into this SEIR and is available online at: http://www.sandiegocounty.gov/pds/gpupdate/environmental.html

Fulfillment of Project Objectives

The current situation of the Land Use Map and zoning for the former CGSP area is considered a mapping error and would leave owners with very few options for use of the properties, including no residential allowed (except CG7), as discussed above. This option would not be in line with Guiding Principle 1 (support a reasonable share of projected regional population growth), Guiding Principle 3 (reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities), or Guiding Principle 10 (recognize community and stakeholder interests while striving for consensus).

4.4 Analysis of the Environmentally Superior Alternative

As shown in Table 4-2 and Table 4-5, implementation of the No Project Alternative would result in the greatest reduction in significant impacts when compared to the Proposed Project. However, CEQA Guidelines Section 15126.6(e)(2) states that if the environmentally superior alternative is the no project alternative, the EIR shall identify an environmentally superior alternative among the other alternatives.

For the PSR Analysis Areas, the Reduced Density Alternatives would result in a reduction of environmental impacts when compared to the Proposed Project and would be the Environmentally Superior Alternative. The exception to this is for PSR Analysis Areas FB19+ and ME26 which do not have a Reduced Density Alternative. For the PSR Analysis Areas FB19+ and ME26, the No Project Alternative would be the Environmentally Superior Alternative, because no other alternatives were identified. As discussed above in Section 4.1, no feasible alternatives were identified for the revision to the Valley Center Community Plan Residential Policy 8. The policy revision would be environmentally superior to the No Project Alternative for that component, as the revision would allow clustering away from sensitive habitats, agricultural lands, and other resources, in addition to reducing the need for infrastructure expansion. The revision would have the effect of reducing the development footprint in applicable areas, and would not change allowed residential density.

For the former CGSP Area the ESMA-CG would result in the greatest reduction in impacts to the environment, and therefore, would be the Environmentally Superior Alternative for the former CGSP Area.

Table 4-1 Comparison of Land Use Changes within the PSR Analysis Areas and Former CGSP Subareas for the Reduced Density Alternatives

Analysis Area	General Plan		Parcels	Acres	Potential Dwelling Unit Existing	Potential Dwelling Unit Proposed	Potential Dwelling Unit Increase Proposed	Potential Dwelling Unit Alternative	Potential Dwelling Unit Increase from Alternative
	Current General Plan	GPA (Proposed Project)							
Bonsall									
BO18+ Analysis Area	SR-10	SR-4	120	921	129	196	67	165	36
CG1, 6, 7, 8 (Referral Map for Proposed/Preliminary Staff Recommendation Alt)	SPA/RL-20	SR-10/C-4	8	44	1	8	7[(2)]	8	7
Crest Dehesa									
CD14 Analysis Area	SR-1/RL-20	SR-2/RL-20	10	101	10	17	7	14	4
Desert									
DS8 Analysis Area	VR2	VR4.3	3	169	337	726	389	489	152
DS24 Analysis Area	SR-10	SR-1	2	169	16	169	153	34	18
Fallbrook									
FB2+ Analysis Area	RL-20/RL-40	SR-4/RL-20	23	491	26	42	16	37	11
FB17 Analysis Area	SR-2	SR-1/SR-2	6	107	49	82	33	64	15
FB19+ Analysis Area	RL-20	SR-10	61	579	61	62	1	-	-
FB21+ Analysis Area	RL-20	SR-10	52	679	61	68	7	63	2
Mountain Empire									
ME26 Analysis Area	RL-20	SR-10	15	678	33	59	26	-	-
ME30A Analysis Area	RL-40	SR-4/RL-40	1	262	6	35	29	16	10
NC Metro									
NC3A Analysis Area	RL-20	SR-10	48	1,015	66	77	11	69	3
NC18A Analysis Area	SR-2	SR-1/SR-2	5	93	43	77	34	57	14
NC22 Analysis Area	SR-10	SR-1/SR-10	17	154	21	73	52	28	7
NC37 Analysis Area	SR-10	SR-4	15	158	19	31	12	31	12
NC38+ Analysis Area	SR-2	SR-1	8	77	37	75	38	64	27
CG5 (Referral Map for Proposed/Preliminary Staff Recommendation Alt	SPA	SR-2	2	15	0	5	5[(2)]	2	2
Pala-Pauma									
PP30 Analysis Area	RL-40	SR-2/ RL-40	11	518	12	134	122	31	19

Table 4-1 Comparison of Land Use Changes within the PSR Analysis Areas and Former CGSP Subareas for the Reduced Density Alternatives

Analysis Area	General Plan		Parcels	Acres	Potential Dwelling Unit Existing	Potential Dwelling Unit Proposed	Potential Dwelling Unit Increase Proposed	Potential Dwelling Unit Alternative	Potential Dwelling Unit Increase from Alternative
	Current General Plan	GPA (Proposed Project)							
San Dieguito									
SD15 Analysis Area	SR-1	CG/VR10.9/ SR.5	1	69	61	362	301	80	19
Valley Center									
VC7+ Analysis Area	SR-4	SR-2	233	1,465	366	619	253	507	141
VC51 Analysis Area	RL-20	SR-4	14	166	14	27	13	~~19~~17	~~5~~3
VC57+ Analysis Area	SR-4	SR-2	217	1,337	374	605	231	524	150
VC67 Analysis Area	SR-2	I-2	6	13	-	-	-	-	-
CG2, 3, 4[(1)] (Referral Map for Proposed/Preliminary Staff Recommendation)	SPA	SR-4/SR-2	4	56	0	19	19[b]	10	10[(2)]
Totals:			**882**	**9,336**			**1,826**[(2)]		**~~664~~662**

[(1)] CG Subarea CG4 is located in both the Valley Center and Hidden Meadows (NC Metro Subregion) planning areas. For this table, it is covered in the Valley Center section.

[(2)] The approximate increase in potential dwelling units for CGSP properties is based on the difference between the Referral Map (or Preliminary Staff Recommendation Map for "Alt" numbers shown) for CGSP properties in the current General Plan and the existing SPA designation (mapping error) with a 0 density on the Land Use Map. CG7 is the exception, with a current designation of RL20.

Table 4-2 Comparison of PSR Reduced Density Alternatives – Environmental Impacts

Issue Areas	Proposed Project		PSR Reduced Density Alternatives to the Proposed Project																							
	Without Mitigation	With Mitigation	BO18+	CD14	DS8	DS24	FB2+	FB17	FB19+	FB21+	ME26	ME30A	NC3A	NC18A	NC22	NC37	NC38+	PP30	SD15	VC7+	VC51	VC57+	VC67	CG Preliminary Staff Recommend Map	SD15 – 2012 Board Letter	No Project
2.1 Aesthetics																										
Scenic Vistas	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Scenic Resources	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Visual Character or Quality	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Lighting and Glare	PS	SU	▼	—	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
2.2 Agricultural Resources																										
Conversion of Agricultural Resources	PS	SU	▼	▼	▼	—	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	—	▼	▼	▼	▼	▼	—	▼
Conflicts with Existing Zoning for Agricultural Use, or Williamson Act Contract Land	LS	LS	▼	—	—	—	—	—	N/A	—	N/A	—	—	▼	—	—	—	—	—	—	▼	—	—	—	—	—
Indirect Conversion of Agricultural Resources	PS	SU	▼	▼	▼	—	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	—	▼	▼	▼	▼	▼	—	▼
Direct and Indirect Loss or Conversion of Forestry Resources	PS	LS	▼	—	▼	—	▼	▼	N/A	▼	N/A	▼	▼	—	▼	—	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
2.3 Air Quality																										
Air Quality Plans	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▲	▼	▼	▼	▼	▼	▲	▼
Air Quality Violations	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▲	▼	▼	▼	▼	▼	▲	▼
Nonattainment of Criteria Pollutants	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▲	▼	▼	▼	▼	▼	▲	▼
Sensitive Receptors	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▲	▼	▼	▼	▼	▼	▲	▼
Objectionable Odors	LS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	▼	—	—	—	▲	—	—	▼	▼	—	▲	—
2.4 Biological Resources																										
Special Status Plant and Wildlife Species	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Riparian Habitat and Other Sensitive Natural Communities	PS	SU	▼	—	—	—	▼	▼	N/A	▼	N/A	▼	—	▼	▼	—	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Federally Protected Wetlands	PS	LS	▼	—	—	—	▼	▼	N/A	▼	N/A	▼	—	▼	▼	—	▼	▼	—	▼	▼	▼	▼	▼	—	▼
Wildlife Movement Corridors and Nursery Sites	PS	SU	▼	▼	—	—	▼	—	N/A	▼	N/A	▼	▼	▼	▼	▼	—	▼	▼	—	—	—	—	▼	▲	▼
Local Policies and Ordinances	LS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	—
Habitat Conservation Plans and Natural Community Conservation Plans	LS	LS	▼	▼	—	—	▼	—	N/A	▼	N/A	—	▼	—	▼	▼	—	▼	▼	▼	—	▼	—	▼	▲	—
2.5 Cultural and Paleontological Resources																										
Historical Resources	PS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	—	—	▼	—	—	—	—	—	▼
Archaeological Resources	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Paleontological Resources	PS	LS	—	—	▼	▼	▼	—	N/A	—	N/A	▼	▼	—	—	—	▼	▼	—	—	—	▼	▼	—	—	▼
Human Remains	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Tribal Cultural Resources	PS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	—	—	—	—	—	—	—	—	▼
2.6 Geology and Soils																										
Exposure to Seismic Related Hazards	LS	LS	▼	▼	▼	▼	▼	—	N/A	▼	N/A	▼	▼	—	—	—	▼	▼	▼	▼	—	▼	▼	▼	▲	—
Soil Erosion or Topsoil Loss	LS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	—	▼	—	—	—	—	▼	▲	—
Soil Stability	LS	LS	▼	—	▼	▼	▼	—	N/A	▼	N/A	▼	▼	—	—	—	▼	—	▼	—	—	▼	▼	▼	▲	—
Expansive Soils	LS	LS	▼	▼	—	—	▼	▼	N/A	—	N/A	—	—	—	—	▼	—	—	▼	▼	—	▼	▼	▼	▲	—
Waste Water Disposal Systems	LS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	—	—	—	—	—	—	▼	—	—
Unique Geologic Features	LS	LS	—	—	▼	▼	—	—	N/A	—	N/A	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Table 4-2 Comparison of PSR Reduced Density Alternatives – Environmental Impacts

Issue Areas	Proposed Project		PSR Reduced Density Alternatives to the Proposed Project																							
	Without Mitigation	With Mitigation	BO18+	CD14	DS8	DS24	FB2+	FB17	FB19+	FB21+	ME26	ME30A	NC3A	NC18A	NC22	NC37	NC38+	PP30	SD15	VC7+	VC51	VC57+	VC67	CG Preliminary Staff Recommend Map	SD15 – 2012 Board Letter	No Project
2.7 Hazards and Hazardous Materials																										
Transport, Use, and Disposal of Hazardous Materials	LS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▲	▼	▼	▼	▼	▼	▲	—
Accidental Release of Hazardous Materials	LS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▲	▼	▼	▼	▼	▼	▲	—
Hazards to Schools	LS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	—	—	—	—	▼	—	—	—	—
Existing Hazardous Materials Sites	LS	LS	▼	▼	▼	—	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	—	▼	▼	▼	▼	▼	▲	—
Public Airports	LS	LS	—	—	▼	—	—	—	N/A	▼	N/A	—	—	—	▼	—	▼	—	—	—	—	—	—	—	—	—
Private Airports	LS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	▼	—	▼	—	▼	—	—	—	—
Emergency Response and Evacuation Plans	PS	LS	—	—	▼	▼	▼	▼	N/A	▼	N/A	▼	—	—	—	—	—	▼	—	—	—	—	—	—	▲	▼
Wildland Fires	PS	SU	▼	▼	—	—	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	—	▼	—	▼	▼	▼	▼	▼
Vectors	LS	LS	▼	▼	—	—	▼	▼	N/A	—	N/A	▼	▼	▼	▼	▼	—	—	—	▼	—	▼	—	▼	▲	—
2.8 Hydrology and Water Quality																										
Water Quality Standards and Requirements	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Groundwater Supplies and Recharge	PS	SU	—	—	▼	▼	▼	—	N/A	—	N/A	▼	—	—	—	—	—	▼	—	—	—	—	—	—	—	▼
Erosion or Siltation	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Flooding	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Exceed Capacity of Stormwater Systems	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Housing within a 100-year Flood Hazard Area	PS	LS	—	—	▼	▼	▼	—	N/A	—	N/A	▼	—	—	—	—	▼	▼	—	—	—	▼	▼	▼	—	▼
Impeding or Redirecting Flood Flows	PS	LS	—	—	▼	▼	▼	—	N/A	—	N/A	▼	—	—	—	—	▼	▼	—	—	—	▼	▼	▼	—	▼
Dam Inundation and Flood Hazards	PS	LS	—	—	—	—	▼	—	N/A	—	N/A	—	—	—	—	—	—	▼	—	—	—	—	—	—	—	▼
Seiche, Tsunami, and Mudflow Hazards	PS	LS	▼	▼	—	—	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	—	▼	▼	▼	▼	▼	—	▼	▲	▼
2.9 Land Use																										
Physical Division of an Established Community	LS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Conflicts with Land Use Plans, Policies, and Regulations	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	▼
Conflicts with HCPs or NCCPs	LS	LS	▼	▼	—	—	▼	—	N/A	▼	N/A	—	▼	—	▼	▼	—	▼	▼	▼	—	▼	—	▼	▲	—
2.10 Mineral Resources																										
Mineral Resource Availability	PS	SU	—	▼	—	—	▼	—	N/A	—	N/A	▼	▼	—	—	—	—	▼	—	—	—	—	—	—	—	▼
Mineral Resource Recovery Sites	PS	SU	—	▼	—	—	▼	—	N/A	—	N/A	▼	—	—	—	—	—	▼	—	—	—	—	—	—	—	▼
2.11 Noise																										
Excessive Noise Levels	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▲	▼	▼	▼	▼	▼	▲	▼
Excessive Groundborne Vibration	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Permanent Increase in Ambient Noise Levels	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	▲	▼
Temporary Increase in Ambient Noise Levels	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Excessive Noise Exposure from a Public or Private Airport	LS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	—	—	▼	—	▼	—	—	—	—
2.12 Population and Housing																										
Population Growth	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Displacement of Housing	LS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	—	—	—	—	—	—	▼	—	—
Displacement of People	LS	LS	—	—	—	—	—	—	N/A	—	N/A	—	—	—	—	—	—	—	—	—	—	—	—	▼	—	—

Table 4-2 Comparison of PSR Reduced Density Alternatives – Environmental Impacts

Issue Areas	Proposed Project		PSR Reduced Density Alternatives to the Proposed Project																								
	Without Mitigation	With Mitigation	BO18+	CD14	DS8	DS24	FB2+	FB17	FB19+	FB21+	ME26	ME30A	NC3A	NC18A	NC22	NC37	NC38+	PP30	SD15	VC7+	VC51	VC57+	VC67	CG Preliminary Staff Recommend Map	SD15 – 2012 Board Letter	No Project
2.13 Public Services																											
Fire Protection Services and Emergency Response Services	PS	LS	▼	▼	—	▼	—	▼	N/A	▼	N/A	▼	—	▼	▼	▼	▼	▼	▼	—	▼	—	—	—	—	▼
Police Protection Services	PS	LS	▼	▼	▼	▼	—	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	▼
School Services	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Other Public Services	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	—	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	—	▼	▼	▼
2.14 Recreation																											
Deterioration of Parks and Recreational Facilities	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Construction or Expansion of New Recreational Facilities	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
2.15 Transportation and Traffic																											
Traffic and Level of Service Standards	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▲	▼	▼	▼	▼	▼	▲	▼
Road Safety	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▲	▼	▼	▼	▼	▼	▲	▼
Emergency Access	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▲	▼
Alternative Transportation	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
2.16 Utilities and Service Systems																											
Wastewater Treatment Requirements	PS	LS	—	—	▼	—	—	—	N/A	—	N/A	—	—	—	▼	—	▼	—	▼	—	—	—	—	▼	—	▼
New Water or Wastewater Treatment Facilities	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	▼
Sufficient Storm Water Drainage Facilities	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	▼
Adequate Water Supplies	PS	SU	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	▼
Adequate Wastewater Facilities	PS	LS	—	—	▼	—	—	—	N/A	—	N/A	—	—	—	▼	—	▼	—	▼	—	—	—	—	▼	—	▼
Sufficient Landfill Capacity	LS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	▼
Solid Waste Regulations	LS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	—
Energy Conservation	LS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	—	—
2.17 Global Climate Change																											
Generation of Greenhouse Gas Emissions	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	—	▼	▼	▲	▼	▼	▼	▼	▼	▲	▼
Conflict with Applicable Plan, Policy, or Regulation	PS	LS	▼	▼	▼	▼	▼	▼	N/A	▼	N/A	▼	▼	▼	▼	—	▼	▼	▲	▼	▼	▼	▼	▼	▲	▼

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Table 4-3 Former Champagne Gardens Specific Plan Area Alternatives Comparison

Former CGSP Subareas	General Plan Land Use Designations				Potential Dwelling Unit Existing	Potential Dwelling Unit Proposed	Potential Dwelling Unit Increase Proposed	Staff Preliminary Recommendation Map	Potential Dwelling Unit Increase Staff Prelim Rec	Environmentally Superior Map	Potential Dwelling Unit Increase Environmentally Superior Map
	Existing	Proposed	Preliminary Staff Recommendation Map	Environmentally Superior Map							
CG1	SPA/ RL-20	SR-10	SR-10	SR-10	1	8	7	8	7	7	6
CG6		SR-10/ RC	SR-10/RC	SR-10							
CG7		SR-10	SR-10	SR-10							
CG8		SR-10/ RC	SR-10/RC	SR-10							
CG2	SPA	SR-4	SR-4	SR-10	0	19	19	10	10	4	4
CG3		SR-2	SR-4	SR-10							
CG4		SR-2	SR-4	SR-10							
CG5	SPA	SR-2	SR-4	SR-10	0	5	5	2	2	1	1
				Total:	**1**	**32**	**31**	**20**	**19**	**12**	**11**

Table 4-4 Champagne Gardens Alternative Zoning Designations

CGSP Area	Existing	Proposed Project	Preliminary Staff Recommendation Map	The Environmentally Superior Map
CG1	S88	Rural Residential	Rural Residential	Rural Residential
CG2	S88	Agriculture	Agriculture	Agriculture
CG3	S88	Agriculture	Agriculture	Agriculture
CG4	S88	Agriculture	Agriculture	Agriculture
CG5	S88	Commercial and Office	Commercial and Office	Commercial and Office
CG6	S88	Rural Residential, Commercial, and Office	Rural Residential, Commercial, and Office	Rural Residential
CG7	S88	Rural Residential	Rural Residential	Rural Residential
CG8	S90	Rural Residential, Commercial, and Office	Rural Residential, Commercial and Office	Rural Residential

Table 4-5 Comparison of ESMA and No Project Alternatives for Former CGSP Area

Issue Areas	Proposed Project Without Mitigation	Proposed Project With Mitigation	CG Environmentally Superior Map	No Project Alternative
2.1 Aesthetics				
Scenic Vistas	PS	LS	▼	▼
Scenic Resources	PS	LS	▼	▼
Visual Character or Quality	PS	SU	▼	▼
Lighting and Glare	PS	SU	▼	▼
2.2 Agricultural Resources				
Conversion of Agricultural Resources	PS	SU	▼	▼
Land Use Conflicts	LS	LS	—	▼
Indirect Conversion of Agricultural Resources	PS	SU	▼	▼
Loss or Conversion of Forestry Resources	PS	SU	▼	▼
2.3 Air Quality				
Air Quality Plans	PS	SU	▼	▼
Air Quality Violations	PS	SU	▼	▼
Non-attainment of Criteria Pollutants	PS	SU	▼	▼
Sensitive Receptors	PS	SU	▼	▼
Objectionable Odors	LS	LS	—	▼
2.4 Biological Resources				
Special Status Plant and Wildlife Species	PS	SU	▼	▼
Riparian Habitat and Other Sensitive Natural Communities	PS	SU	▼	▼
Federally Protected Wetlands	PS	LS	▼	▼
Wildlife Movement Corridors and Nursery Sites	PS	SU	▼	▼
Local Policies and Ordinances	LS	LS	▼	▼
Habitat Conservation Plans and Natural Community Conservation Plans	LS	LS	—	▼
2.5 Cultural and Paleontological Resources				
Historical Resources	PS	LS	—	▼
Archaeological Resources	PS	LS	▼	▼
Paleontological Resources	PS	LS	—	▼
Human Remains	PS	LS	▼	▼
Tribal Cultural Resources	PS	LS	▼	▼
2.6 Geology and Soils				
Exposure to Seismic Related Hazards	LS	LS	▼	▼
Soil Erosion or Topsoil Loss	LS	LS	▼	▼
Soil Stability	LS	LS	▼	▼
Expansive Soils	LS	LS	▼	▼
Waste Water Disposal Systems	LS	LS	▼	▼
Unique Geologic Features	LS	LS	—	▼

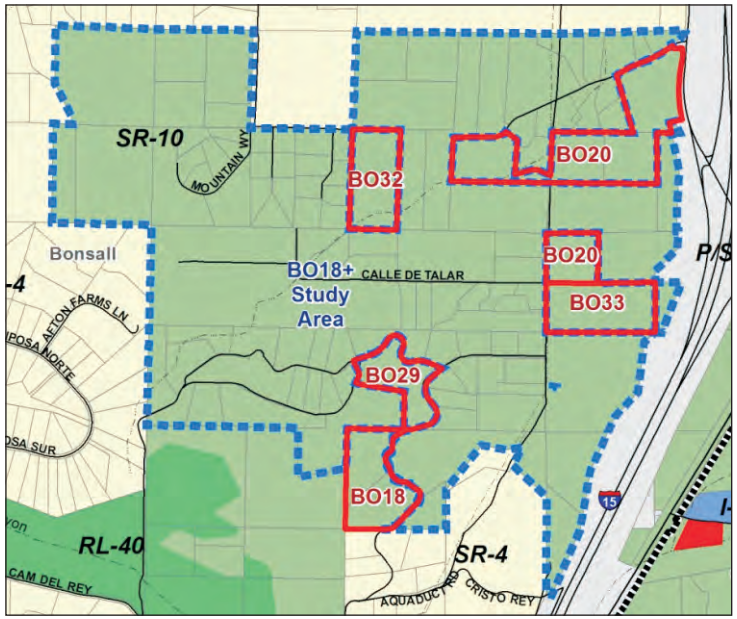
Table 4-5 Comparison of ESMA and No Project Alternatives for Former CGSP Area

Issue Areas	Proposed Project Without Mitigation	Proposed Project With Mitigation	CG Environmentally Superior Map	No Project Alternative
2.7 Hazards and Hazardous Materials				
Transport, Use, and Disposal of Hazardous Materials	LS	LS	▼	▼
Accidental Release of Hazardous Materials	LS	LS	—	▼
Hazards to Schools	LS	LS	▼	▼
Existing Hazardous Materials Sites	LS	LS	—	▼
Public Airports	LS	LS	—	▼
Private Airports	LS	LS	—	▼
Emergency Response and Evacuation Plans	PS	LS	—	▼
Wildland Fires	PS	SU	▼	▼
Vectors	LS	LS	—	▼
2.8 Hydrology and Water Quality				
Water Quality Standards and Requirements	PS	SU	▼	▼
Groundwater Supplies and Recharge	PS	SU	—	▼
Erosion or Siltation	PS	LS	▼	▼
Flooding	PS	LS	▼	▼
Exceed Capacity of Stormwater Systems	PS	LS	▼	▼
Housing within a 100-year Flood Hazard Area	PS	LS	▼	▼
Impeding or Redirecting Flood Flows	PS	LS	▼	▼
Dam Inundation and Flood Hazards	PS	LS	—	▼
Seiche, Tsunami, and Mudflow Hazards	PS	LS	▼	▼
2.9 Land Use				
Physical Division of an Established Community	LS	LS	—	▼
Conflicts with Land Use Plans, Policies, and Regulations	PS	SU	—	▲
Conflicts with HCPs or NCCPs	LS	LS	—	▼
2.10 Mineral Resources				
Mineral Resource Availability	PS	SU	—	▼
Mineral Resource Recovery Sites	PS	SU	—	▼
2.11 Noise				
Excessive Noise Levels	PS	LS	▼	▼
Excessive Groundborne Vibration	PS	LS	▼	▼
Permanent Increase in Ambient Noise Levels	PS	SU	▼	▼
Temporary Increase in Ambient Noise Levels	PS	LS	▼	▼
Excessive Noise Exposure from a Public or Private Airport	LS	LS	—	▼
2.12 Population and Housing				
Population Growth	PS	SU	▼	▼
Displacement of Housing	LS	LS	—	▼
Displacement of People	LS	LS	—	▼

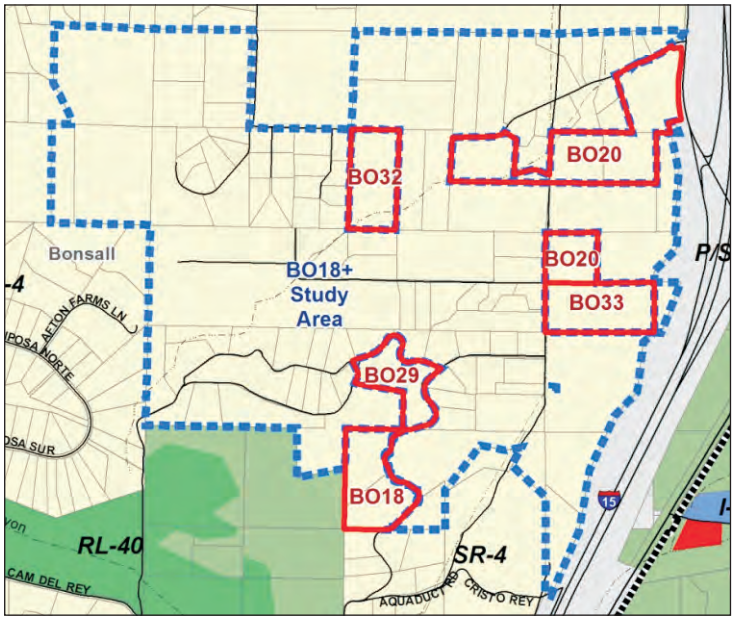
Table 4-5 Comparison of ESMA and No Project Alternatives for Former CGSP Area

Issue Areas	Proposed Project Without Mitigation	Proposed Project With Mitigation	CG Environmentally Superior Map	No Project Alternative
2.13 Public Services				
Fire Protection Services	PS	LS	▼	▼
Police Protection Services	PS	LS	▼	▼
School Services	PS	SU	▼	▼
Other Public Services	PS	LS	▼	▼
2.14 Recreation				
Deterioration of Parks and Recreational Facilities	PS	LS	▼	▼
Construction of New Recreational Facilities	PS	LS	▼	▼
2.15 Transportation and Traffic				
Traffic and Level of Service Standards	PS	SU	▼	▼
Road Safety	PS	SU	▼	▼
Emergency Access	PS	LS	▼	▼
Alternative Transportation	PS	LS	▼	▼
2.16 Utilities and Service Systems				
Wastewater Treatment Requirements	PS	LS	▼	▼
New Water or Wastewater Treatment Facilities	PS	LS	▼	▼
Sufficient Stormwater Drainage Facilities	PS	LS	▼	▼
Adequate Water Supplies	PS	SU	▼	▼
Adequate Wastewater Facilities	PS	LS	▼	▼
Sufficient Landfill Capacity	LS	LS	▼	▼
Solid Waste Regulations	LS	LS	▼	▼
Energy	LS	LS	▼	▼
2.17 Global Climate Change				
Generation of Greenhouse Gas Emissions	PS	LS	▼	▼
Conflict with Applicable Plan, Policy, or Regulation	PS	LS	▼	▼

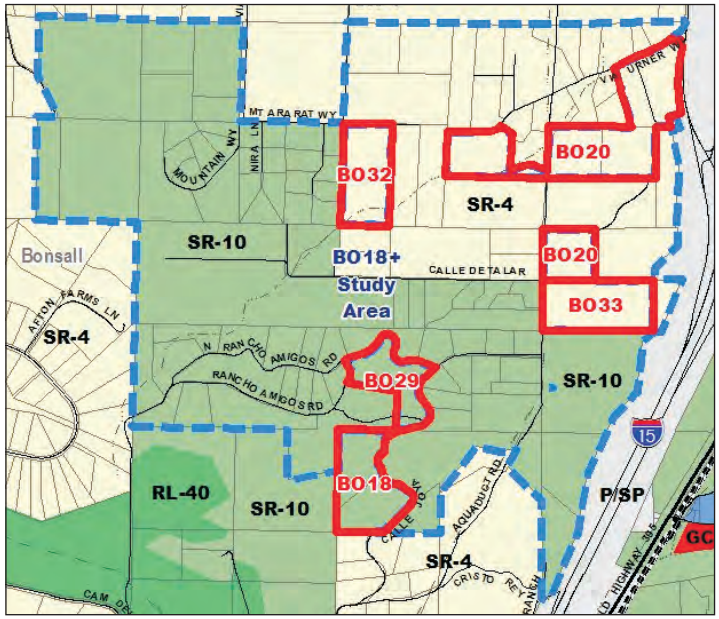
▲ Alternative is likely to result in greater impacts to issue when compared to proposed project
— Alternative is likely to result in a similar impacts to issue when compared to proposed project
▼ Alternative is likely to result in less impacts to issue when compared to proposed project
PS Potentially significant impact
LS Less than significant impact
SU Potentially significant and unavoidable impact



Existing GP Designation (129 DU)



Proposed GP Designation (196 DU)



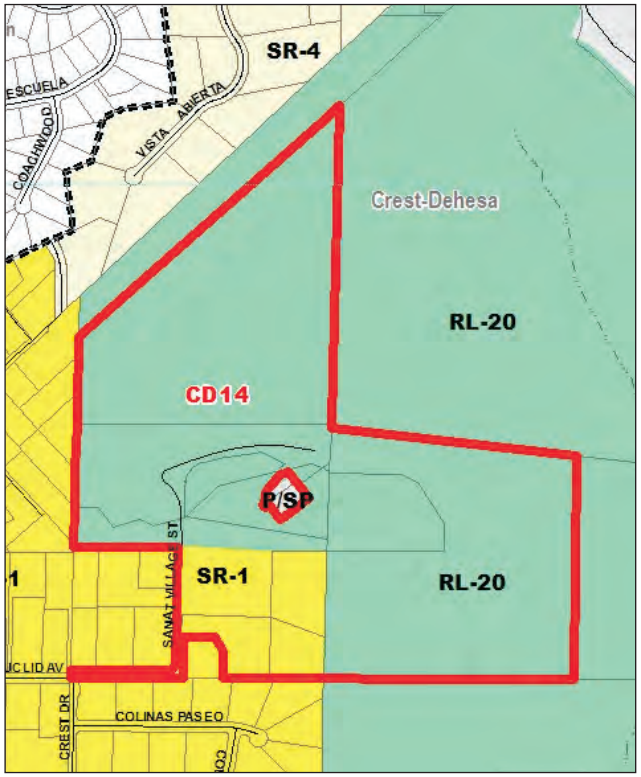
Reduced Density Alternative (165 DU)

No Scale

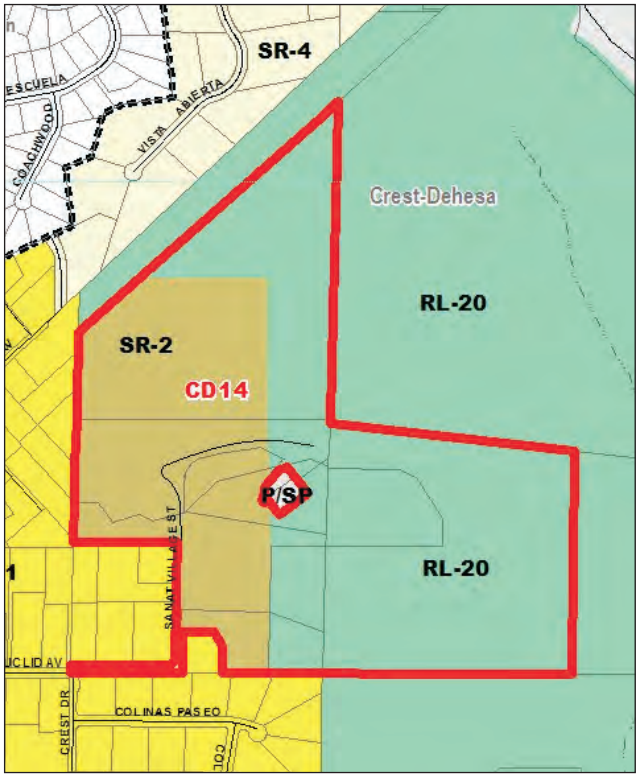
Source: County of San Diego 2017

BO18+ Analysis Area Options

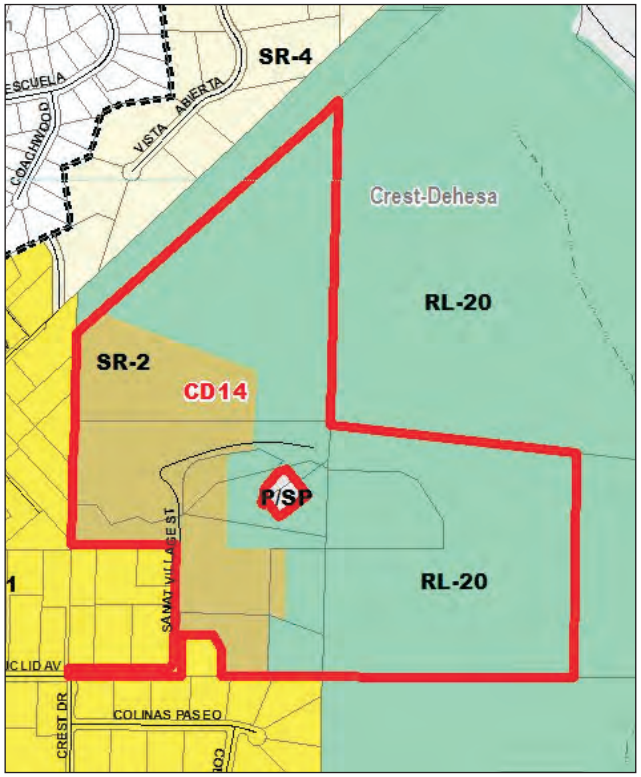
Figure 4-1



Existing GP Designation (10 DU)



Proposed GP Designation (17 DU)



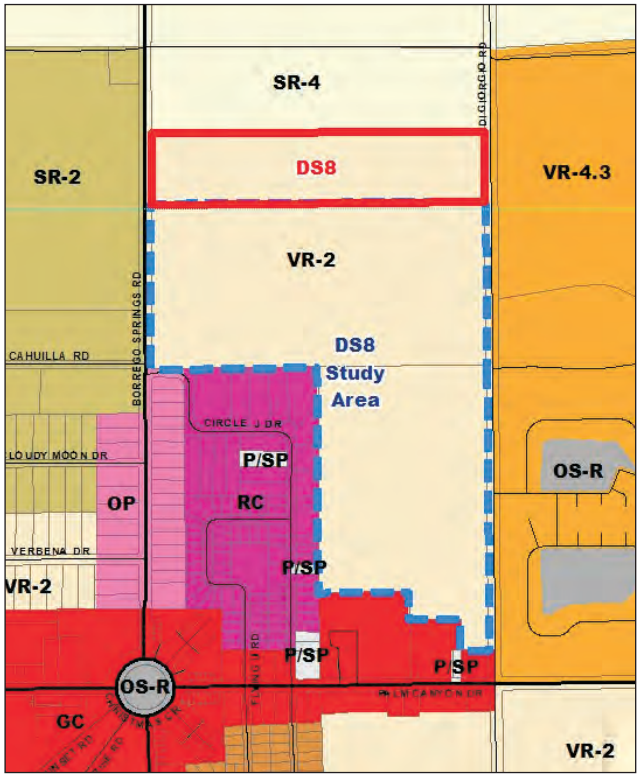
Reduced Density Alternative (14 DU)

No Scale

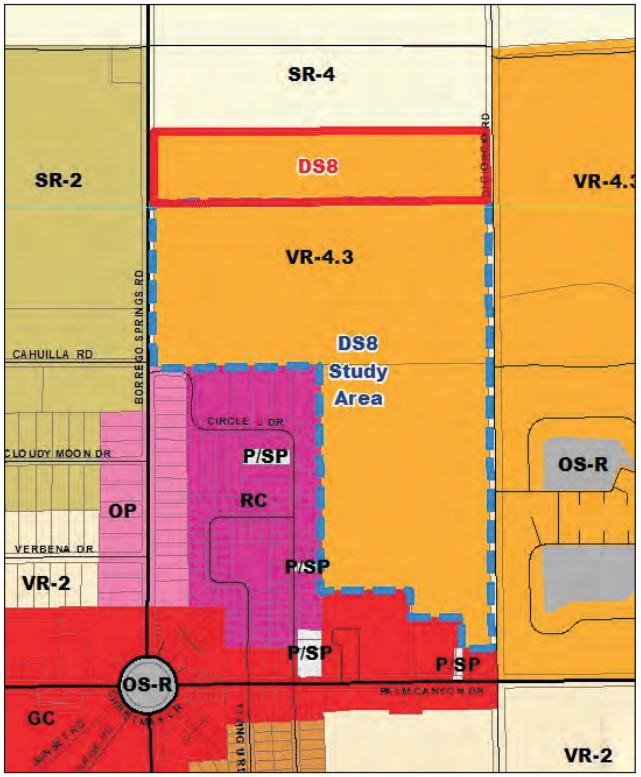
Source: County of San Diego 2017

CD14 Analysis Area Options

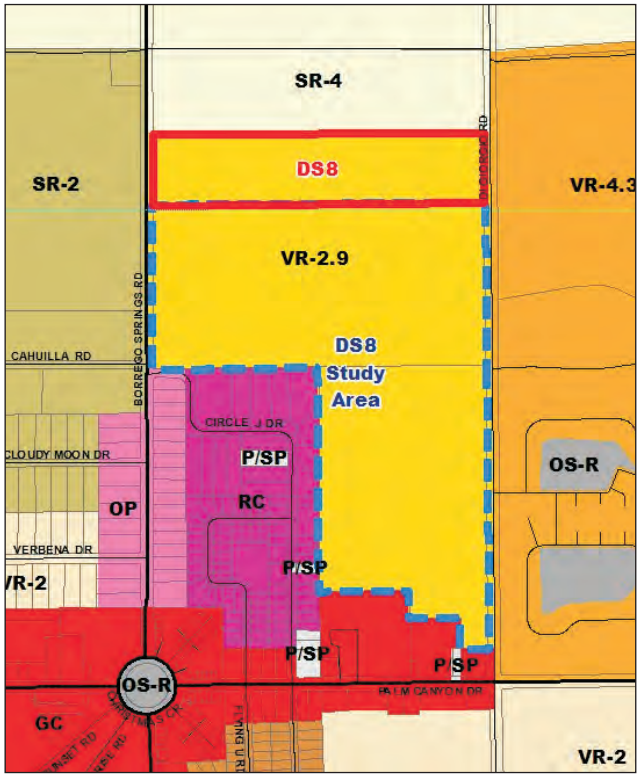
Figure 4-2



Existing GP Designation (337 DU)



Proposed GP Designation (726 DU)



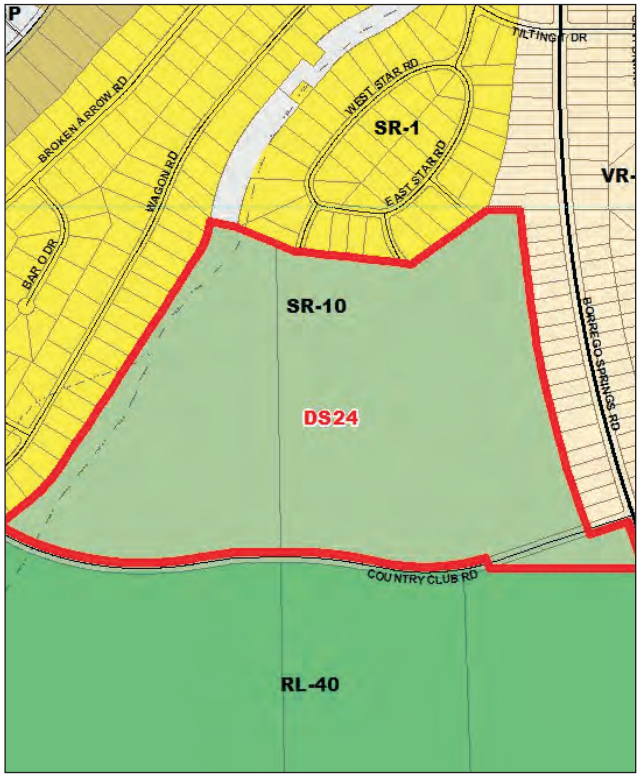
Reduced Density Alternative (489 DU)

No Scale

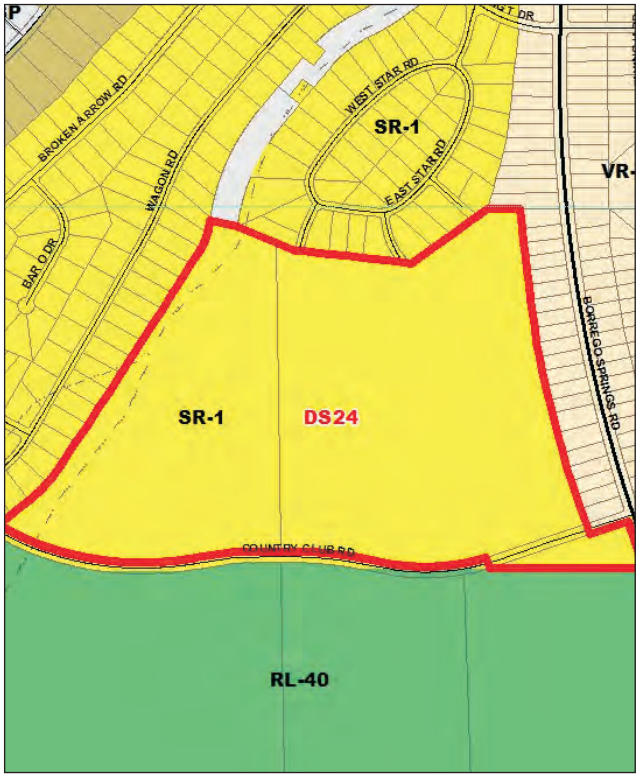
Source: County of San Diego 2017

DS8 Analysis Area Options

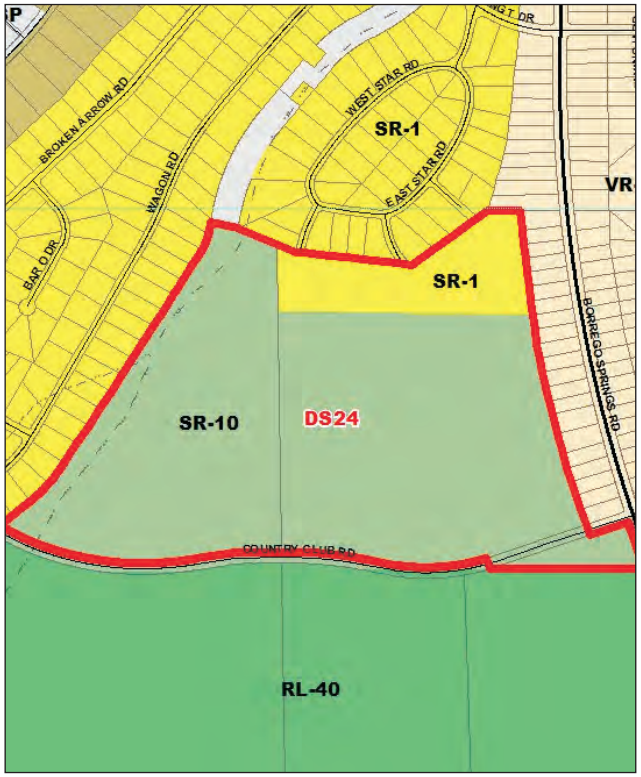
Figure 4-3



Existing GP Designation (16 DU)



Proposed GP Designation (169 DU)



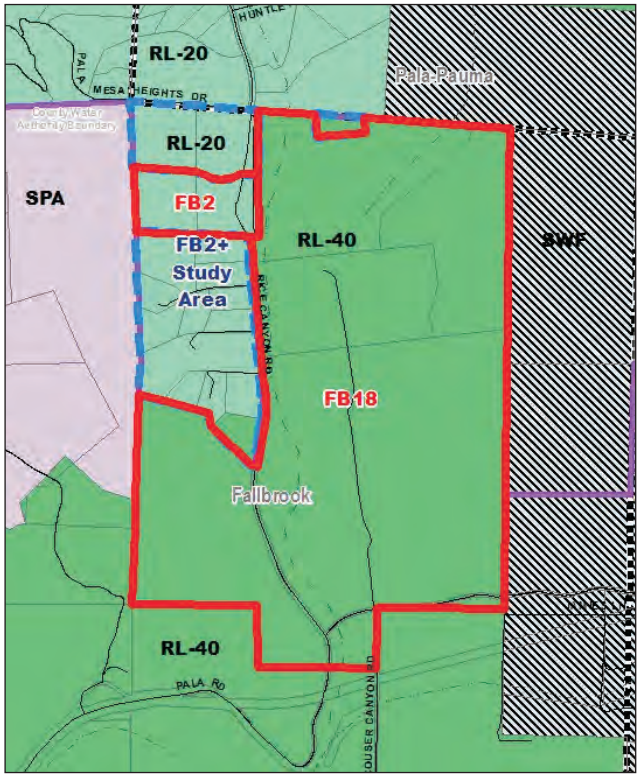
Reduced Density Alternative (34 DU)

No Scale

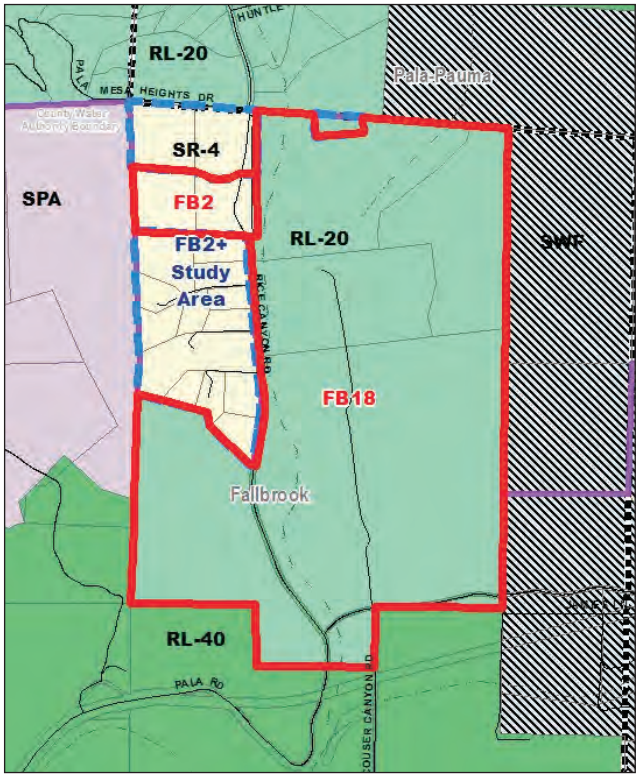
Source: County of San Diego 2017

DS24 Analysis Area Options

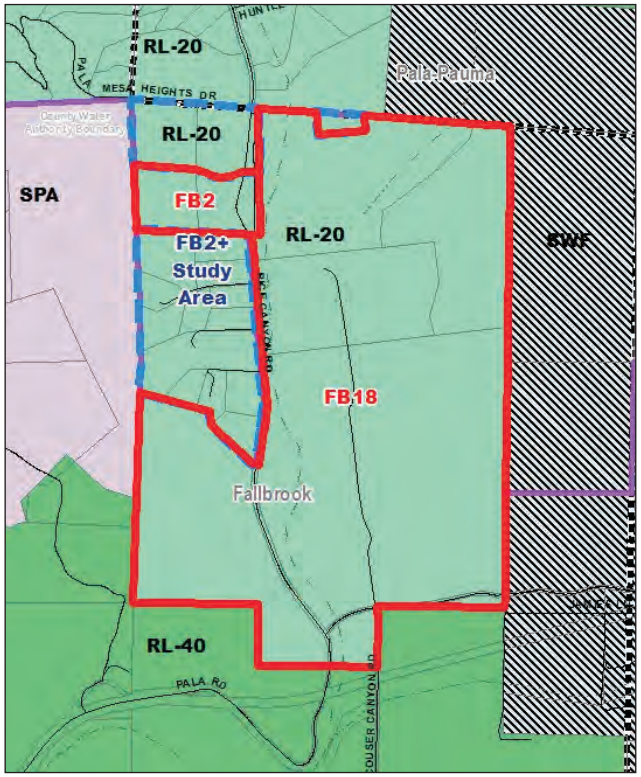
Figure 4-4



Existing GP Designation (26 DU)



Proposed GP Designation (42 DU)



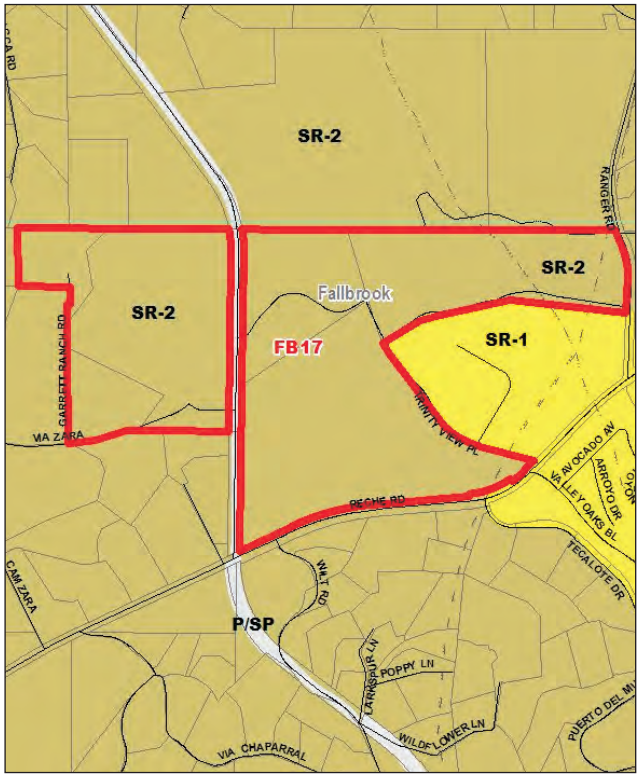
Reduced Density Alternative (37 DU)

No Scale

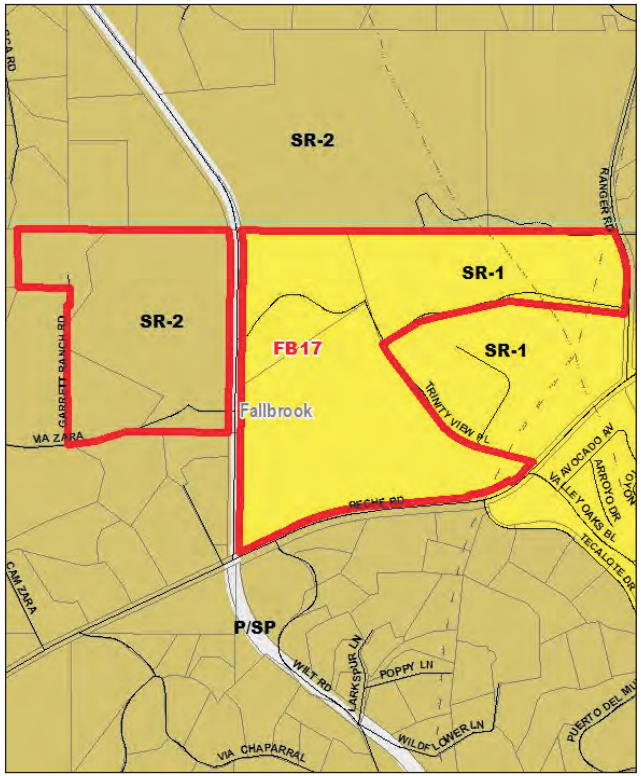
Source: County of San Diego 2017

FB2+ Analysis Area Options

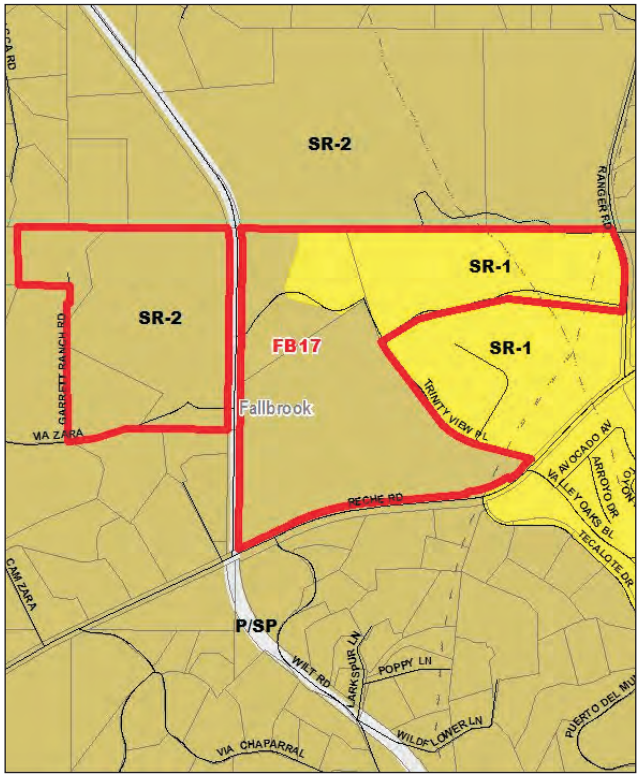
Figure 4-5



Existing GP Designation (49 DU)



Proposed GP Designation (82 DU)



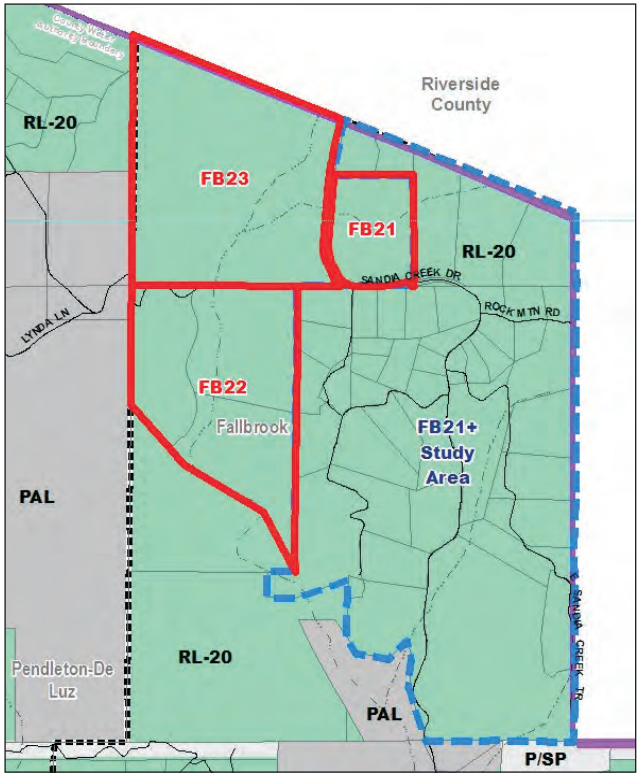
Reduced Density Alternative (64 DU)

No Scale

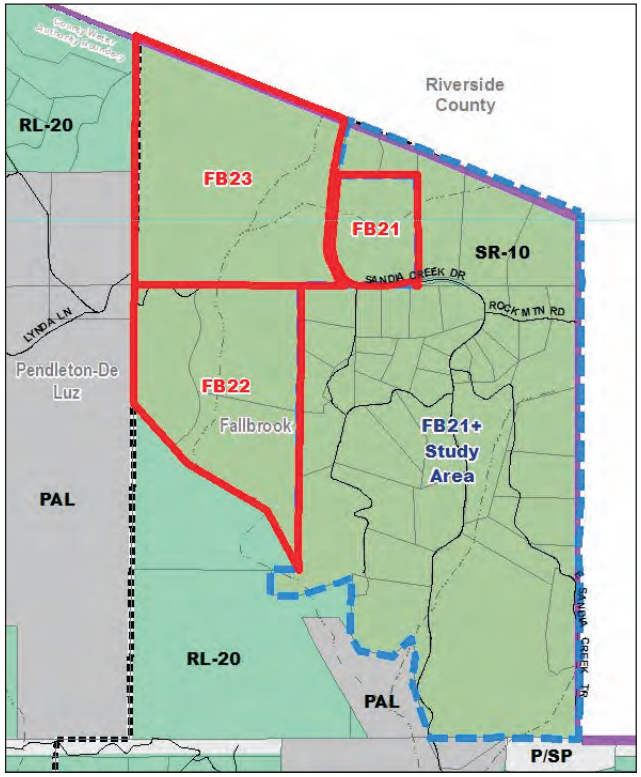
Source: County of San Diego 2017

FB17 Analysis Area Options

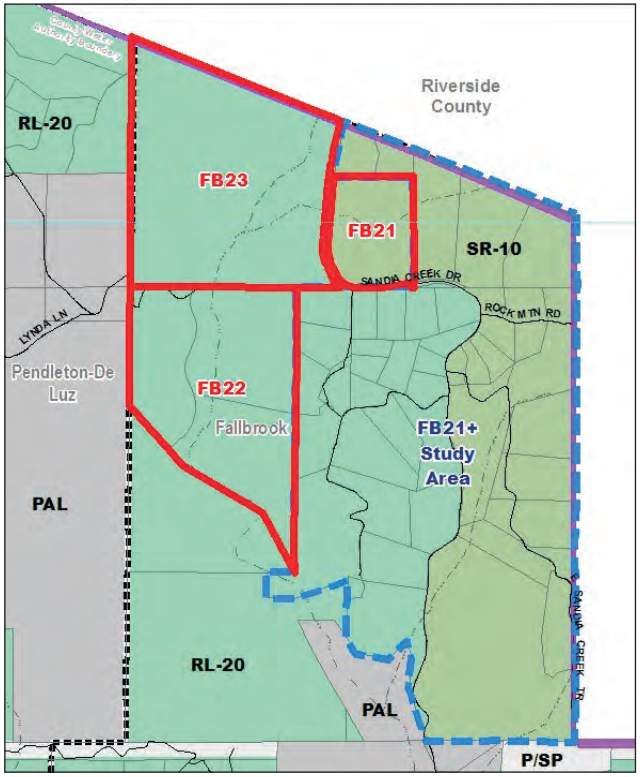
Figure 4-6



Existing GP Designation (61 DU)



Proposed GP Designation (68 DU)



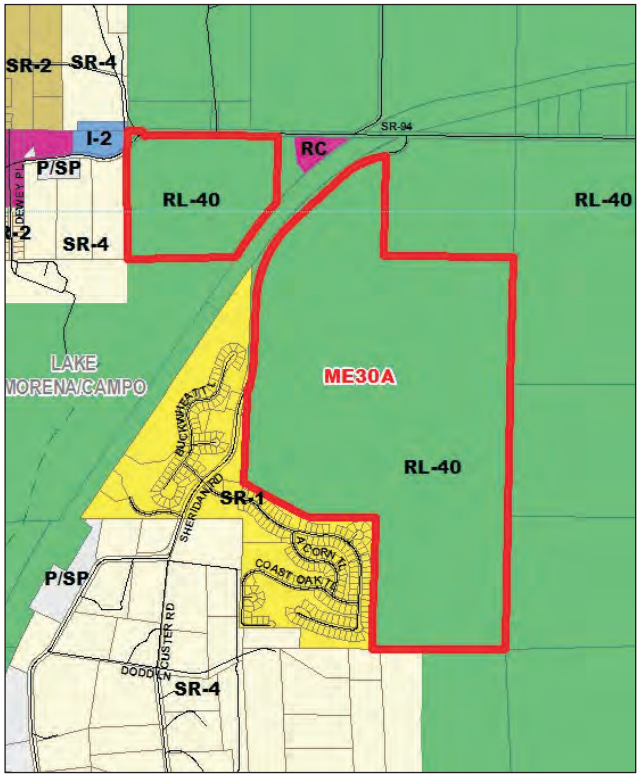
Reduced Density Alternative (63 DU)

No Scale

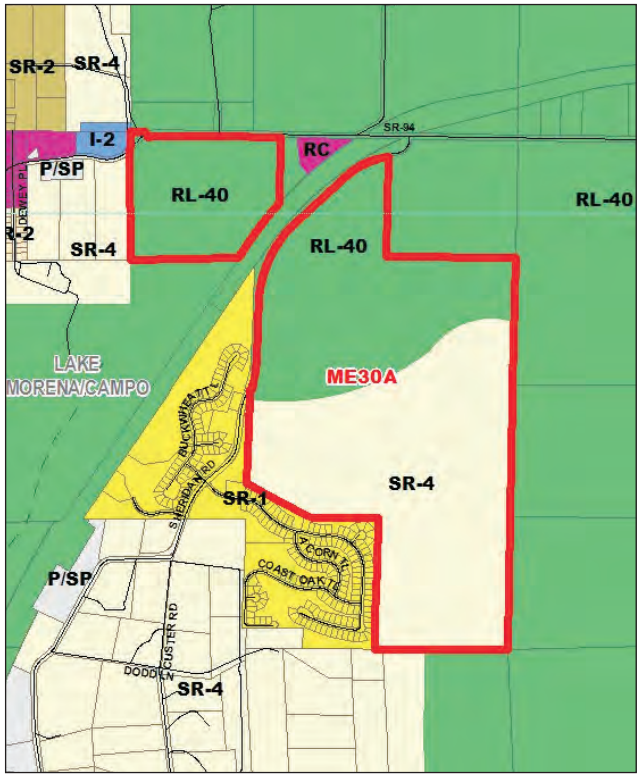
Source: County of San Diego 2017

FB21+ Analysis Area Options

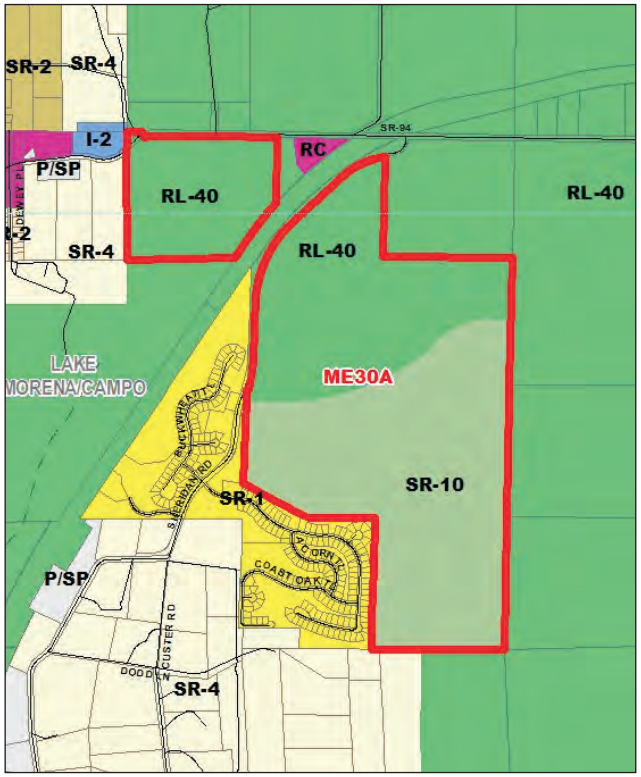
Figure 4-7



Existing GP Designation (6 DU)



Proposed GP Designation (35 DU)



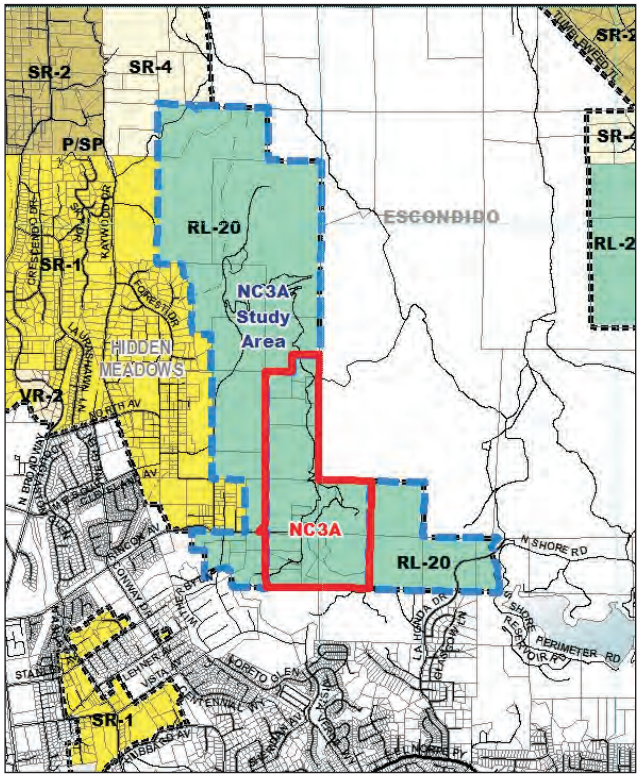
Reduced Density Alternative (16 DU)

No Scale

Source: County of San Diego 2017

ME30A Analysis Area Options

Figure 4-8



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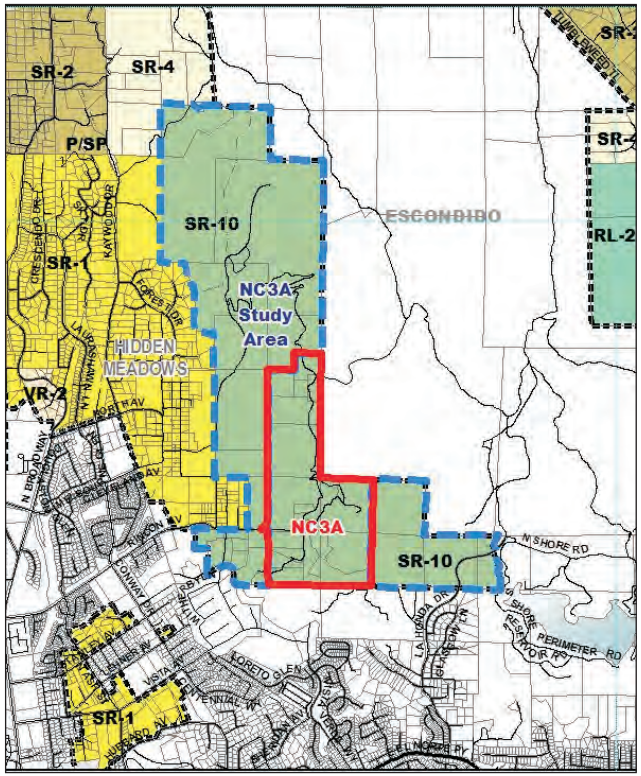
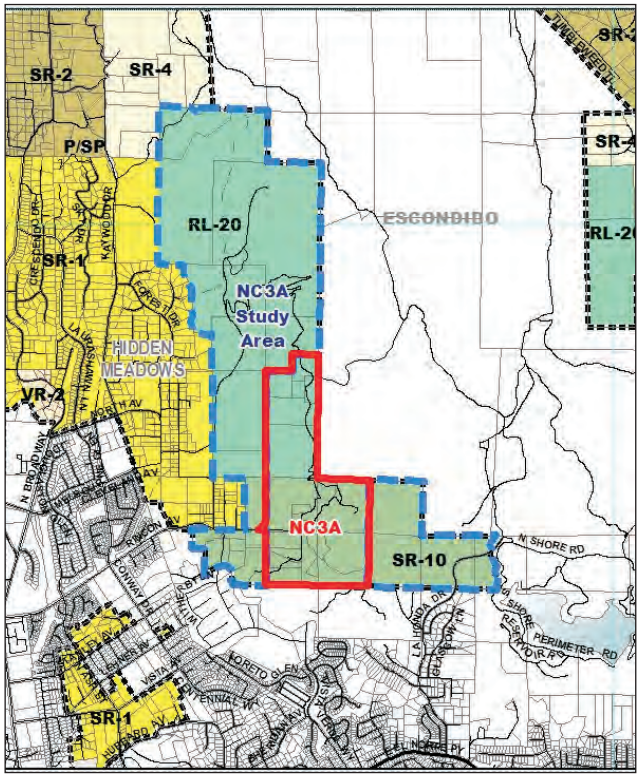


Proposed GP Designation (77 DU)



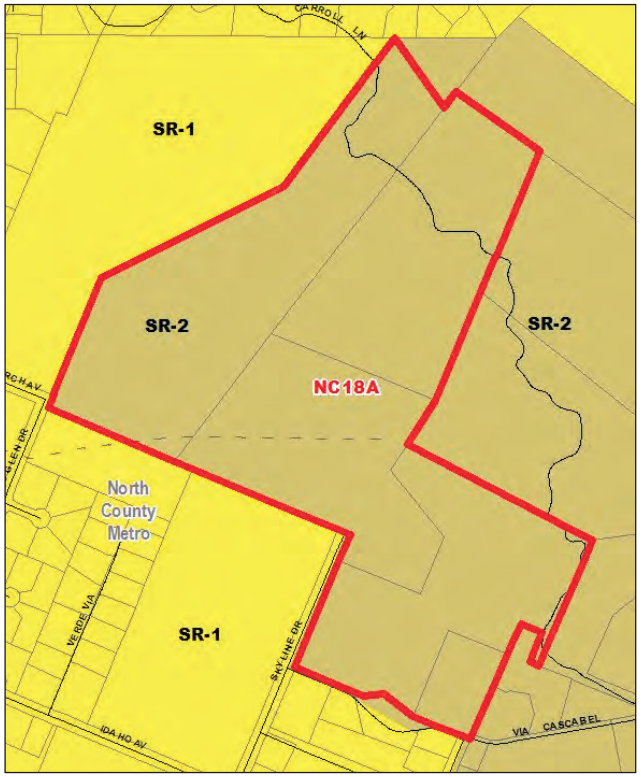
Reduced Density Alternative (69 DU)

No Scale

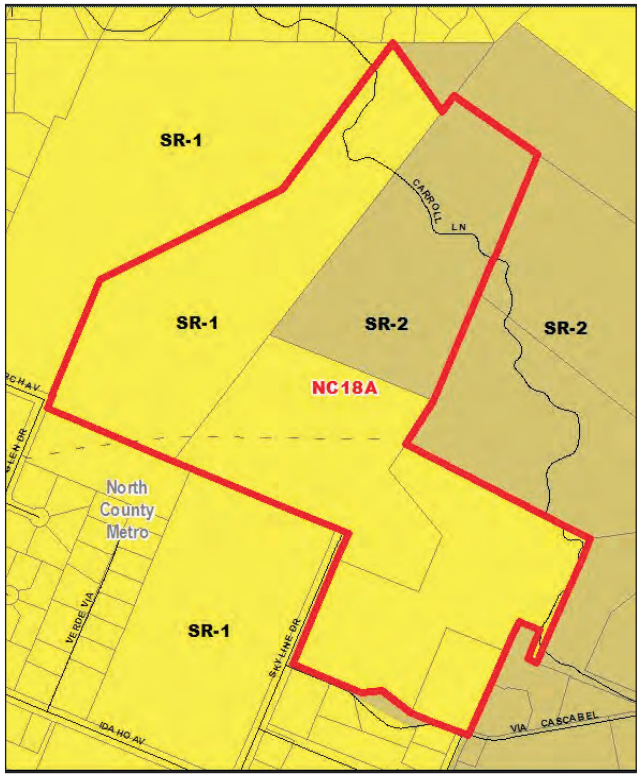
Source: County of San Diego 2017

NC3A Analysis Area Options

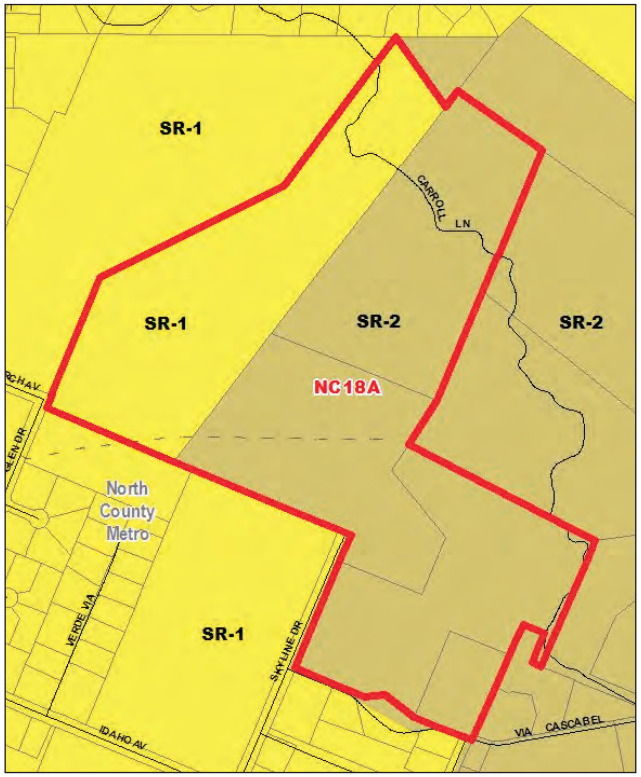
Figure 4-9



Existing GP Designation (43 DU)



Proposed GP Designation (77 DU)



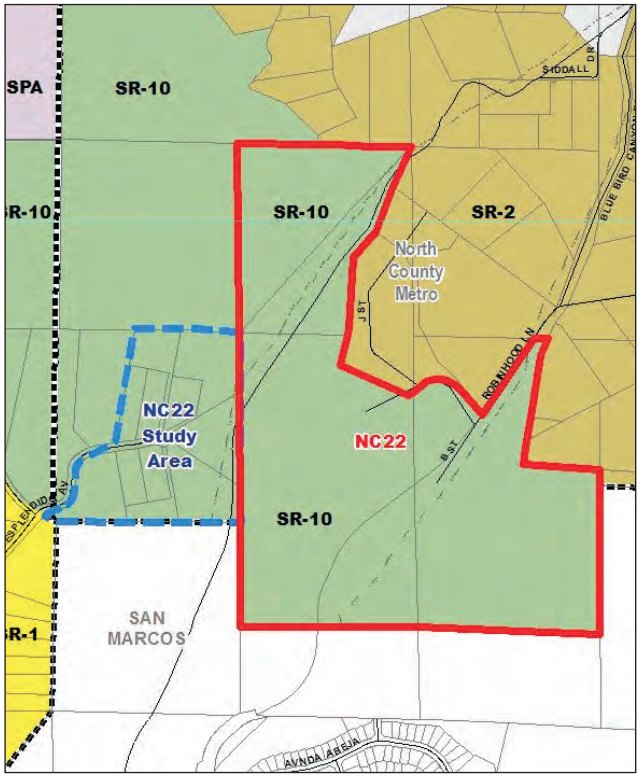
Reduced Density Alternative (57 DU)

No Scale

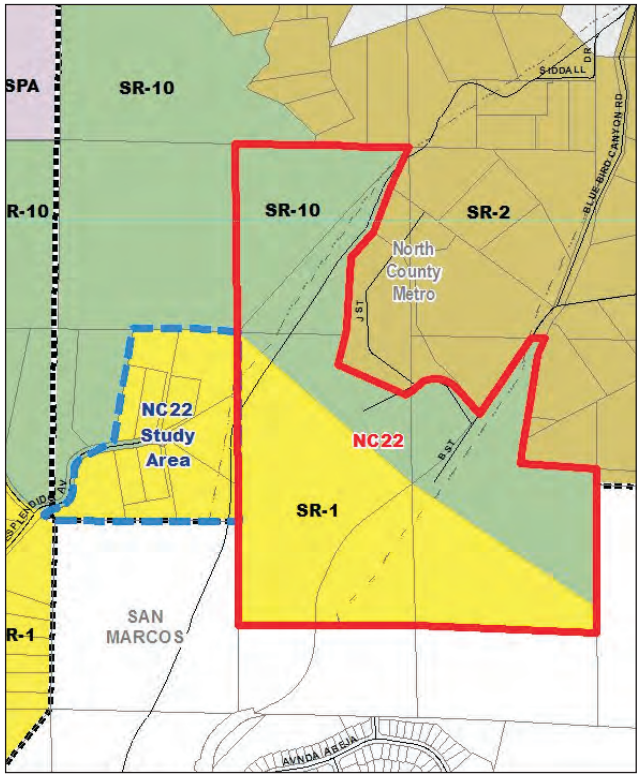
Source: County of San Diego 2017

NC18A Analysis Area Options

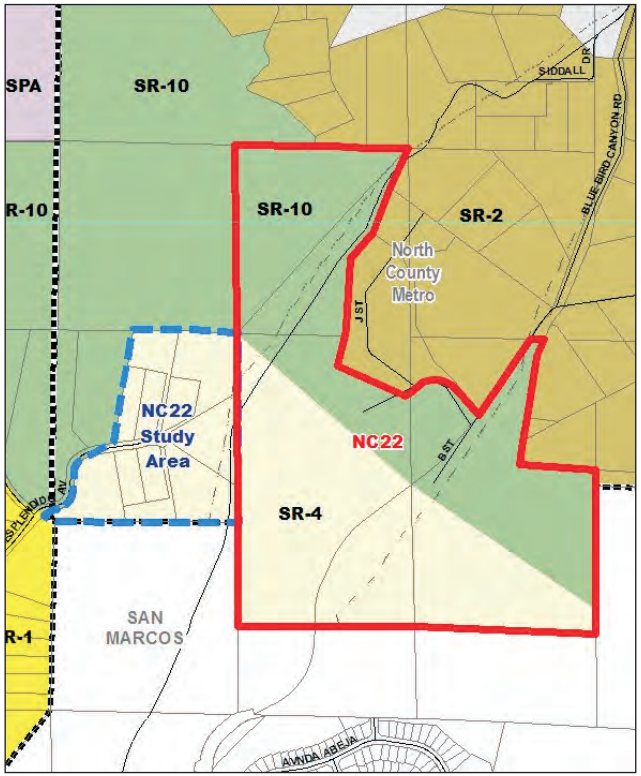
Figure 4-10



Existing GP Designation (21 DU)



Proposed GP Designation (73 DU)



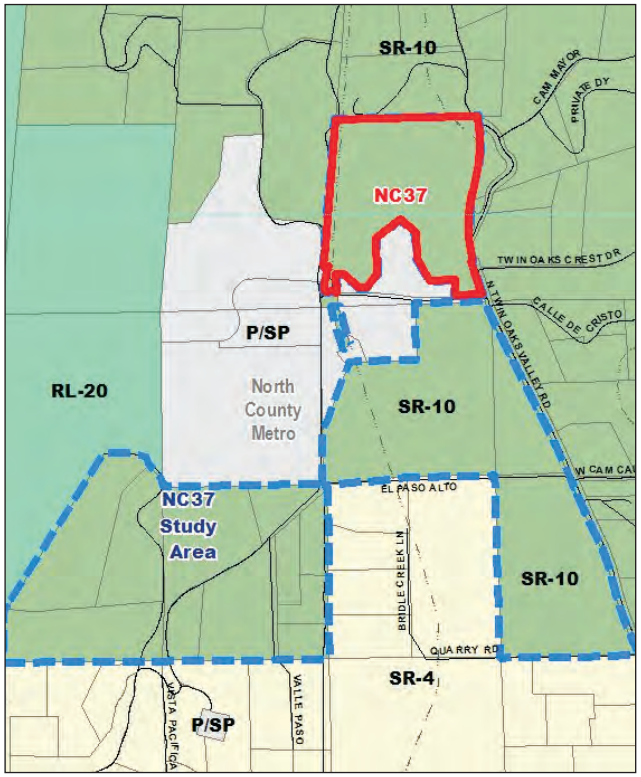
Reduced Density Alternative (28 DU)

No Scale

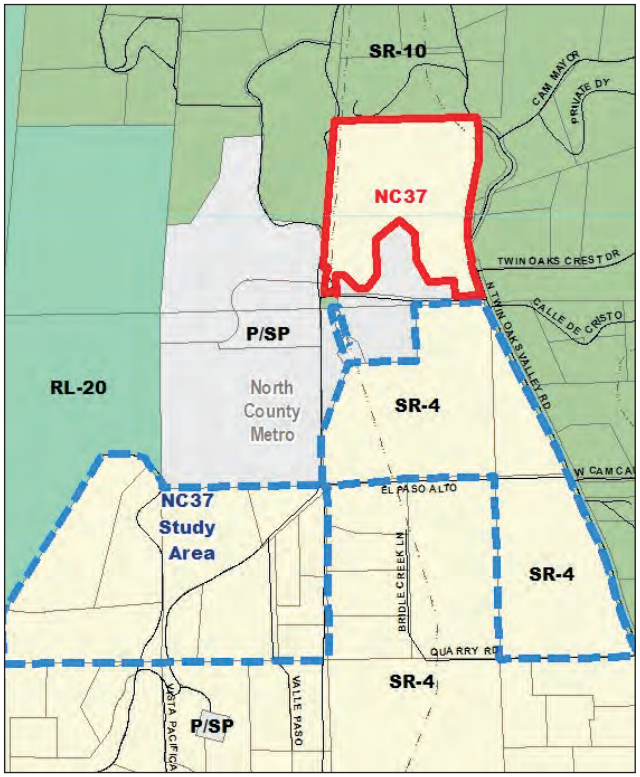
Source: County of San Diego 2017

NC22 Analysis Area Options

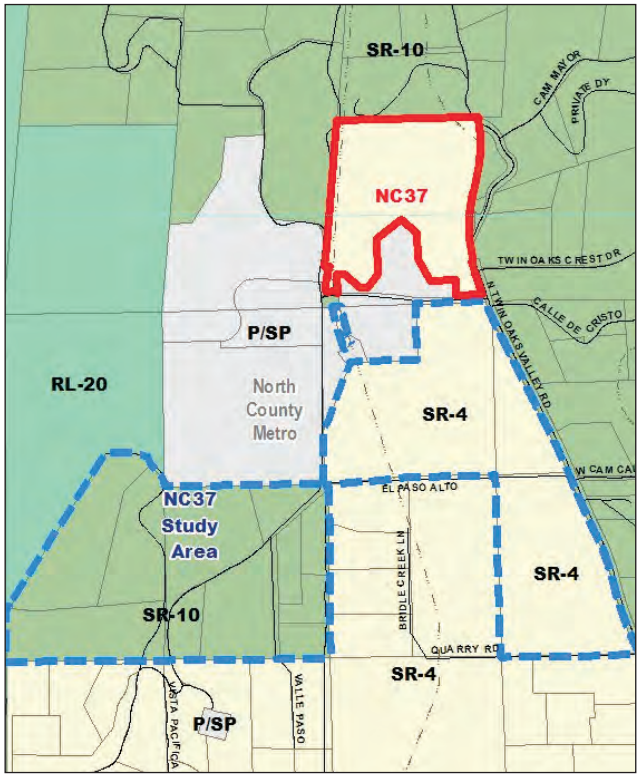
Figure 4-11



Existing GP Designation (19 DU)



Proposed GP Designation (31 DU)



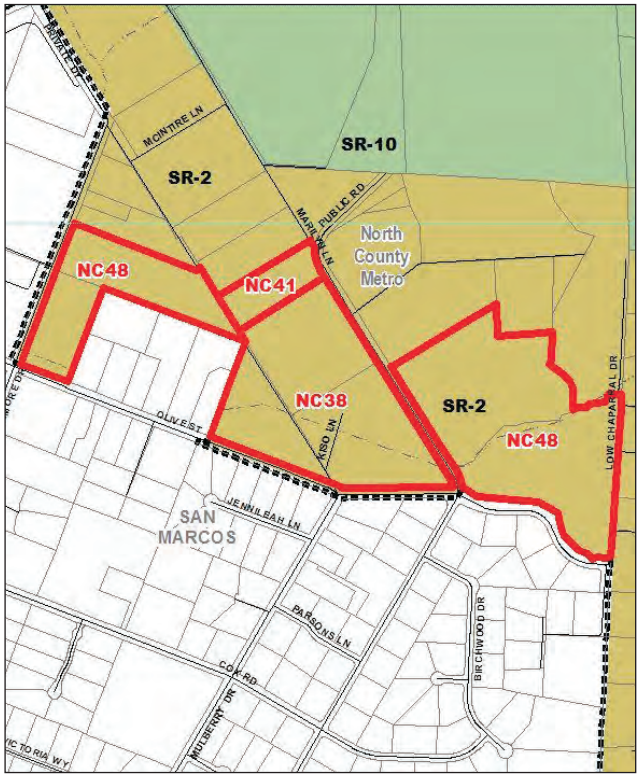
Reduced Density Alternative (31 DU)

No Scale

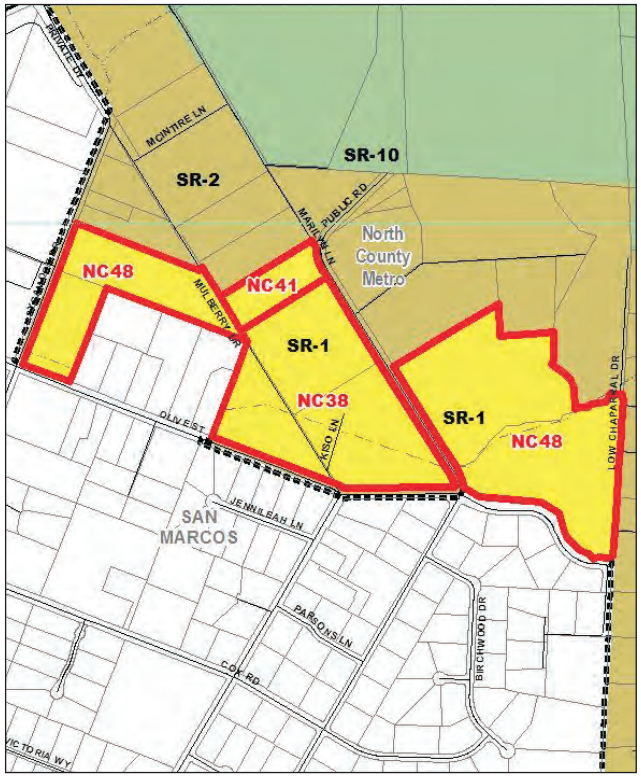
Source: County of San Diego 2017

NC37 Analysis Area Options

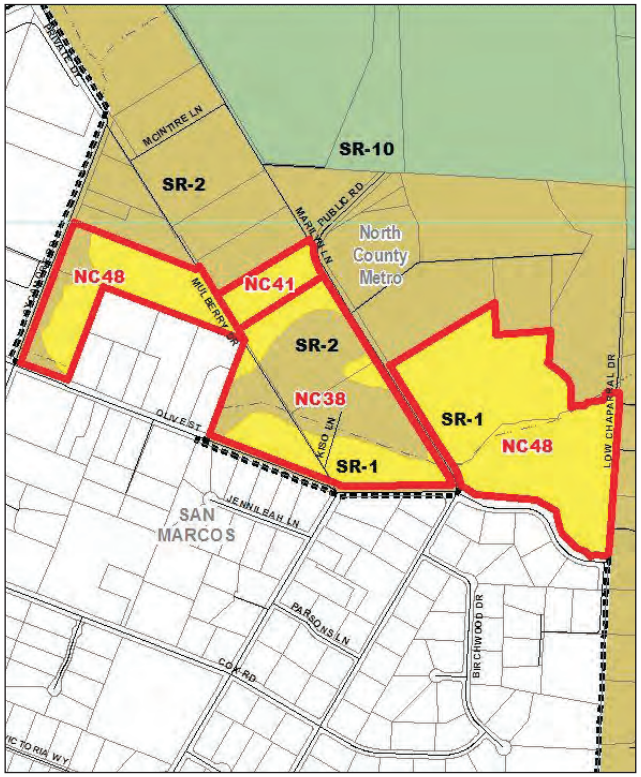
Figure 4-12



Existing GP Designation (37 DU)



Proposed GP Designation (75 DU)



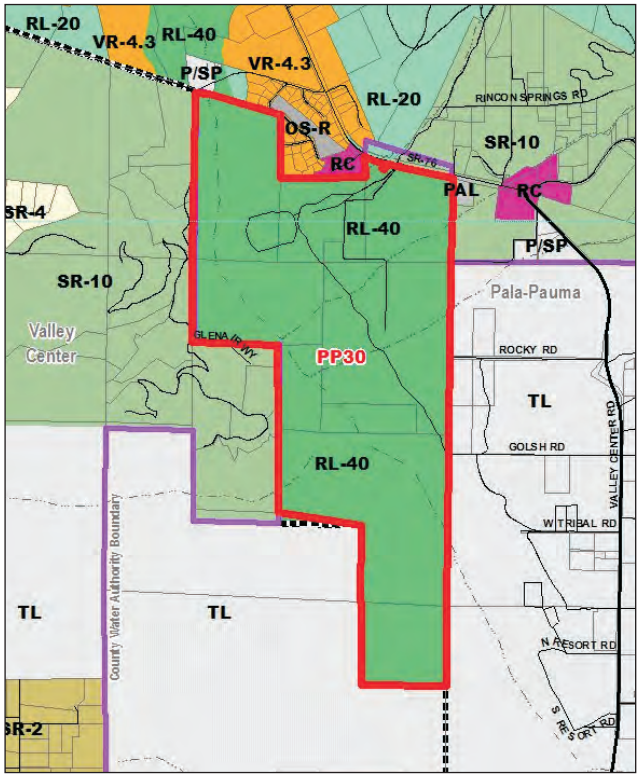
Reduced Density Alternative (64 DU)

No Scale

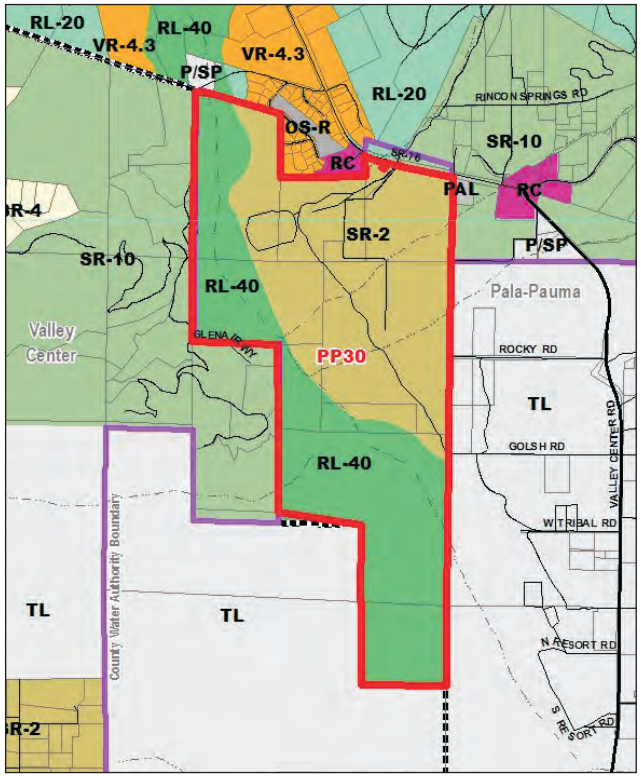
Source: County of San Diego 2017

NC38+ Analysis Area Options

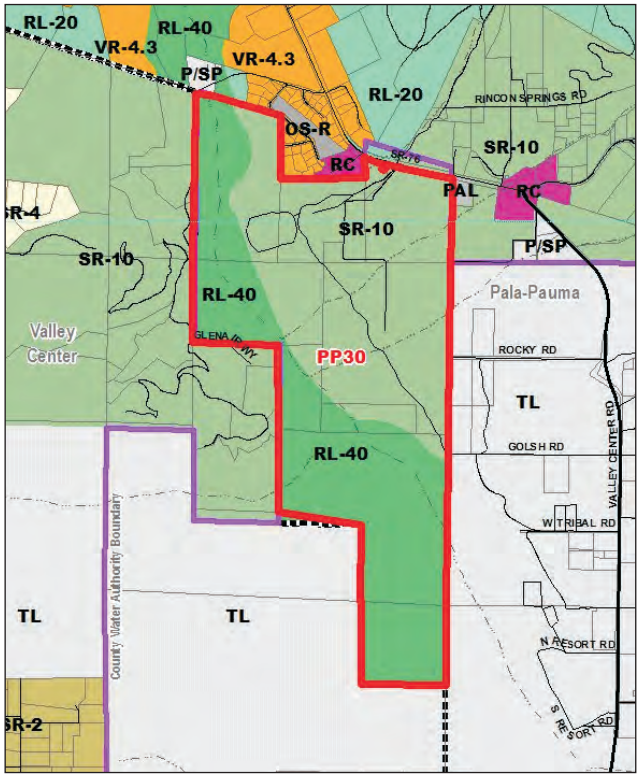
Figure 4-13



Existing GP Designation (12 DU)



Proposed GP Designation (134 DU)



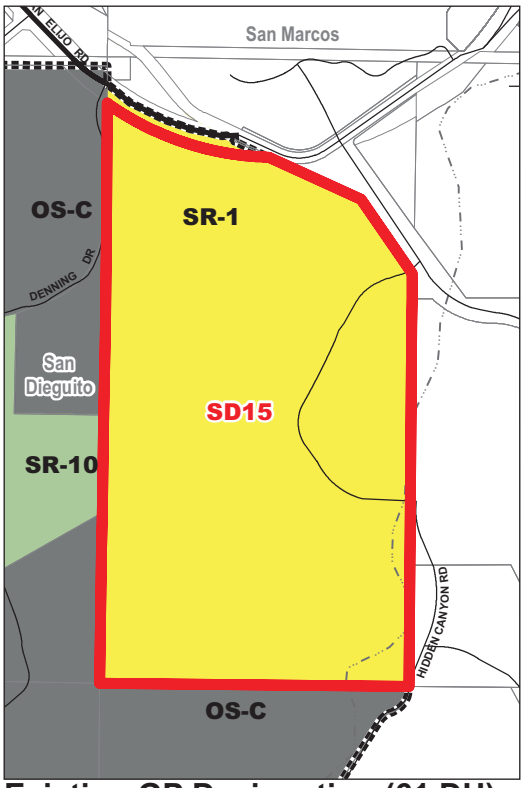
Reduced Density Alternative (31 DU)

No Scale

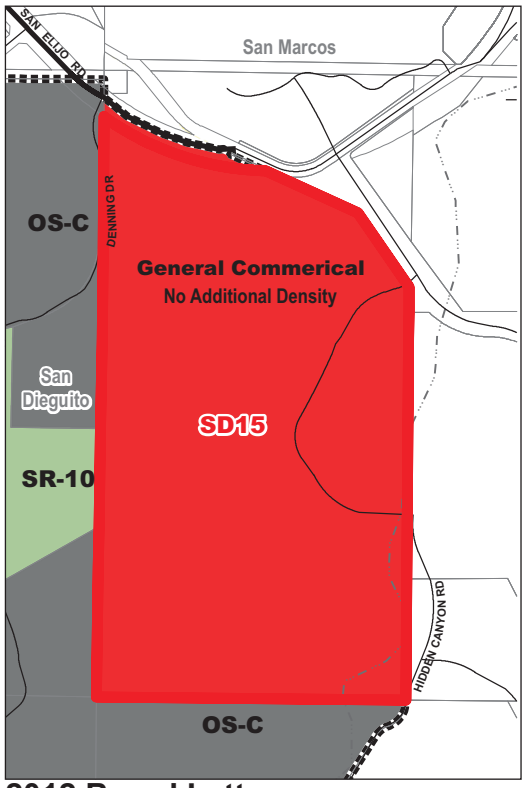
Source: County of San Diego 2017

PP30 Analysis Area Options

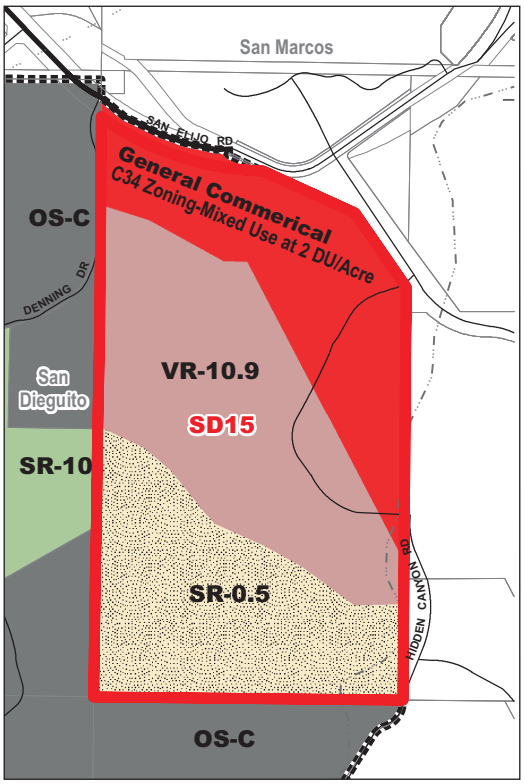
Figure 4-14



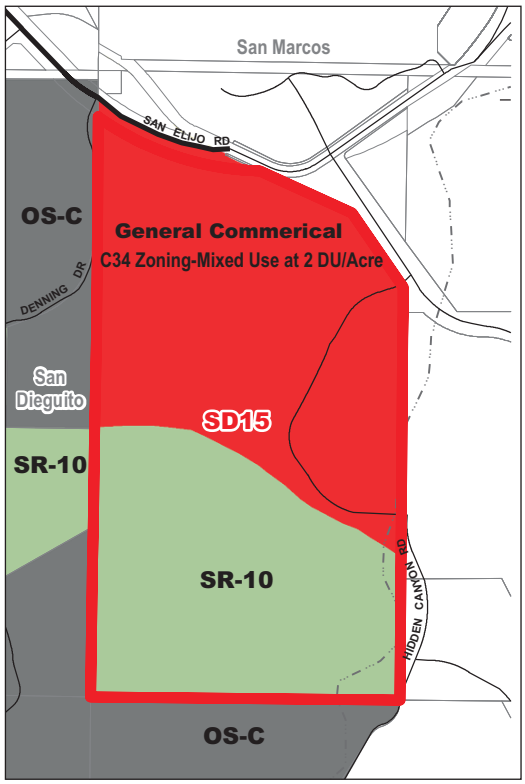
Existing GP Designation (61 DU)



2012 Board Letter



Proposed GP Designation (362 DU)



Reduced Density Alternative
(80 DU + Commercial)

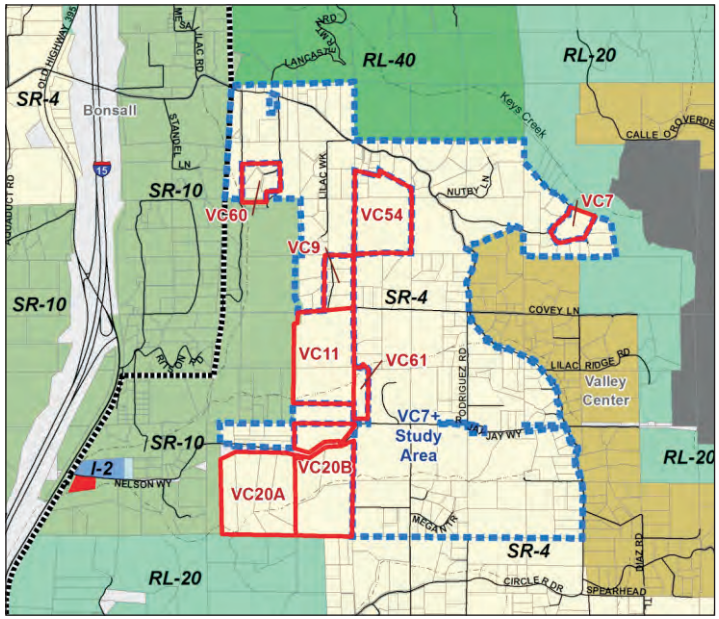
PSR
Village Residential (VR-10.9)
Semi-Rural Residential (SR-5)
Semi-Rural Residential (SR-1)
Semi-Rural Residential (SR-10)
Rural Lands (RL-20)
General Commercial
Open Space (Conservation)

No Scale

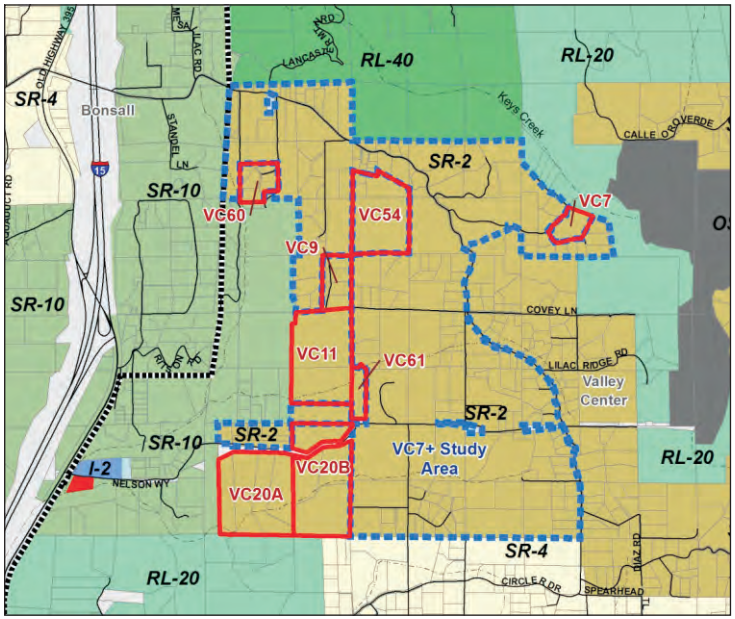
Source: County of San Diego 2017

SD15 Analysis Area Options

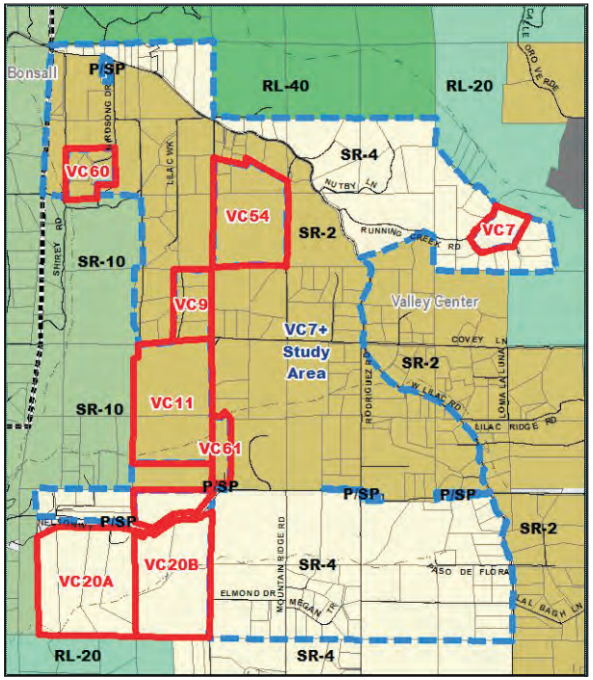
Figure 4-15



Existing GP Designation (366 DU)



Proposed GP Designation (619 DU)



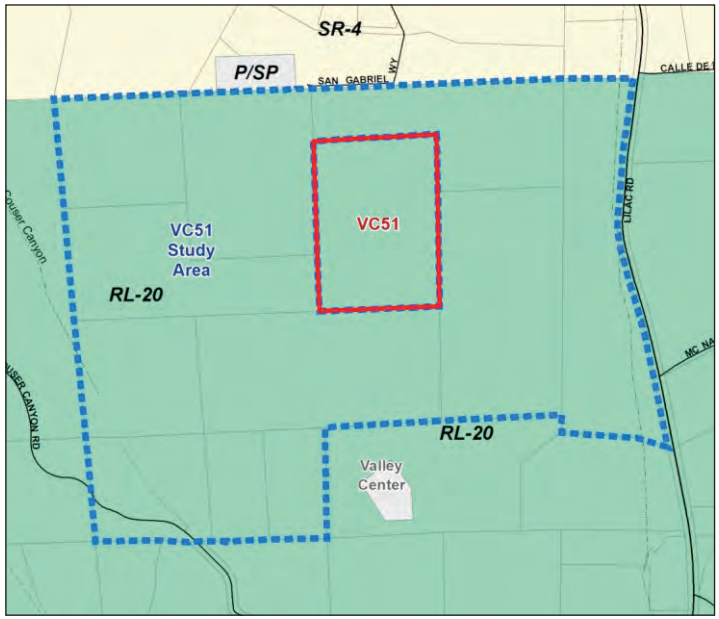
Reduced Density Alternative (507 DU)

No Scale

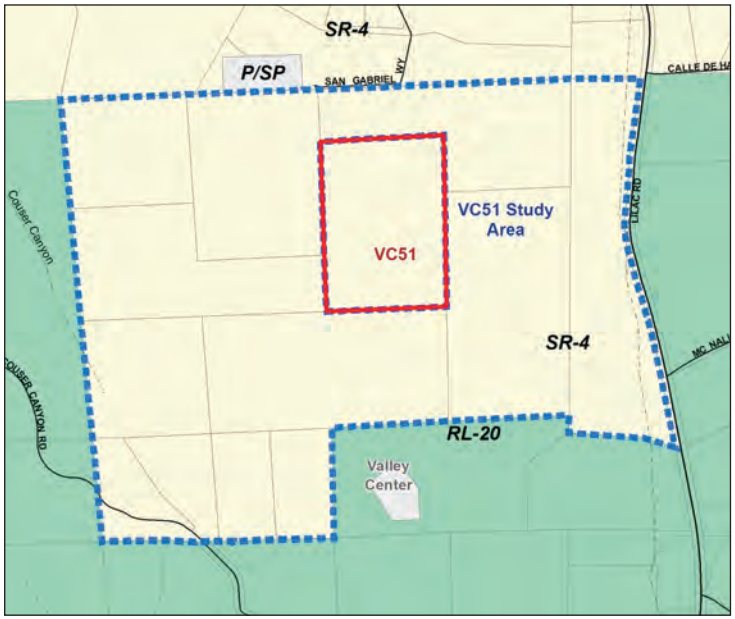
Source: County of San Diego 2017

VC7+ Analysis Area Options

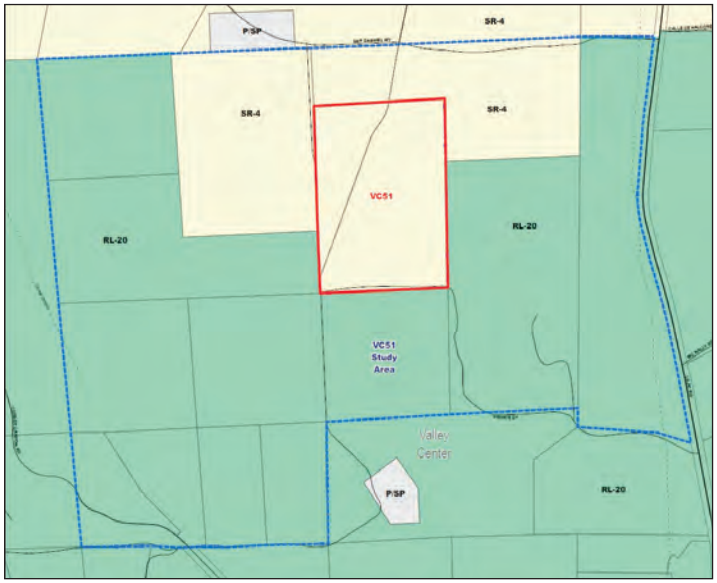
Figure 4-16



Existing GP Designation (14 DU)



Proposed GP Designation (27 DU)



Reduced Density Alternative (19 DU)

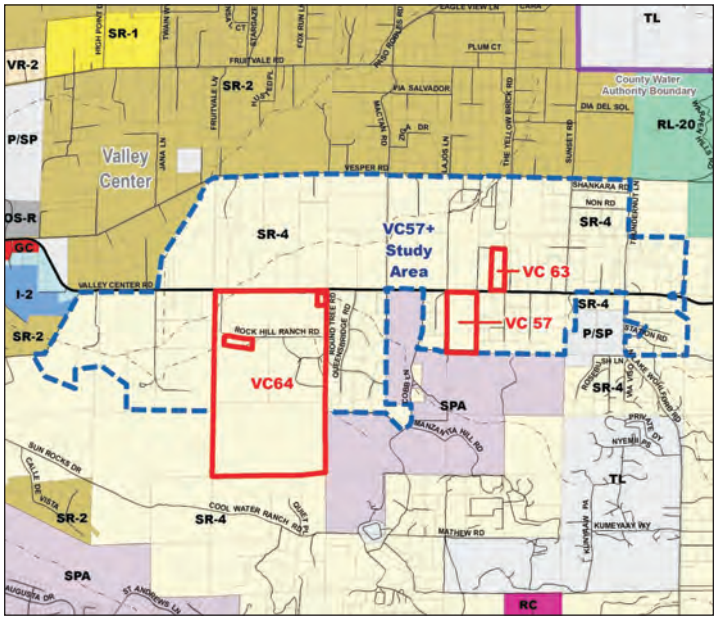
No Scale

Source: County of San Diego 2017

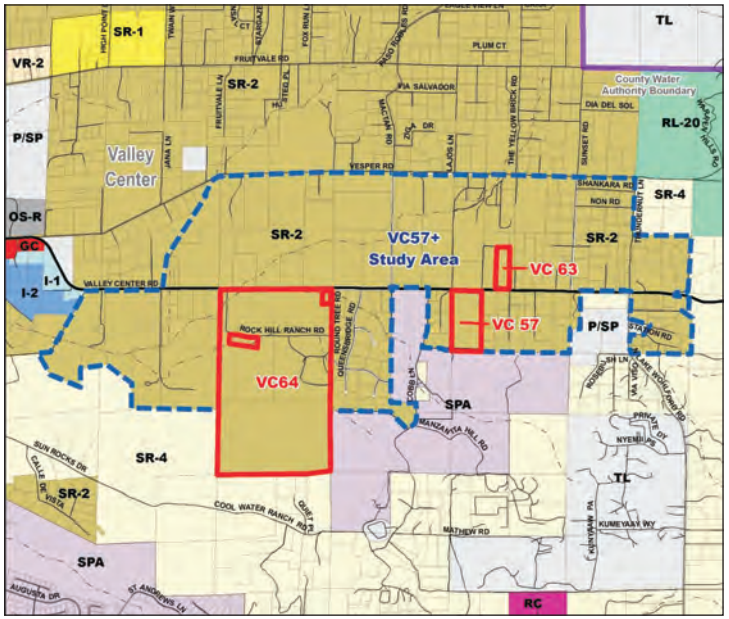
Note: 6 additional DUs possible outside Williamson Act contracts in proposed; with 3 additional in alternative

VC51 Analysis Area Options

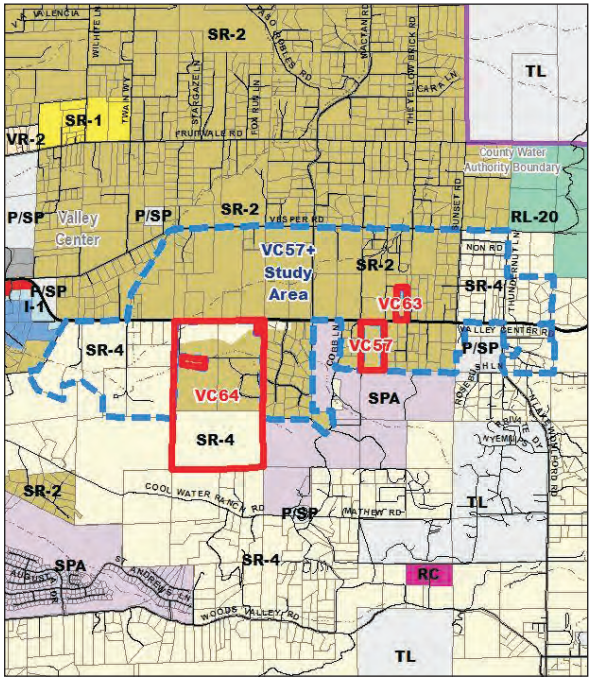
Figure 4-17



Existing GP Designation (374 DU)



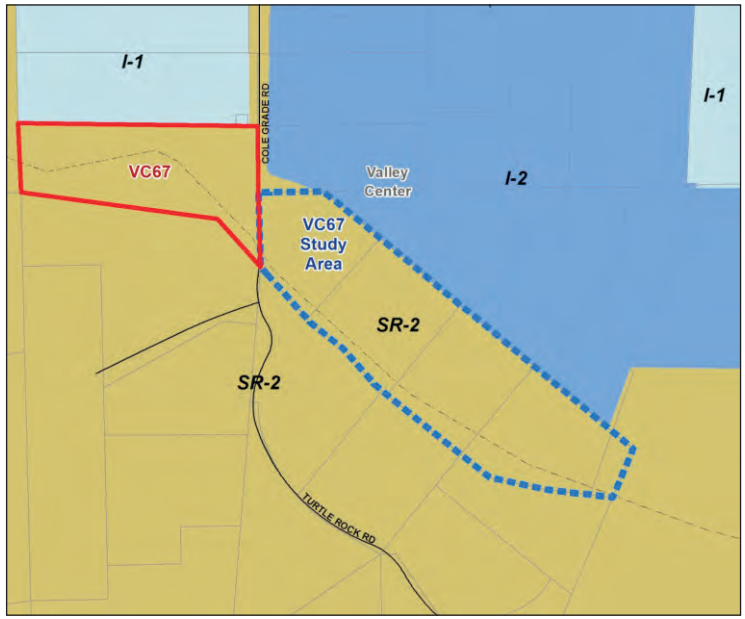
Proposed GP Designation (605 DU)



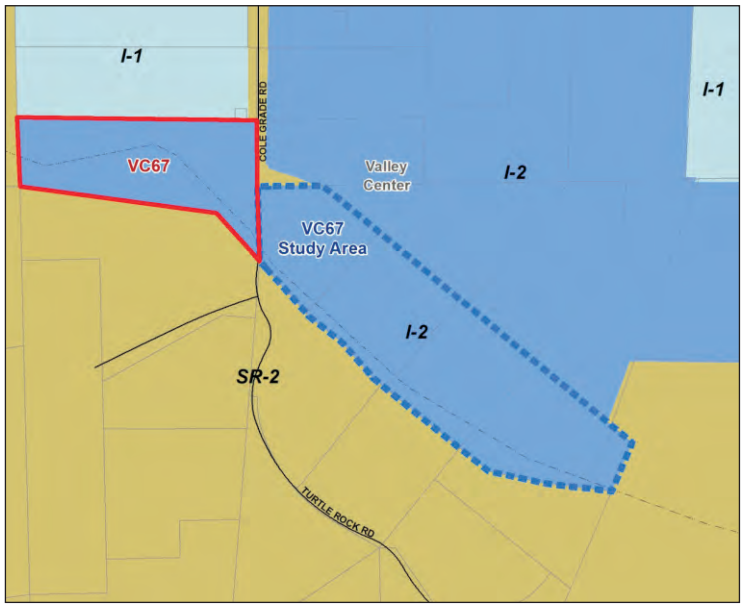
Reduced Density Alternative (524 DU)

No Scale

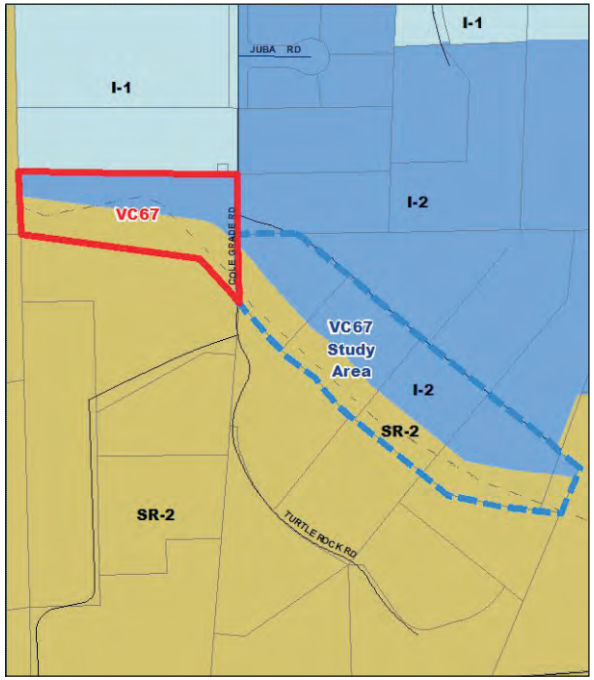
Source: County of San Diego 2017



Existing GP Designation



Proposed GP Designation



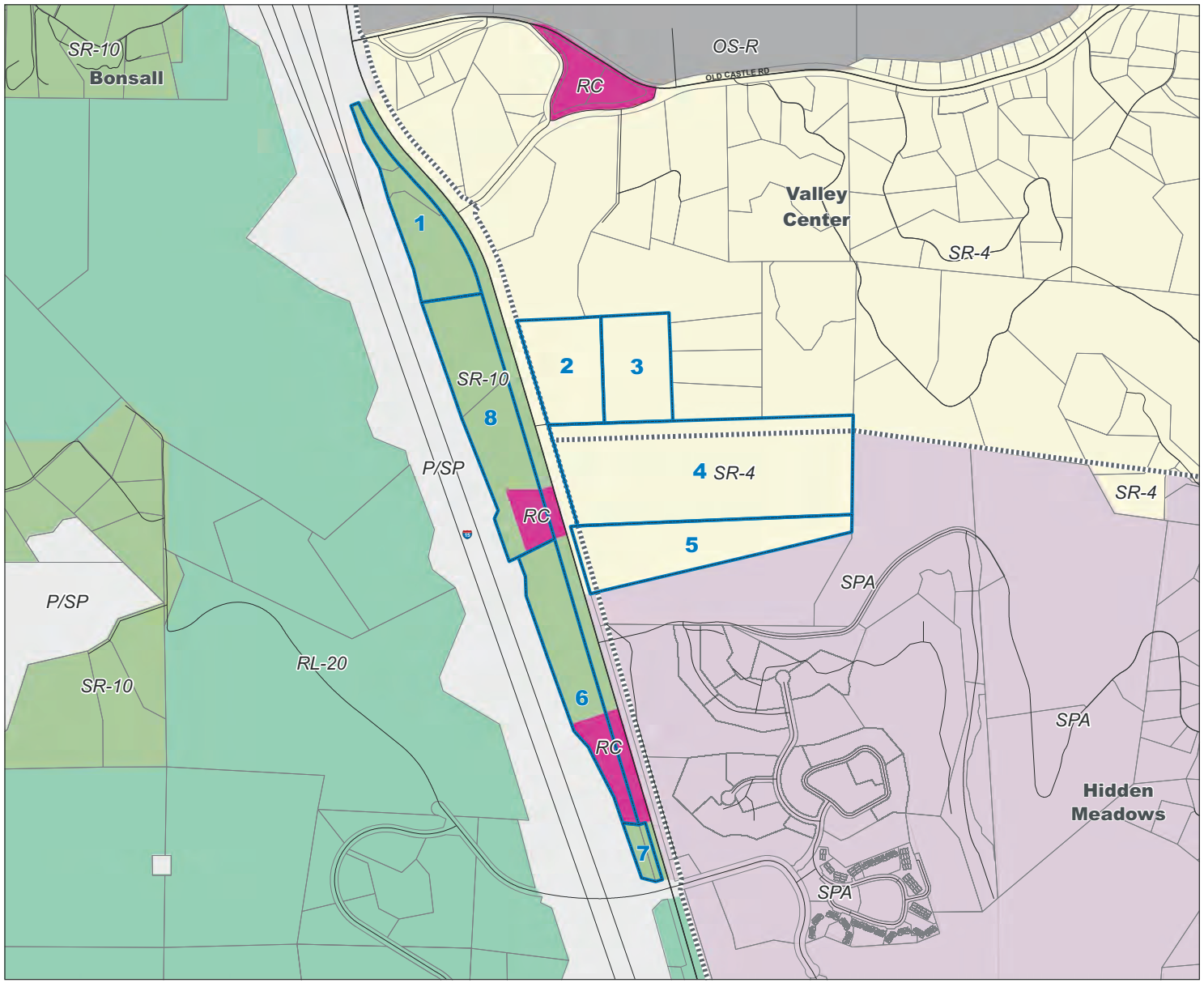
Reduced Intensity Alternative

No Scale

Source: County of San Diego 2017
Note: 100 foot buffer from creek remains SR-2

VC67 Analysis Area Options

Figure 4-19

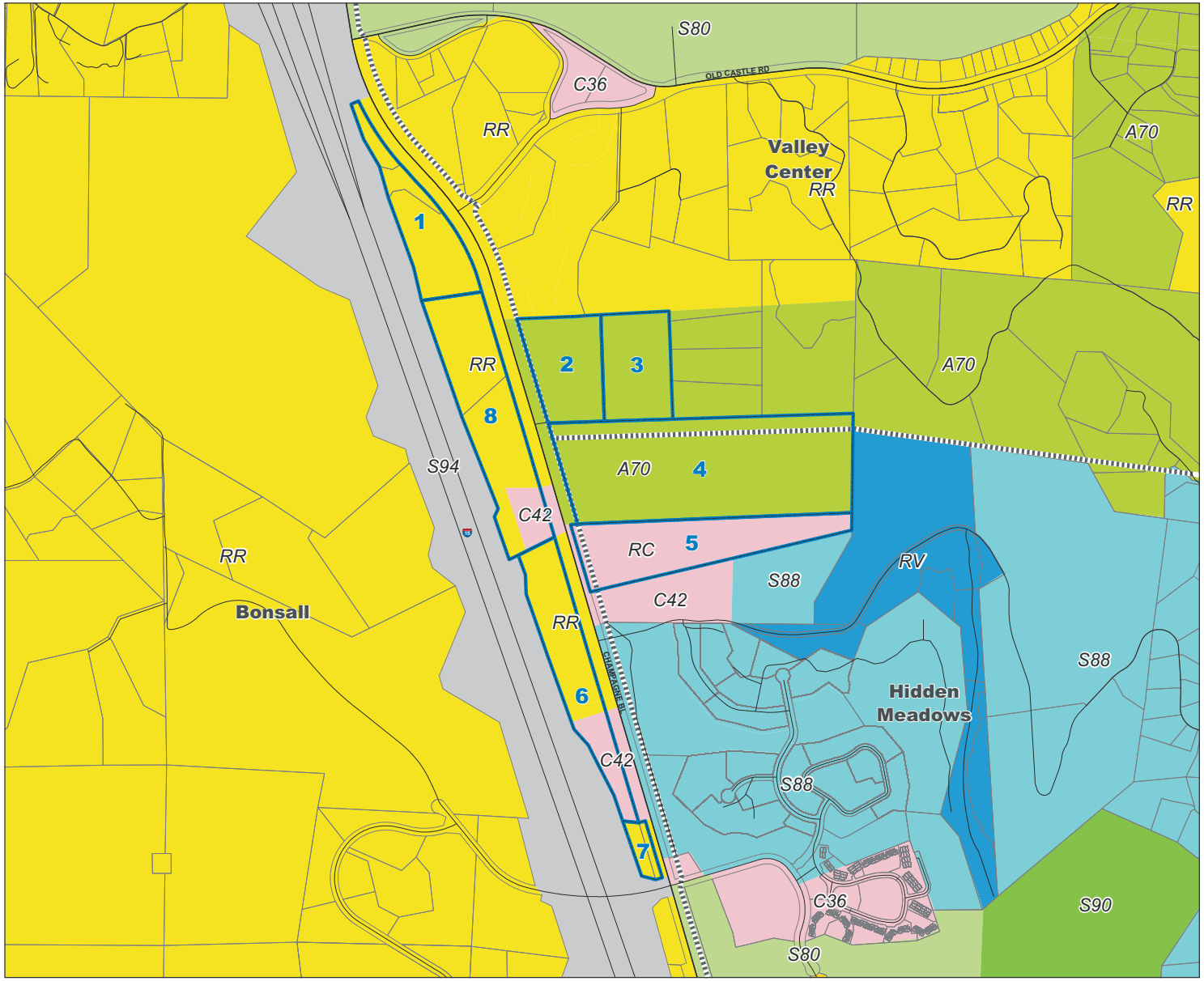


No Scale

Source: County of San Diego 2017

Former CGSP Area Land Use Designation Preliminary Staff Recommendation Map

Figure 4-20a



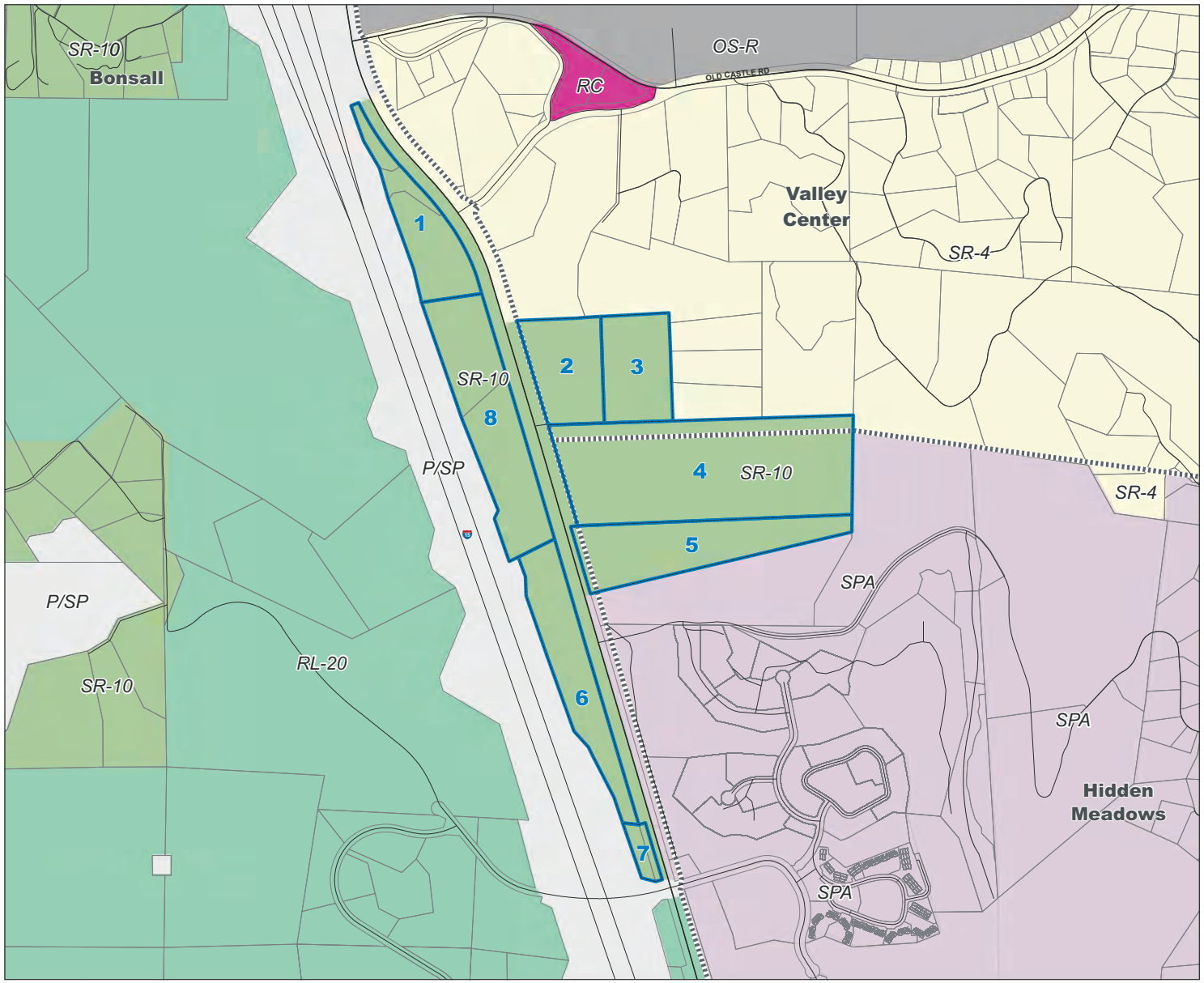
Subarea
Community Plan Area
A70 - Agriculture
C36, C42, RC - Commercial/Office
RR - Rural Residential
RV - Residential - Variable
S80 - Open Space
S88 - Specific Plan
S90 - Holding Area
S94 - Transportation and Utility

No Scale

Source: County of San Diego 2017

Former CGSP Area Zoning Designation Preliminary Staff Recommendation Map

Figure 4-20b

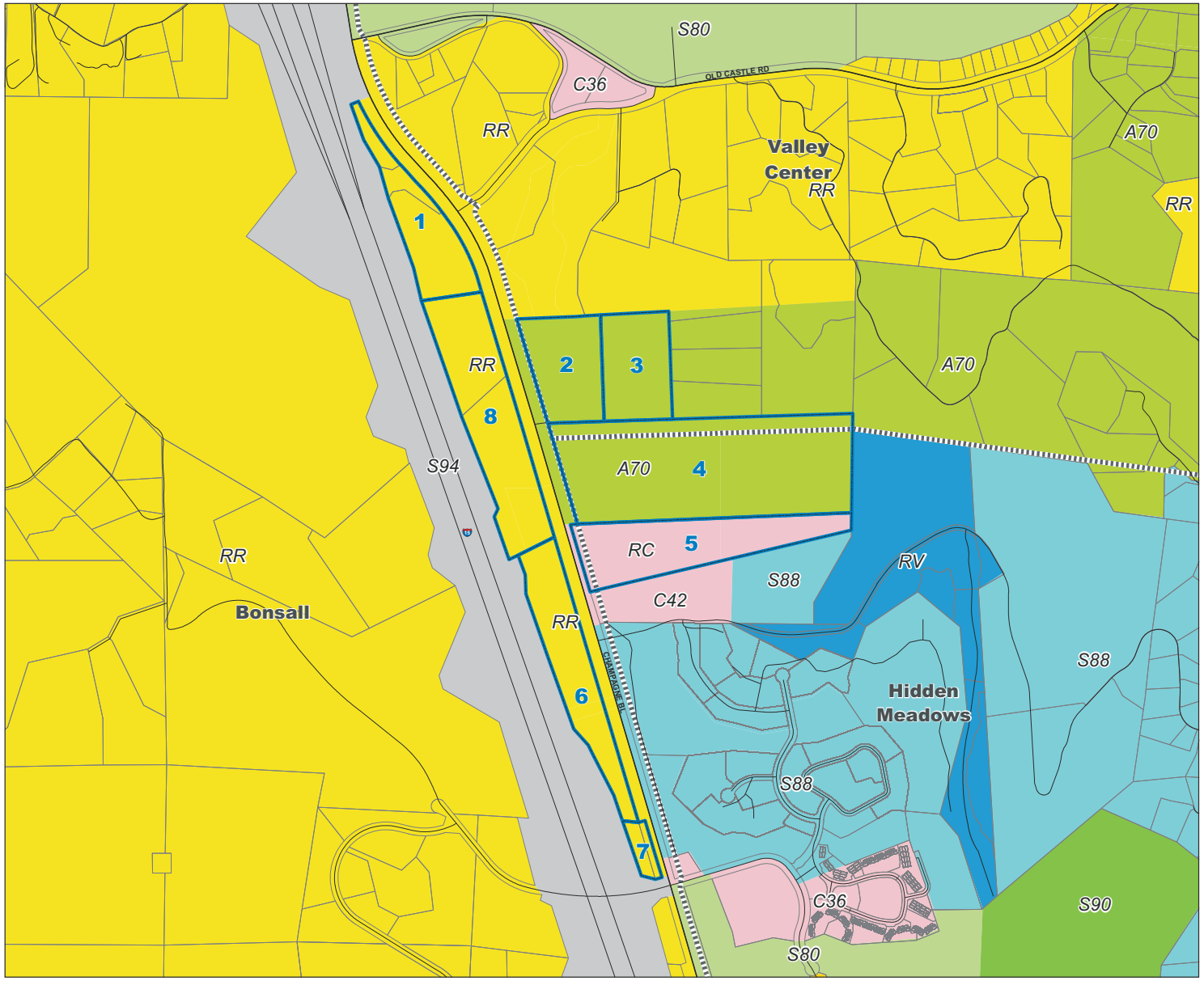


No Scale

Source: County of San Diego 2017

Former CGSP Area Land Use Designation Environmentally Superior Map

Figure 4-21a



- Subarea
- Community Plan Area
- A70 - Agriculture
- C36, C42, RC - Commercial/Office
- RR - Rural Residential
- RV - Residential - Variable
- S80 - Open Space
- S88 - Specific Plan
- S90 - Holding Area
- S94 - Transportation and Utility

No Scale

Source: County of San Diego 2017

Former CGSP Area Zoning Designation Environmentally Superior Map

Figure 4-21b