CHAPTER 4.0 PROJECT ALTERNATIVES

4.1 Rationale for Alternative Selection

In accordance with Section 15126.6(a) of the CEQA Guidelines, an EIR must describe a range of reasonable alternatives to the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The project could result in significant impacts related to visual, air quality, transportation/traffic, hazards (wildfire), agricultural resources, biological resources, cultural resources, and noise. Impacts of the project to air quality (construction only), agricultural resources, biological resources, cultural resources, hazards and noise (construction, stationary and vibration) would be reduced to less than significant levels through implementation of mitigation measures. Each of the alternatives addressed in this chapter were examined in order to determine the extent to which they would avoid or minimize the significant impacts associated with the project.

CEQA Guidelines Section 15126(d)(5) states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The CEQA Guidelines provide several factors that should be considered with regard to the feasibility of an alternative: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistent; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site (if an off-site alternative is evaluated).

According to the CEQA Guidelines Section 15126.6(d), discussion of each alternative should be sufficient "to allow meaningful evaluation, analysis, and comparison with the proposed project." Therefore, the significant effects of each alternative are discussed in less detail than those of the project, but in enough detail to provide decision-makers perspective and a reasoned choice among alternatives to the proposed project.

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

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

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

In the case of the project described in this EIR, both types of No Project Alternative apply and are discussed. The first No Project Alternative is the circumstance under which the project does not proceed. ~~Since~~ Because the project requires a General Plan Amendment and Rezone which involves a revision of an existing land use plan/regulatory plan~~. As such~~, one additional type of No Project Alternative is addressed. This includes an alternative which would allow development consistent with the General Plan and zoning and would retain the existing legal lots.

This EIR therefore fully evaluates the following that provide a reasonable range of alternatives that would avoid or substantially lessen significant impacts of the project.

1. No Project / No Development Alternative
2. No Project / Existing Legal Lot Alternative
3. General Plan Consistent Alternative
4. Reduced Footprint Alternative
5. Reduced Intensity Alternative
6. 2.2 C Alternative
7. Roadway Design Alternative
8. Mountain Ridge Road Fire Station Alternative

Six of these alternatives were selected in order to avoid or minimize significant impacts associated with the project while still meeting a majority of the project objectives. The Roadway Design Alternative was included to disclose the impacts that would occur if the project road modifications were not approved. The Mountain Ridge Road Fire Station Alternative is included to disclose the impacts that would result from locating a fire station in Phase 5 of the project. Thus, the analysis for the first six alternatives focuses on those issue areas identified as significant effects of the project (Chapter 2.0), while the Road Design Alternative and the Mountain Ridge Road Fire Station Alternative analysis includes all issue areas evaluated for the project (Chapters 2.0 and 3.0) to allow the decision maker to adopt the alternative without additional analysis.

Table 4-1 includes a matrix comparing the proposed land uses of the Alternatives. Table 4-1a provides a comparison of trip generation for each alternative. Table 4-2 compares impacts of all the Alternatives with the project (except the Roadway Design Alternative). Table 4-3 includes the impact comparison of each of the 10 roadway designs of the Roadway Design Alternatives to the project. These alternatives permit informed decision making and public participation because there is enough variation amongst the alternatives to provide a reasonable range. Specifically, the following criteria were considered.

The No Project/No Development Alternative, detailed in subchapter 4.2, considers the continuation of existing uses on the site. The existing 16 single-family homes would remain, and no new construction would occur. This alternative was selected as the No Project Alternative required by CEQA and would avoid both construction-period and long-term impacts associated with development of the proposed project.

The No Project / Legal Lot Alternative, detailed in subchapter 4.3, is included as another form of No Project Alternative under CEQA Guidelines Section 15126.6(e) to consider how a project site would develop subject to existing land use regulations. This alternative would allow for 49 single-family residential units all within the Semi-Rural General Plan Land Use Category. This alternative would result in a reduction of impacts compared to the proposed project due to the reduced amount of construction activity and the lower intensity of development.

The General Plan Consistent Alternative, detailed in subchapter 4.4, is included to provide an alternative that eliminates the need for a General Plan Amendment. This alternative was selected to provide a reasonable scenario for development of this site in conformance with the General Plan and Conservation Subdivision Ordinance. This alternative would result in a reduction of impacts compared to the proposed project due to the reduced intensity of construction and operation of land uses.

The Reduced Footprint Alternative, detailed in subchapter 4.5, provides an alternative that contains approximately the same number of units but reduces the development footprint by clustering the development within a 441.3-acre portion of the project site; 166.7 acres would be preserved as biological open space. This alternative was selected specifically to reduce significant impacts related to sensitive resources.

The Reduced Intensity Alternative, detailed in subchapter 4.6, provides an alternative that reduces the intensity of development in order to reduce the significant density related impacts of the project to traffic, air quality, and noise and transportation/traffic. This alternative would provide an intensity of use in the middle of the range between the No Project and proposed project by limiting development to 881 single-family detached homes and a 5.6-acre commercial area, which would support 75,000 square feet of commercial uses. This alternative would result in a reduction of impacts compared to the project due to the reduction of construction activity and operation of land uses.

The 2.2C Alternative, detailed in subchapter 4.7, provides an alternative that illustrates how West Lilac Road could be constructed to General Plan Mobility Element Road Classification of 2.2C, while retaining other key features of the project. This alternative includes Phases 1 and 2 of the Reduced Intensity Alternative and Phases 3, 4, and 5 of the project and would include a total of 1,365 units and a total of 15.3 acres/85,000 square feet of commercial uses.

The Roadway Design Alternative is based on the project as proposed with all, or some, of the various roadway segments described below constructed without design exceptions. It is noted that two of the roadway segments included in this alternative have roadway design options intended to address existing non-conformance with County Road Standards due to existing roadway conditions, including the alternative that addresses the West Lilac Road Bridge and an alternative that addresses the middle segment of West Lilac Road along the northern project boundary. All other aspects of this alternative would be the same as the project, including land uses. While this alternative does not reduce a project impact, the Roadway Design Alternative was included to disclose the impacts that would occur if the project road modifications were not approved.

The Mountain Ridge Road Fire Station Alternative was included to analyze impacts of providing a Fire Station in Phase 5 of the proposed project. This alternative would improve Mountain Ridge Road to public road standards providing access to a Fire Station. Two options for Mountain Ridge Road are included in this alternative. Option 1 would consist of reclassification to a standard Rural Residential Collector. Option 2 would consist of reclassification to Rural Residential Collector with a road exception that would allow the graded right-of-way to be reduced from 48 feet to 40 feet. This alternative removes the project's gates on Mountain Ridge Road that limit traffic flow through Phases 4 and 5. The Mountain Ridge Road Fire Station Alternative is included to disclose the impacts that would occur if a fire station and other associated improvements were constructed in Phase 5 of the project.

All of the alternatives are compared to the impacts of the project and are assessed relative to their ability to meet the basic project objectives. As described in Chapter 1.0, the project includes the following basic objectives:

1. Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County's Community Development Model for a walkable pedestrian-oriented mixed-use community.

2. Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes, and that provides public services and facilities that are accessible to residents of both the community and the surrounding area.

3. Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to the town and neighborhood centers.

4. Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.

5. Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.

6. Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.

7. Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.

Table 4-4 provides a matrix to show each alterative relative to each of the objectives.

4.1.1 Alternatives Considered but Rejected

CEQA Guidelines state that the EIR should identify any alternatives that were considered by the lead agency but were rejected, and briefly explain the reasons underlying the lead agency's determination. Among factors used to eliminate alternatives from detailed consideration in the EIR is failure to meet most of the basic project objectives or inability to avoid significant environmental effects (Guidelines 15126.6(c)).

4.1.1.1 Alternative Location

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative project site location should be considered if development of another site is feasible and if development of another site would avoid or substantially lessen significant impacts of the project. Factors that may be considered when identifying an alternative site location include: the size of the site; its location relative to major transportation corridors, employment centers and the availability of services (including commercial services along with public services, such as fire protection, libraries and schools); the General Plan (or Community Plan) land use designations, and availability of infrastructure. CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in looking at an off-site alternative is ". . . whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location."

With respect to an off-site location, there is no other similarly sized (600+ acres) parcel, or group of contiguous parcels available for assembly that is available for development as a compact village, close to I-15, in the Valley Center-Bonsall area. The location of the project within the I-15 corridor is important to meet the first project objective due to the proximity of the freeway and other infrastructure and services needed to serve the residents of the project. Much of the land along the I-15 corridor, located in the Valley Center, Fallbrook or Rainbow community plan areas is either too steep or outside the boundaries of the sewer and water district, to accommodate the proposed project.

The project site was assembled in order to create a project site large enough in size and scale to meet the project objectives, support a mixed-use village and accommodate all of the necessary infrastructure to serve the project. The Valley Center Community Plan includes two planned Villages, located near the geographical center of the Valley Center Community Plan area, approximately 10 miles from Interstate 15. These Villages, the land use designations for which reflect existing land use patterns, are designed to complete the existing community. The two Villages are planned to be located over 10 miles from the proposed project, on Valley Center Road. They would not be located along a major interstate freeway or other major transportation corridor. Implementing a village within either of the two Village areas identified in the community plan would therefore, likely result in substantially greater traffic impacts than associated with the project, since existing roadway infrastructure would not support large increases in intensity.

The two village sites identified in the Valley Center Community Plan would complete a Village as envisioned in that plan. These two sites pose many constraints and disadvantages relative to the location of the proposed project, including encumbered emergency access and evacuation; greater potential VMT and associated GHG emissions (see VMT analysis summary below); and substantially greater constraints and impacts relative to traffic and required roadway improvements to provide the increased capacity necessary to accommodate the proposed intensity.

A VMT analysis was conducted as a part of the traffic impact study completed for the project (see Appendix E). As shown in that analysis, constructing the project in its proposed location would result in an average vehicular trip length for the project of 7.6 miles, which is over a half-mile lower than the rest of the Valley Center community. That combined with the 0.1 mile trip length reduction that would occur within the Valley Center community as a result of the project would generally reduce traffic and GHG impacts relative to placing the project at an alternative Valley Center village location. Constructing the project in an alternative location would not achieve the trip length reductions, as alternative locations would be a greater distance from regional facilities (e.g., transportation corridors, employment centers and shopping).

This project would create a new Village, providing an additional location within the VCCP area with services and housing opportunities. The project area is positioned in proximity to the I-15 and within existing districts for sewer water and fire service. There is an adequate road network offering multiple routes throughout the project which connect to I-15. Placing the project in another location may result in additional issues related to traffic and services.

Further, the applicant already owns the project site and cannot reasonably acquire an alternative site. Thus, in accordance with CEQA Guidelines Section 15126.6(f), the acquisition of an alternative location would be considered infeasible.

Therefore, an alternative location was considered but rejected because of the (1) lack of a suitable-sized site, (2) lack of a site located in proximity to I-15 and existing service areas, (3) lack of ability to reduce VMT the potential for greater GHG emissions and traffic impacts, and (4) that the proponent cannot reasonably acquire an alternative site.

4.2 Analysis of the No Project/No Development Alternative

4.2.1 Description and Setting

The No Project/No Development Alternative would retain the site in its current condition. The project site currently supports agricultural uses including citrus, row crops, and avocados. There are 21 buildings on-site including 16 existing homes and agricultural buildings. Including the agricultural lands, a total of 17 habitat types and vegetation communities cover the project site. No new development would occur.

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

4.2.2.1 Visual

The No Project/No Development Alternative would result in fewer visual impacts compared to the project. The No Project/No Development Alternative would not change the existing visual quality of the project site. Views into the project area would not depict high-density development that would contrast with the existing undeveloped nature of the surrounding areas.

As detailed in subchapter 2.1, site planning and design standards are included in the Specific Plan to address potentially significant visual impacts. However, visual impacts would remain significant and unavoidable. Additionally, short-term visual impacts associated with construction of the project and cumulative impacts to the viewshed would remain significant an unavoidable.

The No Project/No Development Alternative would avoid the visual impacts associated with the project, including the impairment of visual resources and visual character during construction because it would not change the integrity of the existing site conditions. Impacts associated with this alternative would be less than significant and less than the project.

4.2.2.2 Air Quality

Under the No Project/No Development Alternative, maintenance of the existing condition of the project site would eliminate short-term emissions associated with grading and construction activities. Long-term operational emissions would also be less under this alternative, as there would be no new uses generating additional traffic or stationary source emissions.

Implementation of the project would result in significant and unavoidable impacts to air quality plan consistency, because the proposed population would be greater than the population forecasts used in regional air quality plans. As detailed in subchapter 2.2, implementation of the project would also result in significant construction and operational-related air quality impacts including the emission of criteria pollutants above threshold standards. Through compliance with existing regulations, and proposed policies contained in the Specific Plan, as well as the implementation of mitigation measures, construction-related air quality impacts would be reduced to less than significant levels. However, air quality plan consistency and operational impacts would remain significant and unavoidable.

Under the No Project/No Development Alternative, significant air quality impacts associated with the project would be avoided. Although some air quality impacts could occur from ongoing agricultural operations, the project site would conform to existing RAQs and construction- and new operational-related emissions would not occur. Impacts associated with this alternative would be less than the project.

4.2.2.3 Transportation/Traffic

Under the No Project/No Development Alternative, traffic generation would continue to total 192 trips based on the existing residences and related agricultural uses of the site. Traffic impacts would not occur. Because this alternative places no additional trips on the roadways, no significant impacts would occur and the level of traffic impacts resulting from the No Project/No Development Alternative would be less than the project.

4.2.2.4 Agricultural Resources

Under the No Project/No Development Alternative, no agricultural lands would be converted to other uses, and existing agricultural uses would continue, subject to existing market conditions. Likewise, because no new land uses would be introduced along the perimeter of the project site, potential agricultural adjacency impacts would not occur.

The No Project/No Development Alternative would avoid the conversion of significant agricultural lands and potential urban/agricultural interface conflicts. Therefore, while the project's impacts would be less than significant with mitigation, impacts associated with this alternative would be less than the project.

4.2.2.5 Biological Resources

The No Project/No Development Alternative would retain biological resources in the existing condition; therefore, there would be no direct impacts. Additionally, indirect impacts associated with project construction and long-term occupancy of the site by residents would not occur under this alternative, although continued agricultural use of the project site would have some indirect impacts on nesting birds and other wildlife. While there would be no loss of biological resources, the long-term preservation of resources would not be assured as with the project, which would include dedication of land in a permanent open space easement.

Overall impacts to biological resources associated with this alternative would be less than the project because there would be no direct impacts to biological resources.

4.2.2.6 Cultural Resources

Surveys of the project site revealed two cultural sites. The No Project/No Development Alternative would avoid impacts to both of these sites because no development would occur.

No grading activities (which might uncover unknown resources) would occur on the project site under the No Project/No Development Alternative. Therefore, no significant impacts to cultural resources would occur. Impacts associated with this alternative would be less than the project.

4.2.2.7 Hazards/Hazardous Materials

Like the project, this alternative would not include the transport, emission, or disposal of hazardous materials. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, the project would not create a significant hazard to the public or the environment. Neither the project, nor this alternative would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, or result in impacts associated with vectors.

As discussed in subchapter 2.7, the project site is located within very high and moderate FHSZs. It is also located within a mapped Wildland Urban Interface Area indicating its propensity for brush fires. The project would result in a potentially significant impact associated with wildland fires but would include large areas of irrigated landscape, paved roads, parks, and ignition-resistant developed area. In addition, the FPP prepared for the project identified that adequate fire services will be available to protect the project site.

The project would be conditioned on one of several scenarios relative to the provision of fire protection services for the project site. A remodeled or newly constructed fire station would assure adequate fire protection services are available to the development. No impacts were identified with the construction or remodeling of an existing fire station on- or off-site.

As no new development would occur under the No Project/No Development Alternative, there would not be a need for additional fire facilities, and no additional residents would be located on-site. Therefore, impacts due to fire hazards would be less under this alternative than the project.

4.2.2.8 Noise

Noise impacts associated with the No Project/No Development Alternative would primarily be due to the continued use of farm equipment, as well as occasional vehicle trips. Noise levels would be less than significant because the noise source would be intermittent and mobile, and there is a lack of sensitive receptors adjacent to the farming areas.

Although the project includes mitigation measures, the implementation of which would reduce most potentially significant noise impacts to less than significant, impacts

associated with this alternative would be less than significant and less than the project, because no new noise impacts would occur.

4.2.3 Conclusion

Implementation of the No Project/No Development Alternative would result in less potentially significant and significant impacts than the project. This alternative would avoid significant unavoidable impacts related to: visual (dominance, scale, diversity, and continuity, construction, and cumulative viewshed impacts); air quality (compatibility with the RAQS and operational emissions); noise (traffic-generated), and direct and cumulative traffic impacts. This alternative would also avoid significant and mitigated impacts associated with: direct and cumulative roadway segments and intersections; air quality (construction emissions); agricultural resources, biological resources, cultural resources, noise (construction, stationary and vibration), and, hazards/fire safety. The No Project/No Development Alternative would avoid potential agricultural conflicts completely and the loss of farmland of Prime or Statewide Importance.

The No Project/No Development Alternative would not meet any of the project objectives. This alternative would not provide housing needed to accommodate the future population growth in San Diego County in a manner that provides a range of diverse housing types, including mixed-use or senior housing and a group care facility. In addition, this alternative would not meet any of the project's objectives such as developing a community that would be consistent with the Community Development Model and providing a pedestrian-oriented, mixed-use community. This alternative would not construct parks or trails or provide any new recreational opportunities within the community, nor would it allow for the preservation of sensitive natural resources by setting aside land within a planned and integrated preserve area.

4.3 Analysis of the Legal Lot Alternative

4.3.1 Description and Setting

The Legal Lot Alternative (Figure 4-1) would allow development consistent with existing legal lots in accordance with the existing land use designation of Semi-Rural under the General Plan and the zoning. Under this alternative there would be a total of 49 single-family homes constructed on 2-acre minimum lots within the 608 acres. The scope of development of this alternative would require individual property owners to connect to water infrastructure and install a septic system for the treatment of wastewater. Because development would occur on individual lots in accordance with the current land use designation and under the existing legal lots that currently exist~~s~~, ~~there would be minimal~~ discretionary review would not likely be required. No commercial, mixed-use, parks, trails, or a school site would be developed. Development of this alternative would not necessitate the requirements to include a WRF, RF, recreational facilities, or civic uses, including a fire station.

4.3.2 Comparison of the Effects of the Analysis of the Legal Lot Alternative to the Proposed Project

4.3.2.1 Visual

Development under the Legal Lot Alternative would consist of 49 rural residential homes and would not change the visual quality of the project site because the 2-acre minimum lots would be comparable to existing rural residential development. The views into the area would not demonstratively contrast with the existing nature of the surrounding areas.

As discussed above, specific site planning and design standards are included in the project's Specific Plan to address potentially significant visual impacts. This includes the placement of the widest lots along the northern boundary of the project site in the area of the existing homes. The implementation of mitigation measures and design guidelines focused on the monitoring and maintenance of landscape plans result in a reduction of visual impacts; however, impacts relative to the visual environment in terms of dominance, scale, diversity, and continuity, as viewed from West Lilac Road and surrounding residential areas would remain significant and unavoidable. Additionally, short-term visual impacts associated with construction of the project and cumulative impacts to the viewshed would remain significant an unavoidable.

The Legal Lot Alternative would avoid visual impacts because the development of the 49 homes would not likely occur all at once and would resemble surrounding large-lot single-family development. There would be approximately five lots adjacent to West Lilac Road along the northern boundary of the project site avoiding significant visual impacts associated with the project. Impacts associated with this alternative would be less than significant and less than the project.

4.3.2.2 Air Quality

The Legal Lot Alternative would have a density consistent with regional air quality management plans. Therefore, there would be no impact associated with plan consistency. This alternative would generate 588 ADT, 97 percent less traffic than the project. Therefore, air emissions would be less because of the limited amount of traffic that would be generated from this alternative, and the minimal construction required to build a maximum of 49 homes.

The project would result in significant and unavoidable air quality impacts because the density proposed is greater than that considered in regional air quality plans. Additionally, the project would result in significant and unavoidable operational-related air quality impacts including the emission of criteria pollutants above threshold standards, and significant, but mitigable impacts associated with construction emissions.

Plan consistency impacts associated with this alternative would be avoided. In addition, reduced traffic levels by 97 percent would contribute to lower levels of operational air emissions. Likewise, because the number of lots that would be developed under this alternative is significantly less than the project, construction and operational impacts would be below threshold standards. Therefore, air quality impacts associated with this alternative would be less than significant and less than the project.

4.3.2.3 Transportation/Traffic

The Legal Lot Alternative would generate 588 ADT, less traffic than the project by approximately 97 percent. This alternative's traffic generation would not result in impacts to the existing LOS on surrounding area roadways. Because this alternative would generate less traffic than the project, and would avoid direct and cumulative impacts, traffic-related impacts associated with this alternative would be less than significant and less than the project.

4.3.2.4 Agricultural Resources

As property is developed on the existing lots under this alternative, there would be no mechanism to require dedicated agricultural buffer areas or assure continued on-site agricultural conditions. It is possible that as each lot develops under this alternative, existing agricultural lands within those lots would be converted to residential uses consistent with the existing land use designations and zoning. Therefore, development under this alternative could result in conflicts with adjacent agricultural activity. However, the existing legal lots are relatively large in size and significant direct adjacency/land use conflicts between residential and agricultural uses would not be anticipated. Agricultural interface compatibility impacts under this alternative would be less than significant.

The project would result in the conversion of some existing on-site agricultural lands to a non-agricultural use. Pursuant to County Guidelines, the existing legal lots are large enough to incorporate agriculture even if developed with a home; therefore, direct impacts to agriculture associated with this alternative would be less than the project.

4.3.2.5 Biological Resources

Significant impacts to biological resources could occur under the Legal Lot Alternative. Because development would occur on individual lots without discretionary review consistent with the existing legal lots and underlying zone. As development could occur on a parcel-by-parcel basis without discretionary review, there would not be the opportunity to conserve ~~the development would not require the preservation of~~ large areas of biological open space. Development could occur on individual parcels without the requirement for conservation easements over sensitive habitat. There would be less ability to avoid and preserve sensitive habitat, including wetlands.

The project would preserve a total of 104.1 acres of sensitive habitat within on-site open space easement areas. The open space would be protected in perpetuity, along with minimum 50-foot wetland buffers surrounding RPO wetlands that are located adjacent to proposed development. Mitigation measures for the project would reduce direct, indirect, and cumulatively significant biological impacts to less than significant.

Although the proposed project would result in a greater footprint than the no project alternative, the proposed project impacts are largely located on agricultural land with low biological resource value. Furthermore, the project avoids and/or mitigates for impacts to the sensitive biological resources located on-site. There would be no assurance that future development under the Legal Lot Alternative would avoid or mitigate for impacts to sensitive biological resources. Overall, impacts to biological resources associated with this alternative would be greater than the project because without the requirement of

discretionary review, there would be no mechanism by which to mitigate any impacts to biological resources that may occur under this alternative.

4.3.2.6 Cultural Resources

The Legal Lot Alternative could result in significant impacts to the on-site cultural resources because development would occur on individual lots consistent with the existing legal lots and the underlying zone. Therefore, such development would not be subject to the same discretionary review as the project and would not be required to implement measures, including grading monitoring and the development of a data recovery plan.

The project proposes mitigation measures that assure any potential impacts to cultural resources would be less than significant.

The Legal Lot Alternative would not have the benefit of these measures; however, the amount of grading that would likely occur in conjunction with the construction of single-family homes on 49 lots would be substantially less than that associated with the project. Both direct and indirect impacts to cultural resources associated with this alternative would therefore be less than the project.

4.3.2.7 Hazards/Hazardous Materials

Like the project, this alternative would not include the transport, emission, or disposal of hazardous materials. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would not create a significant hazard to the public or the environment. Neither the project, nor this alternative would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, or result in impacts associated with vectors.

As discussed in subchapter 2.7, the project site is located within very high and moderate FHSZs. It is also located within a mapped Wildland Urban Interface Area indicating its propensity for brush fires. Like the project, development under the Legal Lot Alternative would require conformance with the County Consolidated Fire Code and existing regulations associated with flammable building materials, allowable landscaping, and fire access. Each of the 49 individual homes would be required to show 100-foot FMZ, to construct driveways and access roads to County standards, and to assure adequate egress and for emergency vehicle use.

The Legal Lot Alternative would have similar protections against wildfire impacts. However, the Legal Lot Alternative would not require the construction of a new fire station, or any additional fire service options, in order to meet the required travel time and would result in fewer residents on-site. Therefore, impacts due to fire hazards would be less than the proposed project.

4.3.2.8 Noise

Noise impacts associated with the Legal Lot Alternative would primarily be due to vehicle trips. Noise levels would be less than significant because the noise source would be

intermittent and mobile, and because there would be fewer sensitive receptors adjacent to noise sources.

The project includes design and mitigation measures, the implementation of which would reduce most potentially significant noise impacts to less than significant. However, under this alternative noise-related impacts would be less than significant and less than the project because there would be fewer on-site sensitive receptors and substantially less traffic.

4.3.3 Conclusion

Implementation of the Legal Lot Alternative would result in fewer potentially significant and significant impacts than the project. This alternative would avoid significant unavoidable impacts related to: visual (dominance, scale, diversity, and continuity, construction, and cumulative viewshed impacts); air quality (compatibility with RAQS and operational emissions); and direct and cumulative traffic impacts. This alternative would also avoid significant and mitigated impacts associated with direct and cumulative roadways and intersections, noise, fire hazards, and agricultural and cultural resources. This alternative could, however, result in greater impacts to biological resources.

This alternative would not meet any of the project objectives. This alternative would allow 49 residences on rural lots spanning the project site and would not provide a range of public facilities, housing opportunities and commercial services to the neighborhood and community. It would not develop a pedestrian-oriented, mixed-use community, which is the basis for the project. This alternative would not construct parks, trails or a school site, an on-site WRF or RF and would, therefore, not achieve the principles of a sustainable village. This alternative would not provide a range of diverse housing types, including mixed-use housing and senior housing. This alternative would not provide social, public service, and commercial opportunities to both new and existing residents, while allowing for the preservation of sensitive natural resources by setting aside land within a planned and integrated preserve area.

4.4 Analysis of the General Plan Consistent Alternative

4.4.1 Description and Setting

The General Plan Consistent Alternative would allow development in accordance with the General Plan Land Use designation, Semi-Rural. Pursuant to the General Plan, the 530 acres of the project site within the Valley Center community plan area include two land use designations: 131 acres are designated Semi-Rural 10 (1 unit per 10, or 20 gross acres, depending on slope) and 399 are acres designated Semi-Rural 4 (1 unit per 4, 8, or 16 gross acres, depending on slope). Pursuant to the General Plan, the 78 acres of the project site within the Bonsall community plan area are designated with the Semi-Rural 10 Land Use designation.

This alternative would be subject to the County's Conservation Subdivision Ordinance (CSO), which requires the preservation of 75 percent of the project site within the SR-10 as open space. The CSO applies to the 131 acres within the SR-10 designation within Valley Center and the 78 acres within the SR-10 designation with Bonsall. Compliance with the CSO would thus require the preservation of 156.75 acres of open space on-site within the SR-10. Overall, this alternative would yield 110 single-family dwelling units.

The single-family homes would be clustered to preserve sensitive biological resources, as illustrated on Figure 4-2. Ninety-eight acres of open space would be preserved within the SR-4 land use designation, and 159 acres would be preserved within the SR-10, thus conforming to the requirements of the CSO.

The General Plan Consistent Alternative also would include half-width improvements to the existing West Lilac Road on the project site, consistent with General Plan Mobility Element roadway network standard Road 2.2C. All other internal roadways would be constructed to the same standard as proposed by the project. No gates would be included in this alternative.

In order to accommodate development consistent with the General Plan/CSO, this alternative would consist of two separate subdivisions accommodating 2-acre lot minimums for single-family homes. The northern subdivision (area known in the project as Phases 1, 2, and 3) would take access from West Lilac Road with internal private roadways. The southern subdivision (area known in the project as Phases 4 and 5) would take access from the existing Covey Lane and an additional access point would be provided from Mountain Ridge Road.

This alternative would include: approximately 256.6 acres of dedicated total open space. Due to the reduced scope of this alternative, it would not include a WRF, RF, school, or civic uses, including a fire station. The single-family homes would be served by septic systems. Parks and trails would be provided consistent with the County PLDO and Subdivision Ordinance requirements.

4.4.2 Comparison of the Effects of the General Plan Consistent Alternative to the Project

4.4.2.1 Visual

Development under the General Plan Consistent Alternative would consist of a 110-unit semi-rural residential community on larger lots than the village-based, higher density residential development of the project.

As discussed above, site planning and design standards are included in the project's Specific Plan to address potentially significant visual impacts. This includes the placement of the widest lots along the northern boundary of the project site in the area of the existing homes. Additionally, the implementation of mitigation measures and design guidelines focused on the monitoring and maintenance of landscape plans result in a reduction of visual impacts; however, impacts relative to the visual environment in terms of dominance, scale, diversity, and continuity, as viewed from West Lilac Road and surrounding residential areas would remain significant and unavoidable. Additionally, short-term visual impacts associated with construction of the project and cumulative impacts to the viewshed would remain significant and unavoidable.

The General Plan Consistent Alternative would result in development that would be more similar in character to surrounding land use patterns than the project. Lots would be an average size of over 2 acres. Over 250 acres of open space would be preserved on-site thus providing greater visual buffering from vantage points within the viewshed. Visual impacts associated with construction would be less than significant because grading would be limited to building pads and private roads. Overall, visual impacts

associated with this alternative would be less than the project due to the reduced density/intensity of development.

4.4.2.2 Air Quality

The number of lots under this alternative (110) is contemplated in existing County plans and SANDAG 2030 forecasts. Therefore, this alternative does not represent a conflict with San Diego RAQS or SIP, and impacts would be less than significant. This alternative would generate 1,320 ADTs, which would be approximately 93 percent less than the project. Traffic-related air quality impacts associated with this alternative would therefore be less than the project. Likewise, the construction of this alternative would require less grading, resulting in less than significant construction related emissions. Operational impacts associated with 110 single-family detached homes would be below the threshold standard and impacts would be less than significant.

The project has significant air quality impacts because the density proposed is greater than that considered in regional air quality plans and the resultant emissions from construction and operation exceed thresholds. This alternative would result in reduced construction and operational traffic levels, therefore, contributing a lower level of air emissions than the project. Therefore, air quality impacts associated with this alternative would be less than the project.

4.4.2.3 Transportation/Traffic

This alternative would generate 1,320 ADTs, which would be approximately 93 percent less than that generated by the project. Because most roads surrounding the site currently operate at LOS A, the existing road system would be able to accommodate both direct and cumulative traffic associated with this alternative. Traffic impacts under this alternative would be less than significant and less than those of the project.

4.4.2.4 Agricultural Resources

This alternative would result in the subdivision of 110 lots. Like the project, development of this alternative would result in conversion of agricultural land and indirect impacts, including exposure to noise, odors, and agricultural chemicals that are associated with adjacency to off-site agricultural resources.

Like the project, the General Plan Consistent Alterative, would reduce significant agricultural adjacency conflicts through the implementation of HOA-maintained agricultural buffers within residential lots. Because this alternative proposes substantially larger lots, a greater amount of on-site open space and no school, fewer areas of agricultural adjacency conflicts would occur. This alternative would preserve 256.6 acres of primarily biological open space pursuant to CSO requirements and would not include any areas of dedicated common area open space/agriculture. Agricultural activities may continue where they presently occur on-site within wetland buffers and other limited areas within dedicated open space. Similar to the project, this alternative could result in significant impacts to agricultural resources that would be mitigated through the same measures as identified for the project.

Overall, this alternative would result in fewer agricultural impacts as compared to the project.

4.4.2.5 Biological Resources

Like the project, development under the General Plan Consistent Alternative would include the preservation of on-site wetland areas. However, consistent with the CSO, this alternative would preserve 256.6 acres of on-site open space for the protection of sensitive biological resources, compared to the 104.1 acres preserved by the project. Like the project, this alternative would assure that the open space is protected from intruders. Additionally, an HOA would provide control over pet activity, providing on-leash requirements. Likewise, trails would be regularly maintained to protect against accumulation of debris.

Like the project, this alternative would be required to provide mitigation for impacts to sensitive habitats, species and wildlife movement, including the off-site purchase of sensitive land within the proposed North County MSCP PAMA.

Overall, biological impacts would be less due to the reduced footprint and greater preservation of on-site open space, under this alternative compared to the project.

4.4.2.6 Cultural Resources

The General Plan Consistent Alternative would entail substantially less grading than would be required for the project, as 256.6 acres would be preserved in open space, significantly fewer homes would be constructed and less infrastructure would be required compared to the project. Under the General Plan Consistent Alternative, impacts to cultural resources would be mitigated in the same fashion as for the project, including grading monitors and data recovery, if necessary. Therefore, impacts associated with this alternative would be less than the project, because there would be less area of ground disturbance, which may lead to uncovering archaeological resources.

4.4.2.7 Hazards/Hazardous Materials

Like the project, this alternative does not include the transport, emission, or disposal of hazardous materials. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would not create a significant hazard to the public or the environment. Neither the project, nor this alternative would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, or result in impacts associated with vectors.

As discussed in subchapter 2.7, the project site is located within very high and moderate FHSZs. It is also located within a mapped Wildland Urban Interface Area indicating its propensity for brush fires. Like the project, development of a subdivision under the General Plan Consistent Alternative would be regulated by the County requirements for fire safety, including the Consolidated Fire Code and existing regulations associated with flammable building materials, allowable landscaping, and fire access. Like the project, this alternative would require discretionary review, and therefore, would be required to develop and implement a FPP to address fuel management, emergency access, and other wildland fire safety issues. With the larger lots proposed, a 100-foot FMZ would be provided throughout the site.

The project also would be conditioned on one of several scenarios relative to the provision of fire protection services for the project site. Therefore, adequate fire protection services would be provided to the project site and the fire department would be able to respond within required times. This alternative would not require options for the expansion or construction of an additional fire facility; therefore, impacts would be less compared to the project relative to this issue. Response times would remain the same as under the existing condition.

Although certain areas of the project would be unable to meet the standard 100-foot FMZ, the project includes a FPP that provides design measures to assure adequate fire protection especially in those areas. These measures provide equal safety measures as a 100-foot FMZ, and impacts would be less than significant with this mitigation, similar to the project.

4.4.2.8 Noise

This alternative project would construct 1,636 fewer residential units than the project and 93 percent fewer ADT, resulting in lower overall ambient traffic noise levels. However, nearly all the lots would have some portion within the noise contour of a road. This alternative could avoid significant impacts by precluding placement of home sites within the noise contours on the roadways through the filing of a Tentative Map or the requirement of Site Plans for individual lots.

The project would place residences adjacent to roadways where exterior and interior noise impacts are projected to exceed County standards resulting in significant impacts and therefore, mitigation in the form of additional noise analysis, placement of noise barriers and indoor attenuation is required.

Therefore, due to the reduced number of units, the noise impacts associated with this alternative would be less than the project.

4.4.3 Conclusion

Compared to the project, the GP Consistent Alternative would result in reduced visual impacts due to the reduced density/intensity of development that would occur within the site. Impacts associated with fire service time would be less because no new service options would be required for the DSFPD to serve the project site. This alternative also would reduce significant and unavoidable air quality impacts because it would conform to the existing air quality plans and result in fewer operational emissions due to fewer ADT. Likewise, significant and unavoidable cumulative traffic impacts would be reduced to less than significant. Significant mitigable air quality impacts associated with short-term construction would remain, but be reduced from those of the project. Significant and mitigated impacts associated with direct and cumulative roadways and intersections, agricultural, biological and cultural resources, noise, and hazards/hazardous materials and would be less than the project. No impacts would be greater.

This alternative would only meet three of the seven project objectives (3, 4, and 5). It would provide parkland and trails, as required by County ordinance. This alternative would preserve natural on-site habitat within a preservation easement pursuant to the CSO. This alternative would consist only of single-family detached residential housing with no on-site public facilities; therefore, it would not meet project objectives 1, 6, or 7.

The General Plan Consistent Alternative would not create a walkable mixed-use village; would not provide a range of housing and lifestyle opportunities in a manner that encourages non-automotive mobility; nor would it provide for a variety of housing including housing for seniors. Also, this alternative would not provide educational and neighborhood retail opportunities in close proximity to residential uses.

4.5 Analysis of the Reduced Footprint Alternative

4.5.1 Description and Setting

This alternative is designed to reduce the development footprint in order to increase preservation of sensitive biological resources on-site. As shown on Figure 4-3, the Reduced Footprint Alternative would entail clustering development on approximately 441.3 acres and the preservation of 166.7 acres of on-site biological open space. Residential development would be removed from the upland habitat in Phases 1, 2, and 3 of the project, and wetland buffers would be increased from 50 to 100 feet throughout the site. Additionally due to the fewer number of units, the on-site detention basin acreage would be reduced from 9.4 to 5.4 acres; the wet weather storage would be reduced from 8.1 to 5.5 acres; and the school site would be reduced in size from 12 acres to 9 acres. In turn, a greater amount of upland habitat would be preserved in Phase 3.

Development of this alternative would include 1,251 residential dwelling units, including: 783 single-family detached homes on 142.14 acres (5.5 du/ac) and 468 senior housing units on 71.1 acres (6.6 du/ac). No single-family attached or mixed-use would be provided under this alternative due to the reduced amount of developable area. The alternative would include 25,000 square feet of specialty commercial located on 6 acres within Phase 2 only. No commercial would be provided within Phases 3 and 4, due to the reduced footprint and fewer number of dwelling units to support such uses on-site. No recycling facility and trailhead, private recreation facility or group care would be provided under this alternative. This alternative would include the WRF, a school site, 18 acres of institutional uses in Phase 5, and 16 acres of parkland, approximately 8 acres less than provided by the project due to fewer number of on-site residents. Under this alternative 166.7 acres of biological open space would be provided on-site, along with 20.2 acres of common area and agriculture.

All roadways would be private for this alternative, similar to the project. Also, under this alternative an on-site fire station or renovation to a nearby station or other fire service improvement options would be required as for the project. Like the project, the Reduced Footprint Alternative would require both a General Plan Amendment and Specific Plan and would include the preparation of a Site Plan for any type of development permit. As with the project, this alternative would require a General Plan Amendment to change the Regional Category from Semi-Rural to Village. This alterative would require a land use designation of VR-2.9 for the residential areas. The commercial area would require a designation of General Commercial and also would require a Rezone of the 6-acre commercial site to General Commercial.

4.5.2 Comparison of the Effects of the Reduced Footprint Alternative

4.5.2.1 Visual

Development under the Reduced Footprint Alternative would consist of a primarily residential community clustered within the disturbed/non-biologically sensitive portions of the project site. Like the project, the resulting pattern and intensity of development would contrast with the existing viewshed of the project site; however, to a lesser degree due to the decreased number of units and the increase in amount of open space.

As discussed above, specific site planning and design standards are included in the project's Specific Plan to address potentially significant visual impacts. This includes the placement of 100-foot-wide lots along the northern project perimeter adjacent to existing homes near the existing West Lilac Road. Additionally, the implementation of mitigation measures and design guidelines focused on the monitoring and maintenance of landscape plans result in a reduction of visual impacts; however, impacts relative to the visual environment in terms of dominance, scale, diversity, and continuity, as viewed from West Lilac Road and surrounding residential areas would remain significant and unavoidable. Additionally, short-term visual impacts associated with construction of the project and cumulative impacts to the viewshed would remain significant an unavoidable.

For the Reduced Footprint Alternative, development would be concentrated within a smaller portion of the project site. Lots adjacent to the northern perimeter near the existing West Lilac Road would be generally the same size as those proposed by the project, although there would be fewer lots under the Reduced Project Alternative, due to the preservation of upland habitat in this area. Like the project, the lots proposed along the northern boundary of the project site would require landscaping controls to soften the visual transition into the project site at this location. Because of the fewer number of units along the northern project boundary and within the Town Center, visual impacts under this alternative would be less than those of the project.

4.5.2.2 Air Quality

This alternative would include approximately 30 percent fewer units than the proposed project. However, like the project, the density associated with this alternative would be inconsistent with the General Plan and would be greater than that considered in regional air quality plans. Therefore, like the project, this alternative would result in significant unavoidable impacts associated with regional air quality management plans.

This alternative would generate approximately 12,430 ADT, which would be 37 percent less than the project. Traffic-related operational air quality impacts associated with this alternative would therefore be less than the project.

The construction of this alternative would require less grading because it is within a more compact area. Construction activities would be subject to the same mitigation as those for the project, and thus construction-related air quality impacts also would be less than significant with mitigation and slightly less than the project.

The project's operational-related air quality impacts associated with land uses would be significant due to the emission of ROG, CO, and PM_{10} above established thresholds. While project design and mitigation measures are proposed, including the development

of educational programs and materials for residents, impacts would remain significant after mitigation.

Because there would be fewer ADT and development would be more compact, related emissions would be less than the project and, air quality impacts associated with this alternative would be less than the project.

4.5.2.3 Transportation/Traffic

This alternative would generate 12,430 ADTs, which would be 37 percent less than the project. This alternative, therefore, would result in fewer direct impacts to existing roadways and intersections and cumulative impacts would also be reduced. Like the project, significant impact to roadway segments or intersections would be reduced to less than significant levels through payment of TIF fees or through the provision of improvements, as feasible. Also similar to the project, it would not be feasible to mitigate for impacts to Caltrans facilities because the improvements to those facilities are the responsibility of another jurisdiction, and other impacts would be unavoidable since the mitigation would not be proportional to the project impact (see subchapter 2.3.6 for additional information). Overall, traffic impacts under this alternative would be less than for the project.

4.5.2.4 Agricultural Resources

This alternative would preserve the majority of sensitive on-site habitat including upland habitat in Phases 1 and 3 and wetlands. Under this alternative, wetland buffers would increase to 100 feet from 50 feet, as proposed by the project. Existing agriculture located within this alternative's wetland buffers would remain.

This alternative would concentrate development within areas mapped as orchards, intensive, or extensive agriculture and would retain 20.2 acres of common areas/agriculture on-site, same as the project. Due to the reduced development footprint, this alternative would have fewer areas of adjacency conflict with off-site agricultural lands. Both the project and this alternative would retain a total of 20.2 acres of common area open space subject to HOA maintenance, but would result in significant agricultural impacts.

Because fewer potential areas of agricultural adjacency would occur, impacts to agricultural resources would be less under this alternative.

4.5.2.5 Biological Resources

This alternative would preserve a total of 166.7 acres of land within dedicated biological open space. The preserved areas include wetland and upland habitat. Wetland buffers would be increased from 50 under the project to 100 feet. By maintaining sensitive vegetation in open space, a local wildlife corridor could continue where primarily small mammals roam and forage. The project would preserve 104.1 acres of wetlands and wetland buffers in open space. The project's development of the agricultural lands in the southern portion of the project site limits on-site wildlife corridors to the preserved drainages.

While the project's biological impacts would be mitigated to less than significant, this alternative would preserve more sensitive biological resources; therefore, impacts to sensitive habitats, species and wildlife movement would be less than significant and less than the project.

4.5.2.6 Cultural Resources

The Reduced Footprint Alternative would entail less grading than would be required for the project, as 63 additional acres would be preserved in open space for the preservation of biological resources. Under the Reduced Footprint Alternative, impacts to cultural resources would be mitigated to the same degree as the project, including grading monitors and data recovery, if necessary. Therefore, impacts associated with this alternative would still be significant, but there would be less potential to encounter subsurface resources; therefore, impacts would be less than the project.

4.5.2.7 Hazards/Hazardous Materials

Like the project, this alternative does not include the transport, emission, or disposal of hazardous materials. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would not create a significant hazard to the public or the environment. Neither the project, nor this alternative would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, or result in impacts associated with vectors.

As discussed in subchapter 2.7, the project site is located within very high and moderate FHSZs. It is also located within a mapped Wildland Urban Interface Area indicating its propensity for brush fires. Like the project, development under the Reduced Footprint Alternative would be regulated by the County requirements for fire safety, including the Consolidated Fire Code and existing regulations associated with flammable building materials, allowable landscaping, and fire access.

Like the project, this alternative would be required to develop and implement a FPP to evaluate the level of potential fire hazard affecting the project site and propose methods and measures to minimize any identified hazard which would include establishing fire buffers and other construction measures to reduce fire hazards. The project's FPP includes mitigation measures aimed at assuring reasonable protection against wildland fires such as buffer zones and construction requirements and impacts would be less than significant with this mitigation.

Also like the project this alternative would require a GPA amending the project site's regional land use category from Semi-Rural to Village, reducing allowable fire service response time under the General Plan to five minutes. The project also would be conditioned on one of several scenarios relative to the provision of fire protection services for the project site. Therefore, adequate fire protection services would be provided to the project site and the fire department would be able to respond within required times. No impacts were identified with the construction or remodeling of an existing fire station on- or off-site.

Like the project, fire services response impacts under this alternative would be provided through one of four Fire Options described for the project. Therefore, this alternative's impacts associated with hazards would be similar to the project.

4.5.2.8 Noise

Like the project, development of this alternative would place residential lots within roadway noise contours, where exterior and interior noise levels are projected to exceed County standards, resulting in the potential need for noise barriers and interior and exterior noise attenuation. This alternative would be conditioned with mitigation similar to the project, including noise protection easements over those areas where noise may exceed County standards.

Due to the fewer number of units, and associated reductions in traffic and lesser quantity of grading proposed under this alternative, noise impacts relative to both construction and operational noise would be less under this alternative compared to the project.

4.5.3 Conclusion

The Reduced Footprint Alternative would reduce the significant and unavoidable visual quality impacts associated with the project. Because this alternative would place fewer lots adjacent to the northern project perimeter, visual impacts to views along the existing West Lilac Road would be less under this alternative than for the project. Significant and unavoidable cumulative traffic impacts also would be reduced under this alternative.

Due to the fewer number of units and fewer ADT, operational air quality, traffic, and noise impacts would be less under this alternative as compared to the project. Due to the smaller development footprint and reduced quantity of grading required, impacts related to agricultural, biological and cultural resources would be less under this alternative as compared to the project. Agricultural resource impacts also would be reduced under this alternative, as there would be fewer areas for potential agricultural adjacency conflicts. Finally, both the Reduced Footprint Alternative and the project would result in similar impacts relative to hazards, and each would be required to prepare an FPP and provide for additional fire services to serve the project site.

This alternative would meet six of seven project objectives. This alternative would meet objectives 1, 2, 3, 4, 5, and 7. This alternative meets these objectives because it would develop a project consistent with the Community Development Model and provide a range of housing styles with adequate public facilities. The alternative would provide a variety of recreational opportunities including parks for active and passive activities and trails and would preserve sensitive natural resources by setting aside land within a planned and integrated preserve area. This alternative would also integrate major physical features in the project design, as it would preserve the majority of natural habitat on-site. Also, under this alternative, all roads would be private, thereby including to the maximum extent possible, state of the art hydrological technology for reducing urban runoff. Finally, this alternative would provide a range of social uses within walkable distance from residential uses.

This alternative would not meet objective 6 because it does not provide mixed-use housing.

4.6 Analysis of the Reduced Intensity Alternative

4.6.1 Description and Setting

In order to reduce impacts associated with intensity of land use, the Reduced Intensity Alternative would create a less dense community with a smaller commercial area compared to the project. This alternative's design would direct the densest portion of the development to the flattest northern portion of the site, closest to the proposed commercial area. Grading for West Lilac Road to County standard 2.2C through the northern portion of the project site would result in a large flat mesa near the site's northern boundary. This would create a long sloping transition from the north (along the toe of slope) toward the south. The slope that would result from the construction of West Lilac Road through the project site would only allow for larger lots to the south of the road. This is due to engineering constraints resulting from the flat bench of slopes that would be required to grade the road to a 2.2C standard. Therefore, the higher density and commercial pads would be located along West Lilac Road. As shown on Figure 4-4, development of this alternative would include two single-family neighborhoods totaling 881 detached homes on 286.2 acres. The northern portion of the development would be in Phases 1, 2, and 3 and the southern portion would be in Phases 4 and 5. This alternative would include a 5.6-acre commercial area adjacent to a village square with 75,000 square feet of commercial uses. The commercial area under this alternative would be smaller (5.6 acres with 75,000 square feet of commercial space) compared to the project (10.4 acres of commercial/mixed-use with 80,000 square feet of commercial, 121 dwelling units, and a 50-room country inn). An institutional use area is included in this alternative which could accommodate a church or other civic use. A school is not proposed under this alternative. No attached single-family, senior housing, mixed-use or group care facilities would occur. Overall, grading for this alternative would be similar to the project because the proposed land uses cover the same area as the project. The intensity is reduced nonetheless because attached homes are replaced by single-family homes thereby reducing the density. This alternative would also include a 5.5-acre detention basin, 104.1 acres of biological open space, two parks (a 9-acre park dedicated to the County and a 3-acre HOA-maintained park), and 65 acres of common areas/agriculture. A WRF would be constructed to serve the on-site residents, similar to the project. Also, under this alternative an on-site fire station or renovation to a nearby station would be required as for the project.

The Reduced Intensity Alternative would reflect the alignment of West Lilac Road through the project site; however, it would be constructed consistent with the General Plan Mobility Element Road Standard 2.2C. All other internal roadways would be private and would be constructed to the same standard as proposed by the project. No gates would be included.

Like the project, the Reduced Intensity Alternative would require a GPA, Rezone, and approval of a Specific Plan. The GPA would change the land use designation for the majority of the project site from SR-4 and SR-10 to SR-0.5, which would be consistent with the Regional Category. Also, under this alternative, 5.6 acres would be designated as General Commercial and rezoned to C-36 General Commercial.

4.6.2 Comparison of the Effects of the Reduced Intensity Alternative

4.6.2.1 Visual

The Reduced Intensity Alternative would create substantially fewer lots than the project and would not include mixed-use or group care facilities. Despite the decrease in intensity of uses, the resulting pattern and density of development associated with this alternative would contrast with the existing viewshed of the project site.

As discussed above, specific site planning and design standards are included in the project's Specific Plan to address potentially significant visual impacts. This includes the placement of 100-foot-wide lots along the northern project perimeter adjacent to existing homes near the existing West Lilac Road. Additionally, the implementation of mitigation measures and design guidelines focused on the monitoring and maintenance of landscape plans result in a reduction of visual impacts; however, impacts relative to the visual environment in terms of dominance, scale, diversity, and continuity, as viewed from West Lilac Road and surrounding residential areas would remain significant and unavoidable. Additionally, short-term visual impacts associated with construction of the project and cumulative impacts to the viewshed would remain significant and unavoidable.

Under the Reduced Intensity Alternative, lots adjacent to the northern perimeter would be smaller than those proposed by the project in this location and the village square and commercial center would be located along the existing West Lilac Road. Like the project, the lots proposed along the northern boundary of the project site would require landscaping controls to soften the visual transition into the project site at this location.

Because of the increased intensity of development along the northern project boundary, impacts under this alternative would be similar, albeit slightly greater than those of the project relative to the viewing location, along West Lilac Road.

4.6.2.2 Air Quality

The Reduced Intensity Alternative, although including fewer units than the project, would have a density inconsistent with the General Plan and in turn regional air quality plans. Therefore, like the project, this alternative would result in significant unavoidable impacts associated with regional air quality management plans.

This alternative would generate 11,884 ADT which would be approximately 39 percent less than the project. Traffic-related, operational air quality impacts associated with this alternative would therefore be less than the project.

This alternative would require grading similar to the project. Due to the similar quantity of grading, construction-related emissions would be comparable. This alternative would implement standard dust control measures and, like the project, would have less than significant construction related air quality impacts.

Like the project, an educational program including the distribution of materials focused on reduced reliance on automobiles and using consumer products that would not result in precursor pollutants would be implemented by the HOA. However, because consumer

behavior cannot be enforced, direct and cumulative operational impacts would remain significant and unavoidable.

Overall, this alternative would have lower operational emissions than the project because it would generate fewer ADT; however, operational emissions including ROG, CO, and PM_{10}, would still be above thresholds levels and even with mitigation would not be reduced to less than significant levels. Overall, air quality impacts associated with this alternative would be less than the project.

4.6.2.3 Transportation/Traffic

This alternative would generate 11,884 ADT, approximately 39 percent less than the project. Because this alternative would result in fewer ADT than the project, direct impacts to roadway segments and intersections also would be less under this alternative. Like the project, significant impact to roadway segments or intersections would be reduced to less than significant levels through payment of TIF fees or through the provision of roadway improvements, as feasible. Also similar to the project, it would not be feasible to mitigate for impacts to Caltrans facilities because the improvements to those facilities are the responsibility of another jurisdiction, and other impacts would be unavoidable since the mitigation would not be proportional to the project impact (see subchapter 2.3.6 for additional information). Overall, because ADT would be less, traffic impacts under this alternative would be less than the project.

West Lilac Road would be constructed through the project site to County Road Standard 2.2C and would provide a capacity of 19,000 ADT (acceptable threshold is 13,500 ADT, LOS D). The Reduced Intensity Alternative would generate approximately 11,884 ADT. Therefore, the 2.2C classification for West Lilac Road would be sufficient to support traffic generated by the Reduced Intensity Alternative.

4.6.2.4 Agricultural Resources

Like the project, this alternative would include preserved biological open space areas, including wetland buffers. Existing agriculture located within this alternative's wetland buffers would remain.

As with the project, this alternative also would include multiple 50-foot buffers adjacent to active agriculture that would be maintained by the HOA. The inclusion of this design feature and other mitigation measures like those detailed in subchapter 2.4, would reduce potentially significant impacts related to urban/agricultural interface compatibility to less than significant for both this alternative and the project. Impacts related to agricultural compatibility would therefore, be similar under this alternative and the project.

The project proposes to retain approximately 20 acres of common open space and agriculture, while this alternative would retain 65 acres of common open space and agriculture. Nonetheless, this alternative would have a potential significant impact related to the conversion of an agricultural resource similar to the project. This is because the additional area to be preserved by this alternative does not include important agricultural resources as defined by the LARA model and the impact to important agricultural resources would remain the same as the project. Similar to the

project, this alternative could result in significant impacts to agricultural resources that would be mitigated through the same measures as identified for the project.

4.6.2.5 Biological Resources

This alternative would maintain the same general development footprint as the project, and would provide the same biological open space consisting of 104.1 acres. Impacts to sensitive habitats, species and wildlife movement would be mitigated similar to the project. Therefore, impacts to biological resources associated with this alternative would be similar to the project.

4.6.2.6 Cultural Resources

Because the limits of grading are similar between this alternative and the project, potential impacts to sensitive cultural resources also would likewise be similar. Mitigation measures for both this alternative and the project would include the use of a grading monitor to be present during grading to assure no additional resources are discovered and implementation of a data recovery plan should resources be discovered. Impacts to cultural resources associated with this alternative would be similar to the project.

4.6.2.7 Hazards/Hazardous Materials

Like the project, this alternative does not include the transport, emission, or disposal of hazardous materials. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would not create a significant hazard to the public or the environment. Neither the project, nor this alternative would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, or result in impacts associated with vectors.

As discussed in subchapter 2.7, the project site is located within very high and moderate FHSZs. It is also located within a mapped Wildland Urban Interface Area indicating its propensity for brush fires. Like the project, development of this alternative would be regulated by the County requirements for fire safety, including the Consolidated Fire Code and existing regulations associated with flammable building materials, allowable landscaping, and fire access.

Like the project, this alternative would require discretionary review, and therefore, would be required to develop and implement a FPP to reduce significant wildland fire hazards. The project's FPP includes mitigation measures aimed at assuring reasonable protection against wildland fires such as buffer zones and construction requirements and impacts would be less than significant with this mitigation.

Also like the project this alternative would require a GPA amending the project site's regional land use category from Semi-Rural to Village, reducing allowable fire service response time under the General Plan to five minutes. The project also would be conditioned on one of several scenarios relative to the provision of fire protection services for the project site. Therefore, adequate fire protection services would be provided to the project site and the fire department would be able to respond within required times. No impacts were identified with the construction or remodeling of an existing fire station on- or off-site.

Development of this alternative also would require a new or remodeled fire station. Overall, impacts associated with hazards would be similar to the project.

4.6.2.8 Noise

Like the project, development of the Reduced Intensity Alternative would place residential lots within roadway noise contours, where exterior and interior noise levels are projected to exceed County standards, resulting in the potential need for noise barriers and interior and exterior noise attenuation. Like the project, this alternative would be conditioned with mitigation measures requiring the dedication of noise protection easements over those areas where noise may exceed County standards.

Due to the reduced intensity/density proposed under this alternative and associated reductions in traffic, noise impacts relative to both construction and operations would be less under this alternative compared to the project.

4.6.3 Conclusion

The Reduced Intensity Alternative would not reduce the significant and unavoidable visual quality impacts associated with the project. Because this alternative would place smaller lots adjacent to the northern project perimeter, visual impacts to views along the existing West Lilac Road would be greater under this alternative than for the project. Significant and unavoidable cumulative traffic impacts would be reduced under this alternative.

Due to the reduced intensity of development and fewer ADT, operational air quality, traffic, and noise impacts would be less under this alternative as compared to the project. Because of the similar development footprint and grading required, impacts related to agricultural, biological and cultural resources would be similar for both this alternative and the project. Impacts relative to hazards also would be similar for this alternative and the project.

The Reduced Intensity Alternative would meet three of the seven project objectives. This alternative would meet objective 3 because it would provide a variety of recreational opportunities with parks and trails. It would integrate major physical features of the project site; therefore, meeting objective 4. It would also meet objective 5 by preserving sensitive natural resources. This alternative would not meet the remaining project objectives because it would not: provide a pedestrian-oriented mixed-use community; provide a range of housing and lifestyle opportunities in a manner that encourages non-automotive mobility; or provide diverse housing types including mixed-use and senior housing. It would also not provide residents educational opportunities in close proximity to residential uses.

4.7 Analysis of the 2.2C Alternative

4.7.1 Description and Setting

The 2.2C Alternative combines both Phases 1 and 2 of the Reduced Intensity Alternative with Phases 3, 4, and 5 of the project (see Figure 4-19). The intent of this alternative is to show how West Lilac Road could be constructed to a Mobility Element Road Standard

Classification of 2.2C road standard through the project site with the majority of project features remaining in place, to the greatest extent feasible.

The 2.2C Alternative would include reduced intensity as compared to the project in Phases 1 and 2: the commercial area would be smaller (5.6 acres with 75,000 square feet of commercial space) compared to the project (10.4 acres of commercial/mixed-use with 80,000 square feet of commercial, 121 dwelling units and a 50-room country inn). Grading for West Lilac Road to County standard 2.2C through the northern portion of the project site would result in a large flat area along the site's northern boundary. This would create a sloping transition from the north (along the toe of slope) toward the south. The resulting slope created from grading required to achieve the 2.2C road standard would only allow for larger lots to the south of the road. Therefore, the higher density and commercial pads would have to be located along the 2.2C roadway.

No mixed-use would occur in conjunction with the commercial center in the northern portion of the site under this alternative. This alternative's design would direct the densest portion of the development to the flattest northern portion of the site, closest to the proposed commercial area; therefore, the smaller lots are placed adjacent to the existing West Lilac Road. The remainder of the site (Phases 3, 4, and 5) would be developed identically to the project.

Overall, development of this alternative would include a total of 1365 units: 792 single-family detached homes on 177 acres; 468 senior housing units on 75.9 acres; 105 single-family attached units on 4.3 acres; and a total of 15.3 acres/90,000 square feet of commercial uses. This alternative would also include: a WRF, RF/trailhead, 5.5 acres of detention basins, a 12.0-acre school site; 2 acres of private recreation; 6.5 acres for a group care facility; 10.7 acres of institutional uses; 104.1 acres of biological open space; two parks (a 12-acre park dedicated to the County and a 11.8-acre HOA-maintained park), and 45 acres of common areas/agriculture.

The 2.2C Alternative would reflect the alignment of West Lilac Road through the project site as consistent with General Plan Mobility Element Road Standard Classification of 2.2C. All other internal roadways would be constructed to the same standard as proposed by the project. Development of this alternative also would require a new or remodeled fire station, or other fire service option as identified for the project. Like the project, the 2.2C Alternative would require a General Plan Amendment, Rezone, and approval of a Specific Plan.

4.7.2 Comparison of the Effects of the Reduced Intensity Alternative

4.7.2.1 Visual

The 2.2 C Alternative would construct fewer lots than the project within Phase 1 and 2 and would not include mixed-use development within those phases. Despite the slight decrease in intensity of uses, the resulting pattern and density of development associated with this alternative would contrast with the existing viewshed of the project site.

Site planning and design standards are included in the project's Specific Plan to address potentially significant visual impacts. This includes the placement of 100-foot-wide lots along the northern project perimeter adjacent to existing homes near the existing West

Lilac Road. Additionally, the implementation of mitigation measures and design guidelines focused on the monitoring and maintenance of landscape plans result in a reduction of visual impacts; however, impacts relative to the visual environment in terms of dominance, scale, diversity, and continuity, as viewed from West Lilac Road and surrounding residential areas would remain significant and unavoidable. Additionally, short-term visual impacts associated with construction of the project and cumulative impacts to the viewshed would remain significant an unavoidable.

Under the 2.2C Alternative, lots adjacent to the northern perimeter would be smaller than those proposed by the project in this location and the village square and commercial center would be located along West Lilac Road at the northern project perimeter. Like the project, the lots proposed along the northern boundary of the project site would require landscaping controls to soften the visual transition into the project site at this location. However, because of the increased intensity of development along the northern project boundary, impacts under this alternative would be slightly greater than those of the project relative to this viewing location.

4.7.2.2 Air Quality

The 2.2C Alternative, although including fewer units than the project, would have a density inconsistent with the General Plan and in turn regional air quality plans. Therefore, like the project, this alternative would result in significant unavoidable impacts associated with regional air quality management plans.

This alternative would generate 16,789 ADT, which would be approximately 14 percent less than the project. Traffic-related, operational air quality impacts associated with this alternative would therefore, be less than the project. However, operational air quality impacts associated with this alternative would be significant as daily emissions would likely exceed emissions thresholds.

This alternative would require grading similar to the project. Due to the similar quantity of grading, construction related emissions would be comparable. This alternative would implement standard dust control measures and, like the project, would have less than significant construction related air quality impacts.

Like the project, an educational program including the distribution of materials focused on reduced reliance on automobiles and low ROG/VOC consumer products would be implemented by the HOA. However, because consumer behavior cannot be enforced, direct and cumulative operational impacts would remain significant and unavoidable for both this alternative and the project.

Overall, this alternative would have lower operational emissions than the project because it would generate fewer ADT; however, operational emissions including ROG, CO, and PM_{10}, would still be above thresholds levels and even with mitigation would not be reduced to less than significant levels. Although air quality impacts associated with this alternative would be less than the project, they would remain significant.

4.7.2.3 Transportation/Traffic

This alternative would generate 16,789 ADT, approximately 14 percent less than the project. Because this alternative would result in fewer ADT than the project, direct

impacts to roadway segments and intersections also would be reduced under this alternative. Like the project, any significant impact to roadway segments or intersections would be reduced to less than significant levels through payment of TIF fees or the provision of roadway improvements, as feasible. Also similar to the project, it would not be feasible to mitigate for impacts to Caltrans facilities because the improvements to those facilities are the responsibility of another jurisdiction, and other impacts would be unavoidable since the mitigation would not be proportional to the project impact (see subchapter 2.3.6 for additional information). . Overall, because ADT would be less, traffic impacts under this alternative would be less than the project.

4.7.2.4 Agricultural Resources

Like the project, this alternative would include preserved biological open space areas, including wetland buffers. Existing agriculture located within this alternative's wetland buffers would remain.

As for the project, this alternative also would include multiple 50-foot buffers adjacent to active agriculture that would be maintained by the HOA. The inclusion of this design feature and other mitigation measures like those detailed in subchapter 2.4 would reduce potentially significant impacts related to urban/agricultural interface compatibility to less than significant for both this alternative and the project. Impacts related to agricultural compatibility would therefore, be similar under this alternative and the project.

The project proposes to retain approximately 20 acres of common open space and agriculture, and this alternative would retain 45 acres common open space and agriculture. However, due to the location of the additional preserve area not including important agricultural resources per the LARA model, this alternative would have a similar significant impact to the project related to the conversion of agricultural resources. Similar to the project, this alternative could result in significant impacts to agricultural resources that would be mitigated through the same measures as identified for the project.

4.7.2.5 Biological Resources

This alternative would maintain the same general development footprint as the project, and would provide the same biological open space consisting of 104.1 acres. Impacts to sensitive habitats, species and wildlife movement would be mitigated similar to the project. Therefore, impacts to biological resources associated with this alternative would be similar to the project.

4.7.2.6 Cultural Resources

Because the limits of grading are similar between this alternative and the project, potential impacts to sensitive cultural resources also would likewise be similar. Mitigation measures for both this alternative and the project would include the use of a grading monitor to be present during grading to assure no additional resources are discovered and implementation of a data recovery plan should resources be discovered. Impacts to cultural resources associated with this alternative would be similar to the project.

4.7.2.7 Hazards/Hazardous Materials

Like the project, this alternative does not include the transport, emission, or disposal of hazardous materials. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would not create a significant hazard to the public or the environment. Neither the project, nor this alternative would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, or result in impacts associated with vectors.

As discussed in subchapter 2.7, the project site is located within very high and moderate FHSZs. It is also located within a mapped Wildland Urban Interface Area indicating its propensity for brush fires. Like the project, development of this alternative would be regulated by the County requirements for fire safety, including the Consolidated Fire Code and existing regulations associated with flammable building materials, allowable landscaping, and fire access.

Like the project, this alternative would require discretionary review, and therefore, would be required to develop and implement a FPP to reduce significant wildland fire hazards. The project's FPP includes mitigation measures aimed at assuring reasonable protection against wildland fires such as buffer zones and construction requirements and impacts would be less than significant with this mitigation.

Also like the project this alternative would require a GPA amending the project site's regional land use category from Semi-Rural to Village, reducing allowable fire service response time under the General Plan to five minutes. The project also would be conditioned on one of several scenarios relative to the provision of fire protection services for the project site. Therefore, adequate fire protection services would be provided to the project site and the fire department would be able to respond within required times. No impacts were identified with the construction or remodeling of an existing fire station on- or off-site.

Development of this alternative also would require a new or remodeled fire station. Overall, impacts associated with hazards would be similar to the project.

4.7.2.8 Noise

Like the project, development of the 2.2C Alternative would place residential lots within roadway noise contours, resulting in the potential need for noise barriers and interior and exterior noise attenuation. Like the project, this alternative would include mitigation measures requiring the dedication of noise protection easements over those areas where noise may exceed County standards.

Due to the slightly reduced intensity/density proposed under this alternative, and associated reductions in traffic, operational noise impacts would be slightly less under this alternative compared to the project.

4.7.3 Conclusion

The 2.2C Alternative would not reduce the significant and unavoidable visual quality impacts associated with the project. Because this alternative would place smaller lots

adjacent to the northern project perimeter, visual impacts to views along the existing West Lilac Road would be greater under this alternative than for the project. Significant and unavoidable cumulative traffic impacts would be reduced.

Due to the slightly reduced intensity of development and fewer ADT, operational air quality, traffic, and noise impacts would be less under this alternative as compared to the project. Impacts related to agricultural, biological and cultural resources, and hazards would be similar for both this alternative and the project.

The 2.2 C Alternative is mostly similar to the proposed project in size, scope and proposed land uses; however, this alternative proposes a 2.2C standard road to bisect the northern portion of the project site. Under this alternative, the land use plan becomes segregated, as opposed to having a complete community with a unified identity, which is bifurcated by a major Mobility Element roadway. The net effect is a segregation of uses that spreads apart proposed amenities reducing the project's walkability.

While this alternative would meet the objectives of the project; it would not do so to the same degree, especially with respect to Objective 1. Due to the widening of the roadway traversing the commercial area in Phase 2, this alternative would reduce the total commercial acreage and remove all residential uses from the commercial area. The loss of mixed-use residential would essentially remove the village atmosphere from the commercial area, detracting from Objective 1's focus on the development of pedestrian-oriented mixed-use community. One specific loss would be the inability to form sidewalk cafés and other pedestrian friendly design/uses due to the width, right-of-way restrictions and increased speed of the 2.2C roadway design. The removal of the mixed-use residential uses would detract from the range of housing the project is proposing to construct.

4.8 Analysis of the Road Design Alternatives

The existing conditions, methodology, and significance determination information for the environmental analysis below is the same as the project (see Chapter 2.0). The Road Design Alternative analyzes the differences of the roadway design proposed under this alterative from the roadway analyzed under the proposed project with the exception requests. The other features of the road design under this alternative are the same as the proposed project. The analysis is based on information obtained for the project that is applicable for the alternative, including site visits and technical reports.

4.8.1 Description and Setting

A number of roadway design exceptions are being requested as part of the proposed project. The Road Design Alternative provides an analysis of each of the roadways should any of these the design exceptions not be approved by the County and the roads are designed and improved to full public road standards. The roadway designs analyzed in this alternative include each roadway designed to County standards without the exception being requested and within existing alignments. To be consistent with the project, the construction phasing of these off-site roadway improvements is assumed to be the same as the project.

The locations of the 10 road design exceptions are illustrated in Figures 4-5a and 4-5b, and the detailed designs of those exceptions are shown in Figures 4-6 through 4-15.

Table 1-2 summarizes the road design differences between the project's proposed road exception requests and the design analyzed in the Road Design Alternative. The Road Design Alternatives include (1) West Lilac Road – Old Highway 395 to I-15 Bridge, (2) West Lilac Road Over I-15 Bridge, (3a) West Lilac Road – I-15 Bridge to First Roundabout, (3b) West Lilac Road – Project Boundary to First Roundabout ~~to Easterly Roundabout~~, (4) West Lilac Road – Western Roundabout to Northern Project Boundary, (5) West Lilac Road Along Northern Project Boundary, (6) West Lilac Road - East of Easterly Roundabout to Project Boundary, (7) Mountain Ridge Road - ~~Reduced~~ Design Speed, (8) Mountain Ridge Road at Circle R Road – Taper, (9) On-site Street "C," and (10) On-site Street "E." These road designs alternatives are individually described and analyzed below in subchapters 4.8.1.1 to 4.8.1.10 below so that each design exception request may be decided by the County independently of one another. It is noted that Road Design Alternative 2 has two options and Road Design Alternative 5 has three options, as detailed further below.

This alternative would have the same growth-inducing impacts as the project. Improving roadways to County standards would not result in additional ~~be~~ growth-inducement~~ing~~ beyond that disclosed with the proposed project. ~~, as the improvement would accommodate already planned growth and would not induce further growth.~~

4.8.1.1 Road Design Alternative 1: West Lilac Road – Old Highway 395 to I-15 Bridge

If the project's proposed road design for this road segment, which corresponds to Road Exception Request #1, is not approved by the County, the following alternative design could be implemented by the project.

The road design alternative analyzed under this alternative includes the West Lilac Road segment from the I-15 bridge to Old Highway 395 (see Figure 4-6). The roadway design would include a 64- to 78-foot right-of-way, 40 to 54 feet of curb to curb width (with 8-foot shoulders), 12-foot parkways, and a minimum design speed of 40 mph.

This alternative design would require additional grading on both the north and south sides of West Lilac Road, resulting in 5,010 cy of additional cut and 1,500 cy of additional fill and the creation of manufactured slopes up to 36 feet in height. Other constraints include the need to relocate existing power lines and guardrails and 0.11 acre of additional right-of-way acquisition, compared to the project.

Comparison of the Effects of the Road Design Alternative to the Project

Visual Resources

In summary, this alternative would have the same visual impacts as the project except along the West Lilac Road segment between Old Highway 395 and the I-15 bridge where this alternative includes taller manufactured slopes, additional native vegetation removal, and a wider roadway footprint as described above. These changes result in this alternative having a slightly more urbanized character than the project at this specific location. However, the overall visual impact of this alternative would be similar to the project in regards to community character, scenic vistas, scenic resources, light, glare, and plan consistency. This includes the significant character and quality impacts that would remain significant and unmitigated. All other visual impacts related to scenic

vistas, scenic resources, light, glare, and plan consistency would be less than significant like the project. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed, but the segment of I-15 within the viewshed is identified as a County Scenic Highway. I-15 has very steep, high slopes on both sides of I-15 where Lilac Hills Road crosses over the I-15. Thus, the Road Design Alternative changes to West Lilac Hills Road are not visible from the I-15. The visual impacts of this alternative would be the same the project (see subchapter 2.1.2.1). Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project.

Issue 2: Scenic Resources (Less Than Significant Impact)

Scenic resources in the vicinity of West Lilac Road – Old Highway 395 to I-15 Bridge Road include native vegetation (including oaks) and slopes. The additional grading required for this alternative road design would result in additional impacts to 0.65 acre of native vegetation. The slopes in this area do not qualify as RPO, but would be revegetated/landscaped so that visual impacts would not be detected from public viewpoints or degrade visual quality. Overall, these additional roadway impacts combined with the other project features impacts to scenic resources (i.e., slopes and native vegetation) would be similar to those described for the project in subchapter 2.1.2.2. Therefore, this alternative would result in less than significant impacts to scenic resources, similar to the project.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would have the same visual character as the project except at the West Lilac Road segment which would have a slightly more urban character due to the additional roadway width (including wider shoulders), manufactured slopes, and full parkways on both sides of the roadway. As with the project, the off-site improvements (including the West Lilac Road improvements) would have a less than significant visual character impact since they would not change the overall rural character of the public views in this area (see subchapter 2.1.2.3, Off-Site Improvements). All other visual character and quality impacts of this alternative would be the same as the project.

As with the project (subchapter 2.1.2.3), this alternative would affect visual character/quality as viewed from West Lilac Road (Impact V-1), as viewed from surrounding residences (Impact V-2), and as viewed on a cumulative level within considering the entire viewshed (Impact V-4). Construction phase temporary impacts to visual character and quality would also be significant (Impact V-3). As with the project, these visual impacts would remain significant and unmitigated under this alternative (see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San

Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting along the West Lilac Road – Old Highway 395 to I-15 Bridge as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in the same less than significant light and glare impacts as the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would have air quality impacts similar to the project, which are identified in subchapter 2.2. Due to the additional grading and roadway improvements included in this alternative, the construction impacts would be slightly increased relative to the project, but the increase would be negligible and would be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As described for the project in subchapter 2.2.2.1, this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable, identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. While this alternative would result in additional grading and construction associated with the roadway improvements necessary to County standards, the air quality impact of this

alternative would be the same as the project. The additional grading under this alternative (5,010 cy cut and 1,500 cy of fill) would represent less than a 0.1 percent increase relative to the project grading (4.0 million cubic yards of cut and fill). This alternative would implement project design features (see Table 1-3) that reduce air emissions the same as the project. As with the project, this alternative would have significant and unavoidable air quality impacts (Impact AQ-2) and would require implementation of mitigation measures (M-AQ-2, M-AQ-3, and M-AQ-4; see subchapter 2.2.5) ~~to reduce construction emissions to below a level of significance~~. As with the proposed project, this alternative would have significant and unavoidable air quality impacts during the construction phase.

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative operational impacts would be the same as the project operational impacts described in subchapter 2.2.2.2. Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes would not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions generated by ~~either~~the alternative would be significant and would generate similar ~~and~~ operational ~~impacts~~ emissions (Impact AQ-3) as the project. Both the proposed project and this alternative would require ~~and~~ mitigation (M-AQ-6 and M-AQ-7); however, even with these measures, impacts would be significant and unavoidable; ~~would be~~ the same as the project (see subchapters 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. Construction of this segment of West Lilac Road would occur in Phase 1 when no other phases in operation or construction. Thus, the construction emission changes would not result in any additional cumulative effect beyond that discussed for the project. All other phases of this alternative would be the same as the project, and would result in the same impacts (Impact AQ-4). As with the project (see subchapter 2.2.6), this design alterative would result in a significant and unavoidable (Impact AQ-4) and a cumulatively considerable significant impact (Impact AQ-6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This West Lilac Road Roadway Design Alternative would result in the same traffic volumes and distribution as the project. Thus, the alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures

include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would have the same transportation/traffic impacts as the project. This includes direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative would be less than significant. The roadway design changes at West Lilac Road from Old Highway 395 to I-15 Bridge would not alter the overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). Also, no safety issues would result, as all roads would be built to the County's roadway standards that are designed to provide safe roadways. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would generate construction traffic similar to the project and would also include a project traffic control plan as a project feature (see subchapter 2.3.2.2). Similar to the project, construction-related traffic impacts would be less than significant.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would be the same as the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (subchapter 2.3.3.1), as it would not alter capacity, trip generation, or trip distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. As a result, this alternative would result in significant and unavoidable impacts (TR-20, TR-21, and TR-30 to TR-37), the same as the project. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be the same as the project (see subchapter 2.3.2.3) with the exception of West Lilac Road, Old Highway 395 to I-15 Bridge. This alternative would build that segment to County's road standards that are designed to provide adequate ingress and egress for residents as well as emergency access, safe trail system, and conform to Goal M-4 of the General Plan Mobility Element. Therefore, impacts associated with transportation hazards would be less than significant, similar to the project.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4), with the exception of the West Lilac Road, Old Highway 395 to I-15 Bridge. The construction of this segment of West Lilac Road to County road standards would provide a wider roadway with wider shoulders and parkways. This would result in no negative effect to public transit, bicyclists or pedestrians. As with the project, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would provide alternative transportation opportunities and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative agricultural resource impacts would be similar to the project (subchapter 2.4). The West Lilac Road improvements included in this alternative would not affect additional agricultural resources. As this alternative would not change any proposed land uses, the potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural

land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. The additional West Lilac Road improvements included in this alternative would impact additional area; however, the additional area is not considered an agricultural resource since it is either developed, native vegetation, or does not have soils that qualify as Prime Farmland or Farmland of Statewide Importance. In addition, no active agricultural uses are located on or adjacent to the additional roadway improvements included in this alternative. Thus, this alternative would have the same agricultural resource impacts as the project (direct Impact AG-1 and cumulative Impact AG-16; see subchapter 2.4.2.1). Mitigation M-AG-1 would reduce the direct and cumulative impacts to below a level of significance as with the project (see subchapter 2.4.5 and 2.4.6).

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would be identical to that described for the project in subchapter 2.4.2.2. The West Lilac Road, Old Highway 395 to I-15 Bridge Road segment is not located adjacent to agricultural lands and, in addition, roads are considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. Additionally, this alternative would not impact the Williamson Act contracted lands to the north, or Agricultural Preserve Number 88 because these sites are not adjacent to the project site and would not be limited in their activities. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (see Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations **(Impacts AG-2** through **AG-15;** see subchapter 2.4.2.3). This Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. The West Lilac Road, Old Highway 395 to I-15 Bridge Road segment is not located adjacent to agricultural lands and, in addition, roads are considered compatible with agricultural uses. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative biological resource impacts would be similar to the project but would include additional impacts to sensitive habitat (0.65 acre). Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. The additional sensitive habitat impact would require additional mitigation. This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

In addition to the impacts identified for the project (see subchapter 2.5.2.2, and Impact BIO-2), this alternative would result in the following additional 0.65 acre of riparian and sensitive habitat impacts: 0.6 acre of coastal sage scrub, 0.02 acre of disturbed coastal sage scrub, and 0.03 acre of coast live oak woodland (Table 4-5). These additional sensitive habitat impacts would be significant (Impact RD-BIO-1a). All other impacts of this Road Design Alternative would be the same as the project (see subchapter 2.5).

Construction of the land use plan and off-site improvements proposed under this alternative would result in similar significant impacts as those detailed in subchapter 2.5.2. These impacts include the removal of more than 5 percent of the raptor foraging habitat on-site, identified as Impact BIO-1. The additional area impacted by this alternative (0.77 acre) would not alter the severity of the raptor foraging impact described for the project, as the project impact is 538.29 acres of raptor foraging and the additional area impacted by this alternative would represent a less than 0.1 percent increase in impact. Thus, this alternative would have a similar raptor foraging impact (Impact BIO-1) as the project.

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3, as detailed in subchapter 2.5.5. In addition to the mitigation land identified for the project, the following measure M-RD-BIO-1a would be required to mitigate the additional sensitive habitat impacts of this alternative to below a level of significance (Table 4-6):

M-RD-BIO-1a: Prior to issuance of a grading permit for the construction of West Lilac Road, Old Highway 395 to I-15 Bridge to the County's roadway standards, the following shall be provided either on-site within the open space easement; off-site within a draft PAMA of the draft North County MSCP in Valley Center or <u>suitable lands with native habitat adjacent to the project boundary</u>~~adjacent communities~~; or through a mitigation

bank, subject to the approval of the County and appropriate wildlife agencies:

1. Impacts to 0.62 acre of coastal sage scrub (including disturbed) shall be mitigated at a 2:1 ratio with 1.24 acres.
2. Impacts to 0.03 acre of coast live oak woodland shall be mitigated at a 3:1 ratio with 0.09 acre.

As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community as the project (subchapters 2.5.6.1 and 2.5.6.2).

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). No additional jurisdictional impacts would occur under this alternative. Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands.

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. No additional wildlife movement or nursery sites would be impacted by widening the Old Highway 395 to I-15 Bridge segment of West Lilac Road, as a roadway already exists along the same alignment. The impact to localized wildlife movement would be less than significant, similar to the project.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative cultural resource impacts would be similar to the

project. While the additional West Lilac Road, Old Highway 395 to I-15 Bridge Road, roadway improvements completed by this alternative would affect additional area (0.77 acre) where there is potential for unknown subsurface cultural resources, the potential impact would be similar to the project. Thus, this alternative would result in significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources similar to the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. There are no buildings or other structures within the off-site improvement areas that could be potential historical sites, including the area of West Lilac Road. Thus, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the West Lilac Road area, the archeological site impacts would be the same as the project except for the additional West Lilac Road improvement area. No known cultural resources exist within the West Lilac Road improvement area, but this 0.77 acre area would have a potential for unknown significant subsurface cultural resources considering the known resources in the community.

As described for the project in subchapter 2.6.5.1, this alternative would potentially have significant impacts to: one archeological site that is not protected in proposed dedicated open space **(**Impact CR-1); unknown subsurface archeological resources within on and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to Gopher Canyon Road improvements (Impact CR-3). The additional 0.77-acre area of potential impact to unknown subsurface cultural resources that would occur due to the additional West Lilac Road improvements would not change the impact relative to the project considering this change would represent a 0.1 percent change to the overall impact area. Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas. Human remains are also not expected within the additional 0.77-acre West Lilac Road improvement area that is included in this alternative. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As described for the project in subchapter 2.6.2.4, there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur.

Hazards/Hazardous Materials

In summary, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts (LBZ and fire response) associated with this alternative would be significant but mitigated to below a level of significance, identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. Thus, this Road Design Alternative would have less than significant impacts related to emergency response and evacuation plans similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. The increase in this segment of West Lilac Road would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative impacts related to vectors would be less than significant.

Noise

In summary, the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the same as the project, as this alternative would have the same traffic generation, traffic distribution, and roadway centerlines as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project, as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would have the same traffic generation, traffic distribution, and roadway centerlines as the project. The alternative road design of the West Lilac Road segment improvements between Old Highway 395 and the I-15 bridge would result in similar roadway noise as the project given the traffic volumes would be the same and the centerline would be the same. The alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impacts N-3). As with the project, these noise Impacts N-1 and N-2 would be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise

analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. However, Impact N-3 would potentially remain significant and unmitigated since providing a continuous noise barrier or other methods to reduce traffic noise may be infeasible. Refer to subchapter 2.8.6.1 for additional information.

This alternative would also have the significant cumulative traffic noise impacts of the project (Impacts N-17 and N-18). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would be the same as the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same as the project (subchapter 2.8.2.2), except the additional noise that would occur from the additional widening of West Lilac Road, between Old Highway 395 to I-15 Bridge. This includes direct noise Impacts N-11 to N-14, and cumulative noise Impacts N-19 and N-20. As with the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapters 2.8.6). The additional West Lilac Road improvements included would be located within 10 feet of a residence (8268 West Lilac Road). As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." Noise levels would be less at the receiver location as they are set back from the edge of roadways. Roadway construction noise levels would be below the County's Noise Ordinance 75 dB(A) L_{eq} limit. Thus, impacts to NSLU from widening West Lilac Road, between Old Highway 395 to I-15 Bridge, to standard would be less than significant, similar to the project.

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be the same as the project (refer to subchapter 2.8.6.2, **Impacts N-15 and N-16)**, except for the construction of West Lilac Road, between Old Highway 395 to I-15 Bridge. As discussed for the project, vibration levels may exceed County thresholds (0.004 inches per second RMS) if grading occurs within 150 feet of a residence. This alternative would involve additional grading on West Lilac Road that would be closer to a residence at 8268 West Lilac Road compared to the project. Both the project and the alternative would potentially result in a significant vibration impact from West Lilac Road improvements between Old Highway 395 and I-15 Bridge. As with the project (see subchapter 2.8.6.3), significant vibration impacts N-

15 and N-16 would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11) and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12).

Less than Significant Impacts

Geology and Soils

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, the underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional widening of West Lilac Road between Old Highway 395 and the I-15 bridge, and the geology and soils conditions in that area are the same as addressed for the project. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would slightly increase the GHG emissions relative to the project due to additional roadway improvements, the alternative would be ~~percent reduction from 2020 emissions would be the same considering the inclusion of t~~he same GHG-reducing features as the project and this alternative would be consistent with ~~the County's performance threshold~~all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).

Hydrology and Water Quality

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative public service impacts would be similar to the project as the proposed land uses would be the same. As with the project, public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5).

Recreation

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, storm water facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would result in additional impacts relative to visual resources and biological resources and would not reduce any significant impact of the project. This alternative would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for West Lilac Road, Old Highway 395 to I-15 Bridge, is not approved.

4.8.1.2 Road Design Alternative 2: West Lilac Road Over I-15 Bridge

Interstate 15 provides regional access through San Diego County as a major freeway facility and is oriented in a north-south direction. The bridge is a Caltrans' facility which crosses over Interstate 15; however, the pavement is maintained by the County of San Diego. The project's proposed road design for this road segment corresponds to Road Exception Request #2, as submitted to the County. If the project's proposed road design

for this road segment is not approved by the County, the following alternative design could be implemented by the project.

The road design analyzed under this alternative is the construction of West Lilac Road over the I-15 bridge as a County Light Collector road 2.2C without any exceptions to the road standards. The bridge is over 100 feet above the freeway, and spans 694.9 feet. The standard would require 40 to 54 feet of curb to curb width within a 64 to 78 foot right-of-way with 8-foot shoulders, and 12-foot parkways (see Figure 4-7). The road segment would have a minimum design speed of 40 mph. The bridge currently has 40 feet of paving but does not meet 2.2C Light Collector standards with respect to parkway and shoulder width. Without the proposed exception, the project would need to widen the bridge, increasing the shoulders and parkways. As widening the bridge may be infeasible due to engineering constraints, another option would be to construct a parallel bridge over I-15 to accommodate one-way traffic on each bridge. It is assumed that either of those options would include bridge designs that mimic the "double rainbow" arch style of the existing bridge designed by William Wells in 1978.

Comparison of the Effects of the Road Design Alternative to the Project

Visual Resources

In summary, this alternative would have the same visual impacts as the project except along the West Lilac Road segment that spans over the I-15. The addition of second West Lilac Road bridge would significantly affect the scenic view from County Scenic Highway I-15, but the bridge widening option would not result in an additional significant scenic vista impact. The remaining visual resource issues of community character, scenic resources, light, glare, and plan consistency would be the same as the project. This includes the significant, unmitigated character and quality impacts, and less than significant scenic resources, light, glare, and plan consistency impacts. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed, but the segment of I-15 within the viewshed is identified as a County Scenic Highway. This alternative would have the same scenic vista impact as the project (see subchapter 2.1.2.1) except for the West Lilac bridge. The I-15 northbound has views of the West Lilac Road bridge for approximately 1 mile and the I-15 southbound has a view of the bridge for approximately 0.75 mile. While not a designated or historic landmark, the bridge is a dominant feature of the I-15 scenic view and adds scenic value. Assuming a speed of 70 mph, the motorists would view the bridge for less than one minute. Due to the topography, the bridge is not highly visible from other public locations. Widening of the bridge would not be highly visible from the I-15, but the installation of a second bridge would be. For this reason, the widening would have a less than significant scenic vista impact while the option of providing an additional bridge would be a significant scenic vista impact (Impact RD-V-1). While either bridge improvement option would have to undergo an I-15 Design Review, alternative designs of a double bridge would not avoid this significant visual impact. Thus, the double bridge option would result in a significant and unmitigated visual impact.

Issue 2: Scenic Resources (Less Than Significant Impact)

Scenic resources related to this alternative would be the same the project (see subchapter 2.1.2.2), except the West Lilac Road I-15 bridge. The West Lilac Road bridge is considered a scenic resource considering its contribution to the scenic I-15 vista. As described above, the widening of the bridge would not be noticeable but the addition of a bridge adjacent to the existing bridge would be. Thus, the widening of the bridge would not negatively affect its scenic value. The option of adding a second bridge would not physically alter the existing bridge. Therefore, this alternative would result in less than significant impacts to scenic resources, similar to the project.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

The West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would have the same visual character as the project except at the West Lilac Road bridge. As the public view of the bridge structure is limited to the I-15 due to topography, this analysis focuses on visual character and quality changes visible from the I-15. The road design option that widens the bridge would not significantly change its visual character or quality, as it would appear similar to the existing bridge from the I-15 once construction is completed. The road design option that adds a second bridge would have a greater visual impact, but the overall character of the area as viewed by I-15 would remain rural with the addition of the second bridge because a second bridge would be largely obscured by the first bridge. While the overall road would be wider (two bridges), this is a very short segment which provides a transition from the community to the freeway. As a result, the double bridge would not detract from the existing rural character. As with the project, the off-site improvements (including the West Lilac Road improvements) would have a less than significant visual character impact (see subchapter 2.1.2.3, Off-Site Improvements). All other visual character and quality impacts of this alternative would be the same as the project.

As with the project (subchapter 2.1.2.3), this alternative would result in visual character/quality impacts related to the project site development as viewed from West Lilac Road **(**Impact V-1), as viewed from surrounding residences (Impact V-2), and as viewed on a cumulative level within the entire viewshed (Impact V-4). Construction phase temporary impacts to visual character and quality would also be significant (Impact V-3). As with the project, these visual impacts would remain significant and unmitigated under this alternative (see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting along the West Lilac Road bridge(s) as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in the same less than significant light and glare impacts as the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of West Lilac Road over I-15 Bridge Road Design Alternative would have greater air quality impacts than the project, which are identified in subchapter 2.2. Due to the additional construction improvements included in this alternative, the construction impacts would be slightly increased relative to the project. That increase would be negligible and impacts would still be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As with the project (subchapter 2.2.2.1), this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County to provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road bridge improvements. The additional construction associated with widening the bridge or providing an additional bridge to meet County standards would result in a greater air quality impact relative to the project. The additional bridge construction under this alternative would be substantial and would require the operation of heavy equipment for a long period of time. This alternative would result in significantly greater construction-related air quality impacts (RD-AQ-1) above the project impacts (Impact AQ-2). Construction-related air quality impacts would remain significant and unmitigated under this alternative.

The West Lilac Road Bridge Over I-15 Road Design Alternative operational impacts would be the same as the project operational impacts (see subchapter 2.2.2.2). Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes would not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions generated by either would be similar and operational impacts (Impact AQ-3) and mitigation (M-AQ-6 and M-AQ-7) would be the same as the project (see subchapter 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road bridge improvements. Construction of the West Lilac Road Bridge Over I-15 Road Design Alternative would occur in Phase 1 when no other phases in operation or construction. Thus, the construction emission changes would not result in any additional cumulative effect beyond that discussed for the project. All other phases of this alternative would be the same as the project, and would result in the same impacts (**Impact AQ-4**). As with the project (subchapter 2.2.6), this design alterative would result in a **significant and unavoidable (**Impact AQ-4) and a cumulatively considerable significant impact (Impact AQ-6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This West Lilac Road Bridge Over I-15 Road Design Alternative would result in the same traffic volumes and distribution as the project. Thus, the alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The West Lilac Road Bridge Over I-15 Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the West Lilac Road Bridge Over I-15 Road Design Alternative would have the same transportation/traffic impacts as the project. Under the proposed project, the impacts to this segment would be fully mitigated by M-TR-4. All impacts would be the same, ~~This~~ includinges direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative

would be less than significant. The roadway design changes at West Lilac Road from Old Highway 395 to I-15 bridge would not alter the overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). Also, no safety issues would result, as all roads would be built to the County's roadway standards that are designed to provide safe roadways. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The West Lilac Road Bridge Over I-15 Road Design Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see subchapter 2.3.2.2). Nonetheless, this alternative would have a potentially significant impact to traffic during construction due to the potential need to close the West Lilac Road bridge for an extended period of time during widening (Impact RD-TRF-1). This impact would not occur under the proposed project. During the closure of this bridge, the majority of the traffic that currently travels on this section of West Lilac Road would be diverted to Old Highway 395 and/or Circle R Drive. There is no way to avoid this potential impact besides implementing the road design bridge option that consists of a second bridge instead of widening the existing bridge. Under second bridge road design option, the existing bridge could remain open while the second bridge is constructed.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the West Lilac Road Bridge Over I-15 Road Design Alternative would be the same as the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (see subchapter 2.3.3.1), as it would not alter capacity, trip generation, or trip distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be less than significant, the same as the project (see subchapter 2.3.2.3). The only difference with this alternative is ~~with the exception of~~ the West Lilac Road bridge over the I-15~~.~~ ~~This alternative~~ would be constructed~~build that segment~~ to the County's road standards without exceptions. Road standards ~~that~~ are designed to provide adequate ingress and egress for residents as well as emergency access, safe trail system, and conform to Goal M-4 of the General Plan Mobility Element. Both the project and the alternative would be required to comply with the road standards, the difference being the design changes associated with the design exception. However, no exceptions are approved that would result in a transportation hazard. Therefore, impacts associated with transportation hazards would be less than significant, similar to the project.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4), with the exception of the West Lilac Road Bridge Over I-15 Road Design Alternative. The construction of this segment of West Lilac Road to County Road standards would provide a wider roadway with wider shoulders and parkways. This would result in no negative effect to public transit, bicyclists or pedestrians. As with the project, the West Lilac Road Bridge Over I-15 Road Design Alternative would provide alternative transportation opportunities and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the West Lilac Road Bridge Over I-15 Road Design Alternative agricultural resource impacts would be the same as the project (subchapter 2.4). The West Lilac Road improvements included in this alternative would not affect additional agricultural resources. As this alternative would not change any proposed land uses, the potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. The additional West Lilac Road improvements included in this alternative would impact additional area; however, the additional area is not considered an agricultural resource since it is either developed, native vegetation, or does not have soils that qualify as Prime Farmland or Farmland of Statewide Importance. This alternative would have the same agricultural resource impacts as the project (direct Impact AG-1 and cumulative Impact AG-16; see subchapter 2.4.2.1). Mitigation M-AG-1 would reduce the direct and cumulative impacts to below a level of significance as with the project (see subchapter 2.4.5 and 2.4.6).

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the West Lilac Road Bridge Over I-15 Road Design Alternative would be identical to the project (see subchapter 2.4.2.2). The West Lilac Road bridge would be considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. Additionally, this alternative would not impact the Williamson Act contracted lands to the north, or Agricultural Preserve Number 88 because these sites are not adjacent to the project site and would not be limited in their activities. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (in Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations **(Impacts AG-2** through **AG-15;** see subchapter 2.4.2.3). This Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. The West Lilac Road bridge would be considered compatible with agricultural uses. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the West Lilac Road Bridge Over I-15 Road Design Alternative biological resource impacts would be similar to the project but may include additional impacts to sensitive habitat, specifically coastal sage scrub located in the vicinity of the bridge. Small amounts of eucalyptus woodland and coast live oak woodland could also be impacted. Although the exact impact ~~(~~acreage cannot be determined without specific engineering designs prepared in coordination with Caltrans, it is estimated that the improvements (assuming a double bridge design) could impact ~~undeterminable)~~approximately five acres. See Table 4-5 for estimated impact acreages.

Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. The additional sensitive habitat impact would require additional mitigation. This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issues 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

In addition to the impacts identified for the project (see subchapter 2.5.2.2, and Impact BIO-2), this alternative may result in additional impacts to sensitive habitat depending on the bridge design. However, as it is not feasible to determine the bridge design at this time, this impact is speculative and is not discussed further herein. All other impacts of this Road Design Alternative would be the same as the project (see subchapter 2.5).

Construction of the land use plan and off-site improvements proposed under this alternative would result in the same significant impacts as those detailed in subchapter 2.5.2. These impacts include the removal of more than 5 percent of the raptor foraging habitat on-site, identified as Impact BIO-1. The additional area impacted by this alternative is not expected to alter the severity of the raptor foraging impact (538.29 acres) relative to the project, as the alternative is expected to increase the impact by less than 5 percent (i.e., less than 27 acres). Thus, this alternative would have a similar raptor foraging impact (Impact BIO-1) as the project.

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3, as detailed in subchapter 2.5.5. As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community similar to the project (subchapters 2.5.6.1 and 2.5.6.2). As noted above, additional sensitive habitat impacts may occur depending on the bridge design, but the determination of such impacts and associated mitigation would be speculative and is not addressed further herein.

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the West Lilac Road Bridge Over I-15 Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). Since jurisdictional areas are not located near the bridge, additional jurisdictional impacts are not anticipated for this Road Design Alternative.

Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands.

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. No additional wildlife movement or nursery sites would be impacted by providing an additional bridge or widening the existing bridge, as the bridge spans over habitat and does not result in a barrier to wildlife movement. The impact to localized wildlife movement would be less than significant, similar to the project.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The West Lilac Road Bridge Over I-15 Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the Road Design Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the West Lilac Road Bridge Over I-15 Road Design Alternative cultural resource impacts would be similar to the project. While the additional West Lilac Road Bridge Over I-15 Road Design Alternative bridge improvements included in this alternative would affect additional area where there is potential for unknown subsurface cultural resources, the potential impact would be similar to the project. Thus, this alternative would result in significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources similar to the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. There are no buildings or other structures within the off-site improvement areas that could be potential historical sites, including the area near the West Lilac Road bridge. Thus, the West Lilac Road Bridge Over I-15 Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the West Lilac Road area, the archeological site impacts would be the same as the project except for the additional West Lilac Road bridge improvement area. No known cultural resources exist within the West Lilac Road improvement area, but there would be a slight increase

in potential for unknown significant subsurface cultural resources considering the known resources in the community.

As described for the project in subchapter 2.6.5.1, this alternative would have potentially significant impacts to: one archeological site that is not protected in proposed dedicated open space **(**Impact CR-1); unknown subsurface archeological resources within on- and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to Gopher Canyon Road improvements (Impact CR-3). The additional area of potential impact to unknown subsurface cultural resources that would occur due to the additional West Lilac Road improvements would not change the impact relative to the project considering this change would represent a relatively small change to the overall impact area. Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas. Human remains are also not expected within the additional West Lilac Road bridge improvement area that is included in this alternative. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the West Lilac Road Bridge Over I-15 Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As with the project (see subchapter 2.6.2.4), there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur.

Hazards/Hazardous Materials

In summary, the West Lilac Road Bridge Over I-15 Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts of this alternative would be significant but mitigated to below a level of significance identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The West Lilac Road Bridge Over I-15 Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The West Lilac Road Bridge Over I-15 Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The West Lilac Road Bridge Over I-15 Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As with project (see subchapter 2.7.2.3), the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. The existing West Lilac Road bridge widening alternative would require the temporary closure of the bridge, while the bridge could remain open for the option that adds a second bridge. The temporary bridge closure may affect Miller Station fire services (e.g., fire service response times), as it would result in emergency vehicles having to travel southeast on West Lilac Road to Circle R Drive to get to the west of the I-15. The greatest response time impact would be in a situation such as where the Miller Station emergency vehicles responding to a call at Old Highway 395/West Lilac Road would have to travel over 9 miles (18 minutes if traveling at 30 mph) if the bridge was closed instead of approximately 1 mile (2 minutes if traveling at 30 mph) if the bridge was open. This potential fire service impact is considered significant since it has the potential to result in reducing the Miller Station 5-minute fire service response time area and potentially result in the need for a temporary fire station facility (Impact RD-HAZ-1). The impacts of a temporary fire station facility would be speculative since the location and design of such a facility is unknown. Thus, this impact is not addressed further herein.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. The increase in this segment of West Lilac Road would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The West Lilac Road Bridge Over I-15 Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the West Lilac Road Bridge Over I-15 Road Design Alternative impacts related to vectors would be less than significant.

Noise

In summary, the West Lilac Road Bridge Over I-15 Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the same as the project, as this alternative would have the same traffic generation, traffic distribution, and roadway centerlines as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project, as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The West Lilac Road Bridge Over I-15 Road Design Alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impacts N-3). The addition of a second bridge or widening of the existing bridge would not result in any additional traffic noise impacts, as there are no noise-sensitive land uses adjacent to the bridge. As with the project, these noise Impacts N-1 and N-2 would be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. Impact N-3 would potentially remain significant and unmitigated similar to the project due to the potential infeasibility of providing a continuous noise barrier or other methods to reduce traffic noise. Refer to subchapter 2.8.6.1 for additional information.

This alternative would also have the significant cumulative traffic noise impacts of the project (cumulative traffic (Impacts N-17 and N-18). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the West Lilac Road Bridge Over I-15 Road Design Alternative would be the same as the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-

emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same as the project (see subchapter 2.8.2.2), except the additional noise that would occur from the additional West Lilac Road bridge improvements. This includes direct noise Impacts N-11 to N-14, and cumulative noise Impacts N-19 and N-20. As with the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapter 2.8.6). The additional West Lilac Road bridge improvements would not be located adjacent to a residence. As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." The additional West Lilac Road bridge improvements would not exceed the County's Noise Ordinance 75 dB(A) L_{eq} limit at occupied properties. Thus, impacts to NSLU from the West Lilac Road Bridge Over I-15 Road Design Alternative to standard would be less than significant, similar to the project.

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be the same as the project (refer to subchapter 2.8.6.2, **Impacts N-15 and N-16)**, except for the construction of West Lilac Road bridge improvements. While additional vibration would occur during bridge construction, the bridge improvement area is located at over 150 feet from the nearest residence and it not anticipated to exceed the County thresholds (0.004 inches per second RMS) at the nearest residence. As with the project (see subchapter 2.8.6.3), the significant vibration impacts would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11), and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12).

Less than Significant Impacts

Geology and Soils

The West Lilac Road Bridge Over I-15 Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, the underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional West Lilac Road bridge improvements, and the geology and soils conditions in that area are the same as addressed for the project. Due to the engineering requirements of constructing a bridge differing from standard buildings, additional soil measures may be required beyond those identified for the project to ensure adequate bridge support. As required, those additional measures would be required by the Building Code and addressed in a specific geotechnical report. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The West Lilac Road Bridge Over I-15 Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would increase the GHG emissions relative to the project due to additional bridge improvements, the alternative would be the same GHG-reducing features as the project and this alternative would be consistent with all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies, or regulations (see subchapter 3.1.2).~~percent reduction from 2020 emissions would be similar considering the inclusion of the same GHG-reducing features, amortization of the additional construction emissions over time, and this alternative would be consistent with the County's performance threshold. Thus, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~

Hydrology and Water Quality

The West Lilac Road Bridge Over I-15 Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the West Lilac Road Bridge Over I-15 Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The West Lilac Road Bridge Over I-15 Road Design Alternative public service operational impacts would be similar to the project as the proposed land uses would be the same. As with the project, the additional demand for public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5). Refer to hazards Issue 3 above for the potential temporary impact to emergency response due to the temporary closure of the West Lilac Road bridge.

Recreation

The West Lilac Road Bridge Over I-15 Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the

deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The West Lilac Road Bridge Over I-15 Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the West Lilac Road, Old Highway 395 to I-15 Bridge, Road Design Alternative would result in additional impacts related to scenic vistas (second bridge option), air quality (second bridge), emergency response (bridge widening option), and traffic (bridge widening option). There may also be additional biological resource impacts, but it is not feasible to determine the impact area without additional bridge design. Thus, the biological impacts of this alternative would be speculative not are not addressed further. This alternative would not reduce a significant impact of the project, but would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for West Lilac Road, Old Highway 395 to I-15 Bridge, is not approved. Ultimately, bridge widening is potentially infeasible due to engineering issues and the construction of an additional bridge is likely infeasible due to costs. The costs for constructing the Harbor Drive pedestrian bridge was $40 million, and this bridge would be required to support cars in addition to pedestrians and would be larger. Thus, the additional bridge option is expected to exceed $40 million in costs.

4.8.1.3 Road Design Alternative 3: West Lilac Road – I-15 Bridge to the Westerly Roundabout

The project's proposed road design for this road segment corresponds to Road Exception Request #3, as submitted to the County. This exception request references road design modifications for this road segment affecting both off-site, Exception Request #3a and on-site, Exception Request #3b. If the proposed road design exception is not approved by the County, the following alternative design could be implemented by the project.

The road design analyzed under this alternative is the construction of West Lilac Road, off-site, transitioning from the existing bridge over I-15 (with an existing travel way width

of 24 feet) to the project boundary (Exception Request #3a) and on-site from the project boundary to the westerly roundabout (Exception Request #3b), as shown in Figure 4-8. The standard for this entire portion of West Lilac Road is County Light Collector road 2.2C. This requires 40 to 54 feet of curb to curb width within a 64 to 78-foot right-of-way with 8-foot shoulders, 12-foot parkways and a minimum design speed of 40 mph.

The construction of the off-site portion of this road design (Exception Request #3a) would result in additional grading of approximately 8,733 cy of cut slope and 229 cy of fill. Manufactured slope heights would increase from 28 to 32 feet compared to the project. This alternative would require 0.21 acre of additional right-of-way acquisition. Due to its location within the project site and the grading necessary for the project, the additional widening in the project site (area corresponding to Exception Request #3b) would not result in significant changes to grading.

Comparison of the Effects of the Road Design Alternative to the Project

Visual Resources

In summary, this alternative would have the same visual impacts as the project except along the West Lilac Road segment between the I-15 bridge and the westerly project roundabout. The construction of this segment with no median and 5-foot sidewalks on both sides compared to the project's roadway design that has a median and an 8-foot side walk on the south side would not alter the conclusions of the project's visual resource analysis. This Road Design Alternative would be similar to the project in regards to community character, scenic vistas, scenic resources, light, glare, and plan consistency. This includes the significant character and quality impacts that would remain significant and unmitigated. All other visual impacts related to scenic vistas, scenic resources, light, glare, and plan consistency would be less than significant like the project. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed; however, a segment of I-15 within the viewshed is identified as a County Scenic Highway. There are very steep, high slopes on both sides of I-15 that preclude views of West Lilac Road. Thus, the Road Design Alternative changes to West Lilac Hills Road are not visible from the I-15. The visual impacts of this alternative would be the same the project (subchapter 2.1.2.1). Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project.

Issue 2: Scenic Resources (Less Than Significant Impact)

The scenic resource impacts of this Road Design Alternative would be the same as the project. This alternative would include an additional 0.02-acre of additional native habitat impact, but would not impact any additional RPO slopes or other additional scenic resources. As with the project, graded areas outside of the proposed pavement would revegetated/landscaped so that visual impacts would not be detected from public viewpoints or degrade visual quality. Overall, impacts to scenic resources (i.e., slopes and native vegetation) would be similar to the project (see subchapter 2.1.2.2). This

alternative would result in less than significant impacts to scenic resources, similar to the project.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

This Road Design Alternative would have the same visual character as the project except at the West Lilac Road segment between the I-15 bridge to first project roundabout. The roadway impact area would be the same scale as the project, but the roadway features such as medians and sidewalks would differ. Overall, these changes in road design features would result in a similar visual character and quality impact as the project (see subchapter 2.1.2.3, Off-Site Improvements). All other visual character and quality impacts of this alternative would be the same as the project.

As with the project (subchapter 2.1.2.3), this alternative would affect visual character/quality as viewed from West Lilac Road **(**Impact V-1), as viewed from surrounding residences (Impact V-2), and as viewed on a cumulative level within the entire viewshed (Impact V-4). Construction phase temporary impacts to visual character and quality would also be significant (Impact V-3). As with the project, these visual impacts would remain significant and unmitigated under this alternative (see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting along West Lilac Road, between the I-15 bridge to westerly project roundabout, as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in the same less than significant light and glare impacts as the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would have air quality impacts similar to the project, which are identified in subchapter 2.2. The additional grading (0.16 acre) required under this alternative would slightly increase construction emissions relative to the project, but the increase would be negligible and would be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As with the project (see subchapter 2.2.2.1), this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. While this alternative would result in additional grading and construction associated with the roadway improvements necessary to County standards, the air quality impact of this alternative would be the same as the project. The additional grading under this alternative (0.16 acre including 8,733 cy of cut and 229 cy of fill) would represent 0.1 percent increase relative to the project grading (4.0 million cubic yards of cut and fill). This alternative would implement project design features (see Table 1-3) that reduce air emissions the same as the project. As with the project, this alternative would have significant air quality impacts (Impact AQ-2) and would require implementation of mitigation measures similar to the project (M-AQ-2, M-AQ-3, and M-AQ-4; subchapter 2.2.5) to reduce construction emissions to below a level of significance.

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative operational impacts would be the same as the project operational impacts (see subchapter 2.2.2.2). Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions generated by either would be similar and operational impacts (Impact AQ-3) and mitigation (M-AQ-6 and M-AQ-7) would be the same as the project (subchapter 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. Construction of this segment of West Lilac Road would occur in Phase 1 when no other phases in operation or construction. Thus, the construction emission changes would not result in any additional cumulative effect beyond that discussed for the project. All other phases of this alternative would be the same as the project, and would result in the

same impacts (Impact AQ-4). Similar to the project (see subchapter 2.2.6), this design alterative would result in a significant and unavoidable (Impact AQ-4) and a cumulatively considerable significant impact (Impact AQ-6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This West Lilac Road Roadway Design Alternative would result in the same traffic volumes and distribution as the project. Thus, the alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would have the same transportation/traffic impacts as the project. This includes direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative would be less than significant. The roadway design changes at West Lilac Road from I-15 bridge to the project's westerly roundabout would not alter the overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). Also, this alternative design would not result in a significant safety issue. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see subchapter 2.3.2.2). West Lilac Road improvements would be phased in a manner so the roadway would not be closed during construction. Similar to the project, construction-related traffic impacts would be less than significant.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would be the same as the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (subchapter 2.3.3.1), as it would not alter capacity, trip generation or trip distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be similar to the project (see subchapter 2.3.2.3) with the exception of West Lilac Road, I-15 bridge to the westerly roundabout. This alternative would build that segment to County's road standards that are designed to provide adequate ingress and egress for residents as well as emergency access, safe trail system, and conform to Goal M-4 of the General Plan Mobility Element. It is noted that median the project includes on this segment would provide channelization through the round bout and is intended to improve safety, but the elimination of the median and adherence to the County's standards is not anticipated to result in a significant transportation hazard. Therefore, impacts associated with transportation hazards would be less than significant, similar to the project.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4), with the exception of the West Lilac Road, from

the I-15 bridge to the westerly project roundabout. The construction of this segment of West Lilac Road to County Road standards would include sidewalks on both sides of the roadway. While the project would include bike lanes and an 8-foot multipurpose trail on the south side of this roadway to promote alternative transportation, this alternative would include 5-foot sidewalks on both sides of the road that would promote alternative transportation. Both this Road Design Alternative and the project would provide alternative transportation opportunities and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Overall, neither the project nor this alternative would result in a negative effect to public transit, bicyclists or pedestrians. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative agricultural resource impacts would be similar to the project (subchapter 2.4). The West Lilac Road improvements included in this alternative would affect an additional 0.12 acre of orchards to the north of the roadway, but the impact would not be significant since that area does not meet Prime Farmland or Farmland of Statewide Importance soil quality requirements and is not a significant agricultural resource. As this alternative would not change any proposed land uses, the potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. The additional West Lilac Road improvements included in this alternative would impact an additional 0.12 acre of orchard; however, the additional area is not considered an agricultural resource since it does not have soils that qualify as Prime Farmland or Farmland of Statewide Importance. Thus, this alternative would have the same agricultural resource impacts as the project (direct Impact AG-1 and cumulative Impact AG-16; see subchapter 2.4.2.1). Mitigation M-AG-1 would reduce the direct and cumulative impacts to below a level of significance as with the project (see subchapter 2.4.5 and 2.4.6).

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would be identical to that described for the project in subchapter 2.4.2.2 considering all the proposed on-site land uses would be identical and that roadways are considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley

Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. As with the project, this alternative does not include and is not adjunct to Williamson Act contracted lands or Agricultural Preserves. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (see Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations (Impacts AG-2 through AG-15; see subchapter 2.4.2.3). This Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. While the West Lilac Road, I-15 Bridge to the westerly roundabout segment is located adjacent to orchards, roads are considered compatible with agricultural uses. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative biological resource impacts would be similar to the project but would include additional sensitive habitat impacts (0.02 acre). Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. The additional sensitive habitat impact would require additional mitigation (0.04 acre). This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

In addition to the impacts identified for the project (see subchapter 2.5.2.2, and Impact BIO-2), this alternative would result in an additional 0.02 acre of sensitive coastal sage scrub habitat impact (see Table 4-5). This additional sensitive habitat impact would be significant (Impact RD-BIO-1b). All other impacts of this Road Design Alternative would be the same the project (see subchapter 2.5).

Construction of the land use plan and off-site improvements proposed under this alternative would result in the same significant impacts as those detailed in subchapter 2.5.2. These impacts include the removal of more than 5 percent of the raptor foraging habitat on-site, identified as Impact BIO-1. The additional area impacted by this alternative (0.16 acre) would not alter the severity of the raptor foraging impact described for the project, as the project impact is 538.29 acres of raptor foraging and the additional area impacted by this alternative would represent a less than 0.1 percent increase in impact. Thus, this alternative would have a similar raptor foraging impact (Impact BIO-1) as the project.

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3, as detailed in subchapter 2.5.5. In addition to the mitigation land identified for the project, the following measure M-RD-BIO-1b would be required to mitigate the additional sensitive habitat impact of this alternative to below a level of significance (see Table 4-6):

M-RD-BIO-1b: Prior to issuance of a grading permit for the construction of West Lilac Road, I-15 Bridge to westerly roundabout, to the County's roadway standards, the following shall be provided either on-site within the open space easement; off-site within a draft PAMA of the draft North County MSCP in Valley Center or adjacent communities; or through a mitigation bank, subject to the approval of the County and appropriate wildlife agencies:

1. Impacts to 0.02 acre of coastal sage scrub shall be mitigated at a 2:1 ratio with 0.04 acre.

As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community similar to the project (see subchapters 2.5.6.1 and 2.5.6.2).

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). No additional jurisdictional impacts would occur under this alternative (Table 4-7). Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands.

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. No additional wildlife movement or nursery sites would be impacted by widening the West Lilac Road, I-15 Bridge to the westerly roundabout segment, as the roadway already exists. The impact to localized wildlife movement would be the same as the project, and less than significant.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative cultural resource impacts would be similar to the project. While the alternative West Lilac Road roadway improvements completed by this alternative would affect additional 0.16-acre area where there is potential for unknown subsurface cultural resources, the overall impact area acreage would be similar to the project and, accordingly, the potential impact would be similar to the project. Thus, this alternative would result in significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources similar to the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. No additional buildings beyond those already identified for the project would be impacted by this Road Design Alternative. Thus, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the West Lilac Road area, the archeological site impacts would be the same as the project except for the additional West Lilac Road improvement area. No known cultural resources exist within the West Lilac Road improvement area, but this 0.16-acre area would have a potential for unknown significant subsurface cultural resources considering the known resources in the community.

As described for the project in subchapter 2.6.5.1, this alternative would potentially have significant impacts to: one archeological site that is not protected in proposed dedicated open space **(**Impact CR-1); unknown subsurface archeological resources within on and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to Gopher Canyon Road improvements (Impact CR-3). The additional 0.16-acre area of potential impact to unknown subsurface cultural resources that would occur due to the additional West Lilac Road improvements would not change the impact relative to the project considering this change would represent less than a 0.1 percent change to the overall impact area. Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas. Human remains are also not expected within the additional West Lilac Road improvement area that is included in this alternative. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As described for the project in subchapter 2.6.2.4, there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur. As no County RPO site exists within the additional West Lilac Road improvement area included in this alternative, this Road Design Alternative would have the same less than significant County RPO impact as the project.

Hazards/Hazardous Materials

In summary, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts of this alternative would be significant but mitigated to below a level of significance identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. This alternative would include a traffic control plan during construction and include West lilac Road improvement phasing so the roadway would be open to through traffic during construction. Thus, this Road Design Alternative would have less than significant impacts related to emergency response and evacuation plans similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. The increase in this segment of West Lilac Road would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative impacts related to vectors would be less than significant.

Noise

In summary, the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the same as the project, as this alternative would have the same traffic generation, traffic distribution, and roadway centerlines as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project, as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources

similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would have the same traffic conditions and roadways as the project with the exception of a segment of West Lilac Road. Where the West Lilac Road, I-15 Bridge to the westerly roundabout, segment is built to standard, the nearest existing residence would be 90 feet from the roadway and would not experience significant traffic noise impacts. The alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impacts N-3). As with the project, these noise Impacts N-1 and N-2 would be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. However, Impact N-3 would potentially remain significant and unmitigated since providing a continuous noise barrier or other methods to reduce traffic noise may be infeasible. Refer to subchapter 2.8.6.1 for additional information. This alternative would also have the significant cumulative traffic noise impacts of the project (cumulative traffic (Impacts N-17 and N-18). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would be the same as the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same as the project (subchapter 2.8.2.2), except the additional noise that would occur from the additional widening of West Lilac Road, between the I-15 bridge and western project roundabout. This includes direct noise Impacts N-11 to N-14, and cumulative noise Impacts N-19 and N-20. As described for the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapters 2.8.6). The additional West Lilac Road improvements would be located 90 feet from an existing residence. While the noise levels may be an annoyance, the noise levels would be below the County's Noise Ordinance 75 dB(A) L_{eq} limit. As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." Thus, due to the distance from the edge of roadways to receiver locations, impacts to NSLU from widening West Lilac Road, between the I-15 bridge and

western project roundabout, to standard would be less than significant, similar to the project.

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be the same the project (refer to subchapter 2.8.6.2, Impacts N-15 and N-16), except for the construction of West Lilac Road, between the I-15 bridge and the westerly project roundabout. As discussed for the project, vibration levels may exceed County thresholds (0.004 inches per second RMS) if grading occurs within 150 feet of a residence. This alternative would involve additional grading on West Lilac Road that would be closer to a residence compared to the project. Both the project and the alternative would potentially result in a significant vibration impact from West Lilac Road improvements between I-15 bridge and the westerly project roundabout considering the location of existing residences. As with the project (see subchapter 2.8.6.3), significant vibration impacts N-15 and N-16 would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11) and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12).

Less than Significant Impacts

Geology and Soils

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, the underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional widening of West Lilac Road between Old Highway 395 and the I-15 bridge, and the geology and soils conditions in that area are the same as addressed for the project. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would slightly increase the GHG emissions relative to the project due to additional roadway improvements, the alternative would be the same GHG-reducing features as the project and this alternative would be consistent with all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies, or regulations (see subchapter 3.1.2).~~percent reduction from 2020 emissions would be the same considering the inclusion of the same GHG-reducing features and this alternative would be consistent with the County's performance threshold. Thus, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~

Hydrology and Water Quality

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative public service impacts would be similar to the project as the proposed land uses would be the same. As with the project, public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5).

Recreation

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid

the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the West Lilac Road, I-15 Bridge to Westerly Roundabout, Road Design Alternative would result in additional impacts relative to biological resources and would not reduce any significant impact of the project. This alternative would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for West Lilac Road, I-15 Bridge to the westerly roundabout, is not approved.

4.8.1.4 Road Design Alternative 4: West Lilac Road – Westerly Roundabout to Northern Project Boundary

The project's proposed road design for this road segment corresponds to Road Exception Request #4, as submitted to County. The road design analyzed under this alternative is the construction of West Lilac Road from the western-most roundabout within the project site to the northern project boundary to a standard County Light Collector road 2.2C (see Figure 4-9). Under the standard design, West Lilac Road would include 28 feet of road surface width with 8-foot shoulders and 12-foot parkways on both sides of the road (total road width right-of-way of 64 to 78 feet), and a minimum design speed of 40 mph (compare to the exception requested which would allow 24 feet of pavement, within 28 feet graded width, and a reduction in design speed to 25 mph). This alternative road design would also flatten out the topography (i.e., 500-foot minimum horizontal curve) and reduces the curves of the roadway (400-foot minimum tangent length between curves). An additional 0.11 acre of grading would be required relative to the project to widen the roadway, including 1,483 cy of cut and 167 cy of fill. Slopes associated with this alternative roadway design would be 16 feet tall instead of the 12 feet required for the project. ~~This alternative road design would require condemnation, the relocation of power poles, and impacts to driveways for two adjacent properties.~~

Comparison of the Effects of the Road Design Alternative to the Project

Visual Resources

In summary, visual resource impacts of this road design alternative would be identical to the project except for the West Lilac Road segment between the western roundabout and the northern project boundary. While the roadway in this area would be wider, flatter, and less curvy relative to the project, these changes would not alter the conclusions of the project's visual resource analysis. As with the project, this road design alternative would have significant, unmitigated character and quality impacts, and less than significant impacts to scenic vistas, scenic resources, light, glare, and plan consistency. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed. A segment of I-15 within the viewshed is identified as a County Scenic Highway, but there

are very steep, tall slopes on both sides of I-15 that preclude views of West Lilac Road. Due to this, the alternative road design changes to West Lilac Hills Road are not visible from the I-15. The visual impacts of this alternative would be the same as the project (subchapter 2.1.2.1). Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project.

Issue 2: Scenic Resources (Less Than Significant Impact)

The scenic resource impacts of this Road Design Alternative would be the same as the project. The additional improvements on West Lilac Road would not impact any scenic native vegetation, RPO slopes, or other scenic resource. Thus, impacts to scenic resources (i.e., slopes and native vegetation) would be the same as those described for the project in subchapter 2.1.2.2. As with the project, this alternative would result in less than significant impacts to scenic resources.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

This Road Design Alternative would have the same visual character as the project except at the West Lilac Road segment between the western roundabout and the northern project boundary. The roadway impact area would be a similar scale to the project, but the roadway would be wider, the speed limit higher and a flatter topography. Overall, these changes in road design features would result in a slightly more urban character, but the overall visual character and quality of this West Lilac Road segment would remain similar to the project conditions (see subchapter 2.1.2.3, Off-Site Improvements). As with the project (subchapter 2.1.2.3), this alternative would affect visual character/quality as viewed from West Lilac Road **(**Impact V-1), as viewed from surrounding residences (Impact V-2), and as viewed on a cumulative level within the entire viewshed (Impact V-4). Construction phase temporary impacts to visual character and quality would also be significant (Impact V-3). As with the project, these visual impacts would remain significant and unmitigated under this alternative (see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting along West Lilac Road, between the western roundabout to the northern project boundary, as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in less than significant visual impacts due to the light and glare similar to the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would have air quality impacts similar to the project, which are identified in subchapter 2.2. The additional roadway grading (0.21 acre) and construction required under this alternative would slightly increase construction emissions relative to the project, but the increase would be negligible and the impact would still be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As described for the project in subchapter 2.2.2.1, this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. While this alternative would result in additional grading and construction associated with the roadway improvements necessary to County standards, the air quality impact of this alternative would be the same as the project. The additional grading under this alternative (0.21 acre including 1,483 cy of cut and 167 cy of fill) would represent less than a 0.1 percent increase relative to the project grading (4.0 million cubic yards of cut and fill). This alternative would implement project design features (see Table 1-3) that reduce air emissions the same as the project. As with the project, this alternative would have significant air quality impacts (Impact AQ-2) and would require implementation of mitigation measures (M-AQ-2, M-AQ-3, and M-AQ-4; see subchapter 2.2.5) to reduce construction emissions to below a level of significance.

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative operational impacts would be the same as the project operational impacts described in subchapter 2.2.2.2. Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions

generated by either would be similar and operational impacts (Impact AQ-3) and mitigation (M-AQ-6 and M-AQ-7) would be the same as the project (see subchapter 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. Construction of this segment of West Lilac Road would occur in Phase 1 when no other phases in operation or construction. Thus, the construction emission changes would not result in any additional cumulative effect beyond that discussed for the project. All other phases of this alternative would be the same as the project, and would result in the same impacts (Impact AQ-4). As with the project (subchapter 2.2.6), this design alterative would result in a significant and unavoidable (Impact AQ-4) and a cumulatively considerable significant impact (Impact AQ-6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This West Lilac Road Roadway Design Alternative would result in the same traffic volumes and distribution as the project. Thus, the alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0 for the project, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would have the same transportation/traffic impacts as the project. This includes direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative would be less than significant. The roadway design changes at West Lilac Road from western roundabout to the northern boundary would not alter the overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). Also, this alternative

design would not result in a significant safety issue similar to the project. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see subchapter 2.3.2.2). West Lilac Road improvements would be phased in a manner so the roadway would not be closed during construction. Similar to the project, construction-related traffic impacts would be less than significant.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would be identical to the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (see subchapter 2.3.3.1), as it would not alter capacity, trip generation or trip distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be similar to the project (see subchapter 2.3.2.3) with the exception of West Lilac Road, from the western roundabout to the northern project boundary. This alternative would build that segment to County's road standards that are designed to provide adequate ingress and egress for residents as well as emergency access, safe pedestrian system, and conform to Goal M-4 of the General Plan Mobility Element. It is noted that this roadway design alternative includes increasing the speed from the proposed project 25 mph speed limit to 40 mph on this short segment that approaches a roundabout. To accommodate this increase in speed safely, the County road standards also require the topography to be flattened, and the curves to be reduced. Thus, this alternative roadway design would not result in a significant transportation hazard. As with the project, impacts associated with transportation hazards would be less than significant.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4), with the exception of the West Lilac Road, from the western roundabout to the northern project boundary. The construction of this segment of West Lilac Road to County Road standards would include 12-foot parkways on both sides of the roadway, which have 5-foot sidewalks separated from the roadway. This would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Overall, neither the project nor this alternative would result in a negative effect to public transit, bicyclists or pedestrians. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative agricultural resource impacts would be similar to the project (subchapter 2.4). The West Lilac Road improvements included in this alternative would affect an additional 0.10 acre of orchards, but the impact would not be significant since that area does not meet Prime Farmland or Farmland of Statewide Importance soil quality requirements and is not a significant agricultural resource. As this alternative would not change any proposed land uses, the potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. The additional West Lilac Road improvements included in this alternative would impact an additional 0.11 acre; however, the additional area is not considered an agricultural resource since it consists of developed area (0.01 acre) and the orchards (0.10 acre) does not have soils that qualify as Prime Farmland or Farmland of Statewide Importance. Thus, this alternative would have the same agricultural resource impacts as the project (direct Impact AG-1 and

cumulative Impact AG-16; see subchapter 2.4.2.1). Mitigation M-AG-1 would reduce the direct and cumulative impacts to below a level of significance as with the project (see subchapter 2.4.5 and 2.4.6).

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would be identical to that described for the project in subchapter 2.4.2.2 considering all the proposed on-site land uses would be identical and that roadways are considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. As with the project, this alternative does not include and is not adjunct to Williamson Act contracted lands or Agricultural Preserves. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (see Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations (Impacts AG-2 through AG-15; see subchapter 2.4.2.3). This Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. While the West Lilac Road, Western Roundabout to Northern Project Boundary segment is located adjacent to orchards, roads are considered compatible with agricultural uses. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative biological resource impacts would similar to the project. The additional 0.11-acre improvement area included in this alternative consists of non-sensitive habitat (orchards and developed area). The additional 0.1 acre of orchard impact would not alter the severity of the raptor foraging impact described for the project. Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

This road design alternative would result in the same sensitive habitat and special status species impacts as identified for the project (see subchapter 2.5.2.2, and Impact BIO-2).

The additional 0.11-acre improvement area included in this alternative consists of non-sensitive habitat (orchards and developed area; see Table 4-5). The additional 0.1 acre of orchard impact would not alter the severity of the raptor foraging impact described for the project, as the project impact is 538.29 acres of raptor foraging and the additional 0.1 acre of raptor foraging impact that would occur under this alternative would represent a less than 0.1 percent increase in impact. Thus, this alternative would have a similar raptor foraging impact as the project (Impact BIO-1).

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3, as detailed in subchapter 2.5.5. As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community as the project (see subchapters 2.5.6.1 and 2.5.6.2).

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). No additional jurisdictional impacts would occur under this alternative (see Table 4-7). Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands.

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. No additional wildlife movement or nursery sites would be impacted by widening the West Lilac Road, Western Roundabout to Northern Project Boundary, segment since a roadway already exists and the change in width would not alter wildlife crossings. The impact to localized wildlife movement would be the same as the project, and less than significant.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, this road design alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative cultural resource impacts would be similar to the project. While the alternative West Lilac Road roadway improvements completed by this alternative would affect an additional 0.11-acre area where there is potential for unknown subsurface cultural resources, the overall impact area acreage would be similar to the project and, accordingly, the potential impact would be similar to the project's potential impact to unknown subsurface resources. This alternative would result in significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources identical to the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. No additional buildings beyond those already identified for the project would be impacted by this Road Design Alternative. Thus, the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the West Lilac Road area, the archeological site impacts would be the same as the project except for the additional West Lilac Road improvement area. No known cultural resources exist within that West Lilac Road improvement area, but the 0.11-acre area would have a potential for unknown significant subsurface cultural resources.

As described for the project in subchapter 2.6.5.1, this alternative would potentially have significant impacts to: one archeological site that is not protected in proposed dedicated open space **(**Impact CR-1); unknown subsurface archeological resources within on and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to Gopher Canyon Road improvements (Impact CR-3).

The additional 0.11-acre area of potential impact to unknown subsurface cultural resources that would occur due to the additional West Lilac Road improvements would not change the impact relative to the project considering this change would represent less than a 0.1 percent change to the overall impact area. Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential

archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas. Human remains are also not expected within the additional West Lilac Road improvement area that is included in this alternative. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the West Lilac Road, Westerly Roundabout to Northern Project Boundary, Road Design Alternative would have a less than significant ~~historical resource~~ impact related to human remains, similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As described for the project in subchapter 2.6.2.4, there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur. As no County RPO site exists within the additional West Lilac Road improvement area included in this alternative, this Road Design Alternative would have the same less than significant County RPO impact as the project.

Hazards/Hazardous Materials

In summary, the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts of this alternative would be significant but mitigated to below a level of significance identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing

septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. This alternative would include a traffic control plan during construction and include West lilac Road improvement phasing so the roadway would be open to through traffic during construction. Thus, this Road Design Alternative would have less than significant impacts related to emergency response and evacuation plans similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. The increase in this segment of West Lilac Road would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative impacts related to vectors would be less than significant.

Noise

In summary, the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the similar to the project, as this alternative would have the same traffic generation and traffic distribution as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project,

as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would have the same traffic conditions and roadways as the project with the exception of a segment of West Lilac Road. Where the West Lilac Road, Western Roundabout to Northern Project Boundary, segment is built to standard, the nearest existing residence would be 300 feet from the roadway and would not be significantly impacted the traffic noise generated by the project. The alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impacts N-3). As with the project, these noise Impacts N-1 and N-2 would be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. However, Impact N-3 would potentially remain significant and unmitigated since providing a continuous noise barrier or other methods to reduce traffic noise may be infeasible. Refer to subchapter 2.8.6.1 for additional information.

This alternative would also have the significant cumulative traffic noise impacts of the project (cumulative traffic (Impacts N-17 and N-18). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would be the same as the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same as the project (see subchapter 2.8.2.2), except the additional noise that would occur from the additional widening of West Lilac Road, between the western roundabout and northern project boundary. This includes direct noise **Impacts N-11 to N-14**, and cumulative noise Impacts **N-19** and **N-20**. As described for the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapters 2.8.6).

The additional West Lilac Road improvement area included in this alternative would be located 300 feet from an existing residence. As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." While the noise levels may be an annoyance, the noise levels would be below the County's Noise Ordinance 75 dB(A) L_{eq} limit at occupied properties. Thus, impacts to NSLU from widening West Lilac Road, between the western roundabout and the northern project boundary, to standard would be less than significant, similar to the project.

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be the same as the project (refer to subchapter 2.8.6.2, Impacts N-15 and N-16), except for the construction of West Lilac Road, between the western roundabout and the northern project boundary. As discussed for the project, vibration levels may exceed County thresholds (0.004 inches per second RMS) if grading occurs within 150 feet of a residence. This alternative would involve additional grading on West Lilac Road, but that grading would be located approximately 300 feet from the nearest residence. Thus, no additional vibration impact beyond those of the project would occur under this alternative. As with the project (see subchapter 2.8.6.3), significant vibration impacts N-15 and N-16 would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11) and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12).

Less than Significant Impacts

Geology and Soils

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, the underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional widening of West Lilac Road between the western roundabout and the northern project boundary, and the geology and soils conditions in that area are the same as addressed for the project. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would slightly increase the alternative would be the same GHG-reducing features as the project and this alternative would be consistent with all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies, or regulations (see subchapter 3.1.2).~~the GHG emissions relative to the project due to additional roadway improvements, the percent reduction from 2020 emissions would be the same~~

~~considering the inclusion of the same GHG-reducing features and this alternative would be consistent with the County's performance threshold. Thus, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~

Hydrology and Water Quality

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative public service impacts would be similar to the project as the proposed land uses would be the same. As with the project, public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5).

Recreation

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the West Lilac Road, Western Roundabout to Northern Project Boundary, Road Design Alternative would result in additional impacts relative to visual resources and biological resources and would not reduce any significant impact of the project. This alternative would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for West Lilac Road, western roundabout to northern project boundary, is not approved.

4.8.1.5 Road Design Alternative 5: West Lilac Road Along Northern Project Boundary

The project's proposed road design for this road segment corresponds to Road Exception Request #5, as submitted to the County. As requested by the County, this alternative has three roadway design options: (A) follow the existing pavement and build to classification 2.2F unmodified, (B) follow the existing pavement and build to classification 2.2C, and (C) follow the SC-270 alignment and build to classification 2.2C. These options are described further below.

Option A

The road design analyzed under this alternative is the construction of West Lilac Road along the northern project boundary as a County Light Collector road 2.2F (pursuant to the project's General Plan/Mobility Element Amendment) (see Figure 4-10a). The road surfacing width would be 28 feet within a 52-foot right-of-way, a 2-foot shoulder, and 12-foot parkway, with a minimum design speed of 40 mph (compared to Exception Request #5 which would allow construction of a modified half-width 2.2F Light Collector improvement widening the existing 24 feet of pavement to 26 feet). The road design under this alternative would include a 500 foot minimum horizontal curve and 400 foot minimum tangent length between curves would be required (compared to the requested exception to the tangent length between curves which would allow the existing centerline to be maintained, due to the proximity of existing adjacent homes and consistent with existing front yard setbacks and established land uses). The alternative roadway design would require an additional 2.82 acres of grading, including 4,484 cy of cut and 440 cy of fill. This alternative would include 14 foot slopes along this segment, while the project roadway improvements would only require a 5-foot slope.

This road design would require 1.5 acres of additional right-of-way acquisition through condemnation, affecting two buildings and 12 driveways, and requiring relocation of existing power poles. Since existing homes are very close to the existing pavement some may need to be demolished and driveways would need to be reconstructed.

Option B

The road design analyzed under this alternative is the construction of West Lilac Road at its currently designated classification of 2.2C, following the existing centerline of the existing pavement (see Figure 4-10b). Classification 2.2C (without a turn lane) requires two 12-foot travel lanes, eight-foot shoulders (40 feet of pavement overall), and 12-foot parkways within a 64-foot graded right-of-way.

The alternative roadway design would require an additional 8.39 acres of grading, including 7,192 cy of cut and 8,550 cy of fill. This alternative would include 14 foot slopes along this segment, while the project roadway improvements would only require a 5-foot slope. This road design would require 2.06 acres of additional right-of-way acquisition through condemnation, encroaching on the existing footprint of two single-family residences and 12 driveways, and requiring relocation of existing power poles.

Option C

The road design analyzed under this alternative is the construction of West Lilac Road at its currently designated classification of 2.2C, generally following the SC-270 alignment. This road design would construct West Lilac Road to the same standards as above, but following the SC 270 alignment. The SC 270 alignment is an adopted alignment that was mapped in 1971 (RS 383-1). There would be no other differences in the design of this roadway. Figure 4-10c shows West Lilac Road constructed as a standard 2.2C generally following the SC-270 alignment. .

The alternative roadway design would require an additional 7.3 acres of grading, including 6,564 cy of cut and 11,439 cy of fill. This alternative would include 14 foot slopes along this segment, while the project roadway improvements would only require a 5-foot slope. This road design would require 1.75 acres of additional right-of-way acquisition through condemnation, encroaching on the existing footprint of two single-family residences and 12 driveways, and requiring relocation of existing power poles.

Comparison of the Effects of the Road Design Alternative to the Project

The existing conditions, methodology and significance determination information for the environmental analysis below is the same as the project (see Chapter 2.0). The Road Design Alternative analyzes the differences of the roadway design proposed under this alterative from the roadway analyzed under the proposed project with the exception requests. The other features of the road design under this alternative are the same as the proposed project. The analysis is based on information obtained for the project that is applicable for the alternative, including site visits and technical reports.

This road design alternative has three options. Where these three options result in the same impacts, no distinction is made between the options in the analysis. Where different impact severities would occur between the options, the impacts are explained separately for each option.

Visual Resources

In summary, this alternative would have the same visual impacts as the project except along the West Lilac Road segment along the northern project boundary. The

alternative road designs for this segment would result in a wider roadway with a more urbanized character relative to the project, but would not alter the conclusions of the project's visual resource analysis. As with the project, this road design alternative would result in significant unmitigated character and quality impacts, and less than significant scenic vistas, scenic resources, light, glare, and plan consistency impacts. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed; however, a segment of I-15 within the viewshed is identified as a County Scenic Highway. There are very steep, high slopes on both sides of I-15 that preclude views of West Lilac Road. Thus, the Road Design Alternative changes to West Lilac Hills Road are not visible from the I-15. The visual impacts of this alternative would be the same as the project (see subchapter 2.1.2.1). Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project.

Issue 2: Scenic Resources (Less Than Significant Impact)

The scenic resource impacts of this Road Design Alternative would be similar to the project. This alternative would include an additional impact area (2.82 acres for Option A, 8.39 acres for Option B, and 7.3 acres for Option C), but would not impact any additional RPO slopes and the additional impacts to native vegetation (0 acre for Option A, 0.53 acre for Option B, and 0.69 acre for Option C) would be a small increase relative to the project impact. As with the project, graded areas outside of the proposed pavement would revegetated/landscaped so that visual impacts would not be detected from public viewpoints or degrade visual quality. Overall, impacts to scenic resources (i.e., slopes and native vegetation) would be similar to those described for the project in subchapter 2.1.2.2. Therefore, this alternative would result in less than significant impacts to scenic resources, similar to the project.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

This Road Design Alternative would have the same visual character as the project except at the West Lilac Road segment along the northern project boundary. The additional widening under this alternative would result in a slightly more urbanized feel than the project. Considering the overall character and quality with the proposed land uses in conjunction with infrastructure improvements, the road design alternative and project would result in a similar significant visual character and quality impact. As with the project (subchapter 2.1.2.3), this alternative would affect visual character/quality as viewed from West Lilac Road **(**Impact V-1), as viewed from surrounding residences (Impact V-2), and as viewed on a cumulative level within the entire viewshed (Impact V-4). Construction phase temporary impacts to visual character and quality would also be significant (Impact V-3). As with the project, these visual impacts would remain significant and unmitigated under this alternative (see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting along

the West Lilac Road along the northern project boundary, as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in less than significant visual impacts due to the light and glare similar to the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of West Lilac Road Along Northern Project Boundary, Road Design Alternative would have air quality impacts similar to the project, which are identified in subchapter 2.2. The additional grading (4,484 cy of cut and 440 for Option A, 7,192 cy of cut and 8,550 cy of fill for Option B, and 6,564 cy of cut and 11,439 cy of fill for Option C) required under Phase 1 of this alternative would slightly increase construction emissions relative to the project, but the increase would be negligible and would be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As described for the project in subchapter 2.2.2.1, this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. While this alternative would result in additional grading and construction associated with the roadway improvements necessary to County standards, the air quality impact of this

alternative would be the same as the project. The additional grading under this alternative (4,484 cy of cut and 440 for Option A, 7,192 cy of cut and 8,550 cy of fill for Option B, and 6,564 cy of cut and 11,439 cy of fill for Option C) would represent a maximum 2 percent increase relative to the project grading (4.0 million cubic yards of cut and fill). This alternative would implement project design features (see Table 1-3) that reduce air emissions the same as the project. As with the project, this alternative would have significant air quality impacts (Impact AQ-2) and would require implementation of mitigation measures (M-AQ-2, M-AQ-3, and M-AQ-4; see subchapter 2.2.5) to reduce construction emissions to below a level of significance.

The West Lilac Road Along Northern Project Boundary, Road Design Alternative operational impacts would be the same as the project operational impacts described in subchapter 2.2.2.2. Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions generated by either would be similar and operational impacts (Impact AQ-3) and mitigation (M-AQ-6 and M-AQ-7) would be the same as the project (see subchapters 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. Construction of this segment of West Lilac Road would occur in Phase 1 when no other phases in operation or construction. Thus, the construction emission changes would not result in any additional cumulative effect beyond that discussed for the project. All other phases of this alternative would be the same as the project, and would result in the same impacts (Impact AQ-4). As described in subchapter 2.2.6 for the project, this design alterative would result in a significant and unavoidable (Impact AQ-4) and a cumulatively considerable significant impact (Impact AQ-6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This West Lilac Road Roadway Design Alternative would result in the same traffic volumes and distribution as the project. Thus, the alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The West Lilac Road Along Northern Project Boundary, Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the West Lilac Road Along Northern Project Boundary, Road Design Alternative would have the same transportation/traffic impacts as the project. This includes direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative would be less than significant. The roadway design changes at West Lilac Road along the northern project boundary would not alter the overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). As with the project, this alternative design would not result in a significant safety issue. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The West Lilac Road Along Northern Project Boundary, Road Design Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see subchapter 2.3.2.2). West Lilac Road improvements would be phased in a manner so the roadway would not be closed during construction. Similar to the project, construction-related traffic impacts would be less than significant.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the West Lilac Road Along Northern Project Boundary, Road Design Alternative would be the same as the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (see subchapter 2.3.3.1), as it would not alter capacity, trip generation or trip distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be identical to the project (see subchapter 2.3.2.3) with the exception of West Lilac Road along the northern project boundary. The project would include modifications to shift the improvements to the south side of the roadway and minimize widths to avoid impacting existing homes located to the north of the roadway. Pursuant to that, the project retains the existing alignment and includes a wider shoulder and a wider multi-purpose trail on the south side and does not include such features on the north side. Constructing this roadway to standard would include a wider and flatter roadway (i.e., horizontal curve) with wider curves (i.e., vertical curve), and 2-foot shoulders and sidewalks on both sides of the road. Both this alternative and the project have been designated to provide adequate ingress and egress for residents as well as emergency access, safe pedestrian system, and conform to Goal M-4 of the General Plan Mobility Element. Therefore, impacts associated with transportation hazards would be less than significant, similar to the project.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4), with the exception of the West Lilac Road, from along the northern project boundary. The construction of this segment of West Lilac Road to County Road standards would include standard sidewalks on both sides of the roadway. While the project would include an 8-foot multipurpose trail on the south side of this roadway to promote alternative transportation, this alternative would include 5-foot sidewalks on both sides of the road that would promote alternative transportation. Both this Road Design Alternative and the project would provide alternative transportation opportunities and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Overall, neither the project nor this alternative would result in a negative effect to public transit, bicyclists or pedestrians. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the West Lilac Road Along Northern Project Boundary, Road Design Alternative agricultural resource impacts would be similar to the project (subchapter 2.4). The West Lilac Road improvements included in this alternative would affect additional orchards (0.87 acre under Option A, 0.96 acre under Option B, and 1.75 acres under Option C), and a portion of that impact may meet Prime Farmland or Farmland of Statewide Importance soil quality requirements. As such, the acreage of this alternative's significant agricultural resource impact would be greater than identified for the project. As this alternative would not change any proposed land uses, the

potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. The West Lilac Road improvements included in this alternative would impact additional orchards (0.87 acre under Option A, 0.96 acre under Option B, and 1.75 acres under Option C) that may have some soils that meet Prime Farmland or Farmland of Statewide Importance. Thus, this alternative would potentially have additional agricultural resource impact acreage (RD-AG-1) than the project (direct Impact AG-1 and cumulative Impact AG-16; see subchapter 2.4.2.1). In addition to the mitigation acreage identified in Mitigation M-AG-1 for the project, this alternative would require the following additional agricultural resource mitigation land or credits to mitigate the direct and cumulative impacts to below a level of significance (see subchapter 2.4.5 and 2.4.6):

M-RD-AG-1: The additional significant agricultural resource impacts (0.87 acre under Option A, 0.96 acre under Option B, and 1.75 acres under Option C) of the West Lilac Road Along Northern Project Boundary, Road Design Alternative shall be mitigated through a combination of one or more of the following:

A. The applicant shall purchase mitigation credits through the County's PACE program at a one-acre to one credit ratio prior to the issuance of a grading permit.

B. In the event that PACE credits are unavailable or the applicant elects not to participate, the applicant may choose to independently secure conservation easements. The conservation easement shall prohibit non-agricultural uses and must include Prime and Statewide important soils equal or greater to the soils being converted and at a 1:1 ratio. ~~The applicant shall secure an off-site agricultural conservation easement(s) over prime and statewide importance soils that prohibit non-agricultural uses at a 1:1 mitigation ratio.~~ The conservation easements shall occur within the County of San Diego and within the cumulative project area, or at a location approved by the Director of P&DS. ~~100 miles of the project site.~~ The applicant shall grant the easement in perpetuity to the County prior to the issuance of a grading permit.

C. The applicant may choose to mitigate through a combination of options A or B so long as the total acreage of mitigation is equal to a 1:1 ratio and occurs on soils of equal value to those being converted. The applicant shall provide proof to the County that the mitigation has been implemented prior to the issuance of a grading permit.~~The applicant shall preserve prime and statewide importance soils on-site~~

~~at a 1:1 ratio through a conservation easement. The applicant shall grant the easement in perpetuity to the County prior to the issuance of a grading permit.~~

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the West Lilac Road Along Northern Project Boundary, Road Design Alternative would be identical to that described for the project in subchapter 2.4.2.2 considering all the proposed on-site land uses would be identical and that roadways are considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. As with the project, this alternative does not include and is not adjunct to Williamson Act contracted lands or Agricultural Preserves. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (see Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations (Impacts AG-2 through AG-15; see subchapter 2.4.2.3). This Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. While the West Lilac Road along the northern project boundary segment is located adjacent to orchards, roads are considered compatible with agricultural uses. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the West Lilac Road Along Northern Project Boundary, Road Design Alternative biological resource impacts would be similar to the project but would include additional sensitive habitat (0 acre for Option A, 0.53 acre for Option B and 0.69 acre for Option C). Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. The additional sensitive habitat impact would require additional mitigation (1.06 acres for Option B and 1.38 acres for Option C). This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

In addition to the impacts identified for the project (see subchapter 2.5.2.2, and Impact BIO-2), this alternative would result in an additional impacts to sensitive habitat (0 acre for Option A, 0.53 acre of coastal sage scrub for Option B and 0.69 acre of coastal sage scrub for Option C; see Table 4-5). This additional sensitive habitat impact would be significant (Impact RD-BIO-1c). This alternative would also result in additional impacts to raptor foraging habitat above those identified for the project. The additional maximum area impacted by this alternative would not alter the severity of the raptor foraging impact described for the project, as the project impact is 538.29 acres of raptor foraging and the additional area impacted by this alternative would represent a less than 5 percent increase in impact. Thus, this alternative would have a similar raptor foraging impact (Impact BIO-1) as the project. All other sensitive habitat impacts of this Road Design Alternative would be identical to the project (see subchapter 2.5).

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3, as detailed in subchapter 2.5.5. In addition to the mitigation land identified for the project, the following measure M-RD-BIO-1c would be required to mitigate the additional sensitive habitat impact of this alternative to below a level of significance (see Table 4-6):

M-RD-BIO-1c:

1. If West Lilac Road Along Northern Project Boundary, Road Design Alternative Option B is implemented, then the applicant shall provide the following mitigation:

   Prior to issuance of a grading permit for the construction of West Lilac Road Along Northern Project Boundary, to the County's roadway standards, the following shall be provided either on-site within the open space easement; off-site within a draft PAMA of the draft North County MSCP in Valley Center or adjacent communities; or through a mitigation bank, subject to the approval of the County and appropriate wildlife agencies:

   - Impacts to 0.53 acre of coastal sage scrub shall be mitigated at a 2:1 ratio with 1.06 acres.

2. If West Lilac Road Along Northern Project Boundary, Road Design Alternative Option C is implemented, then the applicant shall provide the following mitigation:

   Prior to issuance of a grading permit for the construction of West Lilac Road Along Northern Project Boundary, to the County's roadway

standards, the following shall be provided either on-site within the open space easement; off-site within a draft PAMA of the draft North County MSCP in Valley Center or adjacent communities; or through a mitigation bank, subject to the approval of the County and appropriate wildlife agencies:

- Impacts to 0.69 acre of coastal sage scrub (including disturbed) shall be mitigated at a 2:1 ratio with 1.38 acres.

As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community the project (see subchapters 2.5.6.1 and 2.5.6.2).

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the West Lilac Road Along Northern Project Boundary, Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). No additional jurisdictional impacts would occur under this alternative (see Table 4-7). Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands.

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. No additional wildlife movement or nursery sites would be impacted by widening the West Lilac Road along the northern project boundary segment, as the roadway already exists. The impact to localized wildlife movement would be the same as the project, and less than significant.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The West Lilac Road Along Northern Project Boundary, Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the West Lilac Road Along Northern Project Boundary, Road Design Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the West Lilac Road Along Northern Project Boundary, Road Design Alternative cultural resource impacts would be similar to the project. While the alternative West Lilac Road roadway improvements completed by this

alternative would affect additional area (up to 8.39 acres) where there is potential for unknown subsurface cultural resources, the overall impact area acreage would be similar to the project and, accordingly, the potential impact would be similar to the project. Thus, this alternative would result in significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources similar to the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. Two additional buildings beyond those already identified for the project would be impacted by this Road Design Alternative, but those structures do not meet the requirements to be considered significant historical resources. Thus, the West Lilac Road Along Northern Project Boundary, Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the West Lilac Road area, the archeological site impacts would be the same as the project except for the additional West Lilac Road improvement area. No known cultural resources exist within the West Lilac Road improvement area, but the up to 8.39 acres of impacted area would have a potential for unknown significant subsurface cultural resources considering the known resources in the community.

As described for the project in subchapter 2.6.5.1, this alternative would potentially have significant impacts to: one archeological site that is not protected in proposed dedicated open space (Impact CR-1); unknown subsurface archeological resources within on and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to Gopher Canyon Road improvements (Impact CR-3). The additional area of potential impact to unknown subsurface cultural resources that would occur due to the additional West Lilac Road improvements would not change the impact relative to the project considering this change would represent less than 2 percent change to the overall impact area. Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas. Human remains are also not expected within the additional West Lilac Road improvement area that is included in this alternative. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the West Lilac Road Along Northern Project Boundary, Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As described for the project in subchapter 2.6.2.4, there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur. As no County RPO site exists within the additional West Lilac Road improvement area included in this alternative, this Road Design Alternative would have the same less than significant County RPO impact as the project.

Hazards/Hazardous Materials

In summary, the West Lilac Road Along Northern Project Boundary, Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts of this alternative would be significant but mitigated to below a level of significance identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The West Lilac Road Along Northern Project Boundary, Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The West Lilac Road Along Northern Project Boundary, Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The West Lilac Road Along Northern Project Boundary, Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. This alternative would include a traffic control plan during construction and include West lilac Road improvement phasing so the roadway would be open to through traffic during construction. Thus, this Road Design Alternative would

have less than significant impacts related to emergency response and evacuation plans similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. The increase in this segment of West Lilac Road would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The West Lilac Road Along Northern Project Boundary, Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the West Lilac Road Along Northern Project Boundary, Road Design Alternative impacts related to vectors would be less than significant.

Noise

In summary, the West Lilac Road Along Northern Project Boundary, Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the same as the project, as this alternative would have the same traffic generation, traffic distribution, and roadway centerlines as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project, as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The West Lilac Road Along Northern Project Boundary, Road Design Alternative would have the same traffic conditions and roadways as the project with the exception of a segment of West Lilac Road. Under this road design alternative, the nearest two residences would be removed. The alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impacts N-3). As with the project, these noise Impacts N-1 and N-2 would

be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. However, Impact N-3 would potentially remain significant and unmitigated since providing a continuous noise barrier or other methods to reduce traffic noise may be infeasible. Refer to subchapter 2.8.6.1 for additional information.

This alternative would also have the significant cumulative traffic noise impacts of the project (cumulative traffic (**Impacts N-17 and N-18**). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the West Lilac Road Along Northern Project Boundary, Road Design Alternative would be the same the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same as the project (see subchapter 2.8.2.2), except the additional noise that would occur from the additional widening of West Lilac Road, between the Along the northern project boundary. This includes direct noise Impacts N-11 to N-14, and cumulative noise Impacts N-19 and N-20. As described for the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapters 2.8.6). While the noise levels may be an annoyance to residences in the area, the noise levels would be below the County's Noise Ordinance 75 dB(A) L_{eq} limit. As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." Noise levels would be less at the receiver location as they are set back from the edge of roadways. Thus, impacts to NSLU from widening West Lilac Road, ~~Along~~ along the northern project boundary, ~~to standard~~ would be less than significant, similar to the project.

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be the same the project (refer to subchapter 2.8.6.2, Impacts N-15 and N-16)., ~~except for the construction of West Lilac Road, along the northern project boundary.~~ As discussed for the project, vibration levels may exceed County thresholds (0.004 inches per second RMS) if grading occurs within 150 feet of a residence. While this alternative would involve demolition of the two residences closest to this segment and would therefore avoid vibration impacts to those residences, both the project and the alternative would potentially result in potentially significant vibration impacts to other residences within 150 feet of grading. As with the

project (see subchapter 2.8.6.3), significant vibration impacts N-15 and N-16 would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11) and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12).

Less than Significant Impacts

Geology and Soils

The West Lilac Road Along Northern Project Boundary, Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, the underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional widening of West Lilac Road along the northern project boundary, and the geology and soils conditions in that area are the same as addressed for the project. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The West Lilac Road Along Northern Project Boundary, Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would slightly increase the GHG emissions relative to the project due to additional roadway improvements, the alternative would be the same GHG-reducing features as the project and this alternative would be consistent with all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~the percent reduction from 2020 emissions would be the same considering the inclusion of the same GHG-reducing features and this alternative would be consistent with the County's performance threshold. Thus, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~

Hydrology and Water Quality

The West Lilac Road Along Northern Project Boundary, Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the West Lilac Road Along Northern Project Boundary, Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The West Lilac Road Along Northern Project Boundary, Road Design Alternative public service impacts would be similar to the project as the proposed land uses would be the same. As with the project, public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5).

Recreation

The West Lilac Road Along Northern Project Boundary, Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The West Lilac Road Along Northern Project Boundary, Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the West Lilac Road Along Northern Project Boundary, Road Design Alternative would result in additional impacts relative to visual resources and biological resources and would not reduce any significant impact of the project. This alternative would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for West Lilac Road along the northern project boundary, is not approved.

4.8.1.6 Road Design Alternative 6: West Lilac Road - East of Easterly Roundabout to Project Boundary

The project's proposed road design for this road segment corresponds to Road Exception Request #6, as submitted to the County.

The road design analyzed under this alternative is the construction of West Lilac Road east of the easterly roundabout to the project boundary as a County Light Collector road 2.2F (see Figure 4-11). This requires 28 feet of road surfacing width within a 52-foot right-of-way, a 2-foot shoulder, and 12-foot parkway, with a minimum design speed of 40 mph (compared to Exception Request #6 which would allow the construction of a new roundabout, with 24 feet of pavement, no shoulder, and 12-foot parkway on the south only). This alternative would require additional 0.27 acre of grading, resulting in approximately 50 feet of fill and 440 cy of additional cut to the create manufactured slopes up to 10 feet in height (from 6 feet compared to the project). This alternative would require widening and additional 0.03 acre of right-of-way acquisition along with power pole relocation.

Comparison of the Effects of the Road Design Alternative to the Project

Visual Resources

In summary, this alternative would have the same visual impacts as the project except along the West Lilac Road segment from the eastern roundabout to the project boundary. The alternative road designs for this segment would result in a wider roadway with a more urbanized character relative to the project, but would not alter the conclusions of the project's visual resource analysis. As with the project, this road design alternative would result in significant unmitigated character and quality impacts, and less than significant scenic vistas, scenic resources, light, glare, and plan consistency impacts. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed; however, a segment of I-15 within the viewshed is identified as a County Scenic Highway. There are very steep, high slopes on both sides of I-15 that preclude views of West Lilac Road. Thus, the Road Design Alternative changes to West Lilac Road are not visible from the I-15. The visual impacts of this alternative would be the same as the project (see subchapter 2.1.2.1). Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project.

Issue 2: Scenic Resources (Less Than Significant Impact)

The scenic resource impacts of this Road Design Alternative would be similar to the project. This alternative would include an additional impact area (0.27 acre), but would not impact any additional RPO slopes or native vegetation. As with the project, graded areas outside of the proposed pavement would revegetated/landscaped so that visual impacts would not be detected from public viewpoints or degrade visual quality. Overall, impacts to scenic resources (i.e., slopes and native vegetation) would be the same as

those described for the project in subchapter 2.1.2.2. Therefore, this alternative would result in less than significant impacts to scenic resources, similar to the project.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

This Road Design Alternative would have the same visual character as the project except at the West Lilac Road segment from the eastern roundabout to the project boundary. The additional widening under this road design alternative would result in a slightly more urbanized feel than the project. Considering the overall character and quality with the proposed land uses in conjunction with infrastructure improvements, the road design alternative and project would result in a similar significant visual character and quality impact. As with the project (subchapter 2.1.2.3), this alternative would affect visual character/quality as viewed from West Lilac Road (Impact V-1), as viewed from surrounding residences (Impact V-2), and as viewed on a cumulative level within the entire viewshed (Impact V-4). Construction phase temporary impacts to visual character and quality would also be significant (Impact V-3). As with the project, these visual impacts would remain significant and unmitigated under this alternative (see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting along the West Lilac Road along the from the eastern roundabout to the project boundary, as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in the same less than significant light and glare impacts as the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would have air quality impacts similar to the project, which are identified in subchapter 2.2. The additional grading (0.27 acre) required under Phase 1 of this alternative would slightly increase construction emissions relative to the project, but the increase would be negligible and would be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As described for the project in subchapter 2.2.2.1, this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. While this alternative would result in additional grading and construction associated with the roadway improvements necessary to County standards, the air quality impact of this alternative would be the same as the project. The additional grading under this alternative (441 cy of cut and 48 cy of fill) would represent less than a 1 percent increase relative to the project grading (4.0 million cubic yards of cut and fill) and would minimally alter emissions. This alternative would implement project design features (see Table 1-3) that reduce air emissions the same as the project. As with the project, this alternative would have significant air quality impacts (Impact AQ-2) and would require implementation of mitigation measures (M-AQ-2, M-AQ-3, and M-AQ-4; see subchapter 2.2.5) to reduce construction emissions to below a level of significance.

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative operational impacts would be the same as the project operational impacts described in subchapter 2.2.2.2. Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions generated by either would be similar and operational impacts (Impact AQ-3) and mitigation (M-AQ-6 and M-AQ-7) would be the same as the project (see subchapters 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with West Lilac Road improvements. Construction of this segment of West Lilac Road would occur in Phase 1 when no other phases in operation or construction. Thus, the construction emission changes would not result in any additional cumulative effect beyond that discussed for the project. All other

phases of this alternative would be the same as the project, and would result in the same impacts (Impact AQ-4). As described in subchapter 2.2.6 for the project, this design alterative would result in a significant and unavoidable (Impact AQ-4) and a cumulatively considerable significant impact (Impact AQ-6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This West Lilac Road Roadway Design Alternative would result in the same traffic volumes and distribution as the project. Thus, the alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would have the same transportation/traffic impacts as the project. This includes direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative would be less than significant. The roadway design changes at West Lilac Road, Easterly Roundabout to Project Boundary would not alter the overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). As with the project, this alternative design would not result in a significant safety issue. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see subchapter 2.3.2.2). West Lilac Road improvements would be phased in a manner so the roadway would not be closed during construction. Similar to the project, construction-related traffic impacts would be less than significant.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would be the same as the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (see subchapter 2.3.3.1), as it would not alter capacity, trip generation or trip distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be identical to the project (see subchapter 2.3.2.3) with the exception of West Lilac Road, Easterly Roundabout to Project Boundary. The project would include modifications to avoid additional impacts to properties to the north of the roadway and provide a transition to the roundabout, such as reduced pavement (24-foot), eliminated shoulder, eliminated northern parkway, and reduced graded right-of-way (38-foot). Constructing this roadway to standard would include a wider roadway (28-foot), and 2-foot shoulders on both sides, and sidewalks on both sides, and a 52-foot graded right-of-way. Both this alternative and the project have been designated to provide adequate ingress and egress for residents as well as emergency access, safe pedestrian system, and conform to Goal M-4 of the General Plan Mobility Element. Therefore, impacts associated with transportation hazards would be less than significant, similar to the project.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4), with the exception of the West Lilac Road, from, Easterly Roundabout to Project Boundary. The construction of this segment of West Lilac Road to County Road standards would include standard sidewalks on both sides of the roadway instead of just on the south like proposed by the project to avoid impacts to the properties to the north. Both this Road Design Alternative and the project would provide alternative transportation opportunities and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Overall, neither the project nor this alternative would result in a negative effect to public transit, bicyclists or pedestrians. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative agricultural resource impacts would be similar to the project (see subchapter 2.4). The West Lilac Road improvements included in this alternative would affect additional orchards (0.1 acre), but that area does not meet Prime Farmland or Farmland of Statewide Importance soil quality requirements. As such, the acreage of this alternative's significant agricultural resource impact would be the same as identified for the project. As this alternative would not change any proposed land uses, the potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. The West Lilac Road improvements included in this alternative would impact additional orchards (0.1 acre), but the soils would not meet Prime Farmland or Farmland of Statewide Importance. Thus, this alternative would have the same agricultural resource impact as identified for the project (direct Impact AG-1 and cumulative Impact AG-16; see subchapter 2.4.2.1). As with the project, M-AG-1 would mitigate the agricultural resource impacts of this alternative to below a level of significance (see subchapter 2.4.5 and 2.4.6).

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would be identical to that described for the project in subchapter 2.4.2.2 considering all the proposed on-site land uses would be identical and that roadways are considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac

Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. As with the project, this alternative does not include and is not adjunct to Williamson Act contracted lands or Agricultural Preserves. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (see Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations (Impacts AG-2 through AG-15; see subchapter 2.4.2.3). This Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. While the West Lilac Road, Easterly Roundabout to Project Boundary segment is located adjacent to orchards, roads are considered compatible with agricultural uses. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative biological resource impacts would be similar to the project. Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. No additional sensitive habitat would be impacted by this alternative. This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

This alternative would result in no additional impact to sensitive habitat and would have the same sensitive habitat impacts identified for the project (see subchapter 2.5.2.2, and Impact BIO-2). However, this alternative would result in additional impacts to raptor foraging habitat (0.1 acre of orchards) above those identified for the project (see Table 4-5). The additional area impacted by this alternative would not alter the severity of the raptor foraging impact described for the project, as the project impact is 538.29 acres of raptor foraging and the additional area impacted by this alternative would represent a less than 1 percent increase in impact. Thus, this alternative would have a similar raptor foraging impact (Impact BIO-1) as the project. All other sensitive habitat impacts of this Road Design Alternative would be identical to those described for the project in subchapter 2.5.

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water

quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3 to reduce impacts to sensitive habitat and raptor foraging, as detailed in subchapter 2.5.5. As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community as the project (see subchapters 2.5.6.1 and 2.5.6.2).

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). No additional jurisdictional impacts would occur under this alternative (see Table 4-7). Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands.

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. No additional wildlife movement or nursery sites would be impacted by widening the West Lilac Road, Easterly Roundabout to Project Boundary segment, as the roadway already exists. The impact to localized wildlife movement would be the same as the project, and less than significant.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative cultural resource impacts would be similar to the project. While the alternative West Lilac Road roadway improvements completed by this alternative would affect additional area (0.27 acre) where there is potential for unknown subsurface cultural resources, the overall impact area acreage would be similar to the project and, accordingly, the potential impact would

be similar to the project. Thus, this alternative would result in significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources similar to the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. No additional buildings beyond those already identified for the project would be impacted by this Road Design Alternative. Thus, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the West Lilac Road area, the archeological site impacts would be the same as the project except for the additional West Lilac Road improvement area. No known cultural resources exist within the West Lilac Road improvement area, but 0.27 acre of impacted area would have a potential for unknown significant subsurface cultural resources considering the known resources in the community.

As described for the project in subchapter 2.6.5.1, this alternative would potentially have significant impacts to: one archeological site that is not protected in proposed dedicated open space (Impact CR-1); unknown subsurface archeological resources within on and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to Gopher Canyon Road improvements (Impact CR-3). The additional area of potential impact to unknown subsurface cultural resources that would occur due to the additional West Lilac Road improvements would not change the impact relative to the project considering this change would represent less than 1 percent change to the overall impact area. Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas. Human remains are also not expected within the additional West Lilac Road improvement area that is included in this alternative. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As described for the project in subchapter 2.6.2.4, there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur. As no County RPO site exists within the additional West Lilac Road improvement area included in this alternative, this Road

Design Alternative would have the same less than significant County RPO impact as the project.

Hazards/Hazardous Materials

In summary, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts of this alternative would be significant but mitigated to below a level of significance identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. This alternative would include a traffic control plan during construction and include West lilac Road improvement phasing so the roadway would be open to through traffic during construction. Thus, this Road Design Alternative would have less than significant impacts related to emergency response and evacuation plans similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service

options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. The increase in this segment of West Lilac Road would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative impacts related to vectors would be less than significant.

Noise

In summary, the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the same as the project, as this alternative would have the same traffic generation, traffic distribution, and roadway centerlines as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project, as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would have the same traffic conditions and roadways as the project with the exception of a segment of West Lilac Road. Under this road design alternative, the nearest residence would be 100 feet away. At this distance, the traffic noise impact would be less than significant. The alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impacts N-3). As with the project, these noise Impacts N-1 and N-2 would be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. However, Impact N-3 would potentially remain significant and unmitigated since providing a continuous noise barrier or other methods to reduce traffic noise may be infeasible. Refer to subchapter 2.8.6.1 for additional information.

This alternative would also have the significant cumulative traffic noise impacts of the project (cumulative traffic (Impacts N-17 and N-18). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would be the same as the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same the project (see subchapter 2.8.2.2), except the additional noise that would occur from the additional widening of West Lilac Road, between the easterly roundabout to project boundary, segment. This includes direct noise Impacts N-11 to N-14, and cumulative noise Impacts N-19 and N-20. As described for the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapters 2.8.6). The nearest residence to the West Lilac Road, between the easterly roundabout to project boundary, segment would be 100 feet. While the noise levels may be an annoyance to residences in the area, the noise levels would be below the County's Noise Ordinance 75 dB(A) L_{eq} limit. As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." Noise levels would be less at the receiver location as they are set back from the edge of roadways. Thus, impacts to NSLU from widening West Lilac Road, Easterly Roundabout to Project Boundary, to standard would be less than significant, similar to the project.

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be the same the project (refer to subchapter 2.8.6.2, Impacts N-15 and N-16). As discussed for the project, vibration levels would exceed the County thresholds (0.004 inches per second RMS) where grading occurs within 150 feet of a residence. As with the project, a residence is located within 150 feet of the West Lilac Road roadway improvement area. Both the project and the alternative would potentially result in potentially significant vibration impacts to residences within 150 feet of grading. As with the project (see subchapter 2.8.6.3), significant vibration impacts N-15 and N-16 would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11) and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12).

Less than Significant Impacts

Geology and Soils

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, the underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional widening of West Lilac Road, Easterly Roundabout to Project Boundary, and the geology and soils conditions in that area are the same as addressed for the project. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would slightly increase the GHG emissions relative to the project due to additional roadway improvements, the alternative would be the same GHG-reducing features as the project and this alternative would be consistent with all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies, or regulations (see subchapter 3.1.2).~~the percent reduction from 2020 emissions would be the same considering the inclusion of the same GHG-reducing features and this alternative would be consistent with the County's performance threshold. Thus, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~

Hydrology and Water Quality

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative public service impacts would be similar to the project as the proposed land uses would be the same. As with the project, public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5).

Recreation

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the West Lilac Road, East of Easterly Roundabout to Project Boundary, Road Design Alternative would result the same impacts as the project and would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for West Lilac Road, easterly roundabout to project boundary, is not approved.

4.8.1.7 Road Design Alternative 7: Mountain Ridge Road - ~~Reduced Design Speed~~Built to Private Road Standards

The project's proposed road design for this road segment corresponds to Road Exception Request #7, as submitted to the County.

The road design analyzed under this alternative is the construction of Mountain Ridge Road from Circle R Drive north to the project boundary with 24 feet of paved private roadway width within a 28-foot graded ~~road easement~~ (40-foot ~~right-of-way~~road

easement), with a design speed of 30 mph (compared to Exception Request #7 which would retain the existing 15 mph design speed with additional paving added to achieve 28 feet of grading with ~~25~~24-feet of pavement). The increase in design speed, under this alternative, to 30 mph would require the road to be redesigned, existing power poles would need to be relocated and the existing vertical curves would need to be lengthened. This would result in about ten existing driveways no longer being accessible since they are at the sag or peak of the existing curves. These driveways would need to be redesigned and rebuilt, while maintaining access to the properties. ~~In addition, this alternative would encroach into the existing footprint of three single-family residences and three existing culverts would need to be lengthened compared to the project.~~ In addition, without any retaining walls, the grading for this road design alternative could encroach into the pad area of one single-family residence; however, use of retaining walls would eliminate the encroachment. Also, without retaining walls, grading could impact two ancillary non-habitable sheds that would have to be relocated. Construction of this road segment would require an additional 2.74 acres of grading relative to the project, including an additional 15,662 cy of cut and 11,691 cy of fill (see Figure 4-12). Grading would necessitate the creation of manufactured slopes up to 30 feet in height, which is double the height required for the project. Grading would be balanced with the grading for the project thus not requiring any truck trips.

Comparison of the Effects of the Road Design Alternative to the Project

Visual Resources

In summary, this alternative would have the same visual impacts as the project except along the Mountain Ridge Road segment. The alternative road designs for this segment would result in a wider and flatter road with more urbanized character relative to the project, but would not alter the conclusions of the project's visual resource analysis. As with the project, this road design alternative would result in significant unmitigated character and quality impacts, and less than significant scenic vistas, scenic resources, light, glare, and plan consistency impacts. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed; however, a segment of I-15 within the viewshed is identified as a County Scenic Highway. Motorist on I-15 do not have views of Mountain Ridge Road due to topography and distance. Thus, the Road Design Alternative changes to Mountain Ridge Road are not visible from the I-15. The visual impacts of this alternative would be the same the project (see subchapter 2.1.2.1). Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project.

Issue 2: Scenic Resources (Less Than Significant Impact)

The scenic resource impacts of the Mountain Ridge Road Design Alternative would be similar to the project. This alternative would include an additional impact area (2.74 acres), with an additional impact to 0.14 acre of native habitat. This additional impact would not increase the scenic resource impact described for the project. As with the project, graded areas outside of the proposed pavement would revegetated/landscaped so that visual impacts would not be detected from public viewpoints or degrade visual

quality. Overall, impacts to scenic resources (i.e., vegetation) would be the same as those described for the project in subchapter 2.1.2.2. Therefore, this alternative would result in less than significant impacts to scenic resources, similar to the project.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

This Road Design Alternative would have the same visual character as the project except at the Mountain Ridge Road segment. The additional widening, manufactured slopes and flattening of the topography under this road design alternative would result in a slightly more urbanized feel than the project. Considering the overall character and quality with the proposed land uses in conjunction with infrastructure improvements, the road design alternative and project would result in a similar significant visual character and quality impact. As with the project (subchapter 2.1.2.3), this alternative would affect visual character/quality as viewed from West Lilac Road **(**Impact V-1), as viewed from surrounding residences (Impact V-2), and as viewed on a cumulative level within the entire viewshed (Impact V-4). Construction phase temporary impacts to visual character and quality would also be significant (Impact V-3). As with the project, these visual impacts would remain significant and unmitigated under this alternative (see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting along the Mountain Ridge Road, as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in the same less than significant light and glare impacts as the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of Mountain Ridge Road Design Alternative would have air quality impacts similar to the project, which are identified in subchapter 2.2. The additional grading (2.74 acres) required under Phase 5 of this alternative would slightly increase construction emissions relative to the project, but the increase would be negligible and would be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As described for the project in subchapter 2.2.2.1, this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with Mountain Ridge Road improvements. While this alternative would result in additional grading and construction associated with the roadway improvements necessary to County standards, the air quality impact of this alternative would be the same as the project. The additional grading under this alternative (15,662 cy of cut and 11,691 cy of fill) would represent a 3.4 percent increase relative to the project grading (4.0 million cubic yards of cut and fill) and would minimally alter emissions. This alternative would implement project design features (see Table 1-3) that reduce air emissions the same as the project. As with the project, this alternative would have significant air quality impacts (Impact AQ-2) and would require implementation of mitigation measures (M-AQ-2, M-AQ-3, and M-AQ-4; see subchapter 2.2.5) to reduce construction emissions to below a level of significance.

The Mountain Ridge Road Design Alternative operational impacts would be the same as the project operational impacts described in subchapter 2.2.2.2. Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions generated by either would be similar and operational impacts (Impact AQ-3) and mitigation (M-AQ-6 and M-AQ-7) would be the same as the project (see subchapters 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with Mountain Ridge Road improvements. Construction of this segment of Mountain Ridge Road would occur in Phase 5 when all other phases are operational. The addition of construction emissions to the operational emissions would result in an increase of cumulative emissions beyond those identified for the project. All other phases (Phases 1-4) of this alternative would be the same as

the project, and would result in the same impacts (Impact AQ-4). As described in subchapter 2.2.6 for the project, this design alterative would result in a significant and unavoidable (Impact AQ-4) and a cumulatively considerable significant impact (Impact AQ-6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This Mountain Ridge Road Design Alternative would result in the same traffic volumes and distribution as the project. Thus, this alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The Mountain Ridge Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the Mountain Ridge Road Design Alternative would have the same transportation/traffic impacts as the project. This includes direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative would be less than significant. The roadway design changes at Mountain Ridge Road would not alter the overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). As with the project, this alternative design would not result in a significant safety issue. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The Mountain Ridge Road Design Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see subchapter 2.3.2.2). Mountain Ridge Road improvements would be phased in a manner so the roadway would not be closed during construction. Similar to the project, construction-related traffic impacts would be less than significant.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the Mountain Ridge Road Design Alternative would be the same as the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (see subchapter 2.3.3.1), as it would not alter capacity, trip generation or trip distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be identical to the project (see subchapter 2.3.2.3) with the exception of Mountain Ridge Road. The project would include a reduced speed on this roadway to avoid additional impacts to properties adjacent to the roadway. To safely accommodate the increase in speed under this alternative, this alternative includes a flatter, wider roadway as well as modifications to existing driveways. With the inclusion of these features, this alternative roadway design would provide adequate ingress and egress for residents as well as emergency access, safe pedestrian system, and conform to Goal M-4 of the General Plan Mobility Element. Therefore, as with the project, impacts associated with transportation hazards would be less than significant.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4). As Mountain Ridge Road is currently a private roadway with no sidewalks, and would be a private roadway with no sidewalks under

either the project or this alternative, no impact to public transportation or pedestrian facilities would occur under either this alternative or the project. Both this Road Design Alternative and the project would provide alternative transportation opportunities on-site and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Overall, neither the project nor this alternative would result in a negative effect to public transit, bicyclists or pedestrians. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the Mountain Ridge Road Design Alternative agricultural resource impacts would be similar to the project (subchapter 2.4). The Mountain Ridge Road improvements included in this alternative would affect additional orchards (2.14 acres), but that area does not meet Prime Farmland or Farmland of Statewide Importance soil quality requirements. As such, the acreage of this alternative's significant agricultural resource impact would be the same as identified for the project. As this alternative would not change any proposed land uses, the potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. The Mountain Ridge Road improvements included in this alternative would impact additional orchards (2.14 acres), but the soils would not meet Prime Farmland or Farmland of Statewide Importance. Thus, this alternative would have the same agricultural resource impact as identified for the project (direct Impact AG-1 and cumulative Impact AG-16; see subchapter 2.4.2.1). As with the project, M-AG-1 would mitigate the agricultural resource impacts of this alternative to below a level of significance (see subchapter 2.4.5 and 2.4.6).

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the Mountain Ridge Road Design Alternative would be identical to that described for the project in subchapter 2.4.2.2 considering all the proposed on-site land uses would be identical and that roadways are considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. As with the project, this alternative does not include and is not adjunct to Williamson Act contracted lands or Agricultural Preserves. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (see Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations (Impacts AG-2 through AG-15; see subchapter 2.4.2.3). The Mountain Ridge Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. While the Mountain Ridge Road segment is located adjacent to orchards, roads are considered compatible with agricultural uses. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the Mountain Ridge Road Design Alternative biological resource impacts would be similar to the project, except it would have greater impact acreages for sensitive habitat (0.14 acre) and jurisdictional habitat (0.29 acre). Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. The additional sensitive habitat impact would require additional mitigation. This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

In addition to the sensitive habitat impacts identified for the project (see subchapter 2.5.2.2, and Impact BIO-2), this alternative would result in an additional 0.17-acre of sensitive habitat impacts consisting of 0.03 acre of southern coastal live oak riparian forest, and 0.11 acre of coast live oak woodland as a result of Mountain Ridge Road improvements (Impact RD-BIO-1d; see Table 4-5). It is noted that a portion of this impact along Mountain Ridge Road would occur within an open space easement and would require easement vacation. Also, additional impacts to raptor foraging habitat (2.14 acre of orchards plus the 0.14-acre of native habitat) would occur under this alternative in addition to those identified for the project. The additional area impacted by this alternative would not alter the severity of the raptor foraging impact described for the project, as the project impact is 538.29 acres of raptor foraging and the additional area impacted by this alternative would represent a less than 1 percent increase in impact. Thus, this alternative would have a similar raptor foraging impact (Impact BIO-1) as the project. All other sensitive habitat impacts of this Road Design Alternative would be identical to those described for the project in subchapter 2.5.

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3 to reduce impacts to sensitive habitat and raptor foraging, as detailed in subchapter 2.5.5. In addition, this alternative would be required to implement the following to mitigate for the additional sensitive habitat impacts identified above as additional impacts to sensitive resources compared to the proposed project (see Table 4-6):

M-RD-BIO-1d: Prior to issuance of a grading permit for the construction of Mountain Ridge Road to the County's private roadway standards, the following shall be provided either on-site within the open space easement; off-site within a draft PAMA of the draft North County MSCP in Valley Center or adjacent communities; or through a mitigation bank, subject to the approval of the County and appropriate wildlife agencies:

1. Impacts to 0.03 acre of southern coastal live oak riparian forest shall be mitigated at a 3:1 ratio with 0.09 acre.
2. Impacts to 0.11 acre of coast live oak woodland shall be mitigated at a 3:1 ratio with 0.33 acre.

As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community as the project (see subchapters 2.5.6.1 and 2.5.6.2).

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the Mountain Ridge Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). In addition, this alternative would impact 0.29 acre of County wetlands due to the larger Mountain Ridge Road impact area (Impact RD-BIO-2a; see Table 4-7). No additional ACOE/CDFW/RWQCB jurisdictional impacts would occur under this alternative. Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands. The additional jurisdictional wetland impacts that occur under this alternative would be mitigated by the following (Table 4-8):

M-RD-BIO-2a: Prior to the issuance of grading permits, County RPO wetland impacts shall be mitigated at a ratio of 3:1, consisting of preservation, enhancement, and/or creation of wetlands. Mitigation of wetlands shall include a 1:1 creation component (of the 3:1), to ensure no net loss of wetlands.

1. County RPO jurisdiction: Permanent impacts to 0.29 acre of RPO wetlands off-site shall be mitigated at a 3:1 ratio with 0.87 acre of RPO wetlands enhancement/ preservation/ creation (1:1 creation component).

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-

site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. No additional wildlife movement or nursery sites would be impacted by widening the Mountain Ridge Road, as the roadway already exists and the additional widening would not significant alter existing wildlife movement. The impact to localized wildlife movement would be the same as the project, and less than significant.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The Mountain Ridge Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the Mountain Ridge Road Design Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the Mountain Ridge Road Design Alternative cultural resource impacts would be similar to the project. While the alternative Mountain Ridge Road roadway improvements completed by this alternative would affect additional area (2.74 acres) where there is potential for unknown subsurface cultural resources, the overall impact area acreage would be similar to the project and, accordingly, the potential impact would be similar to the project. Thus, this alternative would result in significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources similar to the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. The additional Mountain Ridge Road grading may encroach onto residential properties next to Mountain Ridge Road, but the structures are expected to remain. Thus, the Mountain Ridge Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the Mountain Ridge Road area, the archeological site impacts would be the same as the project except for the additional Mountain Ridge Road improvement area. No known cultural resources exist within the Mountain Ridge Road improvement area, but 2.74 acres of impacted area would have a potential for unknown significant subsurface cultural resources considering the known resources in the community.

As described for the project in subchapter 2.6.5.1, this alternative would potentially have significant impacts to: one archeological site that is not protected in proposed dedicated open space (Impact CR-1); unknown subsurface archeological resources within on and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to

Gopher Canyon Road improvements (Impact CR-3). The additional area of potential impact to unknown subsurface cultural resources that would occur due to the additional Mountain Ridge Road improvements would not change the impact relative to the project considering this change would represent less than 1 percent change to the overall impact area. Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas. Human remains are also not expected within the additional Mountain Ridge Road improvement area that is included in this alternative. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the Mountain Ridge Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As described for the project in subchapter 2.6.2.4, there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur. As no County RPO site exists within the additional Mountain Ridge Road improvement area included in this alternative, this Road Design Alternative would have the same less than significant County RPO impact as the project.

Hazards/Hazardous Materials

In summary, the Mountain Ridge Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts of this alternative would be significant but mitigated to below a level of significance identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The Mountain Ridge Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The Mountain Ridge Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The Mountain Ridge Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. This alternative would include a traffic control plan during construction and include Mountain Ridge Road improvement phasing so the roadway would be open to through traffic during construction or alternative routes would be provided. Thus, this Road Design Alternative would have less than significant impacts related to emergency response and evacuation plans similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. The increase in this segment of Mountain Ridge Road would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The Mountain Ridge Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the Mountain Ridge Road Design Alternative impacts related to vectors would be less than significant.

Noise

As described further in the analysis below, the Mountain Ridge Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the same as the project, as this alternative would have the same traffic generation, traffic distribution, and roadway centerlines as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project, as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The Mountain Ridge Road Design Alternative would have the same traffic conditions and roadways as the project with the exception of a segment of Mountain Ridge Road. Under this road design alternative, the nearest residence may experience a slightly higher noise level due to the elevation changes associated with reducing the vertical curve and increasing speed. None-the-less, the noise impact would be similar to the project considering the amount of traffic generated by the project on this roadway would be limited due to the proposed gates and the change in noise level would not likely be perceptible (i.e., over 3 dB). The alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impact N-3). As with the project, these noise Impacts N-1 and N-2 would be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. However, Impact N-3 would potentially remain significant and unmitigated since providing a continuous noise barrier or other methods to reduce traffic noise may be infeasible. Refer to subchapter 2.8.6.1 for additional information.

This alternative would also have the significant cumulative traffic noise impacts of the project (cumulative traffic (Impacts N-17 and N-18). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the Mountain Ridge Road Design Alternative would be the same as the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same the project (see subchapter 2.8.2.2), except for construction noise associated with Mountain Ridge Road improvements. This includes direct noise Impacts N-11 to N-14, and cumulative noise Impacts N-19 and N-20. As described for the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapters 2.8.6). Under this road design alternative, the nearest residence would be 10 feet from the Mountain Ridge Road grading activities. While the noise levels may be an annoyance to residences in the area, the noise levels would be below the County's Noise Ordinance 75 dB(A) L_{eq} limit. As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." Noise levels would be less at the receiver location as they are set back from the edge of roadways. Thus, impacts to NSLU from widening Mountain Ridge Road, Easterly Roundabout to Project Boundary, to standard would be less than significant, similar to the project.

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be similar to the described for the project (refer to subchapter 2.8.6.2, Impacts N-15 and N-16). As discussed for the project, vibration levels would exceed the County thresholds (0.004 inches per second RMS) where grading occurs within 150 feet of a residence. As with the project, a residence is located within 150 feet of the Mountain Ridge Road roadway improvement area. Both the project and the alternative would potentially result in potentially significant vibration impacts to residences within 150 feet of grading. As with the project (see subchapter 2.8.6.3), significant vibration impacts N-15 and N-16 would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11) and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12). Impacts would be reduced to less than significant similar to the project.

Less than Significant Impacts

Geology and Soils

The Mountain Ridge Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, this Mountain Ridge Road Design Alternative underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional widening of Mountain Ridge Road, and the geology and soils conditions in that area are the same as addressed for the project. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The Mountain Ridge Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would slightly increase the GHG emissions relative to the project due to additional roadway improvements, the alternative would be the

same GHG-reducing features as the project and this alternative would be consistent with all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies, or regulations (see subchapter 3.1.2).~~the percent reduction from 2020 emissions would be the same considering the inclusion of the same GHG-reducing features and this alternative would be consistent with the County's performance threshold. Thus, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~

Hydrology and Water Quality

The Mountain Ridge Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the Mountain Ridge Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The Mountain Ridge Road Design Alternative public service impacts would be similar to the project as the proposed land uses would be the same. As with the project, public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5).

Recreation

The Mountain Ridge Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The Mountain Ridge Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the Mountain Ridge Road Design Alternative would result in additional biological impacts, consisting of sensitive habitats and wetlands. This alternative would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for Mountain Ridge Road is not approved.

4.8.1.8 Road Design Alternative 8: Mountain Ridge Road at Circle R Road – Taper

The project's proposed road design for this road segment corresponds to Road Exception Request #8, as submitted to the County.

The road design analyzed under this alternative is the construction of a taper on the acute angle for right-turn movement from westbound Circle R Drive onto Mountain Ridge Road as required per County standard (see Figure 4-13). The project's Exception Request #8 would eliminate the required taper along westbound Circle R Drive, turning onto northbound Mountain Ridge. In lieu of providing a taper at the intersection of Mountain Ridge Road and Circle R Drive, the project road design would add approximately 8 feet of pavement along a short portion of the western side of Mountain Ridge Road which would accommodate the turning moving of an SU-30 vehicle west-bound on Circle R, turning north onto Mountain Ridge Road. This road design alternative would construct the required taper to County standards, which involves acquiring 0.03 acre of additional right-of-way on an off-site parcel as well as the extension of an existing culvert, and power pole relocation. It is noted that the County cannot condemn for a private road easement and this alternative may be infeasible. A total of 0.03 acre of additional grading would be required, including 500 cy of cut and 500 cy of fill.

Comparison of the Effects of the Road Design Alternative to the Project

Visual Resources

In summary, this alternative would have the same visual impacts as the project except at the Mountain Ridge Road/Circle R Drive intersection. The alternative road design for this intersection would result in small area of the roadway being wider, but would not alter the conclusions of the project's visual resource analysis. As with the project, this road design alternative would result in significant unmitigated character and quality impacts, and less than significant scenic vistas, scenic resources, light, glare, and plan consistency impacts. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed; however, a segment of I-15 within the viewshed is identified as a County Scenic Highway. Motorist on I-15 do not have views of the Mountain Ridge Road/Circle R Drive intersection due to topography and distance. Thus, the Road Design Alternative changes to Mountain Ridge Road are not visible from the I-15. The visual impacts of this alternative would be the same as the project (see subchapter 2.1.2.1). Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project.

Issue 2: Scenic Resources (Less Than Significant Impact)

The scenic resource impacts of the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would be similar to the project. This alternative would include an additional impact area (0.03 acre), including 0.01 acre of native habitat. This additional scenic resource impact would not increase the scenic resource impact described for the project. As with the project, graded areas outside of the proposed pavement would revegetated/landscaped so that visual impacts would not be detected from public viewpoints or degrade visual quality. Overall, impacts to scenic resources (i.e., vegetation) would be the same as those described for the project in subchapter 2.1.2.2. Therefore, this alternative would result in less than significant impacts to scenic resources, similar to the project.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

This Road Design Alternative would have the same visual character as the project except at the Mountain Ridge Road/Circle R Drive intersection. The small area of widened roadway that would occur under this road design alternative would not alter the visual character or quality of the area. Thus, this road design alternative would have the same significant, unmitigated visual character and quality impacts as the project (Impact V-1, V-2, V-3, and V-4; see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting at the Mountain Ridge Road/Circle R Drive intersection, as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in the same less than significant light and glare impacts as the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would have air quality impacts similar to the project, which are identified in subchapter 2.2. The additional grading (0.03 acre) required under Phase 5 of this alternative would negligibly increase construction emissions relative to the project and construction emission impacts would still be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As described for the project in subchapter 2.2.2.1, this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with Mountain Ridge Road/Circle R Drive intersection improvements. While this alternative would result in additional grading and construction associated with the intersection improvements, the air quality impact of this alternative would be the same as the project. The additional grading under this alternative (500 cy of cut and 500 cy of fill) would represent a less than 1 percent increase relative to the project grading (4.0 million cubic yards of cut and fill) and would negligibly alter emissions. This alternative would implement project design features (see Table 1-3) that reduce air emissions the same as the project. As with the project, this alternative would have significant air quality impacts (Impact AQ-2) and would require implementation of mitigation measures (M-AQ-2, M-AQ-3, and M-AQ-4; see subchapter 2.2.5) to reduce construction emissions to below a level of significance.

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative operational impacts would be the same as the project operational impacts described in subchapter 2.2.2.2. Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions generated by either would be

similar and operational impacts (Impact AQ-3) and mitigation (M-AQ-6 and M-AQ-7) would be the same the project (see subchapters 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with Mountain Ridge Road/Circle R Drive intersection improvements. Construction of this Mountain Ridge Road/Circle R Drive intersection improvement would occur in Phase 5 when all other phases are operational. The addition of construction emissions to the operational emissions would result in a negligible increase. All other phases (Phases 1-4) of this alternative would be the same as the project, and would result in the same impacts (Impact AQ-4). As described in subchapter 2.2.6 for the project, this design alterative would result in a significant and unavoidable (Impact AQ-4) and a cumulatively considerable significant impact (Impact AQ-6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would result in the same traffic volumes and distribution as the project. Thus, this alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would have the same transportation/traffic impacts as the project. This includes direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative would be less than significant. The roadway design changes at Mountain Ridge Road/Circle R Drive overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). As with the project, this alternative design would not result in a significant safety issue. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see subchapter 2.3.2.2). Mountain Ridge Road/Circle R Drive intersection improvements would be phased in a manner so the roadway would not be closed during construction. Similar to the project, construction-related traffic impacts would be less than significant.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would be the same as the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (see subchapter 2.3.3.1), as it would not alter capacity, trip generation or trip distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be identical to the project (see subchapter 2.3.2.3) with the exception of the Mountain Ridge Road/Circle R Drive intersection. This alternative would add an 8-foot pavement area to the southbound Mountain Ridge Road approach to Circle R Drive to provide adequate turning radius for

a SU-30 vehicle (e.g., cement truck, large rental truck, delivery truck). While the existing condition and the proposed project improvements do not represent a safety hazard at this intersection, Tthis additional turn area would be an improvement ~~to safety~~ over the existing conditions in that it would provide a larger turning radius for larger trucks. This improvement ~~and~~ would not cause a safety issue. Thus, this alternative would provide adequate ingress and egress for residents as well as emergency access, safe pedestrian system, and conform to Goal M-4 of the General Plan Mobility Element similar to the project. Therefore, as with the project, impacts associated with transportation hazards would be **less than significant**.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4). As Mountain Ridge Road and Circle R Drive currently have no sidewalks and would be retained as such under either the project or this alternative, no impact to public transportation or pedestrian facilities would occur under either this alternative or the project. Both this Road Design Alternative and the project would provide alternative transportation opportunities on-site and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Overall, neither the project nor this alternative would result in a negative effect to public transit, bicyclists or pedestrians. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative agricultural resource impacts would be similar to the project (subchapter 2.4). The Mountain Ridge Road/Circle R Drive intersection improvements included in this alternative would affect additional orchards (0.01 acre), but that area does not meet Prime Farmland or Farmland of Statewide Importance soil quality requirements. As such, the acreage of this alternative's significant agricultural resource impact would be the same as identified for the project. As this alternative would not change any proposed land uses, the potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. The Mountain Ridge Road/Circle R Drive intersection improvements included in this alternative would impact additional orchards (0.01 acre), but the soils would not meet Prime Farmland or Farmland of Statewide Importance. Thus, this alternative would have the same agricultural resource impact as identified for the project (direct Impact AG-1 and cumulative Impact AG-16; see subchapter 2.4.2.1). As with the project, M-AG-1 would mitigate the agricultural resource impacts of this alternative to below a level of significance (see subchapter 2.4.5 and 2.4.6).

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would be identical to that described for the project in subchapter 2.4.2.2 considering all the proposed on-site land uses would be identical and that roadways are considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. As with the project, this alternative does not include and is not adjunct to Williamson Act contracted lands or Agricultural Preserves. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (see Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations (Impacts AG-2 through AG-15; see subchapter 2.4.2.3). The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. While the Mountain Ridge Road/Circle R Drive intersection is located adjacent to orchards, roads are considered compatible with agricultural uses. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative biological resource impacts would be similar to the project, except it would have slightly greater impact acreage for sensitive habitats (0.01 acre) and jurisdictional habitats (0.004 acre). Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. The additional sensitive habitat impact would require additional mitigation. This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

In addition to the sensitive habitat impacts identified for the project (see subchapter 2.5.2.2, and Impact BIO-2), this alternative would result in an additional 0.01-acre of sensitive habitat impacts consisting of coast live oak woodland as a result of Mountain Ridge Road/Circle R Drive intersection improvements (Impact RD-BIO-1e; see Table 4-5). Also, additional impacts to raptor foraging habitat (0.02 acre) would occur

under this alternative in addition to those identified for the project. The additional area impacted by this alternative would not alter the severity of the raptor foraging impact described for the project, as the project impact is 538.29 acres of raptor foraging and the additional area impacted by this alternative would represent a less than 1 percent increase in impact. Thus, this alternative would have a similar raptor foraging impact (Impact BIO-1) as the project. All other sensitive habitat impacts of this Road Design Alternative would be identical to those described for the project in subchapter 2.5.

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3 to reduce impacts to sensitive habitat and raptor foraging, as detailed in subchapter 2.5.5. In addition, this alternative would be required to implement the following to mitigate for the additional sensitive habitat impacts (see Table 4-6):

M-RD-BIO-1e: Prior to issuance of a grading permit for the Mountain Ridge Road/Circle R alternative road design improvements, the following shall be provided either on-site within the open space easement; off-site within a draft PAMA of the draft North County MSCP in Valley Center or adjacent communities; or through a mitigation bank, subject to the approval of the County and appropriate wildlife agencies:

1. Impacts to 0.01 acre of coast live oak woodland shall be mitigated at a 3:1 ratio with 0.03 acre.

As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community as the project (see subchapters 2.5.6.1 and 2.5.6.2).

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). In addition, this alternative would impact 0.004 acre of ACOE/CDFW/RWQCB jurisdictional wetlands due to the larger Mountain Ridge Road impact area (Impact RD-BIO-2b; see Table 4-7). No additional County RPO wetland impacts would occur under this alternative. Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands. The additional jurisdictional wetland impacts that occur under this alternative would be mitigated by the following (see Table 4-8):

M-RD-BIO-2b: Prior to the issuance of grading permits, ACOE/CDFW/RWQCB wetland impacts shall be mitigated at a ratio of 3:1, consisting of on-site preservation, enhancement, and/or creation of wetlands. Mitigation of wetlands shall include a 1:1 creation component (of the 3:1), to ensure no net loss of wetlands.

1. ACOE/CDFW/RWQCB jurisdiction: Permanent impacts to 0.004 acre of jurisdictional wetlands shall be mitigated at a 3:1 ratio with 0.012 acre of wetland enhancement/ preservation/ creation (1:1 creation component).

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. No additional wildlife movement or nursery sites would be impacted by widening a small part of Mountain Ridge Road at the Circle R Drive approach, as the roadway already exists and the additional widening would not significant alter existing wildlife movement. The impact to localized wildlife movement would be the same as the project, and less than significant.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative cultural resource impacts would be similar to the project. While the alternative Mountain Ridge Road/Circle R Drive intersection improvements completed by this alternative would affect additional area (0.03 acre) where there is potential for unknown subsurface cultural resources, the overall impact area acreage would be similar to the project and, accordingly, the potential impact would be similar to the project. Thus, this alternative would result in significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources similar to the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. The additional Mountain Ridge Road/Circle R Drive intersection grading would not impact any existing structures. Thus, the Mountain Ridge Road at

Circle R Drive Taper Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the Mountain Ridge Road/Circle R Drive intersection area, the archeological site impacts would be the same as the project except for the additional Mountain Ridge Road/Circle R Drive intersection improvement area. No known cultural resources exist within the Mountain Ridge Road/Circle R Drive intersection improvement area, but 0.03 acre of impacted area would have a potential for unknown significant subsurface cultural resources considering the known resources in the community.

As described for the project in subchapter 2.6.5.1, this alternative would potentially have significant impacts to: one archeological site that is not protected in proposed dedicated open space (Impact CR-1); unknown subsurface archeological resources within on and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to Gopher Canyon Road improvements (Impact CR-3). The additional area of potential impact to unknown subsurface cultural resources that would occur due to the additional Mountain Ridge Road/Circle R Drive intersection improvements would not change the impact relative to the project considering this change would represent less than 1 percent change to the overall impact area. Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas. Human remains are also not expected within the additional Mountain Ridge Road/Circle R Drive intersection improvement area that is included in this alternative. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As described for the project in subchapter 2.6.2.4, there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur. As no County RPO site exists within the additional Mountain Ridge Road/Circle R Drive intersection improvement area included in this alternative, this Road Design Alternative would have the same less than significant County RPO impact as the project.

Hazards/Hazardous Materials

As described further in the analysis below, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination,

emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts of this alternative would be significant but mitigated to below a level of significance identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. This alternative would include a traffic control plan during construction and include Mountain Ridge Road/Circle R Drive intersection improvement phasing so the roadway would be open to through traffic during construction or alternative routes would be provided. Thus, this Road Design Alternative would have less than significant impacts related to emergency response and evacuation plans similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. The increase in the Mountain Ridge Road/Circle R Drive intersection would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by

mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative impacts related to vectors would be less than significant.

Noise

In summary, the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the same as the project, as this alternative would have the same traffic generation, traffic distribution, and roadway centerlines as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project, as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would have the same traffic conditions and roadways as the project with the exception of the Mountain Ridge Road/Circle R Drive intersection. Under this road design alternative, the nearest residence to the northeast of the intersection would experience a similar noise level as would occur under the project since the centerline and traffic volumes on this roadway would be the same. The alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impacts N-3). As with the project, these noise Impacts N-1 and N-2 would be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. However, Impact N-3 would potentially remain significant and unmitigated since providing a continuous noise barrier or other methods to reduce traffic noise may be infeasible. Refer to subchapter 2.8.6.1 for additional information.

This alternative would also have the significant cumulative traffic noise impacts of the project (cumulative traffic (Impacts N-17 and N-18). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would be the same as the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same the project (see subchapter 2.8.2.2), except for construction noise associated with Mountain Ridge Road/Circle R Drive intersection improvements. This includes direct noise Impacts N-11 to N-14, and cumulative noise Impacts N-19 and N-20. As described for the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapters 2.8.6). Under this road design alternative, the nearest residence would be 5 feet from the Mountain Ridge Road/Circle R Drive intersection grading activities. While the noise levels may be an annoyance to residences in the area, the noise levels would be below the County's Noise Ordinance 75 dB(A) L_{eq} limit. As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." Noise levels would be less at the receiver location as they are set back from the edge of roadways. Thus, impacts to NSLU from widening the Mountain Ridge Road/Circle R Drive intersection, Easterly Roundabout to Project Boundary, to standard would be less than significant, similar to the project.

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be similar to the described for the project (refer to subchapter 2.8.6.2, Impacts N-15 and N-16). As discussed for the project, vibration levels would exceed the County thresholds (0.004 inches per second RMS) where grading occurs within 150 feet of a residence. As with the project, a residence is located within 150 feet of the Mountain Ridge Road/Circle R Drive intersection improvement area. Both the project and the alternative would potentially result in potentially significant vibration impacts to residences within 150 feet of grading. As with the project (see subchapter 2.8.6.3), significant vibration impacts N-15 and N-16 would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11) and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12).

Less than Significant Impacts

Geology and Soils

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, this Mountain Ridge Road at Circle R Drive Taper Road Design Alternative underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional widening of the Mountain Ridge Road/Circle R Drive intersection, and the geology and soils conditions in that area are the same as addressed for the project. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would slightly increase the GHG emissions relative to the project due to additional roadway improvements the alternative would be the same GHG-reducing features as the project and this alternative would be consistent with all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies, or regulations (see subchapter 3.1.2)., ~~the percent reduction from 2020 emissions would be the same considering the inclusion of the same GHG-reducing features and this alternative would be consistent with the County's performance threshold. Thus, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~

Hydrology and Water Quality

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative public service impacts would be similar to the project as the proposed land uses would be the same. As with the project, public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5).

Recreation

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The Mountain Ridge Road at Circle R Drive Taper Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the Mountain Ridge Road at Circle R Drive Taper Road Design Alternative would result in additional biological impacts, including sensitive habitats and wetlands. This alternative would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for Mountain Ridge Road/Circle R Drive intersection is not approved.

4.8.1.9 Road Design Alternative 9: Street "C" (On-site)

The project's proposed road design for this road segment corresponds to Road Exception Request #9, as submitted to the County.

The road design analyzed under this alternative is the construction of a new roadway, Street "C" (approximately 500 feet in length), identified on the Implementing Tentative Map as a 24 foot wide paved private road within a 28 foot right-of-way with a design speed of 30 mph (see Figure 4-14) (compared to Exception Request #9 which would

reduce the design speed from 30 mph to 20 mph along a short, 500 foot long segment to be more conducive to pedestrian and bike use which, is a goal of the project).

Comparison of the Effects of the Road Design Alternative to the Project

Visual Resources

In summary, this alternative would have the same visual impacts as the project except at Street "C". The alternative road design ~~for this intersection~~ would result in a flatter roadway with additional manufactured slope area, but would not alter the conclusions of the project's visual resource analysis. As with the project, this road design alternative would result in significant unmitigated visual character and quality impacts, and less than significant scenic vistas, scenic resources, light, glare, and plan consistency impacts. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed; however, a segment of I-15 within the viewshed is identified as a County Scenic Highway. Motorist on I-15 would not have views of Street "C" due to topography and distance. Thus, the Road Design Alternative changes to Street "C" are not visible from the I-15. The visual impacts of this alternative would be the same as the project (see subchapter 2.1.2.1). Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project.

Issue 2: Scenic Resources (Less Than Significant Impact)

The scenic resource impacts of the Street "C" Road Design Alternative would be similar to the project. This alternative would include an additional impact area that includes native habitat. This additional impact would not increase the severity of the scenic resource impact described for the project. As with the project, graded areas outside of the proposed pavement would revegetated/landscaped so that visual impacts would not be detected from public viewpoints or degrade visual quality. Overall, impacts to scenic resources (i.e., vegetation) would be the same as those described for the project in subchapter 2.1.2.2. Therefore, this alternative would result in less than significant impacts to scenic resources, similar to the project.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

This Road Design Alternative would have identical visual character as the project except at the 500-foot segment of Street "C". The additional grading, including manufactured slopes and flattening of the topography, at Street "C" would result in a slightly more urbanized feel than the project. Considering the overall character and quality with the proposed land uses in conjunction with infrastructure improvements, the road design alternative and project would result in a similar significant visual character and quality impact. As with the project (subchapter 2.1.2.3), this alternative would affect visual character/quality as viewed from West Lilac Road (Impact V-1), as viewed from surrounding residences (Impact V-2), and as viewed on a cumulative level within the entire viewshed (Impact V-4). Construction phase temporary impacts to visual character and quality would also be significant (Impact V-3). As with the project, these visual

impacts would remain significant and unmitigated under this alternative (see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting at the segment of Street "C", as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in the same less than significant light and glare impacts as the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of Street "C" Road Design Alternative would have air quality impacts similar to the project, which are identified in subchapter 2.2. The additional grading required for this alternative would slightly increase construction emissions relative to the project, but the increase would be negligible and would be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As described for the project in subchapter 2.2.2.1, this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with Street "C" improvements. While this alternative would result in additional grading and construction associated with the roadway improvements necessary to meet County standards, the air quality impact of this alternative would be the same as the project. The additional grading under this alternative is expected to be less than a 1 percent increase relative to the project grading (4.0 million cubic yards of cut and fill) and would minimally alter emissions. This alternative would implement project design features (see Table 1-3) that reduce air emissions the same as the project. As with the project, this alternative would have significant air quality impacts (Impact AQ-2) and would require implementation of mitigation measures (M-AQ-2, M-AQ-3, and M-AQ-4; see subchapter 2.2.5) to reduce construction emissions to below a level of significance.

The Street "C" Road Design Alternative operational impacts would be the same as the project operational impacts described in subchapter 2.2.2.2. Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions generated by either would be similar and operational impacts (Impact AQ-3) and mitigation (M-AQ-6 and M-AQ-7) would be the same as the project (see subchapters 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with the segment of Street "C" improvements. Construction of this Street "C" improvement would occur in Phase 1 when no other phases are operational. The addition of construction emissions to the operational emissions would therefore not combine with operations of other phases. This alternative would have the same impacts as identified for the project, including Impacts AQ-4 and AQ-6 (see subchapter 2.2.6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This Street "C" Road Design Alternative would result in the same traffic volumes and distribution as the project. Thus, this alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The Street "C" Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or

odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the Street "C" Road Design Alternative would have the same transportation/traffic impacts as the project. This includes direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative would be less than significant. The roadway design changes at Street "C" would not alter the overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). As with the project, this alternative design would not result in a significant safety issue. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The Street "C" Road Design Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see subchapter 2.3.2.2). Similar to the project, construction-related traffic impacts would be less than significant.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the Street "C" Road Design Alternative would be the same as the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (see subchapter 2.3.3.1), as it would not alter capacity, trip generation or trip

distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be identical to the project (see subchapter 2.3.2.3) with the exception of the segment of Street "C". The project would include a reduced speed on this roadway due to the short length of the segment and to avoid impacts to wetlands. To safely accommodate the increase in speed under this alternative, this alternative includes additional flattening of the roadway. With the inclusion of these vertical curve design features, this alternative roadway design would provide adequate ingress and egress for residents as well as emergency access, safe pedestrian system, and conform to Goal M-4 of the General Plan Mobility Element. Therefore, as with the project, impacts associated with transportation hazards would be less than significant.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4), with the exception of the segment of Street "C" that would be improved a 30 mph design speed. This change would not alter the transit, bicycle or pedestrian features along the roadway. Both this Road Design Alternative and the project would provide alternative transportation opportunities on-site and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Overall, neither the project nor this alternative would result in a negative effect to public transit, bicyclists or pedestrians. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the Street "C" Road Design Alternative agricultural resource impacts would be similar to the project (subchapter 2.4). The segment of Street "C" improvements included in this alternative would affect additional area, but that area contains native habitat and agricultural uses are restricted. As such, the acreage of this alternative's significant agricultural resource impact would be the same as identified for the project. As this alternative would not change any proposed land uses, the potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. In addition, t~~T~~he Street "C" improvements included in this alternative would impact additional approximately 0.1 acres of ~~area~~agricultural land that ~~may~~ includes soils that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance~~, but use of that area for agriculture is restricted due to biological resources present~~. Thus, ~~no~~ additional agricultural resources would be impacted by this alternative and this alternative would have ~~the same~~a slightly greater agricultural resource impact ~~as identified for~~compared to the project. The proposed project identified significant a ~~(~~direct Impact AG-1 and cumulative Impact AG-16; see subchapter 2.4.2.1~~)~~. This alternative would result in preservation of 23.7 acres of agriculture within the onsite biological open space and would require mitigation for the 43.9 acres of impacted agriculture, as detailed below:~~As with the project, M-AG-1 would mitigate the agricultural resource impacts of this alternative to below a level of significance (see subchapter 2.4.5 and 2.4.6).~~

M-AG-1: Pursuant to the County Guidelines (page 45) for direct impacts, a 1:1 mitigation ratio shall be required for impacts to Prime Farmland or Farmland of Statewide Importance. As part of the project design 23.7 acres of agriculture would be preserved within existing biological open space corridors. Therefore, the total acreage requiring mitigation is 43.9 acres and the applicant shall be required to implement one of the following options:

A. The applicant shall purchase mitigation credits through the County's PACE program. The County's PACE program is an approved mitigation banking method which uses in-lieu fees to purchase PACE credits to offset agricultural impacts. Each acre of land permanently protected with an agricultural conservation easement under the PACE program would equate to one mitigation credit. Therefore, the applicant shall mitigate for the 43.9 acres of Prime and Statewide important soils impacted, at a 1:1 ratio, through the purchase of 43.9 mitigation credits. The credits shall be purchased prior to the issuance of a grading permit.

B. In the event that PACE credits are unavailable or the applicant elects not to participate; the applicant may choose to independently secure conservation easements. The conservation easement shall prohibit non-agricultural uses and must include Prime and Statewide important soils of equal or better quality compared to the soils being converted at a 1:1 ratio (43.9 acres). The conservation easements shall be located within the cumulative project area, or, at a location approved by the Director of P&DS. The applicant shall grant the easement in perpetuity to the County prior to the issuance of a grading permit.

C. The applicant may choose to mitigate for 43.9 acres of Prime and Statewide Important soils through a combination of options A and B so long as the total acreage of mitigation is equal to a 1:1 ratio (43.9 acres) and occurs on soils of equal value to those being converted. The applicant shall provide proof to the County that the mitigation has been implemented prior to the issuance of a grading permit.

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the Street "C" Road Design Alternative would be identical to that described for the project in subchapter 2.4.2.2 considering all the proposed on-site land uses would be identical and that roadways are considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. As with the project, this alternative does not include and is not adjunct to Williamson Act contracted lands or Agricultural Preserves. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (see Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations (Impacts AG-2 through AG-15; see subchapter 2.4.2.3). The Street "C" Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. While the segment of Street "C" is located adjacent to existing agricultural area, roads are considered compatible with agricultural uses and most of the existing agriculture would be removed by the alternative. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the Street "C" Road Design Alternative biological resource impacts would be similar to the project, except it would have slightly greater impact acreages for sensitive and jurisdictional habitat. Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. The additional sensitive habitat impact would require additional mitigation. This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

In addition to the sensitive habitat impacts identified for the project (see subchapter 2.5.2.2, and Impact BIO-2), this alternative would result in additional sensitive riparian habitat impacts as a result of the Street "C" improvements (Impact RD-BIO-1f). An additional 0.05 acres of Southern Coast Live Oak Riparian Woodland would be impacted, resulting in a total of 1.15 acres of this habitat being impacted onsite under this alternative. Also, that additional impact area is considered raptor foraging habitat.

The additional area impacted by this alternative would not alter the severity of the raptor foraging impact described for the project, as the project impact is 538.29 acres of raptor foraging and the additional 0.05-acre area impacted by this alternative would represent a less than 1 percent increase in impact. Thus, this alternative would have a similar raptor foraging impact (Impact BIO-1) as the project. All other sensitive habitat impacts of this Road Design Alternative would be identical to those described for the project in subchapter 2.5.

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3 to reduce impacts to sensitive habitat and raptor foraging, as detailed in subchapter 2.5.5. In addition, this alternative would be required to implement the following to mitigate for the additional sensitive habitat impacts:

M-RD-BIO-1f: Prior to issuance of a grading permit for the construction of Street "C" to the County's roadway standards, mitigation shall be provided for sensitive impacts (estimated to be 0.05 acres of Southern Coast Live Oak Riparian Woodland) at the same ratios identified for the project (see M-BIO-1) either on-site within the open space easement; off-site within a draft PAMA of the draft North County MSCP in Valley Center or adjacent communities; or through a mitigation bank, subject to the approval of the County and appropriate wildlife agencies.

As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community as the project (see subchapters 2.5.6.1 and 2.5.6.2).

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the Street "C" Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of ACOE/CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). In addition, this alternative would impact approximately 0.05 acres of additional jurisdictional wetlands due to the additional grading required to meet County roadway design standards (Impact RD-BIO-2c). Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands. The additional jurisdictional wetland impacts that occur under this alternative would be mitigated by the following:

M-RD-BIO-2c: Prior to the issuance of grading permits for constructing Street "C" to County's roadway standards, additional wetland impacts (estimated at 0.05 acre) shall be mitigated at a ratio of 3:1, consisting of on-site

preservation, enhancement, and/or creation of wetlands. Mitigation of wetlands shall include a 1:1 creation component (of the 3:1), to ensure no net loss of wetlands. Any non-wetland jurisdictional impacts shall be mitigated at a 1:1 ratio with preservation, enhancement, and/or creation of habitat of equivalent biological value.

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. The additional Street "C" improvements may reduce those buffer-However, it is anticipated that the alternative could be designed to retain adequate riparian corridor width to allow for local wildlife movement. The impact to localized wildlife movement would be the same as the project, and less than significant.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The Street "C" Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the Street "C" Road Design Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the Street "C" Road Design Alternative cultural resource impacts would be similar to the project. While the Street "C" improvements completed by this alternative would affect additional area where there is potential for unknown subsurface cultural resources, the overall impact area acreage would be similar to the project and, accordingly, the potential impact would be similar to the project. Thus, this alternative would result in significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources similar to the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. The additional Street "C" grading would not affect additional structures. Thus, the Street "C" Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the segment of Street "C" area, the archeological site impacts would be the same as the project

except for the additional Street "C" improvement area impacts. No known cultural resources exist within the Street "C" improvement area, but additional impact area would have a potential for unknown significant subsurface cultural resources considering the known resources in the community.

As described for the project in subchapter 2.6.5.1, this alternative would potentially have significant impacts to: one archeological site that is not protected in proposed dedicated open space (Impact CR-1); unknown subsurface archeological resources within on and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to Gopher Canyon Road improvements (Impact CR-3). The additional area of potential impact to unknown subsurface cultural resources that would occur due to the additional Street "C" improvements would not change the impact relative to the project considering this change would represent less than 1 percent change to the overall impact area. Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas, including the Street "C" area. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the Street "C" Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As described for the project in subchapter 2.6.2.4, there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur. Thus, this Road Design Alternative would have the same less than significant County RPO impact as the project.

Hazards/Hazardous Materials

In summary, the Street "C" Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts of this alternative would be significant but mitigated to below a level of significance identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The Street "C" Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The Street "C" Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The Street "C" Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. Thus, this Road Design Alternative would have less than significant impacts related to emergency response and evacuation plans similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire hydrants. The Street "C" improvements would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The Street "C" Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the Street "C" Road Design Alternative impacts related to vectors would be less than significant.

Noise

As described further in the analysis below, the Street "C" Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the same as the project, as this alternative would have the same traffic

generation, traffic distribution, and roadway centerlines as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project, as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The Street "C" Road Design Alternative would have the same traffic conditions and roadways as the project. The road design changes to internal Street "C' would not alter the traffic noise impacts described for the project. This alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impacts N-3). As with the project, these noise Impacts N-1 and N-2 would be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. However, Impact N-3 would potentially remain significant and unmitigated since providing a continuous noise barrier or other methods to reduce traffic noise may be infeasible. Refer to subchapter 2.8.6.1 for additional information.

This alternative would also have the significant cumulative traffic noise impacts of the project (cumulative traffic (Impacts N-17 and N-18). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the Street "C" Road Design Alternative would be the same as the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same as the project (see subchapter 2.8.2.2), as Street "C" is an internal roadway improvement. As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." As with the project, this alternative includes direct noise Impacts N-11 to N-14, and cumulative noise Impacts N-19 and N-20. As described for the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapters 2.8.6).

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be similar to the project (refer to subchapter 2.8.6.2, Impacts N-15 and N-16). As discussed for the project, vibration levels would exceed the County thresholds (0.004 inches per second RMS) where grading occurs within 150 feet of a residence. Both the project and the alternative would potentially result in potentially significant vibration impacts to residences within 150 feet of grading. As with the project (see subchapter 2.8.6.3), significant vibration impacts N-15 and N-16 would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11) and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12).

Less than Significant Impacts

Geology and Soils

The Street "C" Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, this Street "C" Road Design Alternative underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional Street "C" improvements, and the geology and soils conditions in that area are the same as addressed for the project. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The Street "C" Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would slightly increase the GHG emissions relative to the project due to additional roadway improvements, the alternative would be the same GHG-reducing features as the project and this alternative would be consistent with all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~the percent reduction from 2020 emissions would be the same considering the inclusion of the same GHG-reducing features and this alternative would be consistent with the County's performance threshold. Thus, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~

Hydrology and Water Quality

The Street "C" Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater,

erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the Street "C" Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The Street "C" Road Design Alternative public service impacts would be similar to the project as the proposed land uses would be the same. As with the project, public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5).

Recreation

The Street "C" Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The Street "C" Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the Street "C" Road Design Alternative would result in additional biological impacts, consisting of sensitive habitats and wetlands. This alternative would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for Street "C" is not approved.

4.8.1.10 Road Design Alternative 10: Street "E" (On-site)

The project's proposed road design for this road segment corresponds to Road Exception Request #10, as submitted to the County.

The road design analyzed under this alternative is the construction of Street "E" (approximately 300 feet in length), a 24-foot-wide paved roadway within a 28-foot right-of-way with a design speed of 30 mph (see Figure 4-15). This alternative would require additional grading, manufactured slopes, and potentially retaining walls; however, no additional area would be impacted. The project proposes a slower design speed (25 mph) in this residential area, which is more conducive to pedestrian and bike use consistent with the project goals. The project also proposes an increased paved with (25 feet) and right-of-way (34 feet).

Comparison of the Effects of the Road Design Alternative to the Project

Visual Resources

In summary, this alternative would have the same visual impacts as the project except at Street "E". The alternative road design for this intersection would result in a flatter roadway with additional manufactured slope area, but would not alter the conclusions of the project's visual resource analysis. As with the project, this road design alternative would result in significant unmitigated character and quality impacts, and less than significant scenic vistas, scenic resources, light, glare, and plan consistency impacts. Refer to the analysis below and subchapter 2.1, Aesthetics, for additional information.

Issue 1: Scenic Vistas (Less Than Significant Impact)

No designated state scenic highway or scenic vista is within the project viewshed; however, a segment of I-15 within the viewshed is identified as a County Scenic Highway. Motorist on I-15 would not have views of Street "E" due to topography and distance. Thus, the Road Design Alternative changes to Street "E" are not visible from the I-15. The visual impacts of this alternative would be the same as the project (see subchapter 2.1.2.1). Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project.

Issue 2: Scenic Resources (Less Than Significant Impact)

The scenic resource impacts of the Street "E" Road Design Alternative would be the same as the project. This alternative would not include any additional impacts to visual resources and the scenic resource impact would be the same as the project. As with the project, graded areas outside of the proposed pavement would revegetated/landscaped so that visual impacts would not be detected from public viewpoints or degrade visual quality. Overall, impacts to scenic resources (i.e., vegetation) would be the same as those described for the project in subchapter 2.1.2.2. Therefore, this alternative would result in less than significant impacts to scenic resources, similar to the project.

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

This Road Design Alternative would have identical visual character as the project except along Street "E". The additional grading, including manufactured slopes and flattening of

the topography, at Street "E" would result in a similar urbanized feel to the project. Considering the overall character and quality with the proposed land uses in conjunction with infrastructure improvements, the road design alternative and project would result in a similar significant visual character and quality impact. As with the project (subchapter 2.1.2.3), this alternative would affect visual character/quality as viewed from West Lilac Road (Impact V-1), as viewed from surrounding residences (Impact V-2), and viewed on a cumulative level within entire viewshed (Impact V-4). Construction phase temporary impacts to visual character and quality would also be significant (Impact V-3). As with the project, these visual impacts would remain significant and unmitigated under this alternative (see subchapter 2.1.2.3).

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

This Road Design Alternative would include the Lilac Hills Ranch Specific Plan requirements to minimize new sources of substantial light and to conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). The lighting at the segment of Street "E", as well as all the other proposed lighting would be the same as the project. Therefore, this alternative would result in the same less than significant light and glare impacts as the project (see subchapter 2.1.2.4).

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

Air Quality

In summary, the implementation of Street "E" Road Design Alternative would have air quality impacts similar to the project, which are identified in subchapter 2.2. The additional grading required for this alternative would slightly increase construction emissions relative to the project, but the increase would be negligible and would be reduced to below a level of significance through the mitigation measures identified for the project. This alternative would have less than significant impacts related to sensitive receptors and odors similar to the project. Refer to the analysis below and subchapter 2.2, Air Quality, for additional information.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As the land uses and densities would be the same as the project under this alternative, the impacts associated with conformance to the RAQs would be the same. As described for the project in subchapter 2.2.2.1, this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative impact (Impact AQ-5). Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, requires the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment

projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with Street "E" improvements. While this alternative would result in additional grading and construction associated with the roadway improvements necessary to meet County standards, the air quality impact of this alternative would be the same as the project. The additional grading under this alternative is expected to be less than a 1 percent increase relative to the project grading (4.0 million cubic yards of cut and fill) and would minimally alter emissions. This alternative would implement project design features (see Table 1-3) that reduce air emissions the same as the project. As with the project, this alternative would have significant air quality impacts (Impact AQ-2) and would require implementation of mitigation measures (M-AQ-2, M-AQ-3, and M-AQ-4; see subchapter 2.2.5) to reduce construction emissions to below a level of significance.

The Street "E" Road Design Alternative operational impacts would be the same as the project operational impacts described in subchapter 2.2.2.2. Land uses and project features to reduce air emissions (see Table 1-3) under either project would be the same. The road design changes not alter the number of trips generated or stationary source emissions, and would have no impact on operational air quality emissions. As such, the operational emissions generated by either would be similar and operational impacts (Impact AQ-3) and mitigation (M-AQ-6 and M-AQ-7) would be the same as the project (see subchapters 2.2.2.2 and 2.2.5).

Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants (Significant and Unavoidable Impact)

This alternative would have the same air emissions as the project, except for the additional construction emissions associated with the segment of Street "E" improvements. Construction of this Street "E" improvement would occur in Phase 1 when no other phases are operational. The addition of construction emissions to the operational emissions would therefore not combine with operations of other phases. This alternative would have the same impacts as identified for the project, including Impacts AQ-4 and AQ-6 (see subchapter 2.2.6).

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

This Street "E" Road Design Alternative would result in the same traffic volumes and distribution as the project. Thus, this alternative would not result in a new CO or PM_{10} hot spot beyond any identified for the project. As with the project, CO and PM_{10} hot spot impacts would be less than significant under this alternative (see subchapter 2.2.2.4).

Issue 5: Odor Impacts (Less than Significant Impact)

The Street "E" Road Design Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. Odor impacts would be less than significant, similar to the project.

Transportation/Traffic

In summary, the Street "E" Road Design Alternative would have the same transportation/traffic impacts as the project. This includes direct and cumulative circulation system impacts to roadway segments, intersections, and freeways. Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of this Road Design Alternative would be less than significant. The roadway design changes at Street "E" would not alter the overall transportation/traffic impact conclusions identified for the project because the capacity of this roadway would remain the same as analyzed for the project and no changes related to trip generation or distribution would occur (see Appendix E). As with the project, this alternative design would not result in a significant safety issue. Refer to the analysis below and subchapter 2.3, Transportation/Traffic, for additional information.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The Street "E" Road Design Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see subchapter 2.3.2.2). Similar to the project, construction-related traffic impacts would be less than significant.

Project Trip Generation and Distribution

The individual phase trip generation and total trip generation for the Street "E" Road Design Alternative would be the same as the project (see Table 2.3-9). The distribution of traffic for this alternative would be the same as the project considering the land uses and access would be identical. The phasing of this alternative would also be the same as the project.

Existing Plus Roadway Design Alternative

As the roadway design would not alter capacity and the trip generation and distribution would be the same, the Existing Plus Roadway Design Alternative traffic analysis would be the same as the Existing Plus Project traffic analysis completed for the project in subchapter 2.3.2.1. As with the project, this Roadway Design Alternative would result in direct Impacts TR-1 to TR-9, and would implement Mitigation Measures M-TR-1 to M-TR-5. As with the project (see subchapter 2.3.6.1), Impacts TR-1, TR-2, and TR-5 to TR-9 would be mitigated to below a level of significance by these improvements that

increase capacity, while Impacts TR-3 and TR-4 would remain significant and unmitigated since they are under the jurisdiction of Caltrans.

Cumulative Impact Analysis

This road design alternative would result in the same cumulative traffic impacts as the project (see subchapter 2.3.3.1), as it would not alter capacity, trip generation or trip distribution. As with the project, the road design alternative would result in significant cumulative Impacts TR-10 to TR-37.

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The potential transportation hazards of this alternative would be identical to the project (see subchapter 2.3.2.3) with the exception of the segment of Street "E". To accommodate the increase in speed to meet the County roadway standards, this alternative would reduce the horizontal curve and provide a flatter road. With the inclusion of these vertical curve design features, this alternative roadway design would provide adequate ingress and egress for residents as well as emergency access, safe pedestrian system, and conform to Goal M-4 of the General Plan Mobility Element. Therefore, as with the project, impacts associated with transportation hazards would be less than significant.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4), with the exception of the segment of Street "E" that would be improved a 30 mph design speed. This change would not alter the transit, bicycle or pedestrian features along the roadway. Both this Road Design Alternative and the project would provide alternative transportation opportunities on-site and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Overall, neither the project nor this alternative would result in a negative effect to public transit, bicyclists or pedestrians. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

Agricultural Resources

As described further in the analysis below, the Street "E" Road Design Alternative agricultural resource impacts would be similar to the project (subchapter 2.4). The segment of Street "E" improvements included in this alternative would require no additional area. As such, the acreage of this alternative's significant agricultural resource impact would be the same as identified for the project. As this alternative would not change any proposed land uses, the potentially significant adjacency/land uses conflicts between residential and agricultural uses would be the same as the project. Like the project, this alternative would have less than significant impacts related

to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land and indirect conversion of agricultural uses due to agricultural adjacency issues. Refer to the analysis below for additional information.

Issue 1: Direct Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in a significant impact related to the direct conversion of agricultural resources. The Street "E" improvements included in this alternative would not impact any additional agricultural resources. Thus, this alternative would have the same agricultural resource impact as identified for the project (direct Impact AG-1 and cumulative Impact AG-16; see subchapter 2.4.2.1). As with the project, M-AG-1 would mitigate the agricultural resource impacts of this alternative to below a level of significance (see subchapter 2.4.5 and 2.4.6).

Issue 2: Land Use Conflicts (Less than Significant Impact)

The agricultural land use conflict analysis of the Street "E" Road Design Alternative would be identical to that described for the project in subchapter 2.4.2.2 considering all the proposed on-site land uses would be identical and that roadways are considered compatible with agricultural uses. This alternative would include the same land use plan and General Plan Amendments as discussed for the project in Chapter 1.0. Under this alternative, approval of the General Plan Amendment would allow agricultural uses to be allowed to continue within the project site. Approval of this alternative would implement the Lilac Hills Ranch Specific Plan, which creates a village compatible with the rural/agricultural nature of Valley Center. Therefore, impacts related to the Specific Plan or required rezoning under this alternative would be less than significant. As with the project, this alternative does not include and is not adjunct to Williamson Act contracted lands or Agricultural Preserves. As with the project, impacts would be less than significant.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

As with the project, this alternative would result in potential conflicts with off-site agricultural operations (see Figure 2.4-7) due to land use/agricultural interface issues where residential development neighbors agricultural operations (Impacts AG-2 through AG-15; see subchapter 2.4.2.3). The Street "E" Road Design Alternative would not result in any additional indirect conversion of agricultural uses over that identified for the project. While the segment of Street "E" is located adjacent to existing agricultural area, roads are considered compatible with agricultural uses and most of the existing agriculture would be removed by the alternative. As with the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 (subchapter 2.4.5) that provide adequate buffers and interim agricultural uses to reduce significant impacts at the agricultural interface locations to below a level of significance.

Biological Resources

In summary, the Street "E" Road Design Alternative biological resource impacts would be the same as the project. Like the project, this alternative would have significant impacts related to special status species (raptors), riparian habitat or sensitive natural community; and jurisdictional waters and waterways that would be mitigated to below a level of significance. No additional sensitive habitat would be impacted. This alternative

would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

This alternative would result in the same sensitive habitat impacts the project (see subchapter 2.5.2.2, and Impact BIO-2) and raptor foraging impact as the project (Impact BIO-1), as no additional biological resources would be impacted by this alternative relative to the project (see subchapter 2.5).

As with the project, this alternative would result in indirect impacts to the preserved or restored sensitive habitat areas from increased human access, domestic animals, invasive plants, drainage, noise, and night time lighting. This alternative would include the same project features to reduce these impacts, including buffers, limited building zones, fencing, and signage. Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant (see subchapter 2.5.2.2).

This alternative would implement mitigation M-BIO-1 through M-BIO-3 to reduce impacts to sensitive habitat and raptor foraging, as detailed in subchapter 2.5.5. As with the project, this alternative project would require the development of a Revegetation Plan (Mitigation Measure M-BIO-4) and a Resource Management Plan (M-BIO-2) to manage the preserved areas. Ultimately, this alternative would mitigate for impacts to special status species, riparian habitat and sensitive natural community as the project (see subchapters 2.5.6.1 and 2.5.6.2).

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

As with the project, the Street “E” Road Design Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of ACOE/CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site (see subchapter 2.5.2.3, Impact BIO-3). Jurisdictional waters impacts (Impact BIO-3) would be mitigated by M-BIO-3 and M-BIO-4, which include habitat mitigation at ratios designed to result in no net loss of wetlands. No additional impacts to jurisdictional waters would occur.

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these local corridors. The additional Street “E” improvements would not impact any additional area beyond that identified for the project. The impact to localized wildlife movement would be the same as the project, and less than significant.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The Street "E" Road Design Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the Street "E" Road Design Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

Cultural Resources

As described further in the analysis below, the Street "E" Road Design Alternative cultural resource impacts would be the same as the project. Street "E" improvements completed by this alternative would not affect additional area; thus, this alternative would result in the same significant mitigated impacts related to archeological sites; less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources as the project.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. The additional Street "E" grading would not affect additional structures. Thus, the Street "E" Road Design Alternative would have a less than significant historical resource impact, similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

As the impact area of this alternative is the same as the project except for the segment of Street "E" area, the archeological site impacts would be the same as the project. As described for the project in subchapter 2.6.5.1, this alternative would potentially have significant impacts to: one archeological site that is not protected in proposed dedicated open space (Impact CR-1); unknown subsurface archeological resources within on and off-site areas (Impacts CR-2 and CR-4); and one off-site archeological site due to Gopher Canyon Road improvements (Impact CR-3). Mitigation measures M-CR-1, M-CR-2, and M-CR-3 identified for the project would also reduce the potential archeological site impacts of this alternative to below a level of significance (see subchapter 2.6.5.1).

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site, including the Street "E" area. If any accidental discovery of human remains occurs under this alternative, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the Street "E" Road Design Alternative would have a less than significant historical resource impact the same as the project.

Issue 4: County RPO (Less than Significant Impact)

As described for the project in subchapter 2.6.2.4, there is one cultural site (CA-SDI-18362) within this alternative that meets RPO criteria. As with the project, this

alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur. Thus, this Road Design Alternative would have the same less than significant County RPO impact as the project.

Hazards/Hazardous Materials

In summary, the Street "E" Road Design Alternative hazards/hazardous materials would result in similar impacts as the project. Hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vector impacts would be less than significant under this alternative. Wildland fire impacts of this alternative would be significant but mitigated to below a level of significance identical to the project.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The Street "E" Road Design Alternative would include the same land uses as the project, and would have the same potential to involving hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The Street "E" Road Design Alternative impacts related to hazardous substance handling use would be less than significant, identical to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

The Street "E" Road Design Alternative site and off-site areas would be the same as the project, and would include the same existing contamination issues identified in subchapter 2.7.2. As with the project, this alternative would result in less than significant impacts related to existing soil contamination due to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems issues considering the alternative would comply with applicable regulations.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex and Energy Shortage Response Plan, and Structure or Tower Greater than 100 feet. This alternative includes the same land uses, height limits and site location, and Evacuation Plan compared to the project. Thus, this Road Design Alternative would have less than significant impacts related to emergency response and evacuation plans similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

This Road Design Alternative would be exposed to the same existing fire risk as the project, and would also include the same land uses, fire safety features, and fire service options as the project (see Chapter 1.0 and subchapter 2.7). The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; fire apparatus/secondary emergency access roads, and adequate water supply for fire

hydrants. The Street "E" improvements would not alter wildland fire risk or the ability to provide adequate protection from wildfires. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that requires a 100-foot brush management zone around structures or equivalent fire protection.

Issue 5: Vectors (Less than Significant Impact)

The Street "E" Road Design Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the Street "E" Road Design Alternative impacts related to vectors would be less than significant.

Noise

As described further in the analysis below, the Street "E" Road Design Alternative noise impacts would be similar to the project. Traffic noise generated under this alternative would be the same as the project, as this alternative would have the same traffic generation, traffic distribution, and roadway centerlines as the project. Construction noise and vibration impacts of this alternative would be similar to the project as well. Stationary noise from this alternative would be the same as the project, as the land uses would be the same. Thus, this alternative would have significant noise/vibration impacts related to traffic, stationary, and construction noise sources similar to the project. As with the project, all noise impacts would be mitigated with the exception of cumulative traffic noise impacts.

Issue 1: Traffic Generated Noise (Significant and Unmitigated Impact)

The Street "E" Road Design Alternative would have the same traffic conditions and roadways as the project. The road design changes to internal Street "C' would not alter the traffic noise impacts described for the project. This alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impacts N-3). As with the project, these noise Impacts N-1 and N-2 would be reduced to below a level of significance through mitigation measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards. However, Impact N-3 would potentially remain significant and unmitigated since providing a continuous noise barrier or other methods to reduce traffic noise may be infeasible. Refer to subchapter 2.8.6.1 for additional information.

This alternative would also have the significant cumulative traffic noise impacts of the project (cumulative traffic (Impacts N-17 and N-18). As with the project, these cumulatively significant traffic noise impacts would remain significant and unmitigated (see subchapter 2.8.6.4).

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

As the same land uses would be located in the same location as the project, stationary noise impacts of the Street "E" Road Design Alternative would be the same the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details.

Construction

The construction noise of this road design alternative would be the same as the project (see subchapter 2.8.2.2), as Street "E" is an internal roadway improvement. As stated in the project analysis, "average hourly roadway construction noise levels would be approximately 75 dB(A) L_{eq} at the edge of the roadways." As with the project, this alternative includes direct noise Impacts N-11 to N-14, and cumulative noise Impacts N-19 and N-20. As described for the project, mitigation measures M-N-8 to M-N-11 would reduce these impacts to below a level of significance (see subchapters 2.8.6).

Issue 3: Vibration (Significant Mitigated Impact)

The vibration impacts of this alternative would be similar to the described for the project (refer to subchapter 2.8.6.2, Impacts N-15 and N-16). As discussed for the project, vibration levels would exceed the County thresholds (0.004 inches per second RMS) where grading occurs within 150 feet of a residence. Both the project and the alternative would potentially result in potentially significant vibration impacts to residences within 150 feet of grading. As with the project (see subchapter 2.8.6.3), significant vibration impacts N-15 and N-16 would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11) and monitoring, and, if needed, limitations on heavy equipment within 150 feet of residences to attenuate vibration to acceptable levels (M-N-12).

Less than Significant Impacts

Geology and Soils

The Street "E" Road Design Alternative geology and soil-related impacts would be the same as the project. As the site is the same under both the project and this alternative, this Street "E" Road Design Alternative underlying geology and soils are also the same and pose the same potential environmental impacts. The only development footprint difference is the additional Street "E" improvements, and the geology and soils conditions in that area are the same as addressed for the project. As with the project, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features (see subchapter 3.1.1).

Greenhouse Gases

The Street "E" Road Design Alternative greenhouse gas impacts would be similar to the project. While this alternative would slightly increase the GHG emissions relative to the project due to additional roadway improvements, the alternative would be the same GHG-reducing features as the project and this alternative would be consistent with all of the analysis methodologies and assumptions evaluated in the project's GHG report. Thus, like the project, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~the percent reduction from 2020 emissions would be the same considering the inclusion of the same GHG-reducing features and this alternative would be consistent with the County's performance threshold. Thus, this alternative would have a less than significant impact related to GHG emissions and conformance to applicable plans, policies or regulations (see subchapter 3.1.2).~~

Hydrology and Water Quality

The Street "E" Road Design Alternative hydrology and water quality impacts would be similar to the project. The changes to roadway design would have a negligible effect on hydrology and water quality considering the general location of the project would remain the same and both the project and this alternative would be required to comply with plans, policies and regulations. As with the project, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow (see subchapter 3.1.3).

Land Use Planning

The land uses included in the Street "E" Road Design Alternative would be the same as the project. Implementation of either the project or this alternative would involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

Public Services

The Street "E" Road Design Alternative public service impacts would be similar to the project as the proposed land uses would be the same. As with the project, public service impacts (school, law enforcement, fire protection, and library) of this alternative would be less than significant (see subchapter 3.1.5).

Recreation

The Street "E" Road Design Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See subchapter 3.1.6 for additional information.

Utilities and Service Systems

The Street "E" Road Design Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See subchapter 3.1.7 for additional information.

Energy Use and Conservation

The land uses included in the Road Design Alternative would result in the same operational energy and water use, as well as the same vehicle trips, as the project. This alternative would also include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. Therefore, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant, like the project.

Conclusion

Impacts of the Street "E" Road Design Alternative would result the same impacts as the project and would not reduce any significant project impacts. This alternative would meet all the main project objectives. As noted in the introduction, this alternative is intended to disclose the impacts that would occur if the project road modification for Street "E" is not approved.

Implementation of all 10 Road Design alternatives would not cause cumulative impacts (collectively the impacts of all road design modification requests being denied) would not be significant. Most of the 10 alternatives would result in only minor impacts, primarily to disturbed areas or within ROW, that when brought together, would not be cumulative considerable.

4.9 Analysis of the Mountain Ridge Road Fire Station Alternative

4.9.1 Description and Setting

The Mountain Ridge Road Fire Station Alternative was developed to analyze an alternative that proposes to include a fire station within Phase 5, the southern portion of the project site. This alternative also includes access changes to accommodate the placement of a fire station within Phase 5. The analysis associated with this ~~is~~ alternative reveals impacts as they relate to the baseline condition so~~is analyzed such that~~ it ~~can~~ could be used in the decision-making process to provide the approval of this alternative. Conclusions are then compared to the project. Under the existing baseline, Mountain Ridge Road is a 24-foot paved AC roadway, within an approximate 28-foot graded area of a 40-foot easement. The existing design speed of the road is approximately 15 mph. It does not presently meet current minimum County of San Diego private road design standards.

This alternative would encompass the same 608-acre project site and would consist of the same mix of residential, commercial, and institutional uses, along with parks, open space and other project amenities, as the project (Figure 4-16). Like the project, the residential component of this alternative would contain a maximum of 1,746 units. The project proposes four options for fire services. Option 3 includes a fire station in Phase 3 at the site designated as Community Purpose Facility. Under this alternative, a permanent fire station would be constructed similar to Option 4, but the fire station would be in Phase 5. To accommodate the fire station in the Phase 5 location, this alternative includes improving Mountain Ridge Road to as a County public road and eliminating the gates in the southern area of the site (i.e., in Phases 4 and 5). Brush management measures consistent with the Consolidated Fire Code would be required along Mountain Ridge Road. All other aspects of this alternative would be the same as the project and would require a GPA, a Specific Plan, Rezone, Master Tentative Map, subsequent implementing Tentative Maps, MUPs for the WRF and the public park (P-7), and Site Plans for all private parks. Individual components of the Mountain Ridge Road Fire Station Alternative that differ from the project are described below.

4.9.1.1 Fire Station

As mentioned above, the project fire service option 3 includes a fire station in Phase 3 at the site designated as Community Purpose Facility. Instead of a fire station in Phase 3 or the other project fire service options, the Mountain Ridge Road Fire Station Alternative would locate a new permanent DSFPD fire station within a two-acre site in Phase 5 (see Figure 4-16). The permanent station would represent a new building to the overall project description under this alternative. Under the project, this 2-acre site would be designated as SFS-6, which allows single- family senior housing units. The Mountain Ridge Road Fire Station Alternative would designate the 2-acre portion of the SFS-6 site as Fire Station instead and transfer the units to the remaining area of SFS-6 in Phase 5, as detailed further in the residential component discussion below. The Specific Plan land uses surrounding the proposed fire station site include institutional uses directly west and south and SFS-5 across a roadway to the east and north.

The permanent station would consist~~ing~~ of 3,000 square feet of livable space accommodating three fire fighters, with two dual-stacked engine bays equal to 1,500 square feet. The site would include a total of ten parking spaces. It would be a fully

functioning fire station similar to existing stations in other unincorporated County areas. The station would be designed with the same architectural and landscaping style as the project. The final design of the fire station would require a Site Plan and approval by the DSFPD.

As with the project, adequate fire service is available to the first 71 units. In order to provide fire service within the 5-minute response time after the 71st unit, either an agreement could be made with CALFIRE to provide temporary service from Miller Station (located adjacent to the project site along West Lilac Road), or a temporary fire station would be provided in an on-site location that assures an average 5 minute response time to the alternative. As with the project, fire stations are an allowed use within the residential, commercial and institutional uses within the site. This temporary service period would occur after the construction of the 71st unit until the permanent fire station can be constructed in Phase 5. The temporary fire station would be provided on-site in lieu of a use that would generate 18 ADT or more. After the construction of the permanent fire station in Phase 5, the temporary station would be converted back to its underlying zoning allocation pursuant to the Specific Plan.

4.9.1.2 Residential

While the fire station included in this alternative would be located on a site designated as SFS-6 by the project's Specific Plan, the number of single- family senior housing units would remain the same as the project. The entire 13.5-acre SFS-6 area in Phase 5 is designated for 59 units by the project. Under this alternative, the approximately 9 units that would have been included on the 2-acre site under the project would be transferred to the remaining 11.5-acre SFS-5 area in Phase 5. Thus, like the project, this alternative consists of 1,746 residential units composed of 903 traditional single-family detached homes; 164 single-family attached homes; 211 residential units within the commercial mixed-use areas; and 468 single-family detached age-restricted residential units within the senior citizens neighborhood. Like the project, the residential component of the alternative consists of 1,746 units with an overall density less than 2.9 dwelling units per acre (du/ac).

4.9.1.3 Community Purpose Facility (CPF)

This alternative includes a CPF designation over a two 2-acre site in Phase 3 just like the project. As the fire station would be located in Phase 5, this alternative does not include an option to develop a portion of the CPF site with a fire station. Instead, that entire site would be developed with a 40,000 square-foot community recreation center. Refer to Chapter 1.0 for additional details regarding the community recreation center uses.

4.9.1.4 Circulation

The Mountain Ridge Road Fire Station Alternative would include the same transportation network as the project, except for modifications related to Mountain Ridge Road and the gates in Phases 4 and 5. This alternative includes access changes to accommodate the placement of a fire station within Phase 5. These access changes are intended to allow for fire trucks to utilize roadways in a manner that would provide quicker response times to off-site locations. As described further below, these changes include the redesignation

of Mountain Ridge Road from a private road to a public Rural Residential Collector and the elimination of the gates included in Phases 4 and 5 of the project.

Mountain Ridge Road is currently a private road with access easements for several parcels in the vicinity and on-site parcels as shown in Table 4-9). The project would limit Mountain Ridge Road access to these parcels with existing access easement rights via gates and the continued designation of the roadway as a private road. This alternative would reclassify the roadway from a private road to a public Rural Residential Collector and remove the gates to provide quicker access between the fire station and the area to the south and southeast. These circulation changes would also allow the public, including the proposed on-site uses and other existing residents in the area, full access to Mountain Ridge Road. While this alternative would eliminate the project's gates that are intended to restrict access to off-site roadways, this alternative may still include neighborhood entrance gates. The neighborhood entrance gates would restrict access into proposed neighborhoods on-site but not to through roadways.

TABLE 4-9
MOUNTAIN RIDGE ROAD EXISTING ACCESS EASEMENTS

APN	Access Easement Rights
129-300-31 to -35	All of Mountain Ridge Road
129-430-01 to -18	All of Mountain Ridge Road
129-300-07	Middle and lower portion of Mountain Ridge Road
129-300-16	Middle and lower portion of Mountain Ridge Road
129-300-46	Middle and lower portion of Mountain Ridge Road
129-300-48	Middle and lower portion of Mountain Ridge Road
129-300-50	Middle and lower portion of Mountain Ridge Road
129-300-09 to -10 (on-site)	Lower portion of Mountain Ridge Road
129-390-18	Lower portion of Mountain Ridge Road
129-390-38 to -41	Lower portion of Mountain Ridge Road

The project includes two road modification requests related to Mountain Ridge Road; road modification requests #7 and #8 (see EIR Chapter 1.0). Those two roadway modification requests would not be applicable under this alternative due to the redesignation and the associated Mountain Ridge Road and Circle R Road intersection improvements. However, this alternative would include a new Mountain Ridge Road modification request option, as described further below.

The alternative includes two reclassification options; Option 1 would consist of reclassification to a standard Rural Residential Collector and Option 2 would consist of reclassification to Rural Residential Collector subject to a road exception request. The purpose of the optional road modification request would be to reduce impacts to biological resources that are located adjacent to the roadway, including impacts to wetlands and a biological open space easement. The following is a description of these two Mountain Ridge Road options:

Option 1: This option includes construction of Mountain Ridge Road to a standard Rural Residential Collector, including a 28-foot paved

roadway within a 48-foot graded right-of-way (Figure 4-17). Other features include a 350-foot horizontal radius, 13.36 percent maximum grade, and 130-foot angle of departure. The design speed for this Rural Residential Collector would be 30 mph.

Option 2: This option includes a road exception request for Mountain Ridge Road to allow the 28-foot paved roadway to be within a 40-foot graded right-of-way, instead of a standard 48-foot graded right-of-way (Figure 4-18). This would reduce the graded right-of-way on both sides of the roadway by 4 feet. The design speed for this option would be 30 mph identical to Option 1. All other aspects of Mountain Ridge Road Option 2 would also be the same as a standard Rural Residential Collector, as described above under Option 1.

~~Construction of Mountain Ridge Road as a private road would require the acquisition of 0.01 acre (642 square feet) of right-of-way.~~ Both the Mountain Ridge Road options would require the acquisition of additional 2.37-acres of right-of-way. Lights would be placed intermittently along Mountain Ridge Road, as required under the County Light Ordinance and Road Design Manual.

The analysis of the Mountain Ridge Road Fire Station Alternative below addresses the Mountain Ridge Road Option 1 in the detailed analysis, as this would be the worst-case impact scenario. The impact difference between Option 2 is provided in the summary of each issue area to disclose the impact of Option 2 and to provide the County the choice of approving a road design exception request for the reduced right-of-way.

4.9.1.5 Infrastructure and Utilities

While the major water, wastewater, storm water, recycling, and electrical infrastructure included in this alternative would be the same as the project (see subchapter 1.2), minor changes would be required due to the Mountain Ridge Road widening. These minor changes include the relocation of several power poles and extending three existing culverts.

4.9.1.6 Grading

Under the Mountain Ridge Road Fire Station Alternative, the permanent fire station would be located in Phase 5 within the development footprint of the project. Thus, the fire station included in this alternative would not result in additional grading or impact areas beyond that of the project.

The construction of Mountain Ridge Road as a Rural Residential Collector requires that the existing hills and valleys of the roadway (a.k.a. vertical alignment) be minimized. In other words, the valley low points would be raised and the hill high points would be lowered to result in ~~a~~ flatter topography. Thus, the Mountain Ridge Road improvements of this alternative would result in additional grading beyond the project.

The Mountain Ridge Road Option 1 grading would involve grading a total area of approximately ~~an additional~~ 4.45~~-~~ acre~~s area~~, and would include a total of 3,271 ~~n additional 3,271~~ cubic yards of ~~fill~~ cut and 78,944 cubic yards of ~~cut~~fill ~~above that required~~ for the construction of Mountain Ridge Road as a public road. This is in contrast

to the grading required to implement improvements as a private road under the project which would require 950 cubic yards of cut and 2,110 cubic yards of fill. Manufactured slopes would be up to 35 feet high with the construction to public road standards under the alternative. As shown in Figure 4-17, a portion of the ~~additional~~ grading for this alternative would occur within an existing open space easement. The easement is located along a drainage and is held by the County of San Diego to preserve open space. ~~In order to grade within the easement, this alternative would require an open space easement vacation.~~

Mountain Ridge Road Option 2 (see Figure 4-18) would eliminate 4 feet of grading along both sides of the roadway, compared to Option 1. ~~This~~ Option 2 would result in ~~change would reduce the additional~~ a total graded area ~~to~~of 4.19~~4.04~~ acres. Grading quantities ~~of~~ for Option 2 would be similar to Option 1, as the majority of the grading quantities are generated by the need to flatten out the topography and are not related to the graded right-of-way area. As with Option 1, Option 2 would result in manufactured slopes up to 35 feet in height~~ and an open space easement vacation~~.

4.9.1.7 Growth Inducement

As described for the project in subchapter 1.8, this alternative would potentially induce growth due to improved fire and emergency services and the expansion of sewer and water infrastructure. However, the environmental impacts that may result from growth inducement are too speculative to address due to the unknown nature, design, and timing of future projects. In accordance with CEQA Guidelines Section 15145, such impacts are not addressed further herein, but would be required to be addressed at the time future projects are identified and processed.

4.9.2 Comparison of the Effects of the Mountain Ridge Road Fire Station Alternative to the Project

While the CEQA Guidelines Section 15126.6(d) states “the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed”, the additional environmental impacts of this alternative are described below in similar detail as the project to allow the County the option of adopting this alternative without the need to complete additional subsequent environmental analysis. Thus, the analysis below not only addresses each environmental factor (e.g., visual resources, noise), but each associated issue question as well.

Due to the more in depth analysis completed, a summary is provided in the introduction to each environmental factor. The summary table identifies the impacts of the project and the alternative for each environmental issue. The summary text includes three paragraphs; one that (1) identifies the resources utilized to complete the analysis, (2) the difference between the alternative’s impacts and the project’s impacts, and (3) the change in impacts if Mountain Ridge Road Option 2 is implemented instead of Option 1.

The detailed analysis completed under each issue determines the impacts of the Mountain Ridge Road Fire Station Alternative based on the existing conditions. The results of the analysis are then compared to the impacts of the project. If the impact is the same as the project, the analysis will state such and refer to the analysis completed for the project. For example, the impacts of the fire station included in this alternative are typically the same as those impacts already identified for the project since the fire station

would be located within an area already identified for development by the project. The reader is then referred to the project analysis for additional information. If new impacts or an increase in impact severity is identified for the alternative relative to the project, then the analysis describes the impact in detail, identifies the additional impact utilizing the "MRR-" prefix, and identifies mitigation as feasible. For example, the Mountain Ridge Road improvements included in this alternative result in impacts to additional area outside of the project's development footprint and, therefore, are typically addressed in detail in the analysis below.

The majority of the impacts identified for this alternative are associated with the improvements to Mountain Ridge Road to be constructed to public road standards. The impact analysis below focuses on the worst-case impact scenario associated with the Mountain Ridge Road Fire Station Alternative, which is Mountain Ridge Road Option 1 (see Figure 4-17). Mountain Ridge Road Option 1 is considered the worst-case since it has a 48-foot-wide graded right-of-way where Mountain Ridge Road Option 2 includes a reduced 40-foot-wide graded right-of-way. As mentioned above, the summary of each environmental factor also provides a brief comparison of the impacts associated with the construction of Mountain Ridge Road Option 2 versus the construction of Mountain Ridge Road Option 1.

4.9.2.1 Visual Resources

The existing conditions, methodology and significance determination information for the Visual Resources analysis below is the same as the project (see subchapter 2.1), Visual Resources. The analysis below is based on information obtained for the project that is applicable for the alternative, including site visits and a specific Mountain Ridge Road Fire Station Alternative analysis included as Appendix V-1.

The Mountain Ridge Road Fire Station Alternative (with Mountain Ridge Road Option 1) would have the same less than significant impacts related to scenic vistas, scenic resources, light, glare, and consistency with applicable policies and planning documents. The significant and unavoidable impacts due to changes in the existing visual environment as viewed from West Lilac Road and from surrounding residences that would occur under the project would also occur as a result of this alternative (Impacts V-1 to V-4). Refer to the analysis below for additional information.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar visual impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would negligibly affect I-15 scenic vistas, scenic resources, visual character and quality, and have no effect on light and glare, and plan compliance.

Issue 1: Scenic Vistas (Less Than Significant Impact)

The project site is not visible from a designated state scenic highway or scenic vista; however a portion of the project site is visible from a segment of the I-15 that is designated as a County Scenic Highway. As discussed in subchapter 2.1.2.1 for the project, the view of the project site from I-15 is very distant and the project improvements on-site would not be highly visible. Due to the distance, the view from the I-15 of the site under the project and this alternative would be similar. In addition, tThe fire station and Mountain Ridge Road features included in this alternative ~~compared to the project~~

~~features~~ would not be discernable from the I-15. Therefore, this alternative would result in less than significant impacts to scenic vistas, similar to the project (see Appendix C).

Issue 2: Scenic Resources (Less Than Significant Impact)

The project site contains approximately 20 acres of steep slopes that are considered scenic resources under RPO. As with the project, this alternative would impact eight percent of these slopes on-site and would be consistent with the RPO. The disturbance and subsequent revegetation/landscaping of a relatively small area of steep slopes would not be visibly detectable and would not degrade the visual quality of the remaining on-site steep slopes. The fire station included in this alternative would be within the project's impact footprint, and no additional impacts beyond those identified for the project would occur. The construction of Mountain Ridge Road under this Alternative would impact additional area beyond the project site, but that area does not include additional steep slopes. Mountain Ridge Road improvements included in this alternative would result in the removal of a few oak trees, but that visual change would have no impact to scenic value. Therefore, this alternative would result in less than significant impacts to scenic resources, similar to the project (see Appendix C).

Issue 3: Visual Character or Quality (Significant and Unavoidable Impact)

This alternative would result in significant temporary visual impacts associated with construction of the project site similar to the project. Impacts of this alternative would be the same as identified for the project in the visual resources analysis for the Project (subchapter 2.1.2.3), except for the additional Mountain Ridge Road improvement area. The fire station would be located within the existing footprint and the visual appearance of the fire station construction would be similar to the residential construction proposed in the same location by the project. The Mountain Ridge Road additional impact area would be 4.4 acres and would not significantly increase the severity of the project impact. Thus, this alternative would have the same construction impact (Impact V-3) as identified for the project in subchapter 2.1.2.3. Although short term, construction related impacts would remain significant and unavoidable (see Appendix C). M-V-2 identified in subchapter 2.1.5 would be infeasible considering grading of each phase is dependent upon the infrastructure in another phase (see subchapter 2.1.6). Short term, construction-related impacts would remain significant and unavoidable (see Appendix C).

The Mountain Ridge Road Fire Station Alternative would have the same significant direct and cumulative visual impacts identified for the project along West Lilac Road, surrounding residences, and other roadways. These impacts identified in the subchapter 2.1.2.3 include Impact V-1 (West Lilac Road), Impact V-2 (surrounding residences) and Impact V-4 (cumulative impacts). This alternative project would include design features similar to the project (see subchapter 2.1.2.3) intended to assist in the reduction of potentially significant impacts (including transitional landscaping intended to relate to adjacent natural hillsides, riparian areas, and rural residential lots; manufactured slope treatments that soften their manmade appearance; and light fixtures with cut-off features to minimize light spillage beyond their intended target areas). As with the project, Mitigation Measure M-V-1 that requires dense landscaping to screen views would be infeasible due to the Consolidated Fire Code requirements. Like the project, impacts to existing views under this alternative would remain significant and unavoidable. Impacts to existing views along West Lilac Road, and surrounding

residences under this alternative would remain significant and unavoidable similar to the project (see Appendix C).

The additional on- and off-site improvements associated with the Mountain Ridge Road Fire Station Alternative would change the quality of the visual environment along Mountain Ridge Road and for surrounding properties. Currently Mountain Ridge Road is a 20-foot paved roadway ~~24-foot-wide, paved private roadway~~ that follows the undulating topography, contains no regular pattern of street lighting, and has minimal traffic generated from nearby properties. Under the project, Mountain Ridge Road would be retained as a private roadway.

This alternative would improve Mountain Ridge Road to a Rural Residential Collector, which would result~~s~~ in widening the roadway to 28 feet of pavement, the addition of sidewalks, curb and gutter, street lighting, additional right-of-way grading, landscaping, and vegetation removal along the roadway, flattening the topography along the roadway, and increased public traffic. Grading associated with this improvement would be ~~significant~~ substantial and result in a total of 3,271 cubic yards of cut and 78,944 cubic yards of fill and slopes up to approximately 50 feet in height. These improvements would introduce new visual elements associated with the roadway ~~with suburban patterns of development~~ but, at the same time, would relate to elements currently found within the viewshed such as asphalt paving, naturalized and native plantings, and other man-made improvements. Existing utility poles, would be relocated and/or removed as overhead utilities within the right-of-way would be undergrounded. The existing visual environment includes slopes along the roadway, limited existing views, and paved roadways in the areas (Circle R Drive). The off-site Mountain Ridge Road improvements included in this alternative would not significantly alter the composition of the visual environment. ~~,~~ and would therefore not result in significant adverse visual impacts to views.

Motorists traveling along Mountain Ridge Road currently have brief expansive views toward the project site between existing view-blocking vegetation, structures and topography that confine views to the immediate vicinity. The brief distant views of the project site exist on Mountain Ridge Road at the topography peaks and at the terminus of the existing roadway. Existing views toward the site from these locations would encompass wetlands, natural hillsides, estate and rural residences, agricultural activities, graded slopes, domestic and transitional landscaping. The southern area of project site (Phase 5 area) in the distant views includes agricultural uses consisting of greenhouses and row crops. These views would remain under the project. With the implementation of the project alternative, Mountain Ridge Road would have lower topography peaks and less expansive views, and the distant views of the project site would be changed to residential, fire station, and institutional structures.

Due to the flattening of the peaks along Mountain Ridge Road, and the changes to the interior views of the project site, the views along Mountain Ridge Road would have increased urbanized character. The visual portions of the project would be at a relative scale and density that would contrast moderately with the composition of the existing visual environment. Policies and guidelines required by implementation of the Specific Plan, as described earlier, would minimize the contrast of the project with its surroundings to the greatest extent possible. The alternative would include project design features including landscaping on slopes, along streets, and within HOA open space areas, that would visually buffer and screen portions of the project from view while providing visual context. As the project vegetation matures, it would increasingly screen

and buffer the project from view, enabling it, over time, to be increasingly integrated into the existing visual environment to the greatest extent possible. Therefore, implementation of the project would not change the visually prominent peaks, ridgelines, and habitat areas; and, project design measures would help reduce the contrast of the project with the existing visual environment; and views along local roadways would be brief and highly constrained by intervening structures, vegetation, topography and distance, there would not be a significant adverse impact to views from Mountain Ridge Road.

Issues 4 and 5: Light and Glare (Less Than Significant Impact)

Approval of this alternative would result in the implementation of the same Lilac Hills Ranch Specific Plan project design as the project. The Specific Plan would require all lighting designed to minimize new sources of substantial light and would conform to the San Diego Light Pollution Code (Sections 59.108-59.110 51.201-51.209). Additionally, the Specific Plan would prohibit use of highly reflective construction materials, and restrict exterior surfaces of buildings to primarily stucco or concrete. The proposed fire station and Mountain Ridge Road improvements would be required to comply with these regulations. Therefore, this alternative would result in less than significant visual impacts due to the light and glare, similar to the project.

Issue 6: Consistency with Applicable Policies and Planning Documents (Less Than Significant Impact)

Approval of this alternative would allow implementation of the land use plan as described in Chapter 1.0. The construction of a fire station in Phase 5 and the additional Mountain Ridge Road improvements would not change the analysis completed for the project. All aspects of the development would be consistent with applicable policies and planning documents related to visual resources as discussed in subchapter 2.1.2.6. Identical to the project, no consistency impact would result from the implementation of this alternative.

4.9.2.2 Air Quality

The existing conditions, methodology and significance determination information for the air quality analysis below is the same as the project (see subchapter 2.2, Air Quality). The analysis below is based on the Air Quality Technical Report prepared by RECON in ~~2014~~ 2015 to specifically address this Mountain Ridge Road Fire Station Alternative. The following section is a summary of that report, which can be found in its entirety in Appendix V-2.

In summary, the implementation of Mountain Ridge Road Fire Station Alternative (with Mountain Ridge Road Option 1) would have one additional significant and unavoidable construction impact related to NO_x emissions (Impact MRR-AQ-1). All other air quality impacts of this alternative would be similar to the project (see subchapter 2.2), including significant and unavoidable impacts related to inconsistency with current regional air quality strategies and standards (Impacts AQ-2 to AQ-4, and AQ-6). This alternative would have less than significant impacts related to sensitive receptors and odors, similar to the project. Refer to the analysis below for additional information.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar air quality impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would negligibly reduce construction emissions, and have no effect to the conclusions regarding conformance with air quality plans, standards, sensitive receptors and odor.

Issue 1: Conformance to Regional Air Quality Strategy (Significant and Unavoidable Impact)

As ~~Since~~ the overall land uses and densities under this alternative would be the same as the project, the impacts associated with conformance to the RAQs would be the same. As described for the project in subchapter 2.2.2.1, this alternative would include a General Plan Amendment that would increase density beyond that currently allowed on the project site. This would lead to an inconsistency with the RAQs assumptions and would result in direct Impact AQ-1 and cumulative Impact AQ-5. Mitigation Measure M-AQ-1, detailed in subchapter 2.2.5, would require the County provide a revised housing forecast to SANDAG to ensure that any revisions to the population and employment projects are considered. The provision of housing information would assist SANDAG in revising the housing forecast; however, until the anticipated growth is included in the emission estimates of the RAQS the direct and cumulative impacts (Impacts AQ-1 and AQ-5) associated with this alternative would be significant and unavoidable identical to the project.

Issue 2: Conformance to Federal and State Ambient Air Quality Standards (Significant and Unavoidable Impact)

Construction

The construction of the new permanent fire station and the conversion of Mountain Ridge Road under the Alternative to a Rural Residential Collector roadway would result in additional construction emissions, as compared to the proposed project. As shown in Table 4-10, the construction of Mountain Ridge Road alone would not exceed the County's thresholds. However, the construction of Mountain Ridge Road in combination with other planned simultaneous on-site construction activities associated with the project (Phases 3 and 5) would exceed County thresholds for nitrogen oxides (NO_x), PM_{10}, and particulate matter with a diameter of 2.5 micrometers or less ($PM_{2.5}$). Compared to the proposed project, the alternative would result in a new significant NO_x impact during construction of Phases 3 and 5 (Impact MRR-AQ-1), and greater PM_{10} and $PM_{2.5}$ impacts (Impact AQ-2), as emissions would be higher due to the additional disturbance associated with the construction of Mountain Ridge Road.

TABLE 4-10
COMPARISON OF UNMITIGATED CONSTRUCTION EMISSIONS FOR THE PROPOSED PROJECT AND MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE (lbs/day)[1]

Source	ROG	NO_X	CO	SO_x	PM_{10}	$PM_{2.5}$
Proposed Project						
Phases 3 and 5[2]	34.0	240.6	454.7	10.3	449.6	99.2
SLT	75	250	550	250	100	55
Significant Impact?	No	No	No	No	Yes	Yes
Alternative						
Fire Station	3.5	25.3	19.5	0.0	8.0	4.5
Mountain Ridge Road	7.3	77.5	45.6	0.0	28.6	8.4
Sub-total	10.8	102.8	65.1	0.0	36.6	12.9
Phases 3 and 5[2]	34.0	240.6	454.7	10.3	449.6	99.2
~~Subt~~Total	~~41.3~~44.8	~~318.1~~ 343.4	~~500.3~~ 519.8	10.3	~~478.2~~ 486.2	~~107.6~~ 112.1
SLT	75	250	550	250	100	55
Significant Impact?	No	**Yes**	No	No	**Yes**	**Yes**

ROG =reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = suspended particulate matter; $PM_{2.5}$ = fine particulate matter; SLT = Screening Level Threshold
[1]Emissions reported are maximum daily emissions from each construction scenario regardless of the construction stage, e.g. maximum PM_{10} and NO_X emissions occur during grading while maximum ROG emissions occur during architectural coatings, but are reported in the table together for impact determination.
[2]Includes emissions from blasting activities.

As with the project, this alternative would implement all project design and mitigation measures (M-AQ-2, M-AQ-3, and M-AQ-4; see subchapter 2.2.5) to reduce construction emissions. The alternative's mitigated construction emissions for ROG, CO, PM_{10}, and $PM_{2.5}$ would be below the screening level threshold (Table 4-11). However, NO_x would remain above the screening level threshold after mitigation. There is no feasible mitigation beyond what is included in the project (see subchapter 2.2) to ~~avoid~~ mitigate this impact. Therefore, this NO_x impact under the alternative would be significant and unavoidable. All other project construction emission impacts would be reduced to below the screening level threshold with the implementation of mitigation (subchapter 2.2.5). Thus, the alternative would result in a~~n additional~~ significant and unavoidable construction phase NO_x impact (Impact MRR-AQ-1) and the impact from construction emissions would be greater than ~~compared to~~ the project.

TABLE 4-11
COMPARISON OF MITIGATED CONSTRUCTION EMISSIONS FOR THE PROPOSED PROJECT AND MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE (lbs/day)[1]

Source	ROG	NO_X	CO	SOx	PM_{10}	$PM_{2.5}$
Project						
Phases 3 and 5	36.1	203.7	474.0	10.3	53.6	16.5
SLT	75	250	550	250	100	55
Significant Impact?	No	No	No	No	No	No
Alternative						
Fire Station	6.3	20.2	21.5	0.0	4.0	2.6
Mountain Ridge Road	7.3	77.5	45.6	0.0	28.6	8.4
Phases 3 and 5	36.1	203.7	474.0	10.3	53.6	16.5
Subtotal	49.7 43.4	**301.4** **281.2**	541.1 519.6	10.3 10.3	86.2 82.2	27.5 24.9
SLT	75	250	550	250	100	55
Significant Impact?	No	Yes	N0No	No	No	No

ROG =reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = suspended particulate matter; $PM_{2.5}$ = fine particulate matter; SLT = Screening Level Threshold
[1]Emissions reported are maximum daily emissions from each construction scenario regardless of the construction stage, e.g., maximum PM_{10} and NO_X emissions occur during grading while maximum ROG emissions occur during architectural coatings, but are reported in the table together for impact determination.

Operational

While the alternative would increase emissions associated with the operation of the new permanent fire station, as shown in Table 4-12, the alternative's operational impacts would be similar as the proposed project's operational impacts. The Mountain Ridge Road Fire Station Alternative operational impacts would be similar to the project operational impacts described in subchapter 2.2.2.2. Land uses under the alternative would be the same as the project, except a fire station would be constructed in Phase 5 rather than Phase 3. This would have little effect on emissions considering bBoth the project and the alternative would involve a temporary station as a part of Phase 1 construction until the permanent station is constructed (i.e., the vehicle trips under both projects and stationary sources would be similar to each other in all phases)and therefore impacts at the beginning of the project would be the same. Due to the construction of the Fire Station as an additional land use, Tthe Mountain Ridge Roadalternative improvements would not changeresult in an increase of 16 the number of trips generated daily and an increase in or stationary source emissions as compared to the project. However, the increase in air emissions associated with the alternative and would have no additionalthe same impacts on operational air quality emissions as identified in (see subchapter 4.9.2.3). As such, the operational emissions air quality impacts generated by this alternative would be the same as the project, and associated impacts (including significant Impact AQ-3) would be the same as described for the project (see subchapter 2.2.2.2). As described for the project in subchapter 2.2.6.3, mitigation (M-AQ-6 and M-AQ-7) would reduce the operational impact but not to below a level of significance.

TABLE 4-12
COMPARISON OF UNMITIGATED OPERATION EMISSIONS FOR THE PROPOSED PROJECT AND MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE (lbs/day)[1]

Source	ROG	NO_X	CO	SO_x	PM_{10}	$PM_{2.5}$
Project						
Traffic Scenario C + Phases 3 and 5	**151.8**	**174.1**	**931.1**	1.2	**169.1**	**12.8**
SLT	75	250	550	250	100	55
Significant Impact?	Yes	Yes	Yes	No	Yes	Yes
Alternative						
Fire Station	**0.2**	**0.2**	**0.6**	0.0	**0.2**	**0.0**
Alternative + Traffic Scenario C + Phases 3 and 5	**152.0**	**174.3**	**931.7**	1.2	**169.3**	**12.8**
SLT	75	250	550	250	100	55
Significant Impact?	Yes	Yes	Yes	No	Yes	Yes

ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = suspended particulate matter; $PM_{2.5}$ = fine particulate matter; SLT = Screening Level Threshold
[1]Emissions reported are maximum daily emissions from all phases.

As described for the project in subchapter 2.2.6.3, mitigation (M-AQ-6 and M-AQ-7) would reduce the operational impact but not to below a level of significance. ~~As a result, this alternative would have significant and unavoidable operational air quality impacts, the same as the project.~~ Table 4-13 includes mitigated combined operational emissions that would occur from operation under the alternative. The table shows that, even after the application of all design considerations and mitigation measures identified in the air quality report, the alternative would exceed the SLT for all criteria pollutants, except SO_X and $PM_{2.5}$. Thus, the significant $PM_{2.5}$ impact would be mitigated to levels below significant, but ROG, NO_X, CO, and PM_{10} emissions would remain significant. Total emissions under the alternative would be greater than the proposed project; however, like the project, this alternative would have significant and unavoidable operational air quality impacts.

TABLE 4-13
COMPARISON OF MITIGATED OPERATIONAL EMISSIONS FOR THE PROPOSED PROJECT AND MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE (lbs/day)[1]

Source	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project						
Traffic Scenario C	**157.0**	**348.1**	**1,235.2**	11.5	**167.2**	21.5
SLT	75	250	550	250	100	55
Significant Impact?	Yes	Yes	Yes	No	Yes	No
Alternative						
Fire Station	0.2	0.2	0.6	0.0	0.2	0.0
Alternative + Traffic Scenario C	**157.2**	**348.3**	**1,235.8**	11.5	**167.4**	21.5
SLT	75	250	550	250	100	55
Significant Impact?	Yes	Yes	Yes	No	Yes	No

ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = suspended particulate matter; $PM_{2.5}$ = fine particulate matter; SLT = Screening Level Threshold
[1]Emissions reported are maximum daily emissions from all phases.

Issue 3: Combined Construction + Operation Impacts~~Cumulatively Considerable Net Increase of Criteria Pollutants~~ (Significant and Unavoidable Impact)

As described in subchapter 2.2.2.3 for the project analysis, this "cumulative" analysis addresses overlapping phases of project construction and operation. This alternative cumulative air analysis would be identical to the project except in Phase 5 when the additional construction emissions related to Mountain Ridge Road occur. As indicated above, the fire station construction and the operation of this alternative would not result in increased emissions relative to the project. Thus, the "cumulative" analysis below focuses on the overlapping construction of Phases 3 and 5 and the operation of Phases 1, 2 and 4 (Traffic Scenario C).

Construction of Mountain Ridge Road would occur in Phase 5 when other phases are in differing stages of operation and construction. As shown in Table 4-11, when operation emissions from previously completed phases (Traffic Scenario C [Phases 1, 2, and 4]) are combined with the construction of Mountain Ridge Road and on-going construction in Phases 3 and 5, all pollutant emissions would exceed all the significance thresholds except for SO_X (Table 4-~~12~~14). The project would also exceed the significance threshold for all pollutants except SO_X under the same scenario. While both this alternative and the project would result in ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$ exceeding the significance threshold in the combined construction and operational conditions (Impact AQ-4), the alternative's exceedance would be greater than the project due to the additional construction emissions associated with Mountain Ridge Road.

TABLE 4-~~12~~14
COMPARISON OF CONSTRUCTION + OPERATIONAL EMISSIONS FOR THE PROPOSED PROJECT AND MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE[1]

Source	ROG	NO_X	CO	SO_x	PM_{10}	$PM_{2.5}$
Project						
Traffic Scenario C + Phases 3 and 5	**156.2**	**385.7**	**1227.2**	11.5	**589.7**	**109.3**
Screening Level Threshold	75	250	550	250	100	55
Significant Impact?	Yes	Yes	Yes	No	Yes	Yes
Alternative						
Construction	10.8	102.8	65.1	0.0	36.6	12.9
Operation	0.2	0.2	0.6	0.0	0.2	0.0
Sub-total	11.0	103.0	65.7	0.0	36.8	12.9
Alternative +Traffic Scenario C + Phases 3 and 5	~~163.5~~ 167.2	~~463.3~~ 488.7	~~1272.8~~ 1,292.9	~~11.5~~ 11.5	~~618.3~~ 626.5	~~117.7~~ 122.2
Screening Level Threshold	75	250	550	250	100	55
Significant Impact?	Yes	Yes	Yes	No	Yes	Yes

ROG =reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur dioxide; PM_{10} = suspended particulate matter; $PM_{2.5}$ = fine particulate matter
[1]Emissions reported are maximum daily emissions from all phases.

Table 4-~~13~~15 includes mitigated combined construction and operational emissions that would occur at the same point in time. The table shows that even after the application of all design considerations and mitigation measures (M-AQ-2 to M-AQ-4) identified in

subchapter 2.2.5 for the project, this alternative would exceed the significance threshold for all criteria pollutants except SO_x and $PM_{2.5}$. Thus, the significant $PM_{2.5}$ impact would be mitigated but ROG, NO_x, CO, and PM_{10} would remain significant. Total emissions (i.e., emissions from overlapping phases of construction and operation) under the alternative would be greater than the project in Phase 5 due to the additional construction activities associated with Mountain Ridge Road. As described for the project in subchapter 2.2.2.3~~6~~ (Impact AQ-4), implementation of this alternative would result in a cumulatively considerable net increase of criteria pollutants because the project conflicts with the RAQS, leading to long-term operational emissions that exceed the County's SLTs. Like the project, total emission impacts to cumulative air quality under this alternative would remain significant ~~and unavoidable (Impact AQ-4)~~. As with the proposed project, this impact would remain significant and unavoidable under the alternative even with implementation of mitigation measures M-AQ-2 through M-AQ-5.

TABLE 4-~~13~~15
COMPARISON OF MITIGATED CONSTRUCTION + OPERATIONAL EMISSIONS FOR THE PROPOSED PROJECT AND MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE (lbs/day)[1]

Source	ROG	NO_X	CO	SOx	PM_{10}	$PM_{2.5}$
Project						
Traffic Scenario C + Phases 3 and 5	**157.0**	**348.1**	**1235.2**	11.5	**167.2**	21.5
SLT	75	250	550	250	100	55
Significant Impact?	Yes	Yes	Yes	No	Yes	No
Alternative						
Construction and Operation	11.0	103.0	65.7	0.0	36.8	12.9
Alternative + Traffic Scenario C + Phases 3 and 5	**168.0** **~~164.4~~**	**451.3** **~~423.3~~**	**1300.9** **~~1277.4~~**	11.5 ~~11.5~~	**204.0** **~~218.7~~**	34.4 ~~34.8~~
SLT	75	250	550	250	100	55
Significant Impact?	Yes	Yes	Yes	No	Yes	No

ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = suspended particulate matter; $PM_{2.5}$ = fine particulate matter; SLT = Screening Level Threshold
[1]Emissions reported are maximum daily emissions from all phases.

As indicated above, even with the implementation of mitigation, the construction- and operation-related emissions of the criteria pollutants under this alternative would exceed the County's screening level threshold for NO_X during construction and ROG, NO_X, CO, and PM_{10} during the overlapping construction plus operation conditions. Therefore, similar to the project, the Alternative would cause a cumulatively considerable significant impact (Impact AQ-6). This alternative would result in greater air impacts during construction than the project, resulting in an increase in this cumulative emission impact relative to the project.

Issue 4: Impacts to Sensitive Receptors (Less than Significant Impact)

Localized Hotspot Carbon Monoxide

According to the TIS for this alternative (see Appendix V-2), the Mountain Ridge Road/Circle R intersection would be unsignalized and the volume of traffic during AM and PM peak periods would be approximately 680 vehicles under the worst-case

cumulative condition. As that is well below the 3,000 peak hour vehicles criteria of the County Guidelines, this alternative would not result in a ~~new~~ CO hot spot. No other CO hot spots were~~s beyond any~~ identified for the project (subchapter 2.2.2.4). Therefore, a~~A~~s with the project, CO hot spot impacts would be less than significant under this alternative.

Localized Hotspot PM_{10}

This alternative would not result in a new highway improvement project, and the volume on I-15 in this area ranges between 107,000 and 113,000 ADT (Caltrans 2011). Based on the Caltrans traffic volume data for I-15 between Deer Springs Road and SR-76, the diesel truck traffic, the primary source of diesel exhaust, represents approximately 7 percent of the total traffic volume (Caltrans 2011). This alternative would not result in the degradation of any additional intersection beyond those analyzed in subchapter 2.2.2.4. Additionally, based on the Mountain Ridge Road Traffic Impact Study (see Appendix V-2), the proposed Mountain Ridge Road intersection would operate at LOS C or better. Thus, the alternative hotspot PM_{10} impact would be the same as analyzed for the project in in subchapter 2.2.2.4, and would be less than significant.

Diesel Particulate Matter (DPM)

As with the construction of the project, construction of this alternative would result in short-term diesel exhaust emissions from on-site heavy-duty equipment during site grading and earthmoving, trenching, asphalt paving, and other construction activities. Other construction-related sources of DPM include material delivery trucks and construction worker vehicles; however, these sources are minimal relative to construction equipment. Particulate exhaust emissions from diesel-fueled engines (DPM) are identified as a toxic air contaminant by CARB.

As with the analysis of the project, the DPM emissions for this alternative's construction were estimated using exhaust PM_{10} values from annual emission estimates. Due to the additional construction associated with Mountain Ridge Road, this alternative's concentration of exhaust PM_{10} would be 0.2058 micrograms per square meter relative to the project's 0.191 micrograms per square meter. Maintaining all other factors used in the project analysis (e.g., best emission-control technologies such as AQ-DC-3), this would result in a cancer risk of 7.49 in one million at the point of maximum concentration, which is above the project's 6.95 in a million cancer risk. While the cancer risk would increase relative to the project, this alternative's modeled cancer risks would not exceed the County's significance threshold of 10 in 1 million. Therefore, as with the project, this alternative's construction-related TAC impacts to sensitive receptors would be less than significant.

Additionally, DPM has chronic (i.e., long-term) non-cancer health impacts. To determine those chronic health impacts, OEHHA threshold was utilized. Per that threshold, ambient DPM concentrations below 5 $\mu g/m^3$ would have no adverse health effects. The non-cancer risk from DPM exposure for this alternative is 0.04116 $\mu g/m^3$. This DPM concentration for the project is below the OEHHA threshold and is under the County's more stringent significance threshold of 1 for non-cancer health impacts. Therefore, like the project, the non-cancer health impacts associated with this alternative's construction-related TAC impacts to sensitive receptors would be less than significant.

Issue 5: Odor Impacts (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative includes options for the treatment of wastes as discussed in Chapter 1.0, including the construction of an on-site WRF. Approval of the project design under this alternative would allow implementation of measures as detailed in subchapter 2.2.2.5. Specifically, the WRF would be designed to reduce any potential odor impacts to the surrounding areas. These design measures include odor control units using activated carbon towers, which would trap volatile organic compounds that are corrosive or odorous. With the inclusion of the carbon towers, this alternative would not result in a substantial increase in odor levels at nearby sensitive receptors. A fire station and widening Mountain Ridge Road would not generate substantial odors. Odor impacts would be less than significant, similar to the project.

4.9.2.3 Transportation/Traffic

The existing conditions, methodology and significance determination information for the Transportation/Traffic analysis below is the same as the project (see subchapter 2.3), Transportation/Traffic. The analysis below is based on the Traffic Impact Study for Lilac Hills Ranch, Mountain Ridge Fire Station Traffic Study prepared by Chen Ryan in 2014 and the report is included as Appendix V-3.

In summary, the Mountain Ridge Road Fire Station Alternative (with Mountain Ridge Road Option 1) would have the same significant mitigated circulation system and congestion management impacts as the project (Impacts TR-1 to TR-37). Also similar to the project, the traffic hazard and public transit, bicycle and pedestrian facility impacts of the Mountain Ridge Road Fire Station Alternative would be less than significant. The change in trip distribution, removal of gated access in Phases 4 and 5, and the Mountain Ridge Road reclassification that occur under this alternative, would not alter the overall transportation/traffic impact conclusions identified for the project. Refer to the analysis below for additional information.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in the same transportation/traffic impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would have no effect on the amount of vehicular traffic on Mountain Ridge Road or roadway operations. Reduced~~moving~~ grading along the sid~~t~~e of the road would also not affect public transit, bicycle or pedestrian traffic or access along Mountain Ridge Road during construction. The project will keep all access points close to or at existing grade; therefore, the access to Mountain Ridge will be maintained throughout. Along the whole of Mountain Ridge road itself, the road will be constructed in phases such that an access route will remain available at all times.

Issue 1: Circulation System Operations and Congestion Management (Significant and Unavoidable Impact)

Construction

The Mountain Ridge Road Fire Station Alternative would generate construction traffic similar to the project and would also include project traffic control plan as a project feature (see EIR subchapter 2.3.2.2). This alternative would result in a temporary

increase in construction traffic on local area roadways; however, the amount of temporary construction traffic would be less than the amount of permanent traffic analyzed below. Similar to the project, a traffic control plan (as detailed in subchapter 2.1 and Table 1-3) would be completed to manage construction traffic and ensure impacts would be less than significant.

~~Project~~ Alternative Trip Generation

The total trip generation for the Mountain Ridge Road Fire Station Alternative would be identical to the project for Traffic Scenarios A, B, and C, as the land uses would be identical (see Table 2.3-9). Under Traffic Scenarios D and E, the alternative would generate 16 additional ADT relative to the project, as it would include a permanent fire station in Phase 5 without reducing any other land uses. Thus, Traffic Scenario D with the alternative would generate 12,942 ADT compared to the Traffic Scenario D plus project's 12,927 ADT. Traffic Scenario E for the alternative would generate 19,422 ADT, while the Traffic Scenario D with the project would generate 19,406 ADT. Refer to Appendix V-2 Section 4.3.1 for additional details, including the AM and PM peak hour breakdowns and the determination of the fire station trip rate.

Project Traffic Distribution and Assignment

Like the analysis of the project as discussed in subchapter 2.3.2.1, the analysis of Existing Plus Project impacts under this alternative is divided into five scenarios based on the construction of project phases. Each construction phase includes additional land uses and circulation improvements. These scenarios are referred to as Traffic Scenarios A (Phase 1), B (Phases 1 and 4), C (Phases 1, 2, and 4), D (Phases 1, 2, 4, and 5), and E (Phases 1, 2, 3, 4, and 5). If the project construction did not follow this phasing order, a specified number of equivalency dwelling units have been assigned to each Traffic Scenario that can be used to determine the appropriate mitigation, as detailed in Appendix V-2.

The distribution of traffic for this alternative would be the same as the project for Traffic Scenarios A to C, as the access would be the same and land uses would be in the same locations. The traffic distribution for Traffic Scenario D and E for the alternative would differ from the project, as the gates that are included in Phase 4 and 5 of the project would be eliminated under this alternative. The elimination of the gates under the alternative would result in a portion of the project-generated traffic shifting from roadways to the north of the site to roadways to the south of the site. Generally, this includes a reduction of project traffic on West Lilac Road and the increase of project traffic on Circle R Road. Refer to Appendix V-2 Section 4.3.2 for additional details.

Existing Plus Project (Traffic Scenarios A to C)

Mountain Ridge Road Fire Station Alternative Traffic Scenario A to C existing plus project analysis would be identical to the proposed project, as the land uses, access and all project features would be identical. Thus, refer to subchapter 2.3 Traffic Scenario A to C for the detailed Mountain Ridge Road Fire Station Alternative Traffic Scenario A to C analysis. In summary, the Mountain Ridge Road Fire Station Alternative would have the following impacts in Traffic Scenarios A to C identical to the project:

Traffic Scenario A

Mountain Ridge Road Fire Station Alternative would have direct impacts to:

- Gopher Canyon Road, between E. Vista Way and I-15 SB Ramps (Impact TR-1), and
- E. Vista Way / Gopher Canyon Road (Impact TR-2).

Traffic Scenario B

Mountain Ridge Road Fire Station Alternative would have direct impacts to:

- Gopher Canyon Road, between E. Vista Way and I-15 SB Ramps (Impact TR-1), and
- E. Vista Way / Gopher Canyon Road (Impact TR-2).
- I-15 SB Ramps/Gopher Canyon Road (Impact TR-3); and
- I-15 NB Ramps/Gopher Canyon Road (Impact TR-4).

Traffic Scenario C

Mountain Ridge Road Fire Station Alternative would have direct impacts to:

- Gopher Canyon Road, between E. Vista Way and I-15 SB Ramps (Impact TR-1), and
- E. Vista Way / Gopher Canyon Road (Impact TR-2).
- I-15 SB Ramps/Gopher Canyon Road (Impact TR-3);
- I-15 NB Ramps/Gopher Canyon Road (Impact TR-4);
- West Lilac Road from Old Highway 395 to Main Street (Impact TR-5);
- E. Vista Way from Gopher Canyon Road to Osborne Street (Impact TR-6); and
- Old Highway 395/West Lilac Road (Impact TR-7).

Traffic Scenario A to C Mitigation

As described for the project, the Mountain Ridge Road Fire Station Alternative would implement mitigation M-TR-1 to M-TR-4 to mitigate impacts TR-1, TR-2, TR-5, TR-6, and TR-7 to below a level of significance. Impacts TR-3 and TR-4 would remain significant, as the improvements required to mitigate those impacts are under the jurisdiction of Caltrans. Refer to subchapter 2.3.6 for additional details.

Existing Plus Project (Traffic Scenario D)

The Existing Plus Mountain Ridge Road Fire Station Alternative (Traffic Scenario D) conditions would include the same existing traffic and the same improvements identified under the project analysis in subchapter 2.3.2.1. As mentioned above, this Traffic Scenario D analysis differs from the project since it (1) includes a permanent fire station in addition to the land uses identified for the project, (2) eliminates the project's gates that restrict access to roadways located the south and southeast of the site, and (3) improves Mountain Ridge Road from a private road to a local public roadway.

Roadway Segments

As under the Traffic Scenario D plus project conditions, four roadway segments would operate at unacceptable levels under the Traffic Scenario D plus the alternative conditions. Identical to the project, the alternative would have a significant impact to the following roadways under Traffic Scenario D (Appendix V-2, Table 5.26):

- Gopher Canyon Road, between E. Vista Way and I-15 SB Ramps – LOS F (Impact TR-1);
- West Lilac Road, between Old Highway 395 and Main Street - LOS F (Impact TR-5); and
- E. Vista Way, between Gopher Canyon Road and Osborne Street – LOS F (Impact TR-6).

As with the project, the alternative's (Traffic Scenario D) impacts to E. Vista Way, between SR-76 and Gopher Canyon Road would be less than significant since the project would add less than 200 ADT to this County segment operating at LOS E.

Intersections

As with the project, five intersections would operate at unacceptable levels under the Traffic Scenario D plus alternative conditions. As with the project, the alternative would have significant direct impacts to the following intersections under Traffic Scenario D (Appendix V-2, Table 5.28):

- E. Vista Way / Gopher Canyon Road (LOS F during both the AM and PM peak hours) (Impact TR-2);
- I-15 SB Ramps / Gopher Canyon Road (Caltrans) – LOS F during both the AM and PM peak hours (Impact TR-3);
- I-15 NB Ramps / Gopher Canyon Road (Caltrans) – LOS E during the AM peak hour and LOS F during the PM peak hour (Impact TR-4);
- Old Highway 395/West Lilac Road (County) – LOS F during both the AM and PM peak hours (Impact TR-7); and
- Old Highway 395/Circle R Drive (County) –LOS E during the AM peak hour and LOS F during the PM peak hour (Impact TR-8).

Two-lane Highways and Freeways

As with the project, the alternative would have no significant impact to two-lane highways (see Appendix V-2, Table 5.29) or freeways since (see Appendix V-2, Table 5.30) all such facilities would operate at acceptable levels in the Traffic Scenario D plus alternative conditions.

Mitigation

As with the project, Mitigation Measures M-TR-1 to M-TR-5 identified in subchapter 2.3.5.1 would reduce impacts TR-1 and TR-2, and TR-5 to TR-8 to below a level of significance by improving roadway capacity or by reducing intersection delay (see

subchapter 2.3.6.1 or Appendix V-2, Tables 5.26 to 5.28 and 5.32). However, Impacts TR-3 and TR-4 would remain significant since the improvements required to mitigate the impacts are under the jurisdiction of Caltrans. Thus, the alternative would have the same traffic impacts as the project under Traffic Scenario D, as identified above.

Existing Plus Mountain Ridge Road Fire Station Alternative (Traffic Scenario E)

The Existing Plus Mountain Ridge Road Fire Station Alternative (Traffic Scenario E) conditions would include the same existing traffic and the same improvements identified under the project analysis in subchapter 2.3.2.1. As mentioned above, this Traffic Scenario E analysis differs from the project since it (1) includes a permanent fire station in addition to the land uses identified for the project, (2) eliminates the project's gates that restrict access to roadways located the south and southeast of the site, and (3) improves Mountain Ridge Road from a private road to a local public roadway.

Roadway Segments

As with the project, three four roadway segments would operate at unacceptable levels in the Traffic Scenario E plus alternative conditions. As with the project, the alternative (Traffic Scenario E) would have a significant impact to the following roadway segments (see Appendix V-2, Table 5.34):

- Gopher Canyon Road, between E. Vista Way and I-15 SB Ramps – LOS F (Impact TR-1);
- West Lilac Road, between Old Highway 395 and Main Street - LOS F (Impact TR-5);
- E. Vista Way, between Gopher Canyon Road and Osborne Street – LOS F (Impact TR-6); and
- E. Vista Way, between SR-76 and Gopher Canyon Road – LOS E (Impact TR 9).

Intersections

As with the project, five intersections would operate at unacceptable levels in the Existing Plus alternative (Traffic Scenario E) conditions. As with the project, the alternative (Traffic Scenario E) would have significant impacts to the following intersections (see Appendix V-2, Table 5.36):

- E. Vista Way / Gopher Canyon Road (LOS F during both the AM and PM peak hours) (Impact TR-2);
- I-15 SB Ramps / Gopher Canyon Road (Caltrans) – LOS F during both the AM and PM peak hours (Impact TR-3);
- I-15 NB Ramps / Gopher Canyon Road (Caltrans) – LOS E during the AM peak hour and LOS F during the PM peak hour (Impact TR-4);
- Old Highway 395/West Lilac Road (County) – LOS F during both the AM and PM peak hours (Impact TR-7); and
- Old Highway 395/Circle R Drive (County) –LOS E during the AM peak hour and LOS F during the PM peak hour (Impact TR-8).

Two-lane Highways and Freeways

As with the project, the alternative would have no significant impact to two-lane highways (see Appendix V-2, Table 5.37) or freeways (see Appendix V-2, Table 5.38) since all such facilities would operate at acceptable levels in the Traffic Scenario E plus alternative conditions.

Mitigation

As with the project, Mitigation Measures M-TR-1 to M-TR-5 identified in subchapter 2.3.5.1 would reduce impacts TR-1 and TR-2, and TR-5 to TR-9 to below a level of significance by improving roadway segment capacity and reducing intersection delay (see subchapter 2.3.6.1, or Appendix V-2, Tables 5.34 to 5.36 and 5.40). However, impacts TR-3 and TR-4 would remain significant since the improvements required to mitigate the impacts are under the jurisdiction of Caltrans. Thus, the alternative would have the same traffic impacts as the project under Traffic Scenario E, as detailed above.

Cumulative Impact Analysis

As with the project analysis detailed in subchapter 2.3.3.1, the Mountain Ridge Road Fire Station Alternative cumulative impact analysis includes 171 cumulative projects located within 7 miles of the site (see Table 1-6 and Figure 1-24). The Existing Plus Cumulative Projects assumptions for this alternative would be identical to that described in subchapter 2.3.3, but the project assumptions would differ. As previously mentioned, the alternative analysis differs from the project since it (1) includes a permanent fire station in addition to the land uses identified for the project, (2) eliminates the project's gates that restrict access to roadways located the south and southeast of the site, and (3) improves Mountain Ridge Road from a private road to a local public roadway.

Roadway Segments

Nine roadway segments would operate at unacceptable levels under the cumulative plus project condition. As with the project (see subchapter 2.3.3.1), the Mountain Ridge Road Fire Station Alternative would result in a significant cumulative impact to the following nine roadway segments under the cumulative condition (see Appendix V-2, Table 6.2):

- West Lilac Road between Old Highway 395 and Main Street – LOS F, and the cumulative projects plus the proposed project would add more than 100 daily trips (Impact TR-10).
- Camino Del Rey between Old River Road and West Lilac Road - LOS E, and the cumulative projects plus the proposed project would add more than 200 daily trips (Impact TR-11).
- Gopher Canyon Road between E. Vista Way to Little Gopher Canyon Road – LOS F, and the cumulative projects plus the proposed project would add more than 100 daily trips (Impact TR-12).
- Gopher Canyon Road between Little Gopher Canyon Road and I-15 SB Ramps – LOS F, and the cumulative projects plus the proposed project would add more than 100 daily trips (Impact TR-13).

- E. Vista Way between SR-76 and Gopher Canyon Road – LOS F, and the cumulative projects plus the proposed project would add more than 100 daily trips (Impact TR-14).
- E. Vista Way between Gopher Canyon Road and Osborne Street – LOS F, and the cumulative projects plus the proposed project would add more than 100 daily trips Impact (Impact TR-15).
- Pankey Road between Pala Mesa Drive and SR-76 - LOS F, and the cumulative projects would add more than 100 daily trips (Impact TR-16).
- Lilac Road between Old Castle Road and Anthony Road - LOS E, and the cumulative projects plus the proposed project would add more than 200 daily trips (Impact TR-17).
- Cole Grade Road, between Fruitvale Road and Valley Center Road - LOS E, and the cumulative projects plus the proposed project would add more than 200 daily trips (Impact TR-18).

Intersections

A total of 12 intersections would operate at unacceptable levels under the cumulative plus alternative conditions. As with the project, the Mountain Ridge Road Fire Station Alternative would result in a significant cumulative impact to the following 11 intersections under the cumulative condition (see Appendix V-2, Table 6.3):

- E. Vista Way/Gopher Canyon Road (County) (LOS F – AM and PM peak hours) (Impact TR-19);
- SR-76/Old Highway 395 (Caltrans) (LOS F - AM and PM peak hours) (Impact TR-20);
- SR-76/Pankey Road (Caltrans) (LOS F - AM and PM peak hours) (Impact TR-21);
- Old Highway 395/E. Dulin Road (County) (LOS F - AM and PM peak hours) (Impact TR-22);
- Old Highway 395/West Lilac Road (County) (LOS F - AM and PM peak hours) (Impact TR-23);
- I-15 SB Ramps/Old Highway 395 (Caltrans) –LOS E during the AM peak hour and LOS F during the PM peak hour (Impact TR-24);
- I-15 NB Ramps/Old Highway 395 (Caltrans) – LOS E during the PM peak hour (Impact TR-25);
- Old Highway 395/Circle R Drive (County) (LOS F - AM and PM peak hours) (Impact TR-26);
- I-15 SB Ramps/Gopher Canyon Road (Caltrans) (LOS F - AM and PM peak hours) (Impact TR-27);
- I-15 NB Ramps/Gopher Canyon Road (Caltrans) (LOS F - AM and PM peak hour) (Impact TR-28); and
- Miller Road/Valley Center Road (County) (LOS F - PM peak hour) (Impact TR-29).

The alternative and cumulative projects would add fewer than five peak hour trips to the critical movement of the Old River Road/Camino Del Rey intersection and, therefore, the cumulative impact would be less than significant.

Two-Lane Highways

As with the project, all segments along Old Highway 395 would operate at acceptable levels in the cumulative condition and no significant cumulative impact would occur as a result of the Mountain Ridge Road Fire Station Alternative (see Appendix V-2; Table 6.4).

Freeway Segments

As with the project (subchapter 2.3.3.1), the Mountain Ridge Road Fire Station Alternative would result in a significant cumulative impact to eight segments of the I-15 (see Appendix V-2, Table 6.5):

- I-15, between Riverside County Boundary and Old Highway 395 (LOS F) (Impact TR-30);
- I-15, between Old Highway 395 and SR-76 (LOS F) (Impact TR-31);
- I-15, between SR-76 and Old Highway 395 (LOS F) (Impact TR-32);
- I-15, between Old Highway 395 and Gopher Canyon Road (LOS F) (Impact TR-33);
- I-15, between Gopher Canyon Road and Deer Springs Road (LOS F) (Impact TR-34);
- I-15, between Deer Springs Road and Centre City Parkway (LOS F) (Impact TR-35);
- I-15, between Centre City Parkway and El Norte Parkway (LOS F) (Impact TR-36); and
- I-15, between El Norte Parkway and SR-78 (LOS F) (Impact TR-37).

Mitigation

To mitigate cumulative impacts, this alternative would implement project mitigation measures M-TR-2 to M-TR-9, which require various roadway improvements and payment towards the TIF program (see subchapter 2.3.5). This would mitigate all impacts to roadways and intersections (see Appendix V-2, Tables 6.2, 6.3, 6.7 and 6.8) except where facilities are under Caltrans jurisdiction (Impacts TR-20, TR-21, and TR-30 to TR-37), and where mitigation is infeasible (Impact TR-12 and TR-16) due to the mitigation not being proportional to project impacts. Refer to subchapter 2.3.6 for additional information.

Issue 2: Transportation Hazard (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative transportation improvements and land uses would be the same as the project except for Mountain Ridge Road reclassification, the removal of gates from Phases 4 and 5, and the change in location of the fire station. The potential transportation hazards of this alternative would be similar to the project (see subchapter 2.3.2.3) with the exception of those features. The widening of Mountain Ridge Road and removal of gates from the southern area near that road would provide

additional public access and faster emergency services access from the site to the south. The Mountain Ridge Road speed limit would be increased to 30 mph, but the roadway would be designed to accommodate for the increase in speed. As with the project, the Mountain Ridge Road Fire Station Alternative road network design would provide adequate ingress and egress for residents as well as emergency access, safe trail system, and conform to Goal M-4 of the General Plan Mobility Element. Therefore, impacts associated with transportation hazards would be less than significant.

Issue 3: Public Transit, Bicycle, and Pedestrian Facilities (Less than Significant Impact)

The public transit, bicycle, and pedestrian facilities of this alternative would be the same as the project (see subchapter 2.3.2.4), with the exception of the Mountain Ridge Road. Mountain Ridge Road is currently a dirt road on-site and a paved road without sidewalks off-site. Mountain Ridge Road would become a larger, more heavily travelled roadway with sidewalks with the implementation of this alternative. This would improve the pedestrian and bicycle access. As with the project, the Mountain Ridge Road Fire Station Alternative would provide alternative transportation opportunities and would be consistent with County Mobility Element Goals 8 and 11 and associated policies. Impacts associated with transit, bicycle and pedestrian facilities would be less than significant, similar to the project.

4.9.2.4 Agricultural Resources

The existing conditions, methodology and significance determination information for the Agricultural Resources analysis below is the same as the project (see subchapter 2.4), Agricultural Resources. The analysis below is based on the agricultural mapping and analysis completed for the project in the Agricultural Resources Technical Report (see Appendix F).

As described further below, the Mountain Ridge Road Fire Station Alternative agricultural resource impacts would be similar to the project. The additional Mountain Ridge Road improvements completed by this alternative would affect additional orchard land, but this additional impact is not considered significant due to the absence of soils that meet the quality criteria for Prime Farmland or Farmland of Statewide Importance. The fire station would have no new affects to agricultural resources, as it is included within the development footprint of both the alternative and the project. Like the project, this alternative would have a less than significant impact related to land use conflicts, and significant mitigated impacts related to direct conversion of agricultural land (Impact AG-1) and indirect conversion of agricultural uses (Impacts AG-2 to AG-15) due to agricultural adjacency issues. Refer to the analysis below for additional information.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road slightly reduce the impact to orchard land, but this would not change the impact conclusions discussed below.

Issue 1: Direct Conversion of Agricultural Resources (Less than Significant Impact)

As discussed in subchapter 2.4.2.1, pursuant to the County adopted guidelines including reliance on the LARA Model, development of this project site would result in the direct

conversion of important agricultural resources. Improvement of Mountain Ridge Road to a Rural Residential Collector would include the conversion of an additional 4.88 acres of orchard land; however this impact would not be significant since it would not affect agricultural land considered significant per the LARA model. The fire station would be constructed within the project footprint and no additional direct agricultural impact would occur. The permanent fire station in Phase 5 proposed by this alternative would be located in the same development footprint analyzed in the project and would therefore not result in any changes with respect to agricultural resource relative to project. Thus, the Mountain Ridge Road Fire Station Alternative would result in the same significant mitigated Impact AG-1 as the project. As with the project, this impact would be mitigated through M-AG-1 that requires the preservation of agricultural land that contains soils that meet the quality criteria for Prime Farmland or Farmland of Statewide Importance ~~agricultural resources~~ at a 1 to 1 ratio.

Issue 2: Land Use Conflicts (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative would include the same land uses and footprint as the project, except for the location of a fire station within the Phase 5 footprint and the additional Mountain Ridge Road improvements. The additional fire station and roadway improvements would not result in additional conflicts with surrounding agricultural uses, as the fire station would be located within the project footprint and a roadway is generally compatible with agricultural uses. As with the project, this alternative would allow some agricultural uses to continue within the project site and would consist of a village development that would be compatible with the rural/agricultural nature of Valley Center. This alternative would include agricultural buffers like the project. Additionally, this alternative would not impact the Williamson Act contracted lands to the north, or Agricultural Preserve Number 88 because these sites properties are not adjacent to the project site and would not be limited in their activities. Therefore, impacts would be less than significant, similar to the project.

Issue 3: Indirect Conversion of Agricultural Resources (Significant Mitigated Impact)

Approval of the Mountain Ridge Road Fire Station Alternative would allow the implementation of the same land uses and require the same General Plan Amendments as discussed in Chapter 1.0. Therefore, like the project, approval of the Mountain Ridge Road Fire Station Alternative would result in potential conflicts with off-site agricultural operations, in locations identified in Figure 2.4-7, due to land use/agricultural interface issues arising from dust, noise, liability concerns, trespassing, theft, competition for water, traffic, pest introduction and conflicts with pesticide use which could occur when residential developments neighbor agricultural operations. The Mountain Ridge Road and fire station included in this alternative would be similar to the indirect conversion impact analysis completed for the project, as a roadway is generally compatible with agricultural uses regardless of width and the fire station would be within the project footprint. The details of each potential impact of the project design under this alternative are the same as those detailed throughout in subchapter 2.4.2.3. Specifically, this alternative would result in the ~~same~~ potentially significant impacts ~~identified in the EIR as Impacts~~ AG-2 through AG-15, the same as the project.

As with the project, agricultural impacts of this alternative would be reduced to below a level of significance through mitigation. Like the project, this alternative would implement Mitigation Measures M-AG-2 through M-AG-5 that are identified in subchapter 2.4.5. M-

AG-2 to M-AG-4 that require 50-foot-wide agricultural buffers, 6-foot-high fencing, and dedication of a Limited Building Zone prohibiting habitable structures adjacent to identified agricultural adjacency areas. The inclusion of these mitigation measures would assure adequate buffering between off- and on-site uses, reducing significant impacts at the agricultural interface locations to below a level of significance. Mitigation Measure M-AG-5 ensures that interim agricultural uses, as the construction of the project under this alternative is phased in over time, would not result in significant indirect impacts. Refer to subchapters 2.4.5 and 2.4.6 for additional details.

4.9.2.5 Biological Resources

The existing conditions, methodology and significance determination information for the Biological Resources analysis below is the same as the project (see subchapter 2.5, Biological Resources). The analysis below is based on biological resource mapping, surveys, and analysis completed in the Biological Resources Report (see Appendix G).

Like the project, this alternative would have significant impacts related to special status species (raptors; Impact BIO-1), riparian habitat or sensitive natural community (Impact BIO-2); and jurisdictional waters and waterways (Impact BIO-3) that would be mitigated (by M-BIO-1 to M-BIO-3) to below a level of significance. In addition, this alternative would result in an additional sensitive habitat impact (Impact MRR-BIO-1a) and jurisdictional habitat impact (Impact MRR-BIO-2a) that would require additional mitigation (M-MRR-BIO-1a and M-MRR-BIO-2a) to be reduced to below a level of significance. This alternative would have less than significant impacts related to wildlife movement and nursery sites; and local policies, ordinances, and adopted plans, similar to the project.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would slightly reduce the sensitive habitat and jurisdictional habitat acreage of Option 1, as described further below.

Instead of the Option 1 impact MRR-BIO-1a described below, Mountain Ridge Road Fire Station Alternative Option 2 would have the following reduced significant impact (Impact MRR-BIO-1b) to sensitive habitats: southern coast live oak riparian woodland (0.01 acre), coast live oak woodland (0.28 acre), and open water (0.10 acre). To mitigate impact MRR-BIO-1b, the following would be implemented:

M-MRR-BIO-1b: Prior to issuance of a grading permit for Mountain Ridge Road improvements, the following shall be provided either on-site within the open space easement; off-site within a draft PAMA of the draft North County MSCP in Valley Center or adjacent communities; or through a mitigation bank, subject to the approval of the County and appropriate wildlife agencies:

1. Impacts to 0.01 acre of southern coast live oak riparian woodland shall be mitigated at a 3:1 ratio with 0.03 acre.

2. Impacts to 0.28 acre of coast live oak woodland shall be mitigated at a 3:1 ratio with 0.84 acre.

3. Impacts to 0.10 acre of open water shall be mitigated at a 3:1 ratio with 0.30 acre.

Instead of the Option 1 impact MRR-BIO-2a described below, Mountain Ridge Road Fire Station Alternative Option 2 would have the following reduced significant impact (Impact MRR-BIO-2b) to jurisdictional habitats: 0.01 acre of County RPO wetlands, and 0.022 acre of wetlands under the jurisdiction of ACOE and CDFW/RWQCB. To mitigate impact MRR-BIO-2b, the following would be implemented:

M-MRR-BIO-2b: Prior to the issuance of grading permits, wetland impacts shall be mitigated at a ratio of 3:1, consisting of on-site preservation, enhancement, and/or creation of wetlands. Mitigation of wetlands shall include a 1:1 creation component (of the 3:1), to ensure no net loss of wetlands. Non-wetland waters and streambed shall be mitigated at a 1:1 ratio consisting of preservation/enhancement. Mitigation measures for impacts to ACOE, CDFW/RWQCB, and County RPO wetlands are listed as follows:

1. ACOE/CDFW/RWQCB jurisdiction: Mountain Ridge Road permanent impacts to 0.022 acre of wetlands shall be mitigated at a 3:1 ratio with 0.066 acre of jurisdictional wetlands enhancement/ preservation/creation (1:1 creation component).
2. County RPO jurisdiction: Mountain Ridge Road permanent impacts to 0.01 acre of RPO wetlands shall be mitigated at a 3:1 ratio with 0.03 acre of RPO wetlands enhancement/ preservation/ creation (1:1 creation component).

Issue 1 and 2: Special Status Species, Riparian Habitat or Sensitive Natural Community (Significant Mitigated Impact)

The Mountain Ridge Road Fire Station Alternative would result in the special status species and riparian habitat or sensitive natural community impacts identified for the project, as those detailed in subchapter 2.5.2.2. These impacts include the removal of more than five percent of the raptor foraging habitat on-site (Impact BIO-1), and impacts to riparian and sensitive natural communities (Impact BIO-2). In addition to the impacts identified for the project, this alternative would result the following additional riparian and sensitive habitat impacts from the construction of Mountain Ridge Road: southern coast live oak riparian woodland (0.01 acre), coast live oak woodland (0.31 acre), and open water (0.11 acre). These additional sensitive habitat impacts would be significant (Impact MRR-BIO-1a). The fire station included in this alternative would be located within the project footprint, and would not result in any additional species or sensitive habitat impacts beyond those identified for project.

Similar to the project, Mitigation Measures M-BIO-1 through M-BIO-3 (see subchapter 2.5.5) would be implemented by this alternative to reduce Impacts BIO-1 and BIO-2 to below a level of significance. In addition, this alternative would include the following mitigation (M-MRR-BIO-1), to reduce the additional Mountain Ridge Road impacts to below a level of significance:

M-MRR-BIO-1a: Prior to issuance of a grading permit for Mountain Ridge Road improvements, the following shall be provided either on-site within the

open space easement; off-site within a draft PAMA of the draft North County MSCP in Valley Center or adjacent communities; or through a mitigation bank, subject to the approval of the County and appropriate wildlife agencies:

1. Impacts to 0.01 acre of southern coast live oak riparian woodland shall be mitigated at a ~~3~~6:1 ratio with 0.~~03~~ 06 acre.
2. Impacts to 0.31 acre of coast live oak woodland shall be mitigated at a ~~3~~6:1 ratio with ~~0.93~~1.86 acre.
3. Impacts to 0.11 acre of open water shall be mitigated at a 3:1 ratio with 0.33 acre.

As detailed in subchapter 2.5.6, ~~the above~~general mitigation ratios were designed to provide adequate preservation of each habitat type within the unincorporated County and to comply with the federal ESA, state ESA, and state NCCP. Implementation of these mitigation measures would reduce this alternative's impact to riparian habitat and sensitive natural communities to below a level of significance. However, it is noted that a portion of the Mountain Ridge Road improvements included in this alternative would impact an area in an open space easement, which was dedicated on Parcel Map 16191 for the protection of vegetation. This alternative would be required to obtain an open space easement vacation to remove the easement prior to grading. In order to cover any potential mitigation associated with the previous map, the mitigation ratios for these impacts have been doubled.

As with the project, this alternative would include a Revegetation Plan as mitigation (see Mitigation Measure M-BIO-4), to assure successful mitigation.

An open space easement for the protection of on-site riparian habitat totaling 104.1-acres would be included in this alternative, identical to the project (see Figures 1-9 and 2.5-3a-c, and subchapter 2.5). Sources of indirect impacts to these sensitive habitat areas could result from increased human access, potential increases in predation/competition on native wildlife from domestic animals, potential increases in invasive plant species or other domestic pests, alterations to natural drainage patterns, potential noise effects, and potential effects on wildlife species due to increases in night time lighting. This alternative, like the project, would include a minimum 50-foot wetland buffer, permanent fencing/walls where lots are adjacent to open space and at trail heads and staging areas, signage every 200 feet on trails along or in open space prohibiting access to sensitive areas, and 100-foot limited building zones around open space areas to reduce these edge effects (see subchapter 2.5.2.2). Likewise, this alternative would comply with lighting, water quality/hydrology, and noise. Potential indirect impacts to sensitive habitat areas within open space would be less than significant.

~~It is noted that a portion of the Mountain Ridge Road improvements included in this alternative would impact area in an open space easement. This alternative would be required to complete obtain an open space easement vacation to remove the easement prior to grading. As this easement was not created to mitigate an impact, no additional mitigation beyond that identified above (M-MRR-BIO-1a or M-MRR-BIO-1b) is warranted.~~

Issue 3: Jurisdictional Waters and Waterways (Significant Mitigated Impact)

The Mountain Ridge Road Fire Station Alternative would impact 4.22 acres of ACOE jurisdictional area 6.55 acres of CDFW/RWQCB jurisdictional area, and 2.23 acres of County wetlands located on-site the same as the project (see subchapter 2.5.2.3, Impact BIO-3). Additional impacts to riparian habitat and sensitive natural communities would result from the widening and grading associated with Mountain Ridge Road improvements proposed under this alternative. This includes southern coast live oak riparian woodland (0.01 acre), coast live oak woodland (0.31 acre), and open water (0.11 acre). These impacts include an additional 0.01-acre to habitat considered sensitive under the County RPO, and 0.024 acre under the jurisdiction of ACOE and CDFW/RWQCB. These additional jurisdictional impacts would be significant (Impact MRR-BIO-2a). The following mitigation (M-MRR-BIO-2a) would reduce this potential impact to below a level of significance:

M-MRR-BIO-2a: Prior to the issuance of grading permits, wetland impacts shall be mitigated at a ratio of 3:1, consisting of on-site preservation, enhancement, and/or creation of wetlands. Mitigation of wetlands shall include a 1:1 creation component (of the 3:1), to ensure no net loss of wetlands. Non-wetland waters and streambed shall be mitigated at a 1:1 ratio consisting of preservation/enhancement. Mitigation measures for impacts to ACOE, CDFW/RWQCB, and County RPO wetlands are listed as follows:

1. ACOE/CDFW/RWQCB jurisdiction: Mountain Ridge Road permanent impacts to 0.024 acre of wetlands shall be mitigated at a 3:1 ratio with 0.072 acre of jurisdictional wetlands enhancement/ preservation/creation (1:1 creation component).
2. County RPO jurisdiction: Mountain Ridge Road permanent impacts to 0.01 acre of RPO wetlands shall be mitigated at a 3:1 ratio with 0.03 acre of RPO wetlands enhancement/ preservation/ creation (1:1 creation component).

Mitigation for impacts to CDFW/RWQCB jurisdictional area fulfills the mitigation requirements for impacts to ACOE jurisdictional and County wetlands. Ultimately, the jurisdictional waters/wetland mitigation shall proceed in accordance with the permit and certification requirements of the ACOE, CDFW/RWQCB, and County.

Issue 4: Wildlife Movement and Nursery Sites (Less than Significant Impact)

Similar to the discussion of the project in subchapter 2.5.2.4, this alternative would not impact regional wildlife corridor or linkage widths. The additional Mountain Ridge Road improvements completed under this alternative would not significantly alter wildlife movement considering Mountain Ridge Road already exists, the pavement increase (from 24 to 28 feet) would not change the amount of wildlife crossing the road, and that the area adjacent to the road does not service as a wildlife corridor. The fire station included in this alternative would be within the project footprint and, therefore, would not result in any additional wildlife movement impact beyond the project. Local wildlife corridors/linkages being preserved on-site would be set back from the adjacent development by a wetland buffer and limited building zones that would reduce the potential for any significant indirect impacts and maintain the visual continuity of these

local corridors. As with the project, this alternative's impact to localized wildlife movement is considered less than significant.

Issues 5 and 6: Local Policies, Ordinances, Adopted Plans (Less than Significant Impact)

The analysis detailed in subchapter 2.5.2.5 would apply to this alternative. The Mountain Ridge Road Fire Station Alternative would be required to obtain all relevant permits, and mitigate impacts pursuant to appropriate ratios consistent with the NCCP and County biological ordinances. As with the project, the Mountain Ridge Road Fire Station Alternative would result in less than significant impacts related to local policies, ordinances, and adopted plans pertaining to biological resources.

4.9.2.6 Cultural Resources

The existing conditions, methodology and significance determination information for the Cultural Resources analysis below is the same as the project (see subchapter 2.6, Cultural Resources). The analysis below is based on survey and analysis information included in the Cultural Resources Inventory and Assessment (see Appendix H).

As described further below, the Mountain Ridge Road Fire Station Alternative cultural resource impacts would be similar to the project. While the additional Mountain Ridge Road improvements completed by this alternative would affect additional area where there is potential for unknown subsurface cultural resources (Impact MRR-CR-1), it would also avoid the project's potential unknown subsurface cultural resources impact associated with the project's Miller Fire Station expansion fire service option (Impact CR-4). This alternative would result in significant mitigated impacts related to archeological sites (Impact CR-1 to CR-3); less than significant impacts to historical sites and human remains; and no impact to County RPO cultural resources similar to the project.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road slightly reduce the chance of uncovering unknown archeological sites, but this would not change the impact conclusions discussed below.

Issue 1: Historical Sites (Less than Significant Impact)

As discussed in subchapter 2.6.2.1, there are no significant historical resources located on the project site. There are also no known historical sites directly adjacent to Mountain Ridge Road. Thus, the Mountain Ridge Road Fire Station Alternative would have a less than significant historical resource impact similar to the project.

Issue 2: Archeological Sites (Significant Mitigated Impact)

No known cultural resources exist within the Mountain Ridge Road improvements proposed by this alternative. However, unknown archeological sites have potential to occur in the Mountain Ridge Road area. Thus, the potential for unknown archeological site impacts under this alternative is slightly increased relative to the project due to the increase in impact area, but the impact would be similar to that described for the project in subchapter 2.6.1.5 and summarized below.

The site includes seven archeological and two isolate sites as detailed in subchapter 2.6.1.5. As with the project, implementation of this alternative would result in potential significant impacts to two archeological sites that meet the criteria for significance under CEQA. While both archeological sites would be included within the limits of the open space, but there would be potential for a significant impact if the open space is not dedicated and preserved in perpetuity (Impact CR-1). Mitigation measure M-CR-1 would require the dedication of the open space and, therefore, significant impacts to significant archeological resources would be reduced to less than significant.

The project site is in an area with a great deal of archaeological and cultural sensitivity. Therefore, implementation of this alternative would result in a potential for grading or other ground-disturbing activity to impact undiscovered buried archaeological resources. As discussed in subchapter 2.6.2.2, impacts to any unknown cultural resources would be a significant impact (Impact CR-2). While this alternative would avoid the potential impact to unknown subsurface cultural resources associated with the project option that includes improvements to the Miller Fire Station (Impact CR-4), it would result in an additional potential impact to unknown subsurface cultural resources due to the additional grading required to improve Mountain Ridge Road (Impact MRR-CR-1). This alternative would implement Mitigation Measure M-CR-2, detailed in subchapter 2.6.5.1.

Implementation of Mitigation Measure M-CR-2 requires an archaeological monitor to be present for all grading activities, including the off-site Mountain Ridge Road improvements included in this alternative. This measure assures that grading would be halted or diverted should any discovery be made. The measure further assures that any findings are recovered, evaluated, and documented. With the implementation of this measure, potentially significant impacts (Impact CR-2 and Impact MRR-CR-1) would be reduced to a level that is less than significant.

The project design of this alternative would include the same off-site improvements identified in Chapter 1.0, including intersection improvements at Old Highway 395 and Gopher Canyon Road. The proposed improvements are within the site boundary of a known significant cultural resource site. Potential impacts to this site are identified as Impact CR-3. Mitigation Measure M-CR-3, detailed in subchapter 2.6.5.1, would be implemented under this alternative. If trenching required for the placement of traffic signals were to affect native soils, this mitigation measure would require the development of a capping plan. Implementation of these mitigation measures would reduce the potentially significant impacts to less than significant levels because they would ensure that relevant information contained in the archaeological record, which is important in understanding prehistory and history, is preserved.

Issue 3: Human Remains (Less than Significant Impact)

As discussed in subchapter 2.6.2.3, there are no known human remains on the project site or off-site areas. If any accidental discovery of human remains occurs, the procedures identified in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed. Thus, the Mountain Ridge Road Fire Station Alternative would have a less than significant historical resource impact similar to the project.

Issue 4: County RPO (Less than Significant Impact)

As indicated in subchapter 2.6.2.4, the cultural resource that meets RPO criteria is a portion of CA-SDI-18362. As with the project, this alternative would preserve that site within dedicated open space and no impact to County RPO cultural resources would occur.

4.9.2.7 Hazards/Hazardous Materials

The existing conditions, methodology and significance determination information for the hazards/hazardous materials analysis below is the same as the project (see subchapter 2.7, Hazards/Hazardous Materials). In addition to the Phase I ~~The analysis below is based on information provided in the 17 Phase I reports~~ and a Limited Phase II ESA (see Appendix I) prepared for the project, a supplemental Phase I ESA was performed along the portions of Mountain Ridge Road that would be subject to grading for the construction of Mountain Ridge Road to public road standards (see attachment to Appendix I). The analysis of hazardous impacts for this alternative is based on information provided in the ~~, and~~ FPP (see Appendix L), Evacuation (see Appendix K), and the Lilac Hills Ranch Fire Service Response Capabilities Assessment (Dudek and Hunt Research Corp. 2014) ~~that also applies~~as relevant to this alternative.

The Mountain Ridge Road Fire Station Alternative hazards/hazardous materials would result in similar impacts as ~~than~~ the project. As detailed in subchapter 2.7, ~~H~~the project would have less than significant impacts associated with hazardous substance handling, existing on-site contamination, emergency response and evacuation plans, and vectors. As the alternative consists of all the same component parts as the project, impacts would likewise be less than significant under this alternative.

Like the project, ~~W~~wildland fire impacts associated with ~~of~~ this alternative would be less than significant.~~similar to the project.~~ This alternative would include the same Fire Options identified in subchapter 2.7. The selection of any of the Fire Options would allow the project to meet the General Plan requirements for emergency response time. Additionally, this alternative would implement M-HZ-1 (see below) which would reduce impacts to wildland fires to less than significant.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would not affect the hazardous substance, on-site contamination, emergency response and evacuation plan, wildland fire or vector issues analysis below.

Issue 1: Hazardous Substance Handling (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative would include the same land uses as the project, and would have the same potential to involve hazardous substance handling. As discussed for the project in subchapter 2.7.2, this alternative would be required to comply with local, state, and federal regulations regarding the handling of hazardous materials, including CalARP. The Mountain Ridge Road Fire Station Alternative impacts related to hazardous substance handling use would be less than significant, similar to the project.

Issue 2: Existing On-site Contamination (Less than Significant Impact)

As the project site is the same, the Mountain Ridge Road Fire Station Alternative existing on-site contamination issues would include those issues identified for the project in subchapter 2.7.2. The fire station included in this alternative, as well as all other on-site features, would be located within the site analyzed in that section. On-site potential contamination issues are related to agricultural uses, existing ACMs/LBP in buildings, and existing septic systems. The additional Mountain Ridge Road off-site impact area included in this alternative has agricultural uses and could also be contaminated by pesticides. This alternative would result in less than significant impacts related to existing soil contamination considering the alternative would comply with applicable regulations, similar to the project.

Issue 3: Emergency Response and Evacuation Plans (Less than Significant Impact)

As described for the project in subchapter 2.7.2.3, the alternative would be consistent with the following plans: Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, and Emergency Water Contingencies Annex and Energy Shortage Response Plan. This alternative includes the same land uses, height limits and site location, and would have a similar Evacuation Plan compared to the project. The evacuation plan differences between the alternative and the project would occur because the alternative would not include gated access points to through traffic in Phases 4 and 5, and would include unrestricted public access from the site to the south via an improved Mountain Ridge Road. These differences are addressed further below. The Mountain Ridge Road Fire Station Alternative would have less than significant impacts related to emergency response and evacuation plans, similar to the project.

Issue 4: Wildland Fires (Significant Mitigated Impact)

Compared to the project, fire risk, the development footprint and land uses would be the same under this alternative. The majority of the fire safety features described in the project's FPP and subchapter 2.7.2.4 would also be applicable to the alternative.

The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; secondary emergency access roads, and adequate water supply for fire hydrants. The design features would differ slightly from the project, as additional brush management measures may be required along Mountain Ridge Road consistent with the Consolidated Fire Code to ensure it could serve as a fire service route and as an additional evacuation route. This alternative does not include gates access. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that a 100-foot brush management zone around structures or equivalent fire protection.

Like the project, DSFPD Station 11 would provide fire service for the first 71st units of the Mountain Ridge Road Fire Station Alternative within the five minute response time required under the County's General Plan. Upon construction of the 72nd unit, the alternative would provide either a temporary station or a temporary service agreement with CALFIRE for services to be provided by the Miller Station until a permanent fire

station is constructed. The Mountain Ridge Road Fire Station Alternative would thereafter locate a permanent DSFPD fire station in Phase 5, instead of Phase 3 like the project Fire Option 3. Such provision of fire service would meet the County's five minute fire service response time goal throughout each phase of development and would therefore be considered adequate. Overall, the fire protection service provided by this alternative would be equivalent to that included in the project.

The alternative would include fire safe design features similar to the project, including project FMZs; ignition resistant building materials; protection of non-residential structures; secondary emergency access roads, and adequate water supply for fire hydrants. The design features would differ slightly from the project, as additional brush management measures ~~may~~ would be required along Mountain Ridge Road to ensure it could serve as a fire service route and as an additional evacuation route. Specifically, the Consolidated Fire Code requires 20 feet of fuel modification along all roadways (public and private). These additional 20 feet are included in the footprint of this alternative's construction of Mountain Ridge Road. Also, the special measures regarding the gated access points in the southern project area would not be necessary under this alternative, as this alternative does not include gates access. As with the project, this alternative would have a potentially significant impact (Impact HZ-1) related to brush management that would be reduced to below a level of significance by mitigation measure M-HZ-1 that a 100-foot brush management zone around structures or equivalent fire protection would be required.

Overall, impacts due to the fire protection service provided by this alternative would be the same as the project.

Issue 5: Vectors (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative would include the same land uses as the project, and would have the same potential to pose as a vector source. As discussed for the project in subchapter 2.7.2, this alternative would include a Vector Management Plan and BMPs as a part of project design. This would reduce the potential vector issues associated with the WRF, hydromodification basins, and wetlands. Similar to the project, the Mountain Ridge Road Fire Station Alternative impacts related to vectors would be less than significant.

4.9.2.8 Noise

The existing conditions, methodology and significance determination information for the noise analysis below is the same as the project (see subchapter 2.8, Noise). The analysis below is based on the Mountain Ridge Road Fire Station Alternative – Noise Analysis letter report prepared by RECON in 2014 (Appendix V-4).

The Mountain Ridge Road Fire Station Alternative would result in the same significant, mitigated traffic, stationary, and construction noise/vibration impacts as the project (Impacts N-1 to N-11, and N-13 to N-16). This alternative would avoid the significant construction noise impact (Impact N-12) associated with the project's Miller Station fire service option, as this alternative does not include that fire service option. However, Mountain Ridge Road Option 1 of this alternative would result in a new significant vibration impact due to the close proximity of the construction to existing residences.

(Impact MRR-N-1) due to the roadway construction occurring within 150 feet of a residence. Refer to the analysis below for additional information.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would eliminate of 4 feet of grading on each side of Mountain Ridge Road relative to Option 1. This change would not affect the traffic noise analysis, as traffic noise analysis is calculated based on the centerline of the roadway, traffic volumes and the receiver location, and those would be the same under both options. Construction noise and vibration would be located 4 feet further away from receivers under Option 2 compared to Option 1, but vibration impacts would remain significant and construction noise would be less than significant as described for Option 1. Stationary noise impacts would be identical for both options.

Issue 1: Traffic Generated Noise (Significant Mitigated Impact)

Based on a review of the Mountain Ridge Road Fire Station Alternative TIS (see Appendix V-2), this alternative would result in traffic volume changes for 11 of the roadway segments modeled under Scenario E; as well as 12 roadway segments associated with the Existing plus Cumulative plus Project condition (worst-case traffic noise conditions). As shown in Tables 4-~~14~~ 16 and 4-~~15~~17, the greatest increase in noise level under both the build-out conditions and cumulative conditions occurs along Circle R Drive between Old Highway 395 and Mountain Ridge Road (1.3 CNEL under build-out and 1.0 CNEL under cumulative). While this increase in the cumulative contribution , the contribution is less than 2 CNEL. Therefore, and the alternative would does not result in any different cumulatively considerable impacts than the project.

TABLE 4-~~14~~16
CHANGES IN OFF-SITE OPERATIONAL NOISE LEVELS BETWEEN THE PROPOSED PROJECT AND THE ALTERNATIVE AT BUILD-OUT

Roadway	From	To	Noise Level at Build-out of Proposed Project[1] CNEL	Noise Level at Build-out of Alternative CNEL	Change dB(A)
W. Lilac Road	Old Highway 395	W. Main Street	66.7	66.1	-0.6
Gopher Canyon Rd.	I-15 SB Ramps	I-15 NB Ramps	67.8	68.0	0.2
Gopher Canyon Rd.	I-15 NB Ramps	Old Highway 395	65.4	65.8	0.4
Circle R Dr.	Old Highway 395	Mountain Ridge Rd.	62.6	63.9	1.3
Old Highway 395	W. Lilac Rd.	I-15 SB Ramps	64.1	63.3	-0.8
Old Highway 395	I-15 SB Ramps	I-15 NB Ramps	61.0	60.2	-0.8
Old Highway 395	I-15 NB Ramps	Camino Del Rey	63.9	63.3	-0.6
Old Highway 395	Camino Del Rey	Circle R Dr.	66.3	66.0	-0.3
Old Highway 395	Circle R Dr.	Gopher Canyon Rd.	65.0	65.5	0.5
I-15	Old Highway 395	Gopher Canyon Rd	81	81	<-0.1

SOURCE: Appendix V-3.
[1]See Table 11, Lilac Hills Noise Technical Report (Appendix M).

TABLE 4-~~15~~17
CHANGES IN CUMULATIVE OFF-SITE OPERATIONAL NOISE LEVELS BETWEEN THE PROPOSED PROJECT AND THE ALTERNATIVE UNDER CUMULATIVE CONDITIONS

Roadway	From	To	Future Cumulative Noise Level of Proposed Project[1] CNEL	Future Cumulative Noise Level of Alternative CNEL	Cumulative Change dB(A)
W. Lilac Road	Old Highway 395	W. Main Street	66.7	66.1	-0.6
W. Lilac Road	W. Main Street	E. Main Street	60.3	60.2	-0.1
Gopher Canyon Rd.	I-15 SB Ramps	I-15 NB Ramps	69.2	69.4	0.2
Gopher Canyon Rd.	I-15 NB Ramps	Old Highway 395	66.8	67.1	0.3
Circle R Dr.	Old Highway 395	Mountain Ridge Rd.	63.7	64.7	1.0
Old Highway 395	W. Lilac Rd.	I-15 SB Ramps	65.9	65.5	-0.4
Old Highway 395	I-15 SB Ramps	I-15 NB Ramps	63.8	63.4	-0.4
Old Highway 395	I-15 NB Ramps	Camino Del Rey	65.2	64.9	-0.3
Old Highway 395	Camino Del Rey	Circle R Dr.	67.3	67.1	-0.2
Old Highway 395	Circle R Dr.	Gopher Canyon Rd.	65.4	65.6	0.2
I-15	Old Highway 395	Gopher Canyon Rd	81	80.9	<-0.1

SOURCE: Appendix V-3.
[1]See Table 13, Lilac Hills Noise Technical Report (Appendix M).

A detailed noise analysis of Mountain Ridge Road was completed and the results are included in Table 4-~~16~~ 18 below. While noise levels at some receivers would increase under this alternative relative to the project, none of the properties along the proposed Mountain Ridge Road alignment would be exposed to noise levels in excess of the County Land Use and Noise Compatibility Guidelines. Thus, this alternative would have the same operational noise impacts as the project.

TABLE 4-~~16~~18
CHANGES IN CUMULATIVE OPERATIONAL NOISE LEVEL ALONG MOUNTAIN RIDGE ROAD BETWEEN THE PROPOSED PROJECT AND ALTERNATIVE

	Cumulative Noise Levels (CNEL)		
Receiver	Proposed Project[1]*	Alternative	Delta Proposed Project vs. Alternative
65	51	51	0
117	47	49	2
118	47	46	-1
120	48	44	-4
149	47	46	-1
150	52	50	-2
151	46	48	2
152	49	56	7
153	44	47	3

SOURCE: Appendix V-3.
[1]See Table 12, Lilac Hills Noise Technical Report (Appendix M).
*Existing and project noise levels are based on conservative traffic noise modeling that does not include topography or other factors that affect the propagation of noise.

This alternative would have the same traffic generated noise impacts as the project, including exterior NSLU impacts (Impact N-1), interior residential noise impacts (Impact N-2), off-site residences on Covey Lane and Lilac Hills Ranch Road (Impact N-3). As with the project, these noise impacts would be reduced to below a level of significance through Mitigation Measures M-N-1 and M-N-2 that require noise analysis and associated attenuation measures to ensure compliance with the County General Plan Noise Element and County interior noise standards.

Issue 2: Stationary and Construction Noise (Significant Mitigated Impact)

Stationary

The stationary noise sources of this alternative would be the same as identified for the project in subchapter 2.8.3.2, except for the fire station. The fire station proposed under the alternative would be developed in Phase 5, and would be adjacent to institutional uses and across the street from residential uses. Noise sources associated with the fire station would include vehicles accessing the station, mechanical ventilation, as well as occasional alarms and sirens. The alarms and sirens associated with operation of the fire station are exempt from the County noise ordinance and, due to the limited time they would sound, would not result in significant impacts. The noise generated by the ventilation equipment could potentially result in unacceptable noise levels at the directly adjacent institutional uses, which would be a potentially significant stationary noise impact, similar to that identified for the project (see subchapter 2.8.2.2, Impact N-4). As with the project, the alternative would implement Mitigation Measures M-N-3 and M-N-4

in addition to project design features to reduce this impact to below a level of significance. This would include the completion of acoustical noise analysis and Best Engineering Practices to ensure noise levels are in compliance with County regulations. Compliance with project design features and mitigation measures would reduce potential impacts to less than significant, similar to the project.

All other stationary noise impacts of the Mountain Ridge Road Fire Station Alternative would be the same as the project (see subchapter 2.8.6.2). This includes the potentially significant stationary noise impacts associated with other HVAC equipment (Impact N-4), non-emergency generators (Impact N-5), parking lots (Impact N-6), loading docks (Impact N-7), dog park (Impact N-8), WRF (Impact N-9), and RF (Impact N-10). As with the project, mitigation measures M-N-3 to M-N-7 would reduce these stationary noise impacts to below a level of significance. See subchapter 2.8.5.2 and 2.8.6.2 for additional details. The Mountain Ridge Road improvements would not be a stationary noise source.

Construction

Grading activities generate the greatest amount of noise during construction, as this phase requires the largest and heaviest pieces of equipment. All of the construction noise would be that the same as the project (see subchapter 2.8.2.2) except the additional noise that would occur from Mountain Ridge Road. The construction noise associated with the fire station would be similar to that described for the project, as the fires station site is would be located within a construction area assumed in the project analysis. The construction noise impacts identified for this alternative include noise Impacts N-11, N-13, and N-14 that were identified for the project. Impact N-12 would be avoided under this alternative, as the CAL FIRE Miller Station would not be altered. The alternative would comply with all applicable design considerations and Mitigation Measures M-N-8, M-N-10, and M-N-11 included in the project. The Mountain Ridge Road additional impacts are discussed below.

The construction of Mountain Ridge Road as proposed by this alternative would involve grading and would occur adjacent to noise sensitive land use (NSLU) property lines. No new pile driving or blasting would be required to construct Mountain Ridge Road as a Rural Residential Collector. With the exception of the residence located at 31013 Mountain Ridge Road, residences and exterior NSLU use areas are located over 75 feet from the roadway centerline of Mountain Ridge Road. At a distance of 50 feet, noise levels could reach as high as 88 dB(A) L_{max} during peak construction activity. Such levels could create temporary annoyance; however, it should be noted that peak noise levels would occur only sporadically since not all equipment would be operating at all times and equipment would be moving along the entire 450 foot long roadway construction area. Using the same methodology as the project, the 8-hour noise levels at the nearest residence (31013 Mountain Ridge Road) would be approximately 63 dB(A) $L_{eq,}$ which is below the County's Noise Ordinance 75 dB(A) eight-hour average L_{eq} limit. Thus, impacts to NSLU from construction of Mountain Ridge Road would be less than significant.

Issue 3: Vibration (Significant Mitigated Impact)

On-site construction vibration impacts of this alternative would be identical to the project, as the on-site footprint and general construction activities would be the same. The fire

station included in this alternative would not result in any additional vibration impacts, as it would be within the project footprint and would require the same construction methods assumed for the project. The Mountain Ridge Road Fire Station Alternative would involve greater improvements to Mountain Ridge Road relative to the project. These additional improvements would result in construction activities along Mountain Ridge Road being closer to existing residences. Construction activities, such as the Mountain Ridge Road improvements, that involve heavy equipment within 150 feet of a NSLU have potential to exceed the County's vibration threshold of 0.004 RMS. Both this alternative and the project would involve the use of heavy grading equipment within 150 feet of the residence at 31013 Mountain Ridge Road. Both the alternative and the project would have potential to result in significant vibration impacts where construction would be within 150 feet of a residence or other noise sensitive land use such as hospitals (Impact N-15). As no additional blasting would be required for this alternative, this alternative would have the same significant blasting impacts to residences as identified for the project (Impact N-16).

To avoid the vibration impact, Mitigation M-N-12 identified for the project (see subchapter 2.8.6.3) would be implemented. This mitigation requires monitoring of activities and, as needed, modification of activities to reduce vibration to below 0.004 RMS at residences and other sensitive land uses. As with the project, blasting vibration impacts would be reduced to below a level of significance through mitigation that requires a blasting and monitoring plan to ensure compliance with County vibration regulations (M-N-11).

4.9.2.9 Less than Significant Impacts

Geology and Soils

The existing conditions, methodology and significance determination information for the Geology and Soils analysis below is the same as the project (subchapter 3.1.1), Geology and Soils. The analysis below is based on information included in the geotechnical investigation and supplement prepared by AGS (see Appendices N-1 and N-2).

The Mountain Ridge Road Fire Station Alternative geology and soil-related impacts would be the same as the project as described further below. As the site is the same under both the project and this alternative, Mountain Ridge Road Fire Station Alternative underlying geology and soils are also the same and pose the same potential environmental impacts. In summary, this alternative would have less than significant impacts related to seismic hazards, soil erosion, soil stability, expansive soils, wastewater disposal systems, and unique geologic features.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would not affect the geology and soils analysis below.

Issue 1: Exposure to Seismic-Related Hazards (Less than Significant Impact)

As detailed in subchapter 3.1.1.2, the site has no known fault ruptures, is subject to moderate-to-severe ground shaking, contains alluvium that is subject to liquefaction, and low landslide risks. The off-site areas also have similar seismic-related hazard

conditions. As with the project, the alternative would implement project design features, standard practices and comply with regulatory guidelines and impacts related to seismic hazards would be less than significant.

Issue 2: Soil Erosion or Loss of Topsoil (Less than Significant Impact)

The soil erosion and loss of topsoil impacts of the alternative would be similar to the project impacts described in subchapter 3.1.1.2. Impacts would be less than significant, as impacts would be avoided through project design features and compliance with the San Diego County regulations.

Issue 3: Soil Stability (Less than Significant Impact)

The landslide, lateral spreading, collapse, subsidence, and liquefaction potential described for the project in subchapter 3.1.1.2 is the same for the Mountain Ridge Road Fire Station Alternative. This alternative would include project design features and compliance with regulations similar to the project, and would have a less than significant soil stability impact.

Issue 4: Expansive Soils (Less than Significant Impact)

The majority of the site is underlain by very low to low expansive soils, with some areas of moderately expansive soils. As with the project, sampling would be completed prior to grading to determine if any pockets of expansive clay soils exist on-site and appropriate foundation and structural building code standards would be completed for on and off-site improvements. Thus, expansive soil impacts of this alternative would be less than significant, similar to the project. Refer to subchapter 3.1.1.2 for additional details.

Issue 5: Wastewater Disposal Systems (Less than Significant Impact)

As with the project (see subchapter 3.1.1.2), this alternative does not propose septic or alternative disposal systems and, therefore, wastewater disposal system impacts would be less than significant.

Issue 6: Unique Geologic Feature (Less than Significant Impact)

As with the project (see subchapter 3.1.1.2), the alternative would have no impact associated with the destruction of a unique geologic feature since none are located within the site or off-site improvement areas.

Greenhouse Gases (GHG)

Like the GHG discussion in subchapter 3.1.2, the GHG emissions analysis provided in this section has been revised and no longer utilizes the 2013 Guidelines to determine the significance of the alternative's GHG emissions. This analysis has been revised to present a similar multi-faceted evaluation as provided for the project's GHG emissions. For clarity purposes, this section is provided without tracked changed edits to allow ease of review.

The existing conditions, methodology and significance determination information for the greenhouse gas analysis below is the same as the project (see subchapter 3.1.2, Greenhouse Gas Emissions). The analysis below is based on the Mountain Ridge Road Fire Station Alternative – Greenhouse Gas Analysis letter report prepared by RECON in 2015 (Appendix V-5).

As shown below, the Mountain Ridge Road Fire Station Alternative GHG impacts would be the same as those of the project. While this alternative would slightly increase the GHG emissions relative to the project due to the additional grading and construction activities on Mountain Ridge Road, as well as operational emissions associated with the new fire station in Phase 5, the alternative's GHG emissions would remain less than significant under the seven methodologies considered in subchapter 3.1.2 and Appendix V-5. Also, the implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would have a negligible effect on GHG emissions, considering the small area affected and the amortization of construction-related emissions.

Issue 1: GHG Emissions (Less than Significant Impact)

In order to evaluate the significance of this alternative's GHG emissions, the same methodologies used for the project evaluation were utilized: 1(a) - incremental increase in GHG emissions attributable to the alternative as compared to the GHG emissions resulting from on-site existing conditions; 1(b) - the County of San Diego's 2015 GHG Guidance; 1(c) - the Sacramento Metropolitan Air Quality Management District's (SMAQMD) CEQA Guide ; and 1(d) - the California Air Resources Board's (CARB) 2008 Scoping Plan. Additional methodological details are available in the project's GHG Tech Report (Appendix O) and Section 2.0 of Appendix V-5.

1a Increase from Existing GHG Emissions

The project site is presently occupied primarily by agricultural uses, with 22 single-family homes scattered throughout the 608 acres at a very low density. Emissions due to the existing residential uses were quantified, and estimated to be 563.8 $MTCO_2E$ in the 2008 baseline year.

This alternative would generate an additional 777.7 $MTCO_2E$ of total construction-related GHG emissions, as compared to the proposed project, due to the additional improvements to Mountain Ridge Road (see Appendix V-5 Table 1). Operation of the alternative would generate an additional 36.7 to 53.1 $MTCO_2E$ as compared to the proposed project. Thus, total Alternative GHG emissions were calculated to range from 33,398.6 to 33,927.9 $MTCO_2E$ in 2020, depending on which calculation method is used, i.e., under County 2015 GHG Guidance, the SMAQMD CEQA Guide, and the 2008 Scoping Plan requirements (see Section 5.1, Calculation Methodology, of the GHG Report).

As with the proposed project, this alternative would increase the quantity of existing GHG emissions on the project site. Because climate change is occurring on a global scale, however, it is not meaningfully possible to quantify the scientific effect of new GHG emissions caused by a single project or whether a project's net increase in GHG emissions, when coupled with other activities in the region, is cumulatively considerable.

Therefore, as similarly provided in subchapter 3.1.2, this analysis also considers other methods for analyzing the significance of the alternative's GHG emissions.

1b County 2015 GHG Guidance

This section analyzes whether the alternative's GHG emissions are significant under the County's *2015 GHG Guidance*, which requires that the "mitigated" alternative achieve at least a 16 percent reduction in GHG emissions from the "unmitigated" condition for impacts to be less than significant. The design features incorporated into this Alternative for the "mitigated" condition, are the same as the project and described in the project's GHG Report.

As shown in Table 4-19 below, the "unmitigated" alternative would emit approximately 42,810.1 $MTCO_2E$ annually, whereas the "mitigated" alternative would emit approximately 33,927.9 $MTCO_2E$ annually. This amounts to a 20.7 percent reduction, which exceeds the County's 16 percent reduction target. Therefore, under this methodology, this alternative's GHG emission impacts would be less than significant.

TABLE 4-19
TOTAL ANNUAL CONSTRUCTION AND OPERATIONAL "UNMITIGATED" AND "MITIGATED" ALTERNATIVE GHG EMISSIONS– COUNTY 2015 GHG GUIDANCE ($MTCO_2E$)

Source	"Unmitigated" Alternative	"Mitigated" Alternative 2020	Percent Reduction	"Mitigated" Alternative 2030	"Mitigated" Alternative 2050
Operational Emissions	42,159.1	33,276.9	21.1%	27,003.6	25,236.2
Construction Emission	651.0	651.0	0.0%	651.0	651.0
Total Emissions	**42,810.1**	**33,927.9**	**20.7%**	**27,654.6**	**25,803.3**

SOURCE: Appendix V-5.
[1]See GHG Report.
[2]See Appendix V-5, Table 1.

1c SMAQMD CEQA Guide

This section analyzes whether the project's GHG emissions are significant under the SMAQMD's *CEQA Guide*, Chapter 6. The SMAQMD's *CEQA Guide* identifies 1,100 $MTCO_2E$ as a bright-line threshold for construction and operational emissions, i.e., annual GHG emissions below 1,100 $MTCO_2E$ would be considered less than significant. Alternately, if a project's emissions exceed 1,100 $MTCO_2E$, the project would be required to achieve a 21.7 percent or greater reduction in GHG emissions from a no action taken condition for impacts to be less than significant (to show consistency with AB 32).

As previously discussed, the SMAQMD considers construction and operational emissions separately. According to the SMAQMD CEQA Guide, annual construction or operational GHG emissions below 1,100 $MTCO_2E$ are considered less than significant. Because the annual construction emissions estimates would exceed 1,100 $MTCO_2E$, they have been amortized over the life of the project. Based on a 25-year lifetime, the construction emissions would be 31.1 $MTCO_2E$ annually. Combining the Alternative's construction emissions for these improvements with the proposed project's construction emissions would result in 379.1 $MTCO_2E$ annually associated with the Alternative. With

respect to operational emissions, Table 4-20 shows that, like the project, the alternative's operational emissions would exceed 1,100 $MTCO_2E$. Therefore, this alternative is required to achieve a 21.7 percent reduction in GHG emissions over the no action taken condition to demonstrate consistency with AB 32. As shown in Table 4-20, this alternative would emit approximately 33,019.5 $MTCO_2E$ per year, whereas the no action taken condition would emit approximately 48,234.7 $MTCO_2E$ per year. This amounts to a 31.3 percent reduction, which exceeds SMAQMD's 21.7 percent reduction target. Therefore, this alternative's operational GHG emissions would be less than significant.

TABLE 4-20
TOTAL ANNUAL NO ACTION TAKEN CONDITION AND ALTERNATIVE GHG EMISSIONS – SMAQMD CEQA GUIDE ($MTCO_2E$)

Operational Emissions	No Action Taken 2020	Alternative 2020	Percent Reduction	Alternative 2030	Alternative 2050
Operational Emissions	48,234.7	33,019.5		26,448.6	24,681.1
Construction Emission	379.1	379.1	0.0%	379.1	379.1
Total Emissions	48,613.8	33,398.6	31.3%	26,827.7	25,041.9

SOURCE: Appendix V-5.

1d CARB's 2008 Scoping Plan Method

This section analyzes whether this Alternative's GHG emissions are consistent with the level of GHG reductions identified in the original 2008 *Scoping Plan* as necessary to achieve the reduction mandate of AB 32, which references at least a 28.5 percent reduction in GHG emissions from the "business as usual" condition for impacts to be less than significant (CARB 2008). The design features incorporated into this alternative are the same as the project and described in the project's GHG report.

As shown in Table 4-21, the "business as usual" condition would emit a total of approximately 48,107.4 $MTCO_2E$ annually, whereas this alternative, with its project design features, would emit a total of approximately 34,085.1 $MTCO_2E$ annually. This amounts to a 30.0 percent reduction, which exceeds the 28.5 percent reduction target. Therefore, this alternative's GHG emissions would be consistent with the *Scoping Plan* reduction goals and impacts would be less than significant.

TABLE 4-21
TOTAL ANNUAL CONSTRUCTION AND OPERATIONAL "BUSINESS AS USUAL" CONDITION AND ALTERNATIVE GHG EMISSIONS – 2008 SCOPING PLAN METHOD ($MTCO_2E$)

Source	BAU 2020	Alternative 2020	Percent Reduction	Alternative 2030	Alternative 2050
Operational Emissions	47,703.3	33,276.9	30.2%	26,770.9	25,003.4
Construction Emission	404.1	404.1	0.0%	404.1	404.1
Total Emissions	**48,107.4**	**33,681.0**	**30.0%**	**27,175.0**	**25,407.5**

SOURCE: Appendix V-5.
[1]See GHG Report.
[2]See Appendix V-5 Table 3.

Conclusion

While the mass GHG emissions of this alternative are slightly higher than the project, the percent reductions, pursuant to each methodology used, demonstrate that the alternative's impacts (like those of the proposed project) are less than significant relative to an AB 32 consistency demonstration. Therefore, the alternative would not result in any new impacts and, as with the project, impacts associated with GHG emissions would be less than significant.

Issue 2: Conformance to Applicable Plan, Policy, or Regulation (Less than Significant Impact)

2a County General Plan

Impacts associated with the alternative's consistency with the County's General Plan goals and policies relating to GHG emission reductions would be similar to those associated with the proposed project. Please see subchapter 3.1.2 for further explanation as to the conclusion that the proposed project, and by extension this Alternative, would not conflict with the applicable, GHG-related portions of the County's General Plan.

2b SB 375 and SANDAG's 2050 RTP/SCS

Impacts associated with the alternative's consistency with SB 375 and SANDAG's *2050 RTP/SCS* would be the same as those associated with the proposed project. As discussed at length in subchapter 3.1.2, the basic project design principles are complimentary of SB 375's underlying policy objectives, and this alternative would not appreciably change the project's land plan, mix of uses, ability to capture trips and keep them on the project site, or other design features that serve to reduce project-related vehicle miles traveled and the corresponding GHG emissions. As such, like the proposed project, the alternative would not conflict with the objectives of SB 375 and the *2050 RTP/SCS* and impacts associated with conflicts with plans or policies would be less than significant.

2c Executive Orders B-30-15 and S-3-05 (2030 and 2050 Reduction Goals)

The state's Executive Branch has identified goals to secure further reductions in the statewide GHG emissions levels in 2030 and 2050. However, as discussed in subchapter 3.1.2, the course that will be charted to achieve the 2030 and 2050 statewide reduction goals is still being determined by the California Legislature and relevant regulatory agencies, most particularly CARB. Further, due to the technological shifts anticipated and the unknown parameters of the regulatory framework in 2030 and 2050, available GHG models and the corresponding technical analyses are subject to limitations for purposes of quantitatively estimating the alternative's emissions in 2030 and 2050. See subchapter 3.1.2 for additional details on the EOs.

Nonetheless, for purposes of this analysis, the alternative's GHG emissions in 2030 and 2050 were estimated in order to identify the emissions trend for the alternative in 2020, 2030 and 2050. Based on that modeling, as summarized below, the alternative's GHG emissions will steadily decrease with time as the state's existing and planned regulatory objectives are implemented and achieved:

- County's *2015 GHG Guidance* (Methodology 1b Calculation): Estimated alternative emissions in 2020 are 33,927.9 $MTCO_2E$; in 2030, those emissions would decrease to 27,654.6 $MTCO_2E$ (35.4 percent reduction), and, in 2050, those emission would decrease further to 25,803.3 (39.7 percent reduction).

- SMAQMD's *CEQA Guide* (Methodology 1c Calculation): Estimated alternative emissions in 2020 are 33,398.6 $MTCO_2E$; in 2030, those emissions would decrease to 26,827.7 $MTCO_2E$ (44.8 percent reduction), and, in 2050, those emission would decrease further to 25,041.9 (48.4 percent reduction).

- CARB's 2008 *Scoping Plan* (Methodology 1d Calculation): Estimated alternative emissions in 2020 are 33,681.0 $MTCO_2E$; in 2030, those emissions would decrease to 27,175.0 $MTCO_2E$ (43.5 percent reduction), and, in 2050, those emission would decrease further to 25,407.5 (47.2 percent reduction).

In accordance with CEQA Guidelines section 15144, which recognizes that preparing an EIR necessarily involves some degree of forecasting, the emission reductions identified for the project in 2030 and 2050 are a result of: (i) application of CARB's EMFAC2014 model; (ii) achievement of a 50 percent RPS by 2030; and, (iii) achievement of the 75 percent solid waste diversion goal by 2030, ten years later than the 2020 target year identified by AB 341/Public Resources Code section 41780.01(a). Conservatively, no other regulatory or technological advancements (e.g., zero net energy buildings) were assumed.

Arguably, whether the project would conflict with or impede substantial progress towards the statewide reduction goals established by EO B-30-15 for 2030 and by EO S-3-05 for 2050 cannot be reasonably determined at this time because no statutes or regulations have been adopted to translate these goals into comparable, scientifically-based emission reduction targets.

Nonetheless, because of the ongoing controversy regarding the application of these two EOs in the context of CEQA and the strong interest in California's post-2020 climate policy, this analysis renders a determination as to whether the alternative would conflict with or impede substantial progress towards the statewide reduction goals established by EO B-30-15 for 2030 and by EO S-3-05 for 2050. As illustrated above, the alternative exceeds the percentage reduction targets identified under three separate methodologies for achievement of AB 32's 2020 reduction mandate (see Methodologies 1b through 1d), evidencing that the project does more than its "fair share" for purposes of 2020 and is on the right track for purposes of post-2020 emission reductions. Further, as shown, the alternative's 2020 emissions totals represent the maximum emissions inventory for the alternative as future emissions would continue to decline from 2030 through at least 2050 based on currently available models and regulatory forecasting. Thus, the project would not impede substantial progress toward long-term GHG goals. As such, although there is some uncertainty as discussed above, the project's impacts with respect to EO B-30-15 and EO S-3-05 are expected to be less than significant.

Summary

Like the analysis provided in subchapter 3.1.2 for the project, the Mountain Ridge Road Fire Station Alternative would be consistent with applicable plans and policies, and

would result in a less than significant impact related to conformance with applicable GHG plans, policies, or regulations.

Hydrology and Water Quality

The existing conditions, methodology and significance determination information for the Hydrology and Water Quality analysis below is the same as the project (see subchapter 3.1.3, Hydrology and Water Quality). The analysis below is based on information included in the Storm Water Management Plans, a Preliminary Drainage Studies, a Hydromodification Management Plan, and a Preliminary Hydrogeologic Assessment (see Appendixes U-1, U-2, U-3, and P) that also is applicable to this alternative.

The Mountain Ridge Road Fire Station Alternative hydrology and water quality impacts would be similar to the project as described further below. In summary, this alternative would have less than significant impacts related to water quality standards, and requirements, groundwater, erosion/siltation, flooding, dam inundation, seiche, tsunami, and mudflow.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in similar impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would have a negligible effect on hydrology and water quality considering the size of the area and that the improvements would be required to comply with plans, policies and regulations.

Issue 1: Water Quality Standards and Requirements (Less than Significant Impact)

As discussed for the propose project in subchapter 3.1.3.2, the alternative would comply with water quality regulations, would implement construction and operational BMPs, LID strategies, and would result in a less than significant impact related to water quality standards and requirements, the same as the project.

Issue 2: Groundwater Supplies and Recharge (Less than Significant Impact)

Similar to the project, this alternative would only use groundwater for irrigation purposes and would not use it for potable water. Potable water service to the site would be adequately provided via the VCMWD. The landscaped area of this alternative would be similar to the project and, like the project, groundwater use would not be expected to exceed the 191 ac-ft per year rate that is currently utilized on-site. Thus, the Mountain Ridge Road Fire Station Alternative would result in less than significant groundwater impact, like the project (see subchapter 3.1.3.2).

Issue 3: Erosion or Siltation/Flooding (Less than Significant Impact)

Erosion, siltation and flooding impacts of the Mountain Ridge Road Fire Station Alternative would be the same as the project considering it would also be required to implement LID features, hydromodification design features, and BMPs during construction and operation. As discussed in subchapter 3.1.3.2 for the project, this alternative would have a less than significant erosion and siltation/flooding impact.

Issue 4: Exceed Capacity of Storm Water System (Less than Significant Impact)

This alternative would comply with the County's storm water system policies and regulations like the project (see subchapter 3.1.3.2). As such, the Mountain Ridge Road Fire Station Alternative impacts associated with the exceedance of storm water drainage system capacity would be less than significant.

Issue 5: Housing within 100-year Flood Hazard Area (Less than Significant Impact)

The housing location under this alternative would be the same as the project and no 100- year flood hazard area is located on-site. Thus, the Mountain Ridge Road Fire Station Alternative would have a less than significant impact related to housing within the 100-year flood hazard area, identical to the project (see subchapter 3.1.3.2).

Issue 6: Dam Inundation (Less than Significant Impact)

The site is not located within a dam inundation zone. As described in subchapter 3.1.3.2 for the project, the Mountain Ridge Road Fire Station Alternative would have a less than significant impact related to dam inundation.

Issue 7: Seiche, Tsunami, and Mudflow (Less than Significant Impact)

As the Mountain Ridge Road Fire Station Alternative site is the same as the project, the risk of seiche, tsunami and mudflow are the same the project (see subchapter 3.1.3.2). As with the project, this alternative would include project design measures and comply with County policies, and result in a less than significant risk of seiche, tsunami and mudflow hazards.

Land Use Planning

The land uses included in the Mountain Ridge Road Fire Station Alternative would be the same as the project. The location of the proposed fire station is not identified in any existing land use plan and locating a fire station in Phase 5 of the site would not alter the analysis in subchapter 3.1.4. Both this alternative and the project would provide adequate fire service (including response times) and would comply with County Policies I-18, I-84, and I-136. Mountain Ridge Road is currently a private road, and therefore not identified in existing land use plans. Changing it to a public roadway would not cause an inconsistency with any adopted land use plan. Implementation of either the project or this alternative would also involve GPAs and Rezones that would be consistent with applicable land use plans as detailed in subchapter 3.1.4. Thus, the land use impacts of this alternative would be similar to the project, and would be less than significant.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would involve the same land uses. The roadway modification request included in this option would adhere to the applicable land use processes and requirements. Thus, the land use impacts would be the same between the two options.

Public Services

The existing conditions, methodology and significance determination information for the public services analysis below is the same as the project (see subchapter 3.1.5, Public Services).

The Mountain Ridge Road Fire Station Alternative's public service impacts would be similar to the project as described further below. While this alternative changes would provide fire service by providing constructing a permanent station in Phase 5, which would not result in impacts associated with the construction or expansion of new facilities because on-site impacts have all been analyzed and no new construction related impacts would occur. Instead of the fire service options included for the project, all those methods of providing fire service result in adequate fire service and a less than significant fire service impact. All other public service impacts (school, law enforcement, and library) would also be less than significant and the same as the project. See the analysis below for additional information.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in the same impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would have no effect to public services.

Issue 1: Schools (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative would include the same number and types of residences as the project and the residences would be in the same location as well. Thus, the alternative would generate the same number of students in the same school district as the project. This alternative would also be required to pay school fees that fund school improvements in accordance with SB 50. The school impact of this alternative would be the same as identified for the project in subchapter 3.1.5.2, which is a less than significant impact.

Issue 2: Fire Protection (Less than Significant Impact)

As described in subchapter 4.9.1 above, DSFPD Station 11 would provide adequate fire service for the first 71st units of the Mountain Ridge Road Fire Station Alternative. Then the alternative would provide either a temporary station or a temporary service agreement with CALFIRE prior to the construction of the 72nd unit until the permanent fire station is constructed in Phase 5. Such provision of fire service would meet the County's five minute fire service response time goal throughout each phase of development, and would therefore be considered adequate. No additional physical environmental impact beyond those identified in Section 4.9.2 would occur to provide fire service to this alternative. Thus, the alternative would result in a less than significant impact related to the provision of adequate fire service similar to the project (see subchapter 3.1.5.2).

Issue 3: Law Enforcement (Less than Significant Impact)

As this alternative would include the same land uses in the same general location as the project, the Mountain Ridge Road Fire Station Alternative would generate the same demand for law enforcement services. This alternative would result in the same less

than significant impact as the project. Refer to subchapter 3.1.5.2 for additional information.

Issue 4: Public Library Facilities (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative would include the same number of residents as the project in the same Valley Center branch library service area. As such, the library service impact of this alternative would be the same identified for the project in subchapter 3.1.5.2, which is less than significant.

Recreation

The existing conditions, methodology and significance determination information for the recreation analysis below is the same as the project (see subchapter 3.1.6, Recreation). The analysis below is based on information obtained for the project that is applicable for the alternative.

The Mountain Ridge Road Fire Station Alternative recreation impacts would be the same as the project, as the land uses and site would be the same. Specifically, this alternative would have less than significant impacts related to the deterioration of recreational facilities, and the construction of new recreational facilities. See the analysis below for additional information.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in the same impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would have no effect on recreation.

Issues 1 and 2: Deterioration of Parks and Recreational Facilities, and Construction of New Recreational Facilities (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative would include the same private parks, public parks, recreational facility, trails, and open space as the project. Also, this alternative would include the same number of residents as the project and generate the same demand for recreational resources. This alternative would comply with the PLDO as well. Thus, similar to the project, the Mountain Ridge Road Fire Station Alternative would provide adequate recreational facilities and would have a less than significant impact related to the deterioration of existing recreational facilities and the construction of new recreational facilities. See subchapter 3.1.6.2 for additional information.

Utilities and Service Systems

The existing conditions, methodology and significance determination information for the utilities and service systems analysis below is the same as the project (see subchapter 3.1.7, Utilities and Service Systems). The analysis below is based on information obtained for the project that is applicable for the alternative.

The Mountain Ridge Road Fire Station Alternative utilities and service systems impacts would be the same as the project, as the land uses, site, and infrastructure improvements would be the same. Specifically, this alternative would have less than

significant impacts related to wastewater treatment, water and wastewater facilities, stormwater facilities, and water supply. See the analysis below for additional information.

The implementation of the Mountain Ridge Road Fire Station Alternative Option 2 (reduced Mountain Ridge Road right-of-way) would result in the same impacts as Option 1. The elimination of 4 feet of grading on each side of Mountain Ridge Road would have no effect to utilities and service systems.

Issue 1: Wastewater Treatment Requirements (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative includes the same land uses in the same general location as the project. Thus, this alternative would result in the same amount of wastewater and recycled water demand as the project (see Table 3.1-9 and subchapter 3.1.7.2) and would also be serviced by the VCMWD. As with the project, this alternative would comply with federal, state and County regulations and would result in a less than significant impact related to wastewater treatment regulations.

Issue 2: New Water and Wastewater Treatment Facilities (Less than Significant Impact)

As described for the project in subchapter 3.1.7.2, the Mountain Ridge Road Fire Station Alternative would include the water and wastewater treatment infrastructure required to service the alternative. These improvements are included as a part of the alternative and addressed in this environmental analysis. Thus, like the project, water and wastewater treatment facility impacts would be less than significant.

Issue 3: Sufficient Storm Water Drainage/Facilities (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative would include impermeable surface areas, BMPs, LID measures, and storm water infrastructure in accordance with local, state, and federal regulations similar to described for the project in subchapter 3.1.7.2. As with the project, this alternative would result in less than significant impacts related to water and wastewater treatment facility.

Issue 4: Adequate Water Supplies (Less than Significant Impact)

The Mountain Ridge Road Fire Station Alternative includes the same land uses in the same general location as the project. Thus, this alternative would result in the same water supply demand as the project (see and subchapter 3.1.7.2) in the VCMWD. As with the project, this alternative would comply with federal, state and County regulations, and would result in a less than significant impact related to water supply.

Issue 5: Adequate Wastewater Facilities (Less than Significant Impact)

As with the project, the Mountain Ridge Road Fire Station Alternative would include wastewater treatment infrastructure required to service the alternative. These improvements would comply with County Policies LU-12.1, LU-14.2, LU-14.3 and LU-14.4 in addition to Board Policies I-78 and I-84 similar to the project (see subchapter 3.1.7.2). The required wastewater improvements are included as a part of the alternative also similar to the project. Thus, water and wastewater treatment facility impacts would be less than significant, like the project.

Energy Use and Conservation

The land uses included in this alternative would result in the similar operational energy and water use, as well as the similar vehicle trips to the project. This alternative would include the same design measures, as detailed in Table 1-3, to reduce energy use, water use, and vehicle trips. As with the project, this alternative would avoid the inefficient, wasteful and unnecessary consumption of energy, and impacts would be less than significant.

4.9.3 Conclusion

This alternative was included to disclose the potential impacts of providing a permanent fire station in Phase 5 and the associated Mountain Ridge Road improvements ~~as requested by the DSPFD~~to public road standards. This alternative would avoid the potential project Impact CR-4 to unknown subsurface resources at the Miller Station site, as this alternative would not include improvements to the Miller Station. This alternative would provide adequate fire services ~~also reduce significant impacts~~ associated with fire response time as ~~Station 11~~the fire station in Phase 5 would be able to serve the entire site within a 5 minute response time. Due to the additional grading required to construct Mountain Ridge Road, additional impacts to air quality (MRR-AQ-1), biological resources (MRR-BIO-1 and MRR-BIO-2), and cultural resources (MRR-CR-1) would occur under this alternative as compared to the project. Below is a summary of those additional impacts as well as associated mitigation and significance after mitigation:

- Impact MRR-AQ-1: The Mountain Ridge Road Fire Station Alternative would result in an additional construction impact related to NO_x emissions. As there is no feasible mitigation, this impact would remain significant and unavoidable.
- Impact MRR-BIO-1a: Construction of Mountain Ridge Road Option 1 would result in additional significant impacts to the following sensitive habitats: southern coast live oak riparian woodland (0.01 acre), coast live oak woodland (0.31 acre), and open water (0.11 acre). This impact would be mitigated to below a level of significance with M-MRR-BIO-1a that requires the preservation of habitat at a mitigation ratio adequate to offset the impact.
- Impact MRR-BIO-1b: Construction of Mountain Ridge Road Option 2 would result in additional significant impacts to the following sensitive habitats: southern coast live oak riparian woodland (0.01 acre), coast live oak woodland (0.28 acre), and open water (0.10 acre). This impact would be mitigated to below a level of significance with M-MRR-BIO-1b that requires the preservation of habitat at a mitigation ratio adequate to offset the impact.
- Impact MRR-BIO-2a: Mountain Ridge Road improvements included in the Mountain Ridge Road Fire Station Alternative Option 1 would result in the following additional jurisdictional impacts: 0.01-acre to habitat considered sensitive under the County RPO, and 0.024 acre under the jurisdiction of ACOE and CDFW/RWQCB. This impact would be mitigated to below a level of significance with M-MRR-BIO-2a that requires the preservation/creation of habitat at a mitigation ratio adequate to offset the impact.
- Impact MRR-BIO-2b: Mountain Ridge Road improvements included in the Mountain Ridge Road Fire Station Alternative Option 2 would result in the following additional jurisdictional impacts: 0.01 acre of County RPO wetlands,

and 0.022 acre under the jurisdiction of ACOE and CDFW/RWQCB. This impact would be mitigated to below a level of significance with M-MRR-BIO-2b that requires the preservation/creation of habitat at a mitigation ratio adequate to offset the impact.

- Impact MRR-CR-1: The additional Mountain Ridge Road grading included in the Mountain Ridge Road Fire Station Alternative would result in an additional potential impact to unknown subsurface cultural resources. This impact would be mitigated through project mitigation measure M-CR-2, as that measure requires an archeological monitoring program for all on and off-site improvement areas.

Impacts related to transportation/traffic, agricultural resources, hazards, geology and soils, greenhouse gases, hydrology and water quality, land use planning, public services, recreation, utilities and service systems, and growth inducement would be similar for both this alternative and the project. This alternative would meet all the objectives of the project and it would provide a new fire station ~~as requested by~~for DSPFD.

4.10 Matrix of Impacts

Tables 4-2, 4-3 and 4-4 provide a summary of the impacts associated with the alternatives as compared to the project. Table 4-5 provides a comparison of the alternatives relative to the project objectives.

4.11 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires identification of an alternative other than the No Project Alternative(s) as the environmentally superior alternative. As such, the General Plan Consistent Alternative would be considered the environmentally superior alternative due to its ability to reduce visual impacts, air quality, traffic, agricultural, biological, and cultural resources, hazards and noise related impacts.

TABLE 4-1
LILAC HILLS RANCH CEQA ALTERNATIVES

			Alternatives															
			1		2		3		4		5		6		7		8	
	Project[1]		No Project - No Development		No Project - Existing Legal Lot		GP Consistent		Reduced Footprint		Reduced Intensity		2.2C		Roadway Design[12]		Mountain Ridge Road Fire Station	
Land Use	Gross Ac.	Units/ Sq. Ft.	Gross Ac.	Units/ Sq. Ft.	Gross Ac.	Units/ Sq. Ft.	Gross Ac.	Units/ Sq. Ft.	Gross Ac.	Units/ Sq. Ft.	Gross Ac.	Units/ Sq. Ft.	Gross Ac.	Units/ Sq. Ft.	Gross Ac.	Units/ Sq. Ft.	Gross Ac.	Units/ Sq. Ft
Single-family Detached	156.9	903	608	16	608.8	49	351.4	110	142.1	783	275.5	881	177	792	156.9	903	156.9	903
Single-family Senior	76.9	468	0	0	0	0	0	0	71.1	468	0	0	75.9	468	76.9	468	74.9	468
Single-family Attached	7.9	164	0	0	0	0	0	0	0	0	0	0	4.3	105	7.9	164	7.9	164
Commercial/Mixed-use	17.3	211	0	0	0	0	0	0	6	0	5.6	0	15.3	0	17.3	211	17.3	211
Water Reclamation	2.4	0	0	0	0	0	0	0	2.4	0	2.4	0	2.4	0	2.4	0	2.4	0
RF/Trailhead	0.6	0	0	0	0	0	0	0	0	0	0.6	0	0.6	0	0.6	0	0.6	0
Detention Basin	7.9	0	0	0	0	0	0	0	5.4	0	5.5	0	5.5	0	7.9	0	7.9	0
Wet Weather Storage	8.1	0	0	0	0	0	0	0	5.5	0	0	0	0	0	8.1	0	8.1	0
School Site	12.0	0	0	0	0	0	0	0	9	0	0	0	12	0	12.0	0	12.0	0
Community Purpose Facility[23]	2.0	0	0	0	0	0	0	0	0	0	0	0	2	0	2.0	0	2.0	0
Fire Station	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2.0	0
Group ~~Residential/~~Care	6.5	0	0	0	0	0	0	0	0	0	0	0	6.5	0	6.5	0	6.5	0
Institutional	10.0	0	0	0	0	0	0	0	10.7	0	10.7	0	10.7	0	10.0	0	10.0	0
Park - HOA	10.1	0	0	0	0	0	0	0	10	0	3.0	0	11.8	0	10.1	0	10.1	0
Park - Dedicated to County	13.5	0	0	0	0	0	0	0	6	0	9.0	0	12	0	13.5	0	13.5	0
Biological Open Space	104.1	0	0	0	0	0	256.6	0	1~~80.36~~ ~~8.8~~	0	102.7	0	103.6	0	104.1	0	104.1	0
Non-circulating Road	45.70	0	0	0	0	0	0	0	45.7	0	41.5	0	43.1	0	45.70	0	45.70	0
Circulating Road	37.6	0	0	0	0	0	0	0	37.6	0	21.5	0	30	0	37.6	0	37.6	0
Common Areas/Agriculture	20.3	0	0	0	0	0	0	0	20.2	0	65.0	0	45	0	20.3	0	20.3	0
Manufactured Slopes	68.2	0	0	0	0	0	0	0	~~67.5~~56	0	65.0	0	50	0	68.2	0	68.2	0
TOTAL	**608.0**	**1,746**	**608.0**	**16**	**608.8**	**49**	**608.0**	**110**	**608.0**	**1,251**	**608.0**	**881**	**608.0**	**1,365**	**608.0**	**1,746**	**608.0**	**1,746**

Ac.= acreage
sq. ft. = square feet
HOA =homeowners association
[1]~~Land uses updated to reflect revised Table 1-1 not shown in strike-out underline format~~
[12]All Roadway design alternatives would have the same land uses, which would be the same as the project.
[23]This land use includes a recreation center and an optional fire station under the project and all the alternatives except the Mountain Ridge Road Fire Station Alternative. The Mountain Ridge Road Fire Station Alternative Community Purpose Facility would be a recreation center without the option of a fire station.

TABLE 4-1A
ALTERNATIVE TRIP GENERATION COMPARISON

CEQA Alternative	No Project - No Development	No Project - Existing Legal Lots	GPU Consistency	Reduced Footprint	Reduced Intensity	Proposed Project
Total Trip Generation	192	588	1,320	12,430	11,884	19,406
Change in Total Trip Generation vs. Proposed Project	-100%	-97%	-93%	-37%	-39%	0%

TABLE 4-2
COMPARISON SUMMARY OF IMPACTS - ALTERNATIVES AND THE PROPOSED PROJECT

Issue	No Project/ No Development	No Project/ Legal Lot	GPU Consistency	Reduced Footprint	Reduced Intensity	2.2C (Hybrid)	Mountain Ridge Road Fire Station
Visual	Less	Less	Less	Less	Greater	Greater	Similar
Air Quality	Less	Less	Less	Less	Less	Less	Greater
Traffic	Less	Less	Less	Less	Less	Less	Similar
Agricultural Resources	Less	Less	Less	Less	Similar	Similar	Similar
Biology	Less	Greater	Less	Less	Similar	Similar	Greater
Cultural Resources	Less	Less	Less	Less	Similar	Similar	Similar
Hazards	Less	Less	Less	Similar	Similar	Similar	Similar
Noise	Less	Less	Less	Less	Less	Less	Similar

TABLE 4-3
COMPARISON SUMMARY OF IMPACTS – ROAD DESIGN ALTERNATIVE AND THE PROPOSED PROJECT

Issue*	1. West Lilac Road – Old Highway 395 to I-15 Bridge	2. West Lilac Road Over I-15 Bridge	3. West Lilac Road – I-15 Bridge to Project Boundary	4. West Lilac Road – Western Roundabout to Northern Project Boundary	5. West Lilac Road Along Northern Project Boundary	6. West Lilac Road - East of Easterly Roundabout to Project Boundary	7. Mountain Ridge Road - Reduced Design Speed	8. Mountain Ridge Road at Circle R Road – Taper	9. Street "C"	10. Street "E"
Visual	Similar	Greater (RD-V-1: scenic vista- double bridge option)	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar
Air Quality	Similar	Greater (RD-AQ-1: additional air emissions; double bridge option)	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar
Traffic	Similar	Greater (RD-TRF-1: bridge closure during construction – single bridge option)	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar
Agricultural Resources	Similar	Similar	Similar	Similar	Greater (RD-AG-1: additional conversion of agricultural resources)	Similar	Similar	Similar	Similar	Similar
Biology	Greater (RD-BIO-1a: additional sensitive habitat)	Potentially Greater	Greater (RD-BIO-1b: additional sensitive habitat)	Similar	Greater (RD-BIO-1c: additional sensitive habitat)	Similar	Greater (RD-BIO-1d: additional sensitive habitat and BIO-2a: additional jurisdictional habitat)	Greater (RD-BIO-1e: additional sensitive habitat and BIO-2b: additional jurisdictional habitat)	Greater (RD-BIO-1f: additional sensitive habitat and BIO-2c: additional jurisdictional habitat)	Similar
Cultural Resources	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar
Hazards	Similar	Greater (RD-HAZ-1: emergency response during bridge closure – single bridge option)	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar
Noise	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar	Similar

*The Road Design Alternatives would have similar impacts as the project for all other issues areas not specifically identified in this table.

TABLE 4-4
COMPARISON SUMMARY OF ALTERNATIVES RELATIVE TO PROJECT OBJECTIVES

Objectives	Alternative							
	No Project/ No Development	No Project/ Existing Legal Lot	General Plan Consistent	Reduced Footprint	Reduced Intensity	2.2C	Road Design	Mountain Ridge Road Fire Station
1. Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County's Community Development Model for a walkable pedestrian-oriented mixed-use community.	No	No	No	Yes (some commercial/ village square within proximity to residential)	No (no mixed-use or attached housing)	Yes (some commercial/ village square within proximity to residential)	Yes	Yes
2. Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes, and that provides public services and facilities that are accessible to residents of both the community and the surrounding area.	No	No	No	Yes (provides senior housing, institutional use and parks)	No (only SF detached)	Yes (provides senior housing and group care)	Yes	Yes
3. Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to the town and neighborhood centers.	No	No	Yes (parkland dedication required; trails)	Yes (provides parks and trails)	Yes (parkland dedicated; trails)	Yes	Yes	Yes
4. Integrate major physical features into the project design, including major drainages, and woodlands and using state of the art hydrological technology for reducing urban runoff.	No	No	Yes	Yes	Yes	Yes	Yes	Yes
5. Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.	No	No	Yes (would preserve sensitive habitat within a conservation easement)	Yes	Yes	Yes	Yes	Yes

TABLE 4-4
COMPARISON SUMMARY OF ALTERNATIVES RELATIVE TO PROJECT OBJECTIVES
(continued)

Objectives	Alternative							
	No Project/ No Development	No Project/ Existing Legal Lot	General Plan Consistent	Reduced Footprint	Reduced Intensity	2.2C	Road Design	Mountain Ridge Road Fire Station
6. Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.	No	No	No	No (No mixed-use or attached)	No	Yes	Yes	Yes
8. Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.	No	No	No	Yes	No (no school commercial may not be economically viable with units)	Yes (parks and trails; school and institutional provided)	Yes	Yes
Total Number of Objectives Met	**0 / 7**	**0 / 7**	**3 / 7**	**6 / 7; 4**	**3 / 7**	**7 / 7**	**7 / 7**	**7 / 7**

TABLE 4-5
ADDITIONAL ROADWAY DESIGN ALTERNATIVE
HABITAT AND VEGETATION COMMUNITY IMPACTS

Habitat/Vegetation Community	Roadway Design Alternatives Impact (acres)											
	Alt 1	Alt 2*	Alt 3	Alt 4	Alt 5-A	Alt 5-B	Alt 5-C	Alt 6	Alt 7	Alt 8	Alt 9*	Alt 10
Coast live oak woodland	0.03	0.5	0	0	0	0	0	0	0.11	0.01	-	-
Coastal sage scrub	0.6	2.5	0.02	0	0	0.53	0.64	0	0	0	-	-
Disturbed coastal sage scrub	0.02	-	0	0	0	0	0.05	0	0	0	-	-
Eucalyptus woodland	0	0.5	0.02	0	0.37	0.37	0.37	0	0	0	-	-
Southern coastal live oak riparian forest	0	-	0	0	0	0	0	0	0.03	0	0.05	-
Orchard	0	1.0	0.12	0.1	0.87	0.96	1.75	0.1	2.14	0.01	0.1	-
Disturbed habitat	0.11	0.5	0	0	0.09	3.79	2.53	0	0.04	0	-	-
Developed	0.01	-	0	0.01	1.49	2.74	1.96	0.17	0.42	0.01	-	-
TOTAL	**0.77**		**0.16**	**0.11**	**2.82**	**8.39**	**7.3**	**0.27**	**2.74**	**0.03**		

*Detailed design specifications for improvements are not available at this level of review; therefore, the impact acreages are estimated and would be subject to verification.~~The impact acreages of this alternative cannot be determined;~~. ~~It is expected that Alt 2 and Alt 9 would result in additional sensitive habitat impacts.~~

TABLE 4-6
ADDITIONAL ROADWAY DESIGN ALTERNATIVE
HABITAT AND VEGETATION COMMUNITY MITIGATION

Habitat/Vegetation Community	Mitigation Ratio	Roadway Design Alternatives Impact											
		1	2*	3	4	5-A	5-B	5-C	6	7	8	9*	10
Coast live oak woodland	3:1	0.09	1.5~~-~~	-	-	-	-	-	-	0.33	0.03	-	-
Coastal sage scrub	2:1	1.2	5~~-~~	0.04	-	-	1.06	1.28	-	-	-	-	-
Disturbed coastal sage scrub	2:1	0.04	-	-	-	-	-	0.10	-	-	-	-	-
Eucalyptus woodland	None	-	-	-	-	-	-	-	-	-	-	-	-
Southern coastal live oak riparian forest	3:1	-	-	-	-	-	-	-	-	0.09	-	0.05	-
Orchard	None	-	-	-	-	-	-	-	-	-	-	0.1	-
Disturbed habitat	None	-	-	-	-	-	-	-	-	-	-	-	-
Developed	None	-	-	-	-	-	-	-	-	-	-	-	-

*Mitigation estimates are provided;~~,~~ however, engineered designs would be needed to verify actual impacts. ~~As the impact acreages of this alternative cannot be determined, the mitigation also cannot be determined~~.

TABLE 4-7
ADDITIONAL ROADWAY DESIGN ALTERNATIVE
JURISDICTIONAL WATERS IMPACTS

Jurisdictional Waters	Roadway Design Alternatives Impacts (acres)									
	1	2*	3	4	5	6	7	8	9*	10
ACOE Total Jurisdiction (Wetlands)	0	0	0	0	0	0	0	0.004	0	0
CDFW/RWQCB Wetlands (riparian habitat)	0	0	0	0	0	0	0	0.004	0	0
County of San Diego RPO Wetlands	0	0	0	0	0	0	0.29	0	0.05	0

*Detailed design specifications for improvements are not available at this level of review; therefore, ~~T~~the impact acreages are estimated and would be subject to verification ~~this alternative cannot be determined~~when detailed design specifications are available.

TABLE 4-8
ADDITIONAL ROADWAY DESIGN ALTERNATIVE
JURISDICTIONAL WATERS MITIGATION

Jurisdictional Waters	Mitigation Ratio	Roadway Design Alternatives Mitigation (acres)									
		1	2*	3	4	5	6	7	8	9*	10
ACOE Total Jurisdiction (Wetlands)	3:1	0	-0	0	0	0	0	0	0.012	-0	0
CDFW/RWQCB Wetlands (riparian habitat)	3:1	0	-0	0	0	0	0	0	0.012	-0	0
County of San Diego RPO Wetlands	3:1	0	-0	0	0	0	0	0.87		-0.05	0

*Detailed design specifications for improvements are not available at this level of review; therefore, the impact acreages are estimated and would be subject to verification when detailed design specifications are available. ~~As the impact acreages of this alternative cannot be determined, the mitigation also cannot be determined.~~

Map Source: Landmark Engineering, 2013

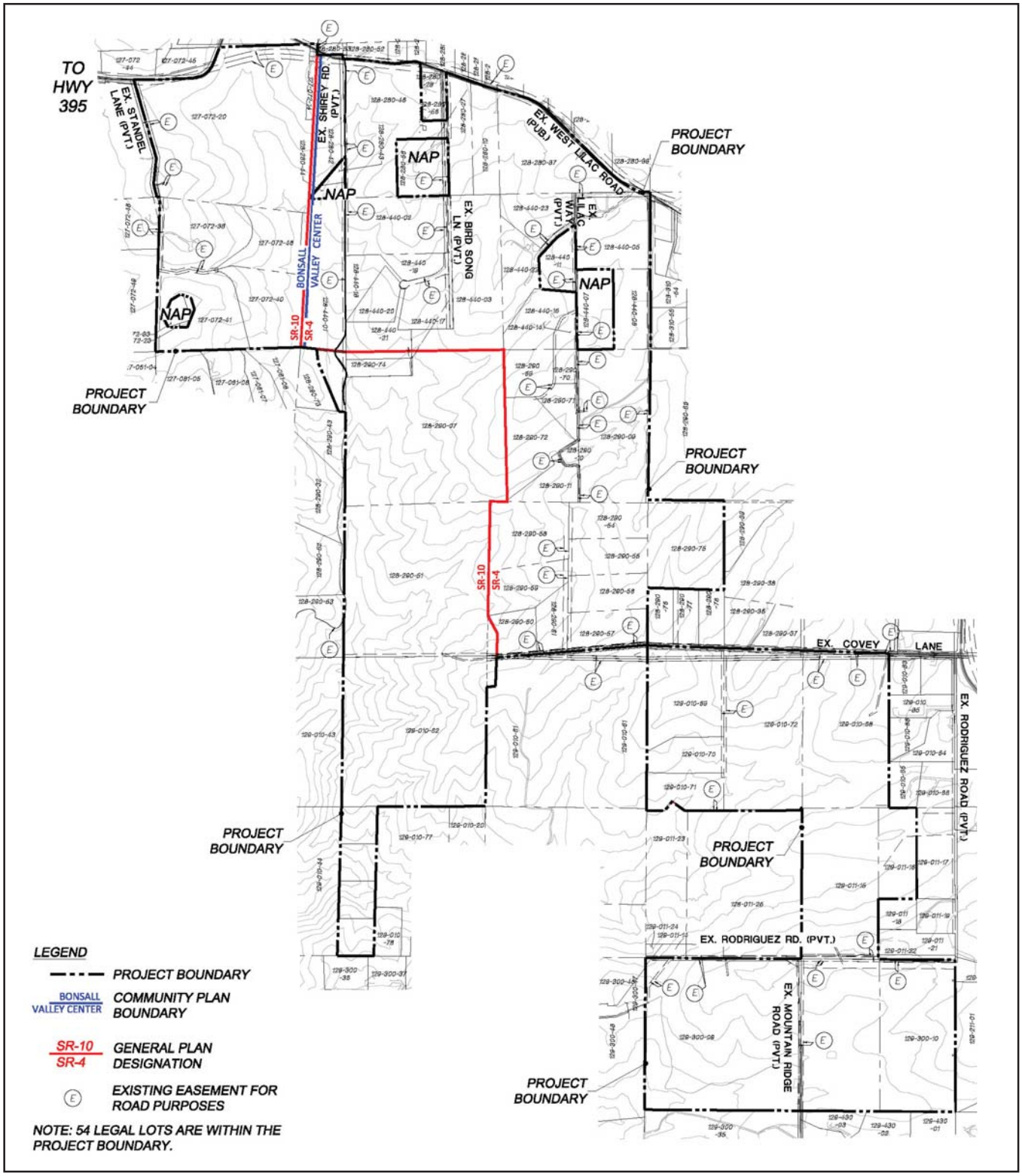

FIGURE 4-1
Legal Lot Alternative

RECON

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Map Source: Landmark Engineering, 2013

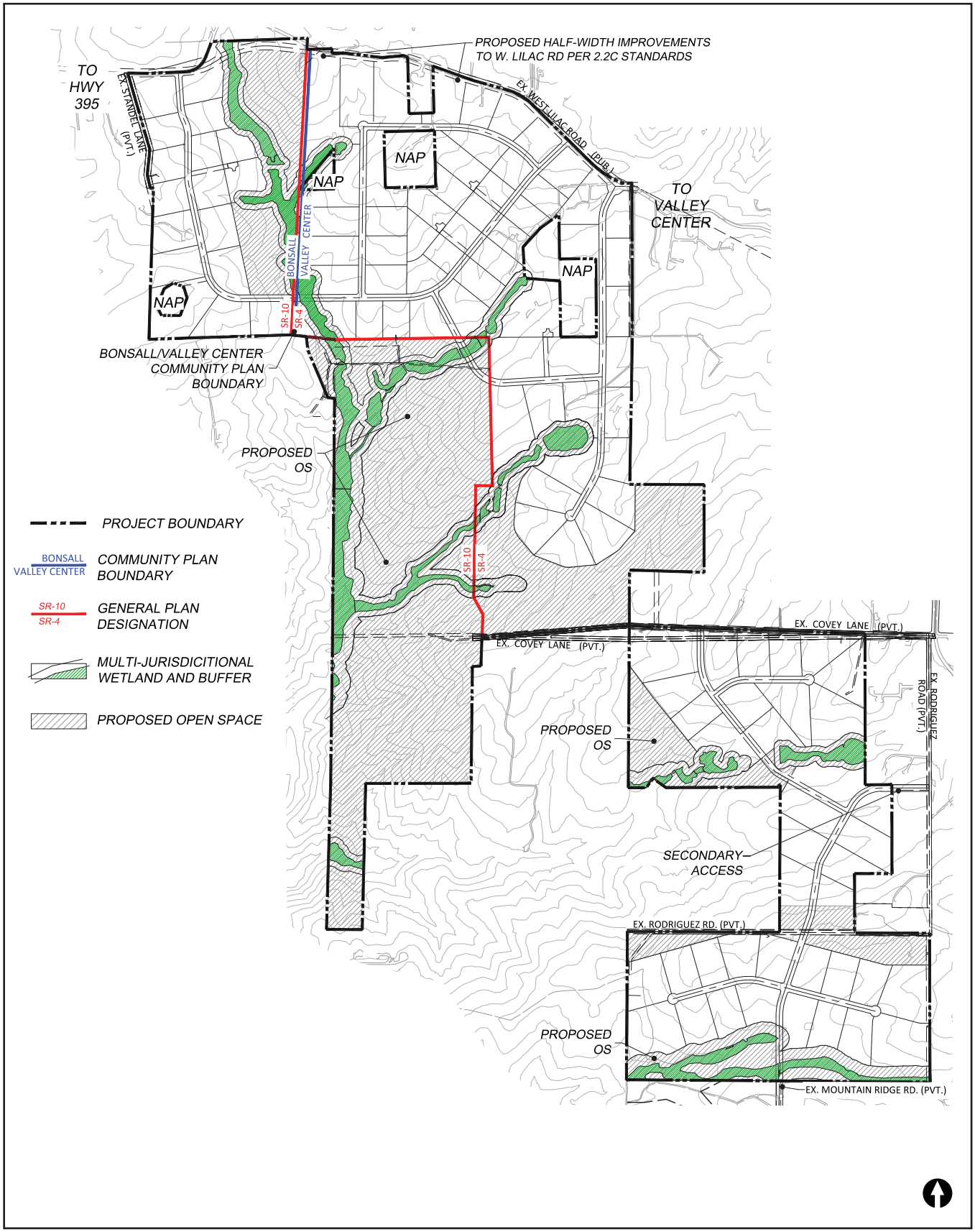

FIGURE 4-2
General Plan Consistent Alternative

RECON

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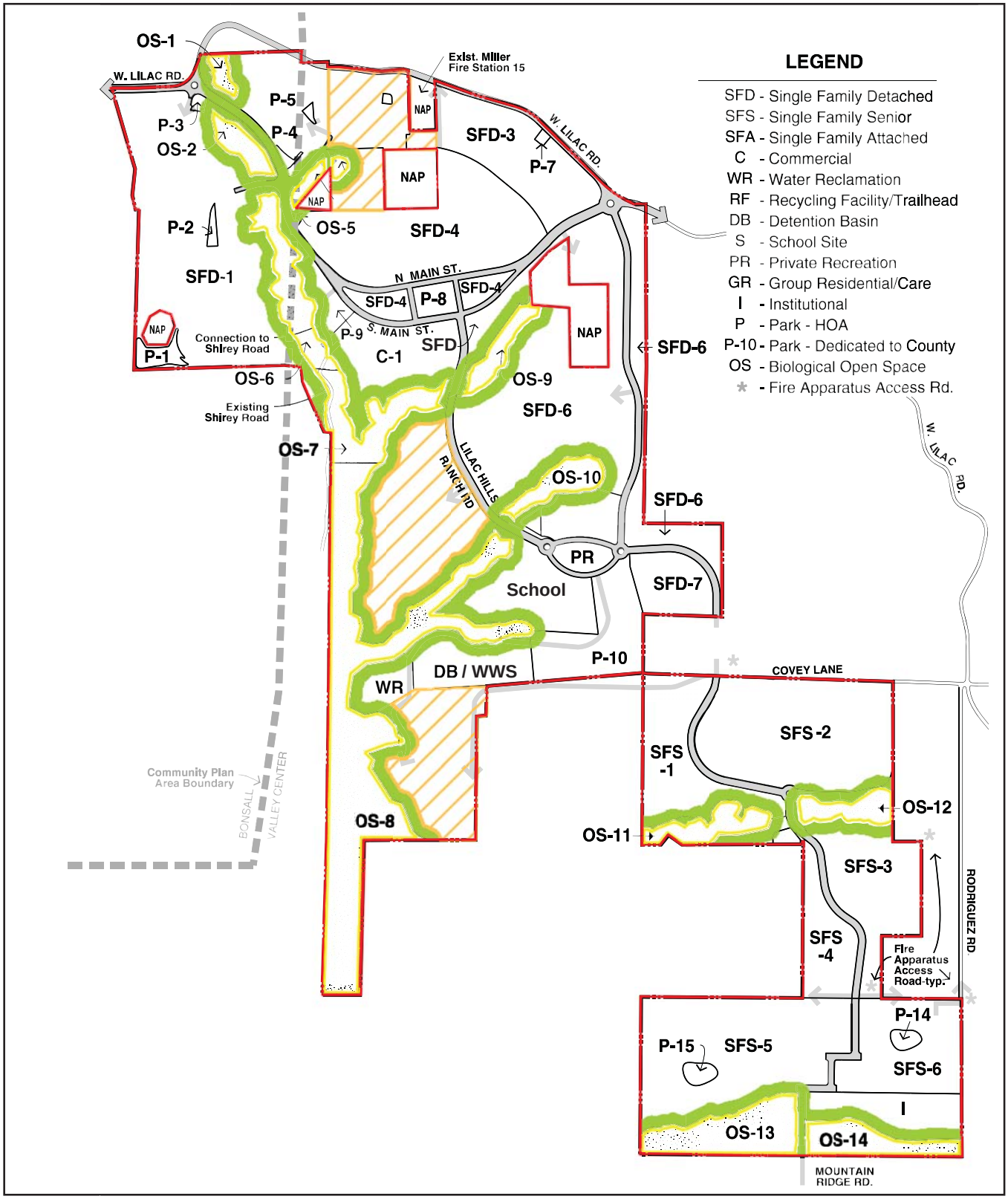

Project Boundary

Boundary of On-site Wetland

100-foot Wetland Buffer

Upland Habitat

FIGURE 4-3

Reduced Footprint Alternative

RECON

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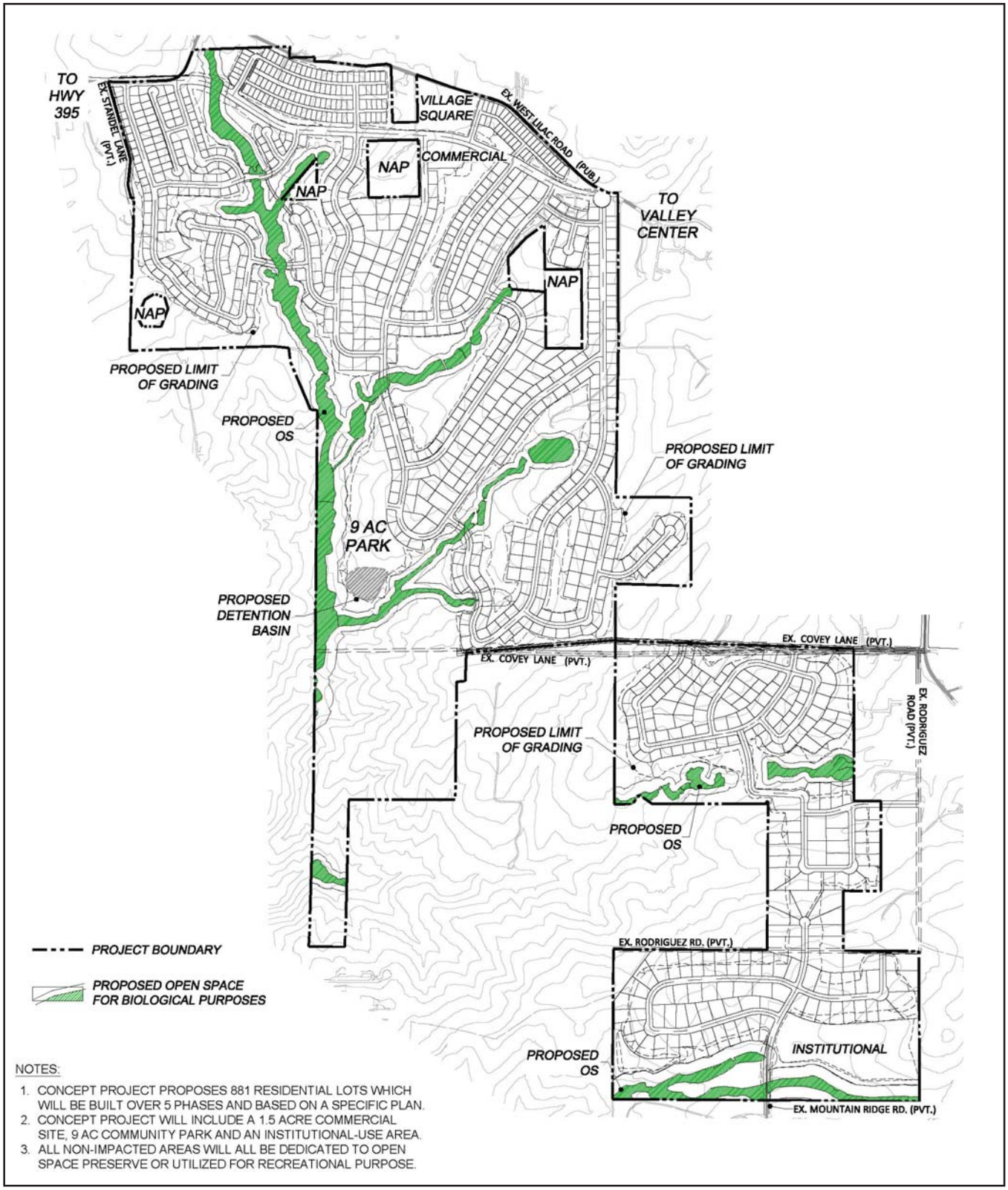
Map Source: Landmark Engineering, 2013



NOTES:

1. CONCEPT PROJECT PROPOSES 881 RESIDENTIAL LOTS WHICH WILL BE BUILT OVER 5 PHASES AND BASED ON A SPECIFIC PLAN.
2. CONCEPT PROJECT WILL INCLUDE A 1.5 ACRE COMMERCIAL SITE, 9 AC COMMUNITY PARK AND AN INSTITUTIONAL-USE AREA.
3. ALL NON-IMPACTED AREAS WILL ALL BE DEDICATED TO OPEN SPACE PRESERVE OR UTILIZED FOR RECREATIONAL PURPOSE.

FIGURE 4-4
Reduced Intensity Alternative

RECON

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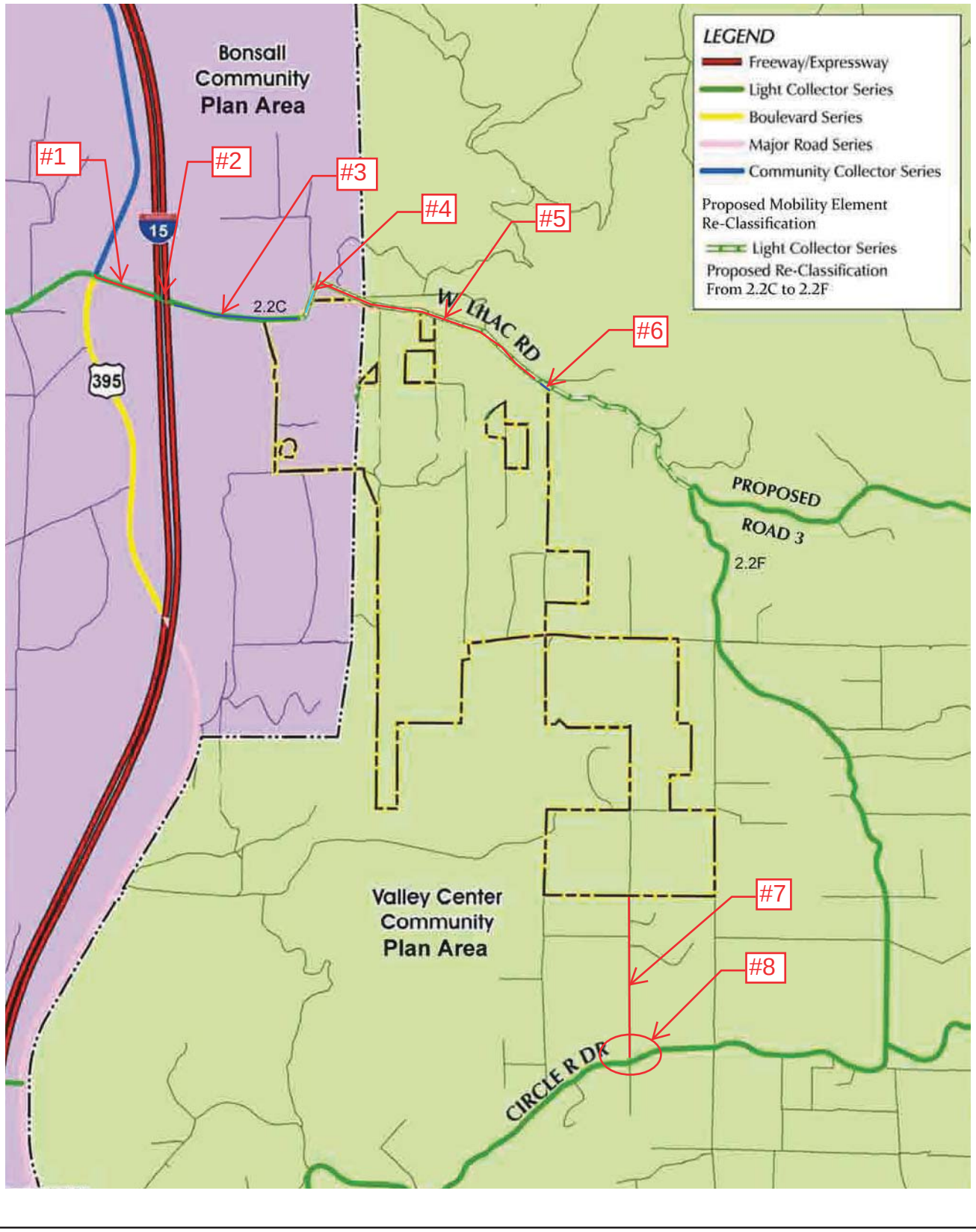
Map Source: Landmark Consultants



0 Feet 1,500

FIGURE 4-5a
Roadway Modification Request Locations 1-8

RECON

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Map Source: Landmark Consultants

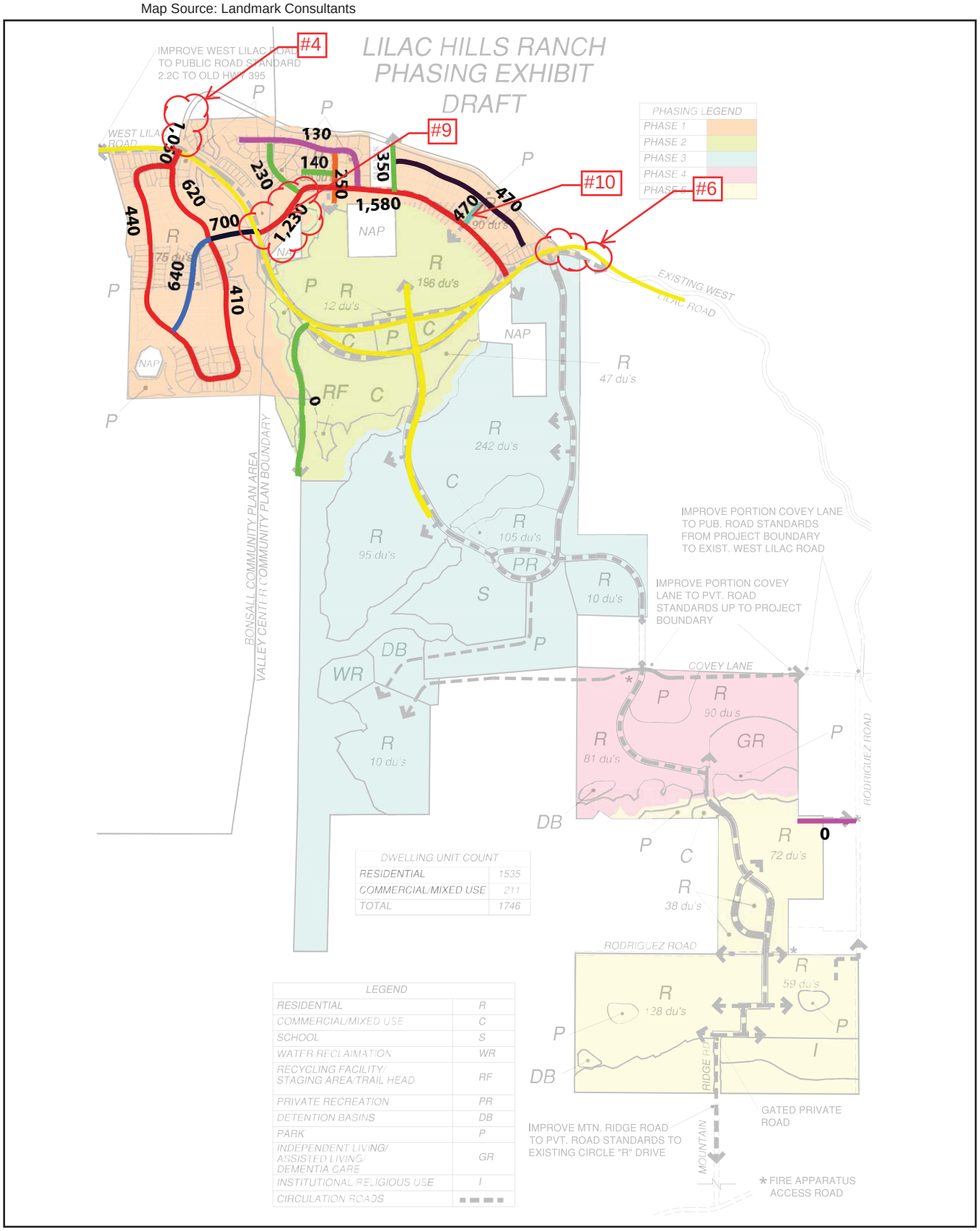

FIGURE 4-5b
Roadway Modification Request Locations 9 and 10

RECON

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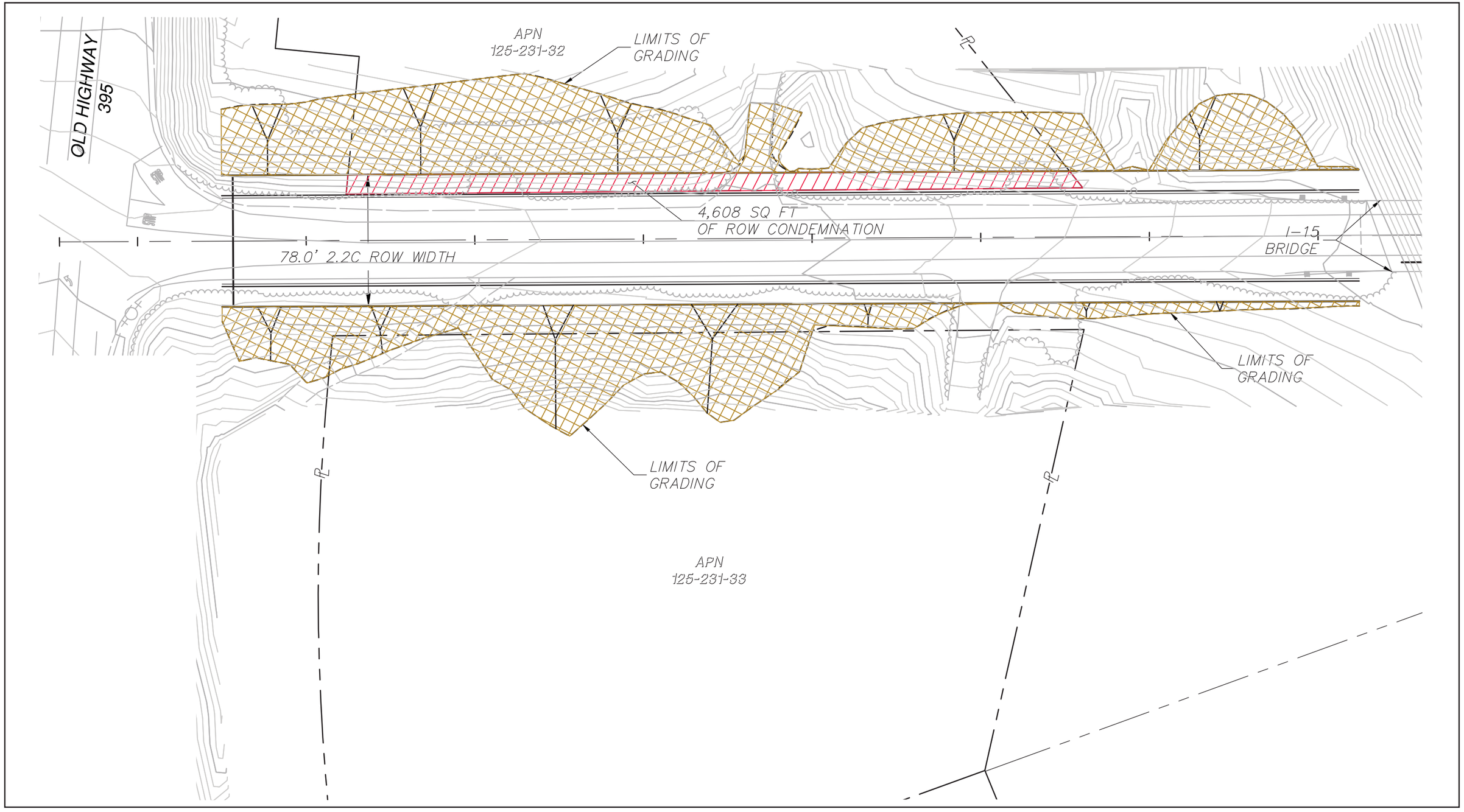
Map Source: Landmark Consultants



ROW Condemnation

Limits of Grading

Not to Scale

FIGURE 4-6

Road Design Alternative 1

West Lilac Road – Old Highway 395 to I-15 Bridge

RECON

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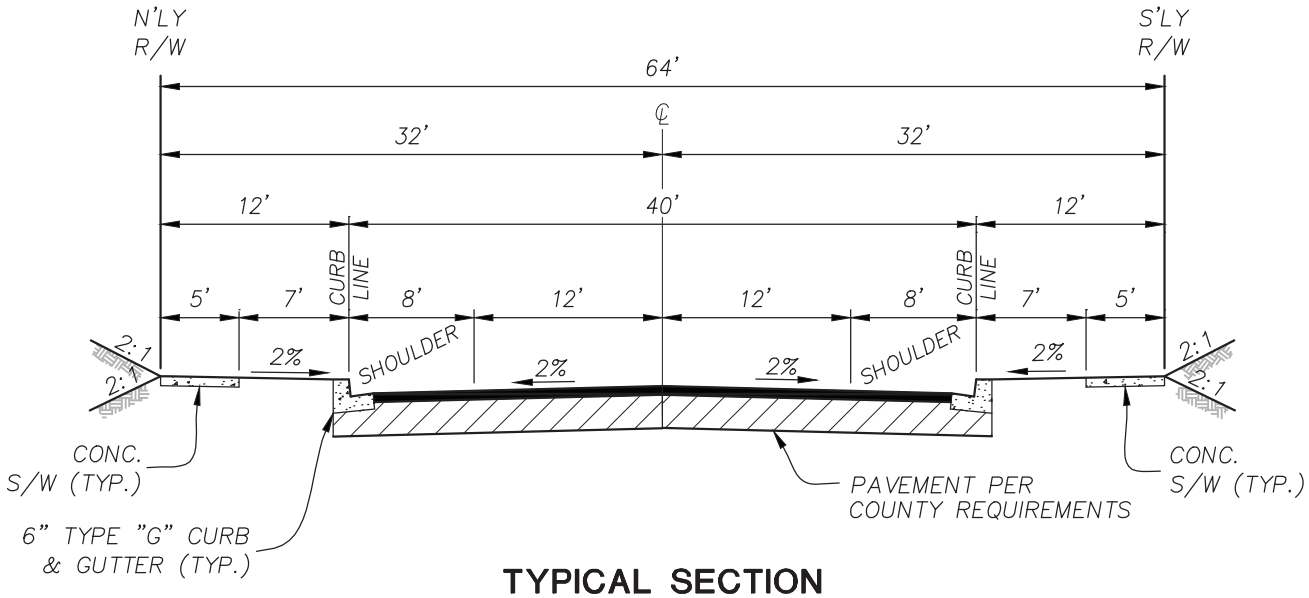
Map Source: Landmark Consultants



TYPICAL SECTION
2.2C LIGHT COLLECTOR
NO SCALE
(PUBLIC)

Not to Scale

FIGURE 4-7
Road Design Alternative 2
West Lilac Road over the I-15 Bridge

RECON

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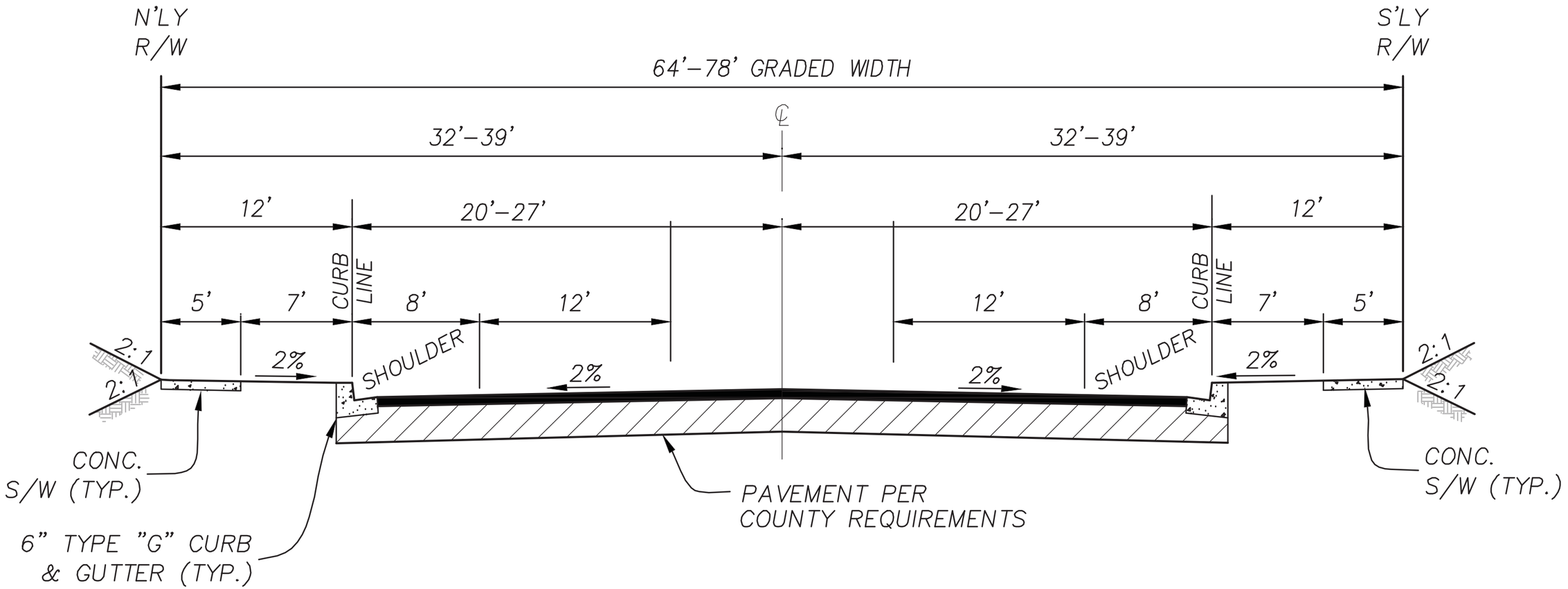
Map Source: Landmark Consultants



TYPICAL SECTION
2.2C LIGHT COLLECTOR W/ INTERMITTENT TURN LANE

NO SCALE
(PUBLIC)

ROW Condemnation

Limits of Grading

Not to Scale

FIGURE 4-8

Road Design Alternative 3

West Lilac Road – I-15 Bridge to Project Boundary

RECON

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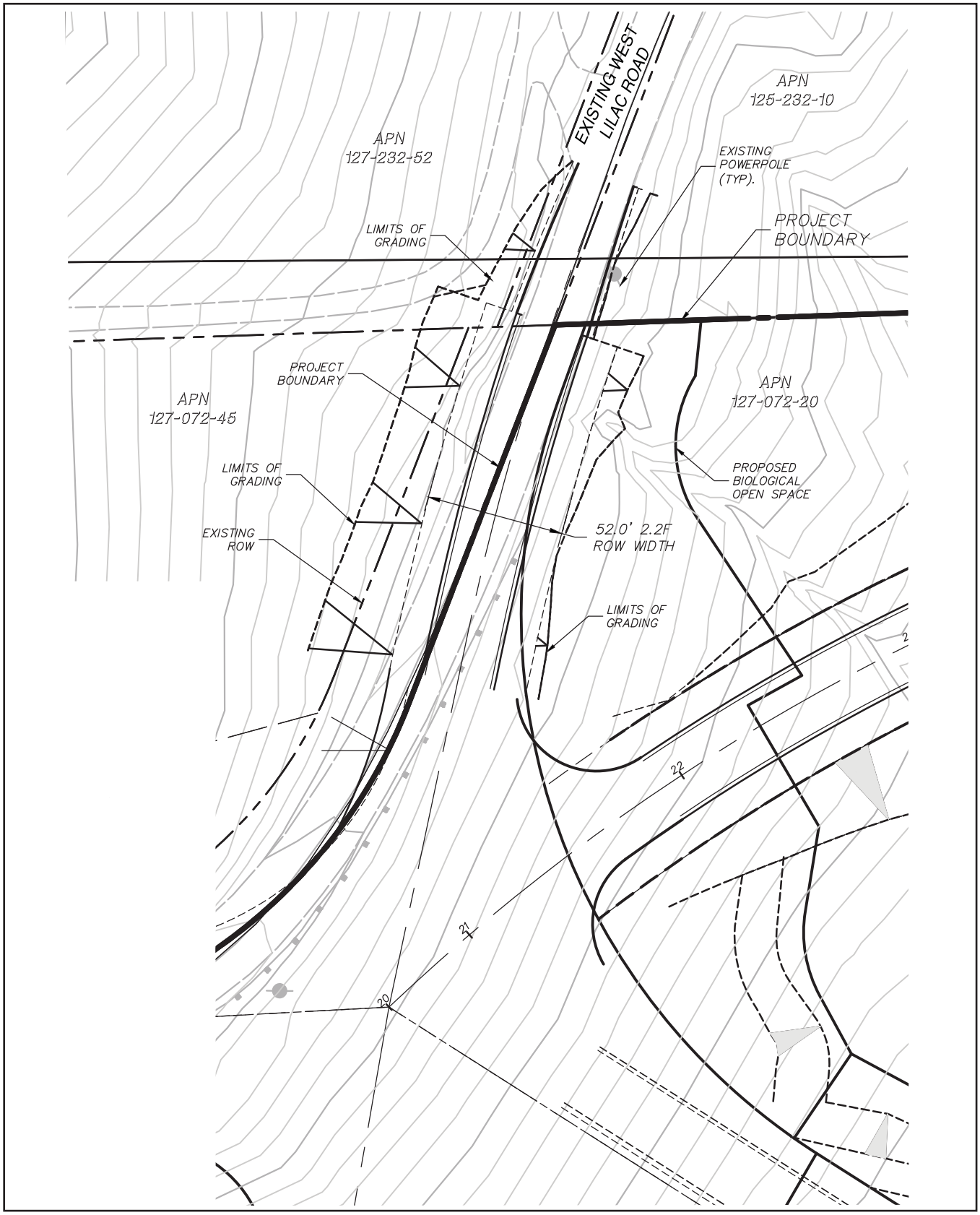
Map Source: Landmark Consultants



Not to Scale

FIGURE 4-9

Road Design Alternative 4

West Lilac Road – Western Roundabout to Northern Project Boundary

RECON

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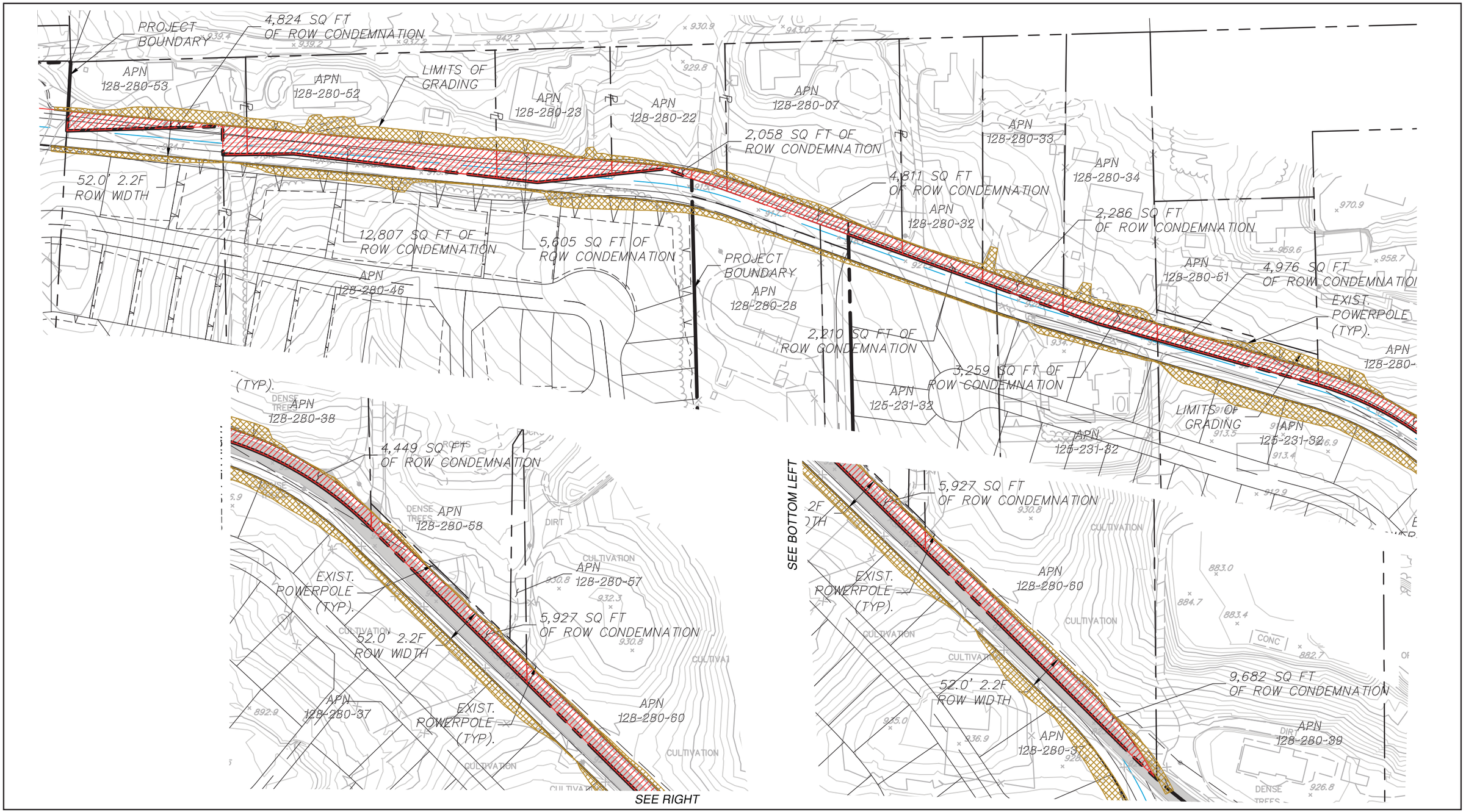
Map Source: Landmark Consultants



ROW Condemnation

Limits of Grading

Not to Scale

FIGURE 4-10a

Road Design Alternative 5

West Lilac Road Along Northern Project Boundary – Option A

RECON

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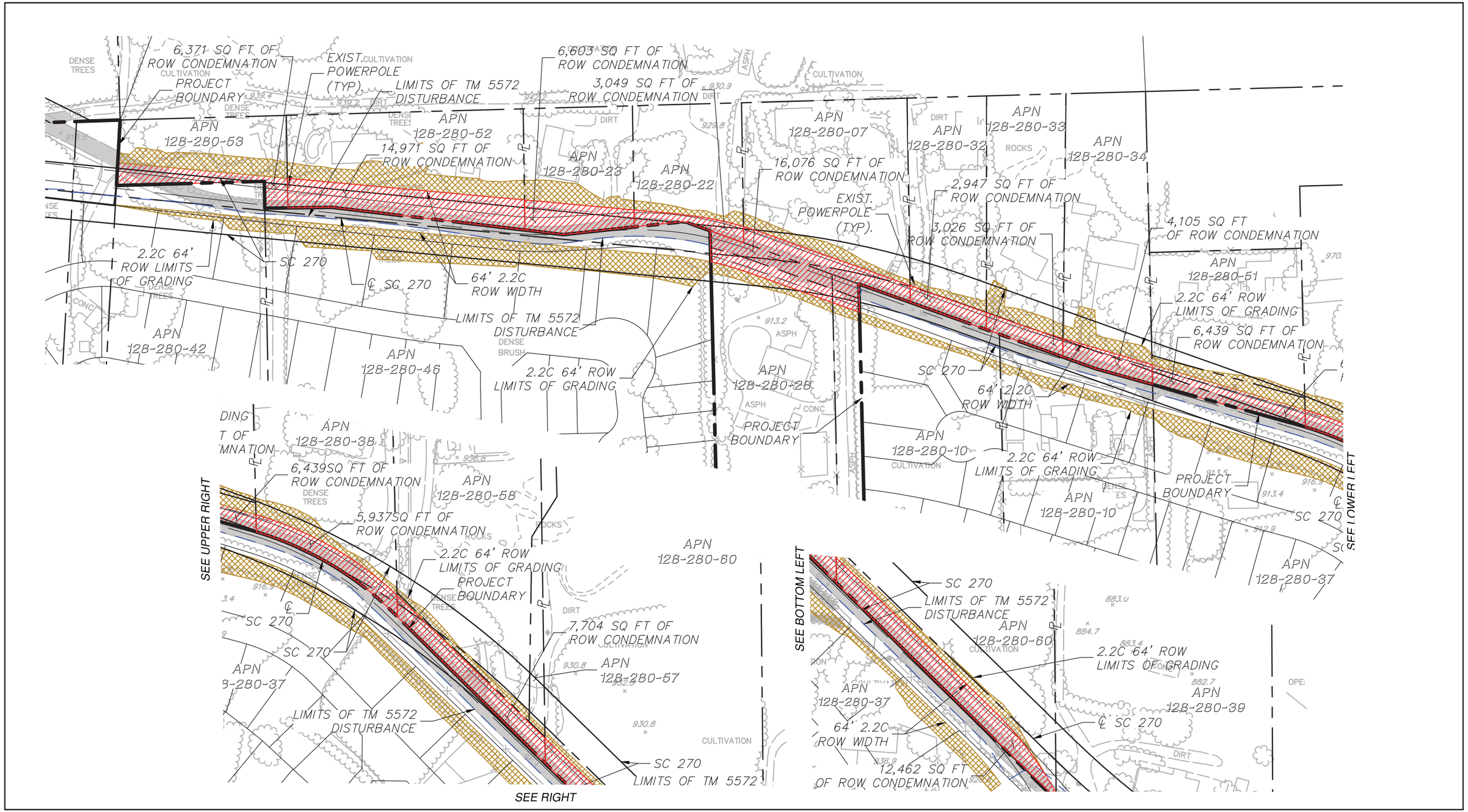
Map Source: Landmark Consultants



ROW Condemnation

Limits of Grading

Not to Scale

FIGURE 4-10b

Road Design Alternative 5

West Lilac Road Along Northern Project Boundary – Option B

RECON

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