

The Valiano Vineyards Alternative

**a balanced solution to provide affordable housing,
ensure public safety
and preserve a historic rural community**



PREPARED BY:

MEMBERS OF THE UNITED RURAL COMMUNITIES OF

EDEN VALLEY, HARMONY GROVE AND ELFIN FOREST

this page intentionally left blank



Table of Contents	i
Introduction	ii
Executive Summary	1
Description and Setting	2
Site Map	3
Rationale for Consideration of the Alternative	4
Compliance with Project Objectives	5
Additional Project Objective	10
Feasibility Analysis	11
Residential Housing	11
Vineyard and Winery	16
Feasibility Comparison	18
Comparison of the Effects of the Valiano Vineyards Alternative to the Proposed Project	21
Aesthetics	21
Air Quality	26
Agricultural Resources	30
Biological Resources	31
Cultural Resources	36
Noise	37
Paleontological Resources	40
Transportation/Traffic	41
Hazards and Hazardous Materials	43
Geology and Soils	46
Community Support and Endorsements	48



Introduction

The Valiano Vineyards alternative is a balanced solution that would provide over 80% of the same affordable housing as the Proposed Project, with a greater range of housing types, while ensuring public safety in the fire-prone area by limiting the scope of the development to prudent densities, and preserving the essential nature of our historic rural community. The analysis shows that the alternative (1) meets the project objectives, in most cases better than the Proposed Project; (2) is feasible; and (3) would substantially lessen environmental effects compared to those of the Proposed Project.

The alternative would feasibly meet or exceed every planning objective of the Proposed Project while substantially lessening the significant environmental effects better than any other alternative considered. The alternative would have the same number of affordable homes as does the Proposed Project, as modified under the Biologically Enhanced alternative, contributing the same type of affordable homes needed in the San Diego area, while limiting total density to prudent General Plan levels in the wildfire-prone Plan area. Most significant impacts would be eliminated or reduced, and the lower total density would relieve daily traffic congestion enabling much safer egress in the event of an evacuation. The alternative would also preserve steep slope topography while returning adequate yield on investment and long term capital appreciation through value-added, brand-able agriculture. The expanded agricultural use of the Valiano Vineyards alternative compared to that seen in the Proposed Project would contribute a greater greenhouse gas sink to offset other project emissions and provide an irrigated buffer to shield the development and surrounding community from wildfire.



Executive Summary

The Valiano Vineyards alternative strikes a balance between providing affordable housing in San Diego County while ensuring public safety and preserving the essential nature of a historic rural community.

Description and Setting

Housing in the Valiano Vineyards alternative would be located on the relatively flat central section of the Project Site using parts of three alternatives considered in the DEIR with over 80% of density identical to the more affordable units from the Proposed Project and a greater range of housing types than the Proposed Project. Dwelling unit counts would be equivalent to General Plan levels. A vineyard and winery would occupy the eastern-facing slopes, or the current orchard use could be continued. Recreation amenities would be provided, and horse and market animal keeping would be allowed.

Rationale for Consideration

The Valiano Vineyards alternative is substantially superior to the Proposed Project, or any other alternative in the DEIR, in its balance of project objective attainment, feasibility and environmental effects. The alternative is composed of other feasible alternatives considered in the DEIR yet is substantially dissimilar as a whole from any other alternative. State CEQA Guidelines section 15126.6 (a) requires that the lead agency evaluate alternatives "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 alternative meets these standards and therefore should be fully evaluated in the EIR. Moreover, under the rule of reason, the alternative must be considered to permit a reasoned choice; and the failure to consider it would preclude a reasoned choice.

Compliance with Project Objectives

The Valiano Vineyards alternative meets every project objective, in most cases better than does the Proposed Project, while limiting density to safe General Plan levels in the wildfire-prone Plan area. In addition, the alternative would provide a public facilities benefit, which the Proposed Project does not do, with a community commons at the proposed winery.

Feasibility

The Valiano Vineyards alternative proposes the same density as the General Plan Density alternative, which is feasible per the DEIR, and the Valiano Vineyards alternative is composed of portions of alternatives chosen for analysis in the DEIR in part for their feasibility and thus would be similarly feasible. In addition, the alternative would be more feasible than the Proposed Project in many ways because of reduced grading, infrastructure and entitlement expenses, as well as broad community support.

Impact Comparison

The environmental effects of the Valiano Vineyards alternative would be substantially lessened, and the alternative is environmentally superior to the Proposed Project. Every significant unmitigatable impact will be lessened, with 50% to 75% reduced substantially enough to be down-rated to significant mitigatable or less than significant. Significant mitigatable and less than significant impacts would also be substantially lessened.

Community Support and Endorsements

The Valiano Vineyards alternative enjoys broad support from members of the surrounding community and has been formally endorsed by local community organizations.



Valiano Vineyards

Description and Setting

The Valiano Vineyards alternative would drastically reduce the extent of areas to be graded within the Project site by replacing housing on the eastern-facing steep slopes with a vineyard, reducing the unit counts to General Plan compliant levels and allowing a greater variety of lot sizes and housing types than does the Proposed Project. The densest housing would be located on the relatively flat, central section in Neighborhoods 1 and 3, using the Biologically Enhanced Alternative layout. General Plan and Harmony Grove Community Plan compliant housing would be located in Neighborhood 5; and multi-acre rural homes would occupy the sloped sections of the Project site in Neighborhoods 2 and 4. Grading could be further reduced by employing stem wall construction for the multi-acre rural homes. Larger areas of open space than the Proposed Project would provide for wildlife movement throughout the Valiano Vineyards development similar to that provided by the Biologically Enhanced alternative. Unlike the Biologically Enhanced alternative, Valiano Vineyards would provide community recreation facilities and amenities for the equestrian community scoped to serve the unit count proportionately reduced from that of the Proposed Project, as well as allow horse and market animal keeping in the development. The agricultural easement portion of the northern parcel would be expanded to include the steep slopes in the western half of Neighborhoods 2 and 4. A vineyard would occupy the easement and a winery could be envisioned on the property near the Mt. Whitney Road entrance, or the current orchard use could be continued. The overall development footprint would be reduced from approximately 165 acres to about 95 acres. The Site Map on the following page illustrates the configuration.

This alternative would also reduce and centralize the WTWRF, associated pump stations and sewage lines that would only be needed to service 96 dwelling units in Neighborhoods 1 and 3. Neighborhood 5 homes would instead use alternative septic systems and Neighborhoods 2 and 4 homes would use traditional septic systems. Potable water lines and on-site roads would be significantly reduced because less capacity will be required to serve the lower density in Neighborhoods 2, 4 and 5, and to provide access for these homes to the recreational uses that would be constructed on site under the Valiano Vineyards alternative.



Rationale for Consideration of the Alternative

The Valiano Vineyards alternative should be added to and considered in the Proposed Project EIR as a matter of California law. State CEQA Guidelines section 15126.6 (a) requires that the lead agency evaluate alternatives "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 Valiano Vineyards meets these standards and therefore should be fully evaluated in the EIR. Additionally, State CEQA Guidelines section 15126.6 (c) prescribes "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects (emphasis added)." Section (c) further specifies "Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."

The following description and analysis, prepared by members of the surrounding community, will show that the Valiano Vineyards alternative meets and exceeds the requirements for inclusion in the range of alternatives considered in the EIR as per CEQA. Moreover, the alternative does not meet any of the factors that may be used to eliminate an alternative defined in CEQA Guideline 15126.6(c).

Additionally, the alternative must be considered in the Proposed Project EIR in compliance with CEQA Guideline 15126.6(f) Rule of Reason that "requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The Valiano Vineyards alternative, which is composed of other feasible alternatives considered in the EIR yet is substantially dissimilar as a whole from any other alternative in its balance of relative impacts and attainment of objectives, would provide a significantly better balance of lessened impacts and fulfillment of project objectives than any other alternative, including the Proposed Project. Hence, inclusion of the alternative is necessary to permit a reasoned choice per Guideline (f) because exclusion of the alternative would lead to failure of the lead agency to provide decision makers with the range of alternatives necessary to make a reasoned choice that "shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects" as per 15126.6(c).

Because the CEQA guidelines clearly prescribe that alternatives to the proposed project "*shall include*" those that meet the requirements for consideration, which the Valiano Vineyards alternative does better than any other alternative considered, and the Valiano Vineyards alternative does not meet the specifications for exclusion from the EIR, and because the alternative should be considered per the rule of reason, the Valiano Vineyards alternative should be added to and considered in the Proposed Project EIR under California law.



Compliance with Project Objectives

The planning objectives of the Valiano Specific Plan are listed below with a description of how the Valiano Vineyards alternative meets every project objective, in most cases better than does the Proposed Project.

- **Develop a community which complements and responds to the unique topography and character of the Plan area and surrounding area**

Valiano Vineyards meets this objective better than the Proposed Project

The Valiano Vineyards alternative would be more complementary and responsive to the unique topography and character of the Plan area and surrounding area than the Proposed Project in several respects, meeting the project objective better than the Proposed Project. The topography of the Plan area is characterized by a north/south valley floor abutting a range of rugged hills to the west and north. The surrounding Eden Valley and Harmony Grove area is a small rural valley and a historically traditional vineyard region, as were many parts of San Diego County at one time. As former San Diego Planning Commissioner Peder Norby “said San Diego County – which before World War II was the highest grape producing county in the state – is experiencing a renaissance in wine making...” as reported March 22, 2014 in a San Diego Union Tribune article on Hill Springs Resort, home of the newly established Emerald Creek Winery near Warner Springs, the largest vineyard and winery in San Diego at 750 acres. Located in a historic vineyard area, Valiano Vineyards would be a natural addition to the growing revival of viniculture and winemaking in San Diego County.

The alternative envisions a continuation of agricultural use on the steepest western slopes with a vineyard or the current orchard; denser housing concentrated in the center of the valley floor; multi-acre rural properties at the base and lower slopes of the hills; and ranchette properties in the adjoining, traditionally equine-centric, Neighborhood 5 area. The plan would require far less blasting and grading than the Proposed Project and, because of this, would naturally be more complementary and responsive to the unique topography of the Plan area bringing out the historical value and beauty of the topography.

Because the total density would be much lower than that in the Proposed Project and equal to the total General Plan density, with higher density dwelling units concentrated in the valley floor in centrally located Neighborhoods 1 and 3 to allow for a variety of housing types, sizes and price ranges as specified in the Project Objectives, surrounded by lower density ranchette and multi-acre rural properties in Neighborhoods 2, 4 and 5, preserving the topography of the Plan area and consistent with the rural equine friendly character of nearby Eden Valley and Harmony Grove, Valiano Vineyards would be more complementary and responsive to the topography and character of the Plan area and surrounding area than the Proposed Project.



- **Utilizing Smart Growth concepts, provide a variety of housing opportunities, ranging in size and affordability, to meet the growing housing needs of the region**

Valiano Vineyards meets this objective better than the Proposed Project

The Valiano Vineyards alternative would embody smart growth concepts, providing a greater variety of housing opportunities, with a wider range of sizes and affordability, than does the Proposed Project and thereby meets and exceeds the fulfillment of this project objective compared to findings for the Proposed Project. Valiano Vineyards would contribute a similar number of affordable homes as does the Proposed Project, just the type of homes needed to fulfill the growing housing needs of the region, while maintaining more consistency with the character of the surrounding area than does the Proposed Project, and while limiting total density to prudent limits in this extreme fire risk area. Like the Proposed Project, Valiano Vineyards would provide smaller, more dense and consequently more affordable housing in Neighborhood 1; and moderately dense, moderately priced housing with some opportunity for horse and other animal keeping in Neighborhood 3. Unlike the Proposed Project, Valiano Vineyards would provide two additional types of housing opportunities the Proposed Project does not provide, ranchette size properties in Neighborhood 5 and multi-acre rural properties in Neighborhoods 2 and 4. Because the Valiano Vineyards alternative offers these additional housing types, types that are much more consistent with the types of housing in the surrounding area and are compliant with the subject area community plans, the alternative provides a greater variety of housing opportunities than does the Proposed Project, meeting the project objective better than the Proposed Project does while limiting over-all density to prudent General Plan levels. The alternative would provide additional housing while maintaining a safe environment for residents and neighbors in the surrounding area.

- **Provide a range of lot sizes to accommodate a full spectrum of housing sizes to meet the varied family make up**

Valiano Vineyards meets this objective better than the Proposed Project

Valiano Vineyards would provide a wider range of lot sizes than the Proposed Project does with a greater range of housing sizes as described above, meeting the project objective better than does the Proposed Project. Lots would range from the smallest lots of less than 10,000 square feet in Neighborhood 1, just as the Proposed Project provides, up to several acres, which the Proposed Project does not provide.

- **Provide for a range of for sale market rate, and detached housing types to accommodate broad market needs from singles to large families and across age groups**

Valiano Vineyards meets this objective better than the Proposed Project

Valiano Vineyards would provide for a wider range of housing types than does the Proposed Project, as described above, with property types more consistent with the surrounding market area thereby accommodating a broader section of market needs than does the Proposed Project and meeting the project objective better than the Proposed Project does. The Eden Valley and Harmony Grove area traditionally attracts buyers in the market for a rural home allowing horse and animal keeping relatively close to, but still separate from denser urban services and employment opportunities,



yet affordable relative to similar markets to the west. Other, denser, urban housing types have not sold well in Harmony Grove Village, and it may be anticipated that Valiano Vineyards would be generally more attractive to buyers than the Proposed Project because of the wider variety of housing types, and greater share of the type of large animal friendly properties buyers seek in the area.

- **Provide recreation areas to serve the recreation needs of the future Plan area residents**

Valiano Vineyards meets this objective

Valiano Vineyards will incorporate recreation areas similar to those in the Proposed Project, scoped proportionately to serve the reduced unit count, similarly meeting the project objective. It must also be noted that larger lots afford better on-site recreation opportunities such as private pools and private play areas that reduce the need for extensive common areas crucial in more urban densities.

- **Design a community that embraces and preserves the equestrian activities and the equestrian nature of the surrounding areas and provides amenities for the community area**

Valiano Vineyards meets this objective better than the Proposed Project

The Valiano Vineyards community would feature an extensive network of bridle trails, a public stable, and properties that would accommodate horse keeping, meeting the project objective in a manner similar to that of the Proposed Project. Unlike those of the Proposed Project, Valiano Vineyards properties would provide several varieties of horse property opportunities to accommodate a broad range of equine lifestyles exceeding the fulfillment of the project objective compared to the Proposed Project. Fourteen smaller horse properties in Neighborhood 3, similar to those in the Proposed Project as modified for the Biologically Enhanced alternative density, may be attractive to growing families who would like to enjoy an equestrian lifestyle in a traditionally equestrian area without the necessity to maintain the full suite of equine facilities on their property. Fifteen Neighborhood 5 ranchettes would have convenient access to the public stables, and would accommodate more horse keeping facilities on site than Neighborhood 3 lots with room for more extensive stables and exercise areas. The seven multi-acre rural properties in Neighborhoods 2 and 4 would be large enough for complete equestrian facilities on site including private riding arenas. The total of thirty-six horse properties in the Valiano Vineyards alternative represents thirty percent of the total primary dwelling units, significantly exceeding the seventeen percent ratio of horse properties in the Proposed Project and more generally consistent with the ratio and property size and type in the surrounding Eden Valley/Harmony Grove and Coronado Hills area. The ranchettes and multi-acre rural properties specifically would be directly consistent with the equestrian nature of the surrounding area, and these additional types of equine property are unavailable in the Proposed Project. It must be noted as well that the horse keeping properties in the Proposed Project are not at all consistent with surrounding equestrian properties in Eden Valley, Harmony Grove or Coronado Hills, as their available footprint for horse-related activities is relatively small. With equestrian amenities and a greater share and variety of horse keeping properties, the Valiano Vineyards community would better embrace and preserve the equestrian activities and the equestrian nature of the surrounding area than does the Proposed Project.



Valiano Vineyards

- **Provide a healthy living component including multi-use trail network that connects to other trails adjacent to the Plan area to encourage pedestrian and equestrian mobility and outdoor connectivity**

Valiano Vineyards meets this objective better than the Proposed Project

Valiano Vineyards would incorporate a multi-use trail network equivalent to that of the Proposed Project, similarly meeting the project objective. Unlike trails in the Proposed Project, the Valiano Vineyards trail network would be extended into the agricultural section on the western slopes of the Plan area providing a more extensive network with more opportunity for exercise on varied slopes with more attractive views exceeding the fulfillment of this project objective compared to what would be available in the Proposed Project.

- **Provide increased residential density close to the shopping, employment, and transportation centers of Escondido and San Marcos**

Valiano Vineyards meets this objective

Valiano Vineyards would provide increased residential density, meeting the project objective, with a broader range of housing types than does the Proposed Project and with density equivalent to prudent General Plan limits.

- **Set aside on-site biological and agricultural resources within open space areas**

Valiano Vineyards meets this objective better than the Proposed Project

On-site biological and agricultural resources would be much more extensive in the Valiano Vineyards project than in the Proposed Project, again meeting the project objective better than does the Proposed Project. Building upon the increased connectivity of the Biologically Enhance alternative for Neighborhoods 1 and 3, the adjoining open spaces of the agricultural easement on the western slopes and the abutting multi-acre residential properties would provide for much greater wildlife access and related biological diversity than does the Proposed Project. Agricultural resources would be greatly conserved and expanded on-site with approximately 60 acres dedicated to a vineyard or a continuation of the current orchard instead of purchasing mitigation agriculture land off-site. These features would allow for much greater biological and agricultural resource preservation and health than does the Proposed Project.

- **Design a safe and efficient circulation system that adequately supports the anticipated level of traffic in and around the Plan area that is pedestrian safe**

Valiano Vineyards meets this objective better than the Proposed Project

The reduced density of the Valiano Vineyards alternative from 326 primary dwelling units in the Proposed Project to 118 in the alternative would result in a far lower level of traffic in and around the Plan area, enabling the Valiano Vineyards alternative to meet the project objective better than does the Proposed Project. The Valiano Vineyards alternative would provide for pedestrian safety in



Valiano Vineyards

a manner similar to that of the Proposed Project, with reduced traffic impacts on the circulation system within the development and in the surrounding area because of the reduced density. Further, the Plan area and surrounding area would be much safer in the event of an emergency evacuation with the Valiano Vineyards alternative than with the Proposed Project because there would be far fewer evacuees, including residents and boarders with horse trailers, which would create less congestion on the limited evacuation routes out of the area.

- **Provide for adequate Public Services and facilities to accommodate the proposed residential uses**

Valiano Vineyards meets this objective

Adequate Public Services and facilities to accommodate the residential uses proposed in the Valiano Vineyards alternative would be provided in a manner similar to that of the Proposed Project meeting the project objective. The impact of these services, particularly the Water Treatment and Wastewater Reclamation Facility would be less than that of the Proposed Project because much less capacity would be required to serve the Valiano Vineyards community that proposes only 96 primary dwelling units on sewer, as compared to 326, with the balance on traditional septic or alternative septic.

- **Develop a financing and phasing plan that provides for the efficient and timely provision of infrastructure and public services as development occurs**

Valiano Vineyards meets this objective

Through detailed planning and engineering required to obtain necessary County approval and permitting of various aspects of the project similar to that required for the Proposed Project, or any project, the Valiano Vineyards alternative would meet the objective to develop a financing and phasing plan to provide for the efficient and timely provision of infrastructure and public services over the course of the development build out. Unlike the Proposed Project, Valiano Vineyards would require far less infrastructure and public services resulting in much lower impacts, lower costs, and less time to complete build-out with much less disruption to the residents of the surrounding area.

- **Provide for the significant preservation of resources and preservation of community character through implementation of the Valiano Specific Plan.**

Valiano Vineyards meets this objective better than the Proposed Project

As described above, Valiano Vineyards would meet the project objectives to preserve biological and agricultural resources and preserve community character better than would the Proposed Project, which would introduce urban densities in a primarily rural and equestrian valley.



Valiano Vineyards

Additional Project Objective

In addition to meeting or exceeding the Proposed Project planning objectives, Valiano Vineyards will also meet the following objective to provide public facilities in adherence to County planning guidelines for General Plan Amendments that the Proposed Project does not provide.

- **Provide a public gathering place for Eden Valley to foster shared identity and values among residents of Valiano Vineyards and the surrounding community.**

The public facility would consist of an Eden Valley Commons at the winery. It would be a gathering place for the community with a moderately sized meeting room and outdoor patio area, similar to the firehouse in Elfin Forest, where public community meetings and events could be hosted. The space would also serve as a tasting room for the winery. In addition to providing a meeting space enabling the Eden Valley community to come together and discuss common concerns and participate in community events, the space could be used for educational opportunities for schools and others about grape growing and wine making, similar to the educational use of the Interpretive Center at the Elfin Forest Recreational Reserve. A community garden may also be envisioned where families in the more densely spaced homes, particularly in Neighborhood 1, could have an area to grow their own produce and participate in the rural farming tradition of Eden Valley.



Feasibility Analysis

The Valiano Vineyards alternative is made up of elements of feasible alternatives evaluated in the Proposed Project DEIR and would be similarly feasible. The *Valiano Project Draft Environmental Impact Report, Chapter 4.0 – Project Alternatives, 4.1 Rationale for Alternative Selection* regarding the six alternatives chosen for inclusion in the DEIR states “...six alternatives represent a reasonable range of alternatives, as defined in the State CEQA Guidelines, because they present feasible alternate development patterns that would reduce and/or eliminate significant impacts associated with the Proposed Project.” (emphasis added) The six alternatives reviewed would reduce impacts and meet project objectives to differing degrees, with varying infrastructure requirements, grading, steep slope impact, and dwelling unit counts ranging from 35 to 326, but all are feasible as stated in the DEIR. The Valiano Vineyards alternative residential housing plan is composed of parts of three of the six feasible alternatives and by extension would also be feasible. The alternative would have the same 118 total number of primary dwelling units as the General Plan Density alternative, which is feasible per the DEIR and is described in the DEIR as follows: “Although this alternative would be lower in development intensity than the Proposed Project, the same infrastructure (i.e. potable water and sewage lines and on-site roads and focused off-site improvements) ...the WTWRF and associated pump stations...would be required to serve the Project site.” (DEIR Chapter 4.0 Project Alternatives, Section 4.3.1 General Plan Density Alternative Description and Setting, page 4-7) With similar infrastructure required to serve the same number of 118 homes in the Proposed Project or the Valiano Vineyards alternative, the Valiano Vineyards alternative would also be feasible. Besides the residential development, the Proposed Project specific plan states, “36.5 acres will be preserved within an agricultural open space easement.” The Valiano Vineyards alternative includes a similar, enlarged agricultural easement and would be similarly feasible.

CEQA Guideline 15126.6(f)(1) Feasibility specifies several factors to consider for evaluation of alternative feasibility including (1) site suitability, (2) economic viability, (3) availability of infrastructure, (4) general plan consistency, (5) other plan or regulatory limitations and (6) jurisdictional boundaries. The residential housing and agriculture aspects of the Valiano Vineyards alternative are analyzed below based on these factors and the alternative is shown to be feasible.

In addition, several aspects of the Valiano Vineyards alternative would make the alternative more feasible than the Proposed Project as described below. In sum, Valiano Vineyards would be practically and economically feasible in its own right, and would be more feasible in many ways than the Proposed Project, making Valiano Vineyards feasibly superior to the Proposed Project.

Residential Housing

The Valiano Vineyards Alternative Housing Plan Would Be Feasible

The Valiano Vineyard housing plan is comprised of three neighborhood density types. These types are based on types described in three alternatives evaluated in the DEIR: The Biologically Enhanced



alternative in Neighborhoods 1 and 3 with more dense housing requiring sewer service; the General Plan Density alternative in Neighborhood 5 not requiring sewer and a candidate for alternative septic; and the Septic Only alternative with multi-acre rural properties in Neighborhoods 2 and 4. Each of these three types of neighborhood, which make up the entirety of the Valiano Vineyards housing development, was included among the feasible alternatives evaluated in the DEIR, and has a feasible analog for comparison, either in the Proposed Project or in the surrounding area. Every one of these analogs is feasible, and by reasonable comparison the equivalent Valiano Vineyards neighborhood is also feasible, as is the entire Valiano Vineyards residential plan.

Neighborhoods 1 and 3 Based On Biologically Enhanced Alternative

Site suitability

The site and plan of Neighborhoods 1 and 3 are identical to the Proposed Project with dwelling unit counts reduced from 96 to 72 in Neighborhood 1 and reduced from 41 to 24 in Neighborhood 3 to improve biological open space as per the Biologically Enhanced alternative. The site would be identically feasible under the Valiano Vineyards alternative as under the Proposed Project.

Economic viability

About 81% of Valiano Vineyards density would be in Neighborhoods 1 and 3 and would be identical to the same units in the Proposed Project. Ninety-six of 118 Valiano Vineyards primary dwelling units comprise Neighborhoods 1 and 3 using the same unit design and neighborhood layout as shown in the Proposed Project. The only difference would be the unit count reduction as per the Biologically Enhanced alternative which is a feasible alternative as per inclusion in the DEIR. Because these units are equivalent to the same units in the Proposed Project, it is reasonable to assess they would be of equivalent economic viability to the same units in Proposed Project. Conversely, if the Neighborhood 1 and 3 units are economically unviable under the Valiano Vineyards alternative, they would also be economically unviable in the Proposed Project.

Availability of infrastructure

The same infrastructure will be available to serve Neighborhoods 1 and 3 in the Valiano Vineyards alternative as would be available to serve the same neighborhoods in the Proposed Project or the Biologically Enhanced alternative. As these are the only neighborhoods that would require sewer service in the Valiano Vineyards alternative, the WTWRF needed to serve 96 primary dwelling units compared to 326 in the Proposed Project would be much smaller, facilitating sewer infrastructure feasibility.

General plan consistency

With 25% fewer primary dwelling units in Neighborhood 1 and 41% fewer in Neighborhood 3, the Valiano Vineyards alternative is more consistent with the General Plan than the Proposed Project and, with total project density equivalent to General Plan levels, the alternative would not require a General Plan Amendment, as does the Proposed Project.



Valiano Vineyards

Other plan or regulatory limitations

Generally, the same other plan and regulatory limitations would apply to the Valiano Vineyards alternative as to the Proposed Project with the same effect on feasibility of the respective plans for Neighborhoods 1 and 3. As no other plan or regulatory limitations render the Proposed Project or the Biologically Enhanced alternative infeasible per the DEIR, the Valiano Vineyards alternative would also not be infeasible. It must be noted, the US Army Corp of Engineers applies regulatory limits governing impacts to Waters of the US that exist in Neighborhood 3. The Valiano Vineyards alternative is based on the Biologically Enhanced alternative that is modified from that in the Proposed Project to reduce biological impacts including impacts to wetland Waters of the US. Because these WUS impacts would be lessened compared to those in the Proposed Project, the Proposed Project may not be qualified to obtain a USACE permit and would be infeasible, whereas the Valiano Vineyards alternative would be feasible.

Jurisdictional boundaries

The same jurisdictional boundary limitations would apply to the Valiano Vineyards alternative as to the Proposed Project or the Biologically Enhanced alternative with no effect on the feasibility of the respective plans for Neighborhoods 1 and 3.

Neighborhood 5 Based On General Plan Density Alternative

Site suitability

The site of Neighborhood 5 has been an equine facility for many years and is more suitable for General Plan density housing conducive to horse keeping than it is for typical suburban sub-division density housing as in the Proposed Plan.

Economic viability

Almost 13 % of the Valiano Vineyards residential housing would be fifteen General Plan complaint density homes in Neighborhood 5. These homes would be similar to Groves Farmhouse homes on multi-acre parcels in The Groves neighborhood of Harmony Grove Village and would be equivalently feasible. The Groves planning area of Harmony Grove Village was found by the County to be feasible and approved as such with the certification of the Final EIR. Valiano Vineyards Neighborhood 5 homes are similar and would be similarly feasible. The primary difference between the Valiano Vineyards Neighborhood 5 properties and the multi-acre properties in The Groves approved with Harmony Grove Village is the plan for alternative septic use for the Valiano Vineyard homes. Alternative septic is approved by the County and is feasible. Alternative septic may increase market feasibility compared to that of the Proposed Project because monthly homeowner sewer bill expense would be eliminated, increasing the competitiveness of the homes.



Availability of infrastructure

The same infrastructure would be available to serve the Valiano Vineyards alternative Neighborhood 5 as would be available for the neighborhood in the Proposed Project with the same effect on feasibility. Less public infrastructure will be required to serve the neighborhood in the alternative because the plan calls for use of alternative septic systems instead of sewer. These systems are approved by the County and are available.

General plan consistency

Whereas the Proposed Project Neighborhood 5 plan is inconsistent with the General Plan and would be infeasible on this basis absent a General Plan Amendment, the Valiano Vineyards alternative is based on the General Plan Density alternative and would be consistent with the General Plan as well as the Elfin Forest/Harmony Grove Community Plan. The alternative would be feasible in terms of these plans without amendment.

Other plan or regulatory limitations

Generally, the same other plan and regulatory limitations would apply to the Valiano Vineyards alternative as to the Proposed Project with the same effect on feasibility of the respective plans for Neighborhood 5. As no other plan or regulatory limitations render the Proposed Project or the General Plan Density alternative infeasible per the DEIR, the Valiano Vineyards alternative would also not be infeasible. It must be noted, the US Army Corp of Engineers applies regulatory limits governing impacts to Waters of the US that exist in Neighborhood 5. Because these WUS impacts under the General Plan Density alternative plan for Neighborhood 5 in the Valiano Vineyards alternative would be lessened compared to the Proposed Project, the Proposed Project may not be qualified to obtain a USACE permit and would be infeasible, whereas the Valiano Vineyards alternative would be feasible.

Jurisdictional boundaries

The Valiano Vineyards alternative is in fact superior to the Proposed Project in that it does not suggest modifying the boundaries of the Harmony Grove Community Plan to accommodate deviations from its policies. As such it is more feasible than the Proposed Project in this regard.

Neighborhoods 2 and 4 Based On Septic Option Alternative

Site suitability

The sites of Neighborhoods 2 and 4 have historically been rural farming areas and the locations would better suit large rural properties, which would be consistent with land uses in the area and the surrounding area, rather than dense suburban single family homes as planned in the Proposed Project.



Economic viability

Nearly 6% of Valiano Vineyards residential housing would be seven multi-acre rural properties that would be equivalently feasible to other similar homes in the surrounding area. Virtually all homes in the surrounding Eden Valley, Harmony Grove and Elfin Forest communities are the same type of multi-acre rural properties on traditional septic. The type is the predominant form of residential development in the area, proven feasible through many years of success as a viable and desirable land use with demonstrable market demand.

Availability of infrastructure

The Neighborhood 2 and 4 homes in the Valiano Vineyards alternative would be on traditional septic requiring no access to community waste disposal infrastructure, reducing the overall waste infrastructure needed to serve the development. Other infrastructure needed to serve the homes would be available just as the infrastructure would be available to serve the Proposed Project. Traditional septic was found to be feasible for these homes as per the DEIR Septic Only alternative.

General plan consistency

The Valiano Vineyards alternative for Neighborhoods 2 and 4 would be consistent with the General Plan and therefore feasible for this factor. The Proposed Project is not consistent with the General Plan and would be infeasible unless a General Plan Amendment is passed.

Other plan or regulatory limitations

Generally, the same other plan and regulatory limitations would apply to the Valiano Vineyards alternative as to the Proposed Project with the same effect on feasibility of the respective plans for Neighborhoods 2 and 4. As no other plan or regulatory limitations rendered the Proposed Project or the Septic Only alternative infeasible per the DEIR, the Valiano Vineyards alternative would also not be infeasible. It must be noted, the US Army Corp of Engineers applies regulatory limits governing impacts to Waters of the US that exist in Neighborhoods 2 and 4. Because these WUS impacts under the Septic Option alternative plan for Neighborhoods 2 and 4 in the Valiano Vineyards alternative would be lessened compared to the Proposed Project, the Proposed Project may not be qualified to obtain a USACE permit alternative and would be infeasible, whereas the Valiano Vineyards alternative would be feasible.

Jurisdictional boundaries

The same jurisdictional boundary limitations would apply to the Valiano Vineyards alternative as to the Proposed Project or the Septic Option alternative with no effect on the feasibility of the respective plans for Neighborhoods 2 and 4.



Vineyard and Winery

The Valiano Vineyards Vineyard and Winery Would Be Feasible

Site suitability

The Eden Valley location of the project has been the site of viniculture for over 100 years, and the proposed agricultural easement location in the Valiano Vineyards alternative or the Proposed Project, which has been suitable and used for an orchard for many years, would be a similarly suitable site for viniculture. Acres of grapevines thrived wild and unattended in the fertile soils of Eden Valley and Harmony Grove for decades after vineyards were abandoned during Prohibition and right up into the 1970s within memory of long time area residents. The historical range of vineyards in the area extended to the western edge of Escondido directly east from the project site that is called the Vineyard District. In fact, San Diego County was the largest grape growing region of California to one time, and the industry is experiencing resurgence with many local vineyard managers installing new production throughout San Diego County. According to the Farm Bureau wine grape planting is the fastest growing commodity in acreage over the last ten years in San Diego County. There is currently an active vineyard/winery in close proximity to the project site; and, as for the specific Project Site agricultural easement soils and microclimate, local farmers who have reviewed the site all agree this is an excellent location to site wine producing vines.

Economic viability

The vineyard and winery industry is viable and growing in San Diego because many areas of the county are economically viable locations for viniculture and the location of the project is among these as a historic grape growing area. According to the San Diego County Vintners Association (SDCVA), there are 115 wineries in San Diego County (<http://sandiegowineries.org/>). Nearby the Project site, in the Escondido area, there are several successful vineyards and wineries. Orfila Vineyard and Winery lays claim to the honor of being the oldest active winery in San Diego with over 1300 medals in major national and international competitions and the honor of their wines being served at the White House. Other prominent up-and-coming wineries in the area include Vesper Vineyards, BKCellars, Hungry Hawk Vineyards, and nearby Tuscandido in Eden Valley. In addition to economic viability of the site, planning and execution resources necessary for feasible establishment and operation of the vineyard and winery are readily available through the Farm Bureau. Because the factors necessary to economic viability of a vineyard and winery exist on site or are readily available, and have been successfully applied at other nearby sites, the vineyard and winery use is economically feasible. Of course, the traditional orchard use that is planned for the agricultural easement in the Proposed Project would also be economically feasible for the agricultural easement in the Valiano Vineyards alternative.

In addition to the feasible economics of a vineyard and winery as a separate operation, independent of the business of the applicant as a residential housing developer, the presumptive principal investors of the applicant and of the Proposed Project, as identified based on publicly available sources, would be well positioned to add significant additional value to establishment of a vineyard and winery. More than



typical passive financial investors, and as associates of highly successful venture capital firms with strong track records of nurturing many prominent companies, like Quest, Apple, Google and Oracle, from development stage to multi-billion dollar enterprises, they would be in a position to provide guidance and thereby enhance realization of the value creation potential of the enterprise if they chose to actively participate. Further, the presumptive lead investor in the applicant has a key connection to one of the top wine collectors in the world who would be able to provide excellent wine industry expertise and guidance. The Proposed Project lead investor is also well positioned to support the vineyard and winery because the investment firm the investor is associated with is a patient value asset manager, associated with a prominent Silicon Valley venture capital firm. With a focus on long term commitment to developing a portfolio of businesses that build value for shareholders over the long term, the investor has the investment perspective that would be important to success of a vineyard. Although the vineyard and winery would be feasible without the participation of these principal investors, their particular characteristics afford them the opportunity to apply connections and expertise with the potential to dramatically increase the land value of the agricultural easement.

Availability of infrastructure

The site of the Valiano Vineyards alternative agricultural easement was an active orchard for many years and much of the infrastructure needed to support a vineyard or orchard, such as irrigation pipes, currently exists on site. Any additional infrastructure would be available, just as it would be for the agricultural easement planned for the Proposed Project, and would not impede feasible use of the land for agriculture or for a winery. In addition, less infrastructure may be needed to support a vineyard as compared to the continuation of avocado farming because grapevines use only about 3% of the water required by mature avocado trees as per the San Diego County Vintners Association (<http://sandiegowineries.org/sd-wine-country/sdcva-history>). With limited need for water, the water needs of the vineyard may possibly be entirely fulfilled by Project reclaimed water.

General plan consistency

The agricultural use planned for the Valiano Vineyards alternative would be consistent with the General Plan and therefore feasible for this factor just as the agricultural use planned for the Proposed Project would be compliant and feasible. The residential housing planned for the Proposed Project in the southwestern portion of the site where a vineyard is planned in the Valiano Vineyards alternative is not consistent with the General Plan and would be infeasible unless a General Plan Amendment is obtained.

Other plan or regulatory limitations

Because the Valiano Vineyards alternative plans continued agricultural use of the entire western portion of the Project site consistent with historic use of that section of the site, and consistent with relevant other plans and regulatory limitations governing use of the site, the site would be feasible in terms of these plans and regulatory limitations. The feasibility of the Valiano Vineyards alternative would be less constrained by the regulatory limits governing impacts to Waters of the US administered by the US Army Corp of Engineers than the Proposed Project. Sections of the agricultural easement in the Valiano



Valiano Vineyards

Vineyards alternative that fall within Waters of the US boundaries would be preserved as biological open space and would not be used for agriculture, thereby substantially lessening the impact of the land use on the WUS as compared to the Proposed Project that plans residential housing on the steep southwestern slopes and would significantly impact WUS as per the Project DEIR. If the Proposed Project is unqualified to obtain a USACE permit because the WUS impacts of the Valiano Vineyards alternative are substantially less, the Proposed Project would be infeasible due to other regulatory limitations, whereas the Valiano Vineyards alternative would be feasible.

Jurisdictional boundaries

The same jurisdictional boundary limitations would apply to the Valiano Vineyards alternative as to the Proposed Project with no effect on the feasibility of the respective plans.

Feasibility Comparison

Valiano Vineyards Would Be More Feasible Than the Proposed Project

- **Community support enhances feasibility of Valiano Vineyards**

The Valiano Vineyards alternative has overwhelming community support, as demonstrated by letters of support from the Friends of Eden Valley for Responsible Development and the Elfin Forest Harmony Grove Town Council. With little or no community opposition, the alternative would move through the County planning and approval process more expeditiously and with greater chance of success, improving the feasibility of the alternative relative to the Proposed Project.

Community opposition degrades Proposed Project feasibility

The Proposed Project has no community support and has attracted vigorous, wide-spread active community opposition. The community will continue to vigorously oppose the Proposed Project to the limits of the law and this opposition will continue to increasingly degrade the feasibility of the Proposed Project. The prospect for ultimate County approval is reduced by the community opposition and the increased time and financial resources spent by the applicant degrades the economic feasibility of the Proposed Project. In the event the Proposed Project is approved despite community opposition, economic feasibility of the project in terms of cost and time to return on investment would be further impaired pending litigation on the approval.

- **Valiano Vineyards drastically reduced traffic impact would make the alternative more feasible than the Proposed Project**

Everybody loathes traffic congestion. Especially the kind we *have to* sit in every day that inches along *forever*and there's no way around. That's exactly what it would be like on Country Club Drive every workday under the Proposed Project, an irredeemable feature of the Proposed Project that could significantly dampen sales and impair economic feasibility. Valiano Vineyards would have 64% fewer ADTs, leading to a higher level of service on surrounding roads, reducing and



perhaps eliminating the traffic congestion concerns of prospective residents, making Valiano Vineyards more attractive to buyers and thus more economically feasible.

- **Less infrastructure required to support fewer homes would enhance feasibility of Valiano Vineyards**

Substantially less infrastructure would be needed to serve far fewer homes on more accessible sections of the site under the Valiano Vineyards alternative, lowering the construction cost, time commitment, engineering complexity and disruption as compared to those of the Proposed Project. For these reasons, less infrastructure would improve the feasibility of Valiano Vineyards compared to that of the Proposed Project.

- **Far less grading would enhance Valiano Vineyards feasibility**

The Valiano Vineyards alternative plans no steep slope residential development. The significantly reduced grading, blasting, and rock breaking needed to prepare the site for housing construction compared to that needed for the Proposed Project would improve the feasibility of the alternative, lowering the cost, time commitment, engineering complexity and disruption as compared to that of the Proposed Project. Consequently, the Valiano Vineyards alternative would be more feasible than would the proposed Project.

- **Faster buildout would enhance investor return and feasibility of Valiano Vineyards**

With less infrastructure and grading required, at lower cost, and fewer homes to be built, and a reduced entitlement processing timeline, the Valiano Vineyards alternative would be finished and made available for sale much sooner than would the Proposed Project, providing return to investors more quickly and enhancing economic feasibility compared to that of the Proposed Project.

- **Proximity to vineyard/winery would enhance desirability and thereby economic feasibility of Valiano Vineyard residential units compared to the Proposed Project**

The vineyard and winery would be an attractive feature of the Valiano Vineyards community and would enhance desirability, differentiation and thereby economic feasibility of Valiano Vineyard residential units. Also, the winery could be leveraged to increase attractiveness and exclusivity for the Valiano Vineyards community by creating a vintners coop for Valiano Vineyards residents who could take advantage of access to winery viniculture and winemaking expertise, as well as service personnel and processing equipment to establish vineyards on their own properties.

- **Lower entitlement processing expense would make Valiano Vineyards more feasible than the Proposed Project**

The Valiano Vineyards alternative is far more consistent with the General Plan and related sub-area plans than is the Proposed Project and would not require a General Plan Amendment. Entitlement would be obtained at a much lower cost requiring less time and with a significantly greater chance



Valiano Vineyards

of success. The resources expended by the applicant over the last five years have been spent, at their own discretion, to attain support for a deeply flawed plan, vehemently opposed by the community. Their expense would have been much lower if they had pursued a development proposal like the Valiano Vineyard alternative that is more consistent with the General Plan and Community Plans with lower impacts. The speculation to date was their choice and is their responsibility to pay for. An equitable assessment of the entitlement expense of the Valiano Vineyards plan should include only the costs as if Valiano Vineyards had been the original plan, not the costs wasted pursuing the Proposed Project, which was pure speculation.



Valiano Vineyards

Comparison of the Effects of the Valiano Vineyards Alternative to the Proposed Project

The Valiano Vineyards alternative would substantially lessen the significant environmental effects of project site development compared to those found in the Proposed Project. Every impact assessed to be significant unmitigatable in the *Valiano Project Draft Environmental Impact Report* will be lessened, with 50% to 75% reduced substantially enough to be down-rated to significant mitigatable or less than significant. Further, three of four of these unmitigatable significant impacts could reasonably be down-rated to less than significant as described in the comparison of impacts outline below. In this case, the only remaining unmitigatable impact would be one that is unmitigatable even with no development.

The environmental effect of the Proposed Project impacts assessed to be significant mitigatable and less than significant would also be substantially lessened under the Valiano Vineyards alternative. The effect would be less for 81% of the Proposed Project significant mitigatable impacts, and 11% to 14% of these would be lessened sufficiently to be down-rated to less than significant or no significant impact. Additionally, forty-four of eighty-eight less than significant impacts, 50%, would be less under the Valiano Vineyards alternative.

It may be reasonably concluded based on comparing the effects of Proposed Project impacts assessed in the *Valiano Project Draft Environmental Impact Report* to the effects of the Valiano Vineyards alternative, that the anticipated environmental effects of the Valiano Vineyards alternative would be substantially lessened, and that the alternative is environmentally superior to the Proposed Project.

The following table summarizes the impact comparison outlined below:

	Proposed Project	Valiano Vineyards	Impact Comparison			
Impact Rating	Count	Count	Change	Percentage Change	LESS Impact	Change
Significant Unmitigatable	4	1 - 2	-2 or 3	- 50 or 75%	4	-100%
Significant Mitigatable	37	32 - 33	-4 or 5	-11 or 14%	30	-81%
Less than Significant	88	92 - 94	+4 to 6	+5 to 7%	44	-50%
No Significant Impact	10	11	+1	+10%	0	0%

Aesthetics

The Valiano Vineyards alternative would substantially lessen aesthetic impacts

The aesthetic effects of the Valiano Vineyards alternative would be much less than those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified three significant aesthetic impacts of the Proposed Project and numerous less than significant impacts. Of the three



significant impacts, one was determined to be unmitigatable and two were determined to be mitigatable. The impacts of the Valiano Vineyards alternative would be less than those of the Proposed Project for all three of these impacts. The unmitigatable impact may be evaluated to be at least mitigatable in the Valiano Vineyards alternative and possibly less than significant as described below. One of the two mitigatable aesthetic impacts of the Proposed Project would be similarly mitigatable in the Valiano Vineyards alternative and the other mitigatable impact would be improved to less than significant impact. The less than significant aesthetic impacts of the Proposed Project would also be less than significant in the Valiano Vineyards alternative. Additionally, the impact of twenty of the thirty-three less than significant impacts summarized below would be less for the Valiano Vineyards alternative than for the Proposed Project. For these reasons, it is evident the Valiano Vineyards alternative would substantially lessen the significant aesthetic impacts of the Proposed Project, and is, therefore, environmentally superior.

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
AESTHETIC IMPACTS			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
Conflict with area visual character due to grading and development work	None	LESS; Significant Mitigatable or Less than Significant	The conflict of the Valiano Vineyards alternative with the visual character of the surrounding area will be much less than that for the Proposed Project. The alternative is a combination of the Biologically Enhanced, General Plan Density and Septic Option alternatives, and the Draft EIR found all of these alternatives to have less impact than those in the Proposed Project with impacts no more than significant mitigatable, or less than significant for the Septic Option alternative. It follows, the impact of the Valiano Vineyards alternative as to conflict with area visual character can be no more than the impact of any one of its component alternatives; no more than significant mitigatable. A finding of less than significant may also be reasonable because while the total density of the Valiano Vineyards alternative is the same as that of the General Plan Density alternative, the impact of which is significant mitigatable in this regard, Valiano Vineyards proposes no homes on the steep slopes and any conflict with area visual character will not occur on the highly visible steep slopes with commensurate reduction in visible loss of vegetation during the construction period. In addition, large open spaces of undeveloped land would exist within the multi-



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
			acre rural properties in Neighborhoods 2 and 4 as well as the ranchette properties in Neighborhood 5. Indeed, Valiano Vineyards has even less short term visible construction impacts on the steep slopes than does the Septic Option alternative that has a less than significant impact. Consequently, Valiano Vineyards would lessen the significant unmitigatable aesthetic impact of the Proposed Project to significant mitigatable and possibly less than significant.
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
Manufactured slopes within steep slopes contrast with natural hillsides	Plant one shrub per 75 s.f. of exposed soil and stain cut rocks	LESS; Less than Significant	There will be no manufactured slopes within steep slopes in the Valiano Vineyards alternative. Rather, the steep slopes will be natural or planted with grape vines. Because there will be no manufactured slopes, the impact will be less than significant.
Retaining walls contrast with rolling hillsides and steep ridgelines	Texture and stain retaining walls	LESS; Significant Mitigatable	Valiano Vineyards will have far fewer, much lower and less visible retaining walls than will the Proposed Project because the development footprint will be much smaller; all development will occur on the valley floor or gradual slopes at the base of the hills; and no manufactured slopes within steep slopes will be required. The impact can be mitigated in the same manner as that in the Proposed Project.
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Consistency with visual character and quality of surrounding area	n/a	LESS; Less than Significant	Valiano Vineyards is more consistent with visual character and quality of surrounding area as described above
Community identity walls and fencing; sound walls Neighborhood 5	n/a	SIMILAR; Less than Significant	
Construction period sound barriers	n/a	LESS; Less than Significant	Shorter construction period



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Key View 1 from Country Club Drive	n/a	LESS; Less than Significant	No homes on hillsides
Key View 2 from Country Club Drive	n/a	SIMILAR; Less than Significant	
Key View 3 from Country Club Drive	n/a	SIMILAR; Less than Significant	
Key View 4 from Seeforever Dr.	n/a	LESS; Less than Significant	Fewer, more widely separated homes in Neighborhood 2
View from Elfin Forest Recreational Reserve	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes
View from Del Dios Highlands Preserve	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes
Views from Country Club Drive	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes
Views from nearby public roadways	n/a	LESS; Less than Significant	Fewer, more widely separated homes in Neighborhood 2 and 4, and no homes on steep slopes
Views from western ridgeline public roads	n/a	SIMILAR; Less than Significant	
Views from west and northwest ridgeline homes & roads	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes
Views from south, Harmony Grove Village	n/a	SIMILAR; Less than Significant	
Views from eastern private homes	n/a	SIMILAR; Less than Significant	
Long-term Project impacts	n/a	LESS; Less than	Smaller development footprint and no homes on steep slopes



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
re visual character		Significant	
Off-site visual effect:	n/a	SIMILAR; Less than Significant	
Conflicts with area visual quality	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes
Conflicts with area visual character	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes
Consistency with applicable design guidelines	n/a	LESS; Less than Significant	Neighborhood 5 will be consistent with the Harmony Grove Community Plan, which the Proposed Project will not be.
Detention and bioretention manufactured slopes	n/a	SIMILAR; Less than Significant	
Loss of eucalyptus and oak due to fire and drought	n/a	SIMILAR; Less than Significant	
Loss of avocado orchard	n/a	LESS; Less than Significant	Vineyard or orchard would provide a more historically consistent agricultural use and view of hillsides than homes in Neighborhoods 2 & 4
Loss of farm structures	n/a	SIMILAR; Less than Significant	
Loss of riparian habitat and non-native grasslands	n/a	SIMILAR; Less than Significant	
Visual impacts to view from scenic highway	n/a	SIMILAR; Less than Significant	
View from area trails	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes
View from area public parks	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
View from outlying areas	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes
Consistency with applicable County Community & Sub-regional Plan	n/a	LESS; Less than Significant	Neighborhood 5 will be consistent with the Harmony Grove Community Plan, which the Proposed Project will not be.
Visual impacts of nighttime lighting	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes requiring less lighting and no lighting on the hillsides
Reflective building materials	n/a	SIMILAR; Less than Significant	
Cumulative visual impact to valley	n/a	LESS; Less than Significant	Smaller development footprint and no homes on steep slopes

Air Quality

The Valiano Vineyards alternative would substantially lessen air quality impacts

The air quality effects of the Valiano Vineyards alternative would be much less than those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified four significant air quality impacts of the Proposed Project and fifteen less than significant impacts. Of the four significant impacts, two were determined to be unmitigatable and two were determined to be mitigatable. The impacts of the Valiano Vineyards alternative would be less than those of the Proposed Project for all four of these impacts. One of the two unmitigatable impacts, while drastically reduced in the Valiano Vineyards alternative, may still be evaluated to be unmitigatable, similar that in to the Proposed Project; however, further expert analysis may also reasonably find the impact to be reduced to less than significant as described below. The other unmitigatable impact would be lessened to less than significant in the Valiano Vineyards alternative. The two mitigatable air quality impacts of the Proposed Project would be less than significant in the Valiano Vineyards alternative. The less than significant air quality impacts of the Proposed Project would also be less than significant in the Valiano Vineyards alternative. Additionally, the impact of nine of the fifteen less than significant impacts summarized below would be less for the Valiano Vineyards alternative than for those of the Proposed Project. For these reasons, it can be reasonably concluded the Valiano Vineyards alternative would substantially lessen the significant air quality impacts of the Proposed Project, and is, therefore, environmentally superior.



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
AIR QUALITY			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
Cumulative construction air quality impacts	None	LESS; Significant Unmitigatable or Less than Significant	Construction of 118 primary dwelling units in the Valiano Vineyards alternative with no steep slope grading or blasting would require far less construction activity over a shorter time compared to the activity required to produce 326 units including many in steep slope areas in the Proposed Project. Construction of 64% fewer homes would cause proportionally less emissions over less time than those of the Proposed Project and the cumulative short term construction air quality impact would be much lower than those of the Proposed Project. While mitigation of the short term construction related cumulative impact of a project is only possible by reducing the project scope, and the impacts of the Valiano Vineyards alternative may be unmitigatable similar to those of the Proposed Project even though the impacts are much less, it is possible that the reduced dwelling unit count and limitation of grading to the flat valley floor will result in the sufficient reduction of short term construction related emissions to a cumulatively less than significant level, similar to the Septic Option alternative. In any case, whether further expert analysis determines a finding of significant unmitigatable or less than significant, cumulative construction air quality impacts would be dramatically lessened under the Valiano Vineyards alternative.
Cumulative operational air quality impacts	None	LESS; Less than Significant	The Valiano Project Draft Environmental Impact Report Air Quality analysis concerning cumulative operational air quality impacts cites Table 2.2-15, <i>Additional Operational Emissions of Project Density as Compared to the General Plan Density Allowance</i> and finds, “....the Proposed Project would be inconsistent with the RAQS and SIP. As a result, there is a significant cumulative operational criteria air quality impact and the Project’s contribution to the significant cumulative air quality impact would be considerable.” The Valiano Vineyards alternative, in contrast, would include the same number of primary dwellings units as the General Plan density



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
			alternative, and would be consistent with the RAQS and SIP. Because the Valiano Vineyards alternative would conform to the RAQS and SIP, and because the direct operational air quality impacts of the alternative would be less than significant, the cumulative operational air quality impacts of the Valiano Vineyards alternative would be less than significant.
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
Conflict with regional air quality plans - density exceeds General Plan density in 2009 RAQS	County revise housing forecast to SANDAG	LESS; Less than Significant	The Valiano Vineyards alternative would conform to density in 2009 RAQS
Cumulative air quality impact due to exceeding SANDAG forecast	County revise housing forecast to SANDAG	LESS; Less than Significant	The Valiano Vineyards alternative would be within the range projected by SANDAG and the alternative would be consistent with the RAQS and SIP.
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Direct construction air quality impacts	n/a	LESS; Less than Significant	Less construction activity over a shorter time necessary to produce 118 primary dwelling units compared to 326 would cause proportionally less emissions over less time than those of the Proposed Project
Direct operational air quality impacts	n/a	LESS; Less than Significant	64% fewer primary dwelling units will cause proportionally less operational emissions
Combined construction & operational air quality impacts	n/a	LESS; Less than Significant	Less construction activity and less operational activity with far fewer dwelling units will produce far less combined emissions.
CO2 hot spot air quality impacts	n/a	LESS; Less than Significant	Far less traffic will cause far less direct vehicle exhaust emissions
Cumulative CO air quality impacts	n/a	LESS; Less than Significant	Far less traffic will cause less cumulative vehicle exhaust emissions



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
WTWRF emissions air quality impacts	n/a	LESS; Less than Significant	WTWRF will be much smaller and cause far less TAC emissions
Diesel exhaust emissions air quality health risk impacts	n/a	LESS; Less than Significant	Less construction activity over a shorter time with no grading for homes on steep slopes would require far less diesel vehicle activity and emissions over less time than those for the Proposed Project
Operational residential development TAC emission air quality impacts	n/a	SIMILAR; Less than Significant	
Operational WTWRF TAC emission air quality impacts	n/a	SIMILAR; Less than Significant	
Construction odor impacts	n/a	LESS; Less than Significant	Less construction activity would produce less odors for less time
Operational odor impacts from equestrian uses	n/a	SIMILAR; Less than Significant	
Operational odor impacts from WTWRF	n/a	SIMILAR; Less than Significant	
Operational odor impacts from sewer pump station	n/a	SIMILAR; Less than Significant	
Cumulative CO hot spot air quality impacts	n/a	LESS; Less than Significant	Far less traffic will cause far less direct vehicle exhaust emissions
Cumulative odor impacts	n/a	SIMILAR; Less than Significant	



Agricultural Resources

The Valiano Vineyards alternative would substantially lessen impacts to agricultural resources

The impacts of the Valiano Vineyards alternative on agricultural resources at the project site would be less than those for the Proposed Project because less agricultural land would be converted to residential uses and more of the site would be used for agriculture than under the Proposed Project. Under the Valiano Vineyards alternative, agricultural preservation in the north and western portions of the Project site would be significantly increased. Similar to areas in the Proposed Project, these areas would be preserved within an easement, but unlike the Proposed Project agricultural use of these areas could be developed as part of the project. When compared to the Proposed Project, this alternative would result in not only fewer impacts to agricultural resources, but an increase in active farming.

The impacts to off-site and cumulative agricultural resources would be similar to those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified one significant mitigatable impact to agricultural resources of the Proposed Project and six less than significant impacts. No impacts were determined to be unmitigatable. The impacts of the Valiano Vineyards alternative would be similar to those of the Proposed Project for all impacts analyzed in the DEIR. Beyond the scope of comparing the impact of Valiano Vineyards to impacts described in the DEIR, Valiano Vineyards would add productive use of land for agricultural purposes on site, whereas those of the Proposed Project would convert more of this land to residential use. Also, the vineyard proposed for the western portion of the site is consistent with the increase in vineyards and wineries in San Diego County and may be inducing, along with those vineyards, to further expansion of the industry in the region, thereby promoting the increase in the use of agricultural resources rather than the destruction of these lands for residential development. For these reasons, the Valiano Vineyards alternative would lessen the net impact to agricultural resources and is environmentally superior.

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
AGRICULTURAL RESOURCES			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
None			
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
Direct impacts to important agricultural resources within site	On/off-site preservation of agricultural resources at a 1:1 ratio	LESS; Significant Mitigatable	Smaller development area would lessen impact on sensitive farmland.



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Consistency with LAFCO goals and policies on conversion of prime agricultural lands	n/a	SIMILAR; No Significant Impact	
Indirect impacts to agricultural resources	n/a	SIMILAR; Less than Significant	
Conflict with Williamson Act provisions	n/a	SIMILAR; Less than Significant	
Project contribution to cumulative CDC candidate soils	n/a	SIMILAR; Less than Significant	
Cumulative impact to active regional agriculture	n/a	SIMILAR; Less than Significant	
Cumulative impacts to farm site loss	n/a	SIMILAR; Less than Significant	

Biological Resources

The Valiano Vineyards alternative would substantially lessen impacts to biological resources

The effects of the Valiano Vineyards alternative on biological resources would be much less than those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified eight significant biological resource impacts of the Proposed Project and numerous less than significant impacts. All of the eight significant impacts were determined to be mitigatable. The impacts of the Valiano Vineyards alternative would be less than those of the Proposed Project for seven out of eight of these impacts. The less than significant impacts to biological resources of the Proposed Project would also be less than significant in the Valiano Vineyards alternative. Additionally, the impact of eight of the fourteen less than significant impacts summarized below would be less for the Valiano Vineyards alternative than for the Proposed Project. For these reasons, it can be reasonably concluded the Valiano



Valiano Vineyards

Vineyards alternative would substantially lessen the significant biological resource impacts of the Proposed Project, and is, therefore, environmentally superior.

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
BIOLOGICAL RESOURCES			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
None			
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
Grassland / pastures habitat impact for seven County Group 1 animal species and raptor foraging	Off-site preservation of like habitat	LESS; Significant Mitigatable	Grassland impact would be lessened as no dwelling units would be constructed at the western central boundary or southern boundary at Mt Whitney.
Construction noise impacts to raptors nesting within 300 ft	No loud activity during breeding season and / or noise barrier / attenuation	LESS; Significant Mitigatable	Smaller development area requiring less construction time would lessen impact on nesting raptors due to loudness of construction activity
Construction impacts to southern riparian forest, southern willow scrub, mule fat scrub, herbaceous wetland, disturbed wetland, coast live oak woodland, Diegan coastal sage scrub, granitic southern mixed chaparral, non-native grasslands	Off-site preservation of like habitat	LESS; Significant Mitigatable	The development footprint of the Valiano Vineyards alternative is based primarily on the Biologically Enhanced alternative in Neighborhoods 1 and 3 and the impact to sensitive habitats in these areas would be less, as is assessed in the DEIR analysis of the Biologically Enhanced alternative. Neighborhoods 2 and 4 in the Valiano Vineyards alternative are based on the Septic Option alternative with only a few multi-acre rural homes and the impact to sensitive habitats in these areas would be greatly reduced, as described in the Septic Option alternative analysis. Neighborhood 5 is based on the General Plan Density alternative that would allow for more open space on private lots with less impact than the dense housing planned for the area in the Proposed Project.



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Impacts to USACE regulated herbaceous wetland WUS and non-wetland WUS	Off-site preservation of like habitat	LESS; Significant Mitigatable	Impacts to every USACE regulated WUS area on-site would be greatly reduced under the Valiano Vineyards alternative because no residential development exceeding current SR-1 and SR-2 zoned density would intersect these areas. Non-wetland WUS in the western half of the site would intersect only multi-acre rural properties in Neighborhoods 2 and 4, or open space areas. WUS in the central and southeastern areas of Neighborhoods 1 and 3 would be in open space dedicated RPO wetlands, buffers and fuel modification zones as per the Biologically Enhanced alternative. Non-wetland WUS in the far southeastern most area of the Project, Neighborhood 5, would intersect lots developed to the current General Plan consistent SR-2 zoning, and with fifteen homes instead of fifty-five, the impact will be greatly lessened compared to those of the Proposed Project.
Impacts to CDFW jurisdiction vegetated habitat, southern riparian forest, coast live oak woodland, southern willow scrub, mule fat scrub, herbaceous wetland and streambed	Off-site preservation of like habitat	LESS; Significant Mitigatable	CDFW jurisdiction habitats occur on -site together with USACE regulated habitats and the impact to the areas under CDFW jurisdiction would be reduced under the Valiano Vineyards alternative similarly to the reduced impact to USACE regulated WUS described above.
Impacts to County RPO wetlands, southern riparian forest and mule fat scrub	Off-site preservation of like habitat	LESS; Significant Mitigatable	Impacts to County RPO wetlands would be reduced similarly to USACE and CDFW jurisdiction habitats as described above.



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Impacts to breeding migratory birds	No grading or clearing of vegetation during breeding season	LESS; Significant Mitigatable	Impacts to seasonal migratory bird breeding will be less because development will require less time and impact fewer breeding seasons
Cumulative impacts to sensitive wildlife	Off-site preservation of like habitat	SIMILAR; Significant Mitigatable	
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Impacts to federal or state listed endangered & threatened species	n/a	SIMILAR; No Significant Impact	
Impacts to County Group C and D plant species and County Group 2 animal species	n/a	SIMILAR; Less than Significant	
Impacts to Arroyo Toad habitat	n/a	SIMILAR; No Significant Impact	
Impacts to Bald and Golden Eagle habitat	n/a	SIMILAR; Less than Significant	
Impacts to core wildlife area	n/a	SIMILAR; No Significant Impact	
Long term impacts to sensitive species resulting from indirect impacts/edge effects	n/a	LESS; Less than Significant	Far fewer homes and a smaller development foot print would result in less indirect edge effect impacts than those of the Proposed Project



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Impacts to occupied burrowing owl habitat	n/a	LESS; Less than Significant	Some non-native grassland burrowing owl habitat would be preserved in the Valiano Vineyards alternative resulting in less impact on burrowing owls.
Impacts to occupied coastal cactus wren habitat	n/a	SIMILAR; No Significant Impact	
Impacts to occupied Hermes copper butterfly habitat	n/a	SIMILAR; No Significant Impact	
Impacts to non-sensitive vegetation communities	n/a	LESS; Less than Significant	Far fewer homes and a smaller development foot print would result in less impact to non-sensitive vegetation. Also, the Valiano Vineyards alternative proposes to increase agricultural uses, not only reducing negative impacts but increasing positive impacts to these vegetation communities.
Impacts affecting groundwater table	n/a	SIMILAR; Less than Significant	
Indirect and cumulative impacts to sensitive vegetation communities	n/a	LESS; Less than Significant	Far fewer homes and a smaller development foot print would result in less impacts to sensitive vegetation communities
Impacts to wildlife access	n/a	LESS; Less than Significant	Far fewer homes and a smaller development foot print with more contiguous open space than the Proposed Project would result in less impact to wildlife access.
Impacts to core wildlife habitat and linkage areas	n/a	SIMILAR; Less than Significant	
Impacts to wildlife corridors	n/a	SIMILAR; Less than Significant	



Valiano Vineyards

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Impacts related to NCCP	n/a	SIMILAR; Less than Significant	
Impacts to connectivity between areas of high habitat value	n/a	SIMILAR; Less than Significant	
Impacts to narrow endemic species	n/a	SIMILAR; No Significant Impact	
Cumulative impacts to local policies, ordinances and adopted plans	n/a	SIMILAR; No Significant Impact	

Cultural Resources

The Valiano Vineyards alternative would lessen impacts to cultural resources

The effects of the Valiano Vineyards alternative on cultural resources would be less than those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified two significant cultural resource impacts of the Proposed Project and three less than significant impacts. Both of the significant impacts were determined to be mitigatable, and the impacts of the Valiano Vineyards alternative would be less than those of the Proposed Project for one of the two significant impacts. Impacts found to be less than significant would be similarly less than significant under the Valiano Vineyards alternative. With less impact for one of the significant impacts, the Valiano Vineyards alternative would lessen the significant cultural resource impacts of development compared to those of the Proposed Project, and is, therefore, environmentally superior.

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
CULTURAL RESOURCES			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
None			



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
Impacts to archeological resources	Data recovery program executed prior to grading	SIMILAR; Significant Mitigatable	
Impacts to potentially buried on- and off-site cultural resources	Grading monitoring and data recovery program and pre-grading survey	LESS; Significant Mitigatable	Less impact potential due to less grading
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Impacts to on-site historic resources	n/a	SIMILAR; Less than Significant	
Impacts to potentially important archeological or historic resources under County RPO	n/a	SIMILAR; No Significant Impact	
Cumulative impacts to cultural resources	n/a	SIMILAR; Less than Significant	

Noise

The Valiano Vineyards alternative would substantially lessen noise impacts

The noise effects of the Valiano Vineyards alternative would be much less than those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified nine significant noise impacts of the Proposed Project and four less than significant impacts. All of the nine significant impacts were determined to be mitigatable. The impacts of the Valiano Vineyards alternative would be less than those of the Proposed Project for all of these impacts with one reduced to no impact. The less than significant noise impacts of the Proposed Project would also be less than significant in the Valiano Vineyards



Valiano Vineyards

alternative and the impact of one of these would be less than in the Proposed Project. For these reasons, it can be reasonably concluded the Valiano Vineyards alternative would substantially lessen the significant noise impacts of the Proposed Project, and is, therefore, environmentally superior.

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
NOISE			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
None			
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
Impact of noise levels at exterior use areas of Neighborhood 5 adjacent to Country Club Drive	Installation of noise control wall	LESS; Significant Mitigatable	59% fewer ADTs will generate far less noise, lessening the traffic noise impact
Impact of noise levels at residential building facades facing Country Club Drive	Exterior-to-interior analysis to show interior noise levels below 45 CNEL	LESS; Significant Mitigatable	59% fewer ADTs will generate far less noise, lessening the traffic noise impact
Impact of residential air conditioner noise within 35 feet of property line	Installation of HVAC noise barriers	LESS; Significant Mitigatable	The Valiano Vineyards alternative would have ninety-six primary dwelling units with density less than one acre, compared to over 300 for the Proposed Project, and would have far fewer primary dwelling units within 35 feet of property line, lessening the impact of residential HVAC noise.
Noise impacts related to WTWRF equipment & generators	Enclose WTWRF equipment inside noise control enclosures	LESS; Significant Mitigatable	Smaller WTWRF to serve ninety-six primary dwelling units compared to 326 units will produce less noise and lessen the impact
Noise impacts related to wastewater pump stations	Enclose pumps and generators inside noise control enclosures	LESS; Significant Mitigatable	No pump station will be required at the northern end of the development lessening the impact



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Noise impacts related to water circulation booster pump station	Enclose pumps and generators inside noise control enclosures	LESS; No Significant Impact	No impact would occur in the Valiano Vineyards alternative because no residential development on steep slopes would exist, eliminating the need for a water booster pump station.
Noise impacts from ripping, heavy dozer, excavator or rock drill activities within 180 feet of homes	Erect 12-foot high barrier	LESS; Significant Mitigatable	Elimination of steep slope heavy rock grading or excavation will greatly reduce related noise impacts, possibly to less than significant
Noise impacts related to operation of rock breaker equipment	No use of a breaker within 300 feet of occupied residence property line	LESS; Significant Mitigatable	Elimination of steep slope heavy rock grading or excavation will greatly reduce related noise impacts, possibly to less than significant
Impacts related to blasting	Blast plan; noise barriers and blankets	LESS; Significant Mitigatable	Elimination of steep slope heavy rock grading or excavation will greatly reduce related noise impacts, possibly to less than significant
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Noise impacts of HVAC systems to off-site residential uses	n/a	SIMILAR; Less than Significant	
Noise impacts of construction activities to on-site noise sensitive land uses	n/a	SIMILAR; Less than Significant	



Valiano Vineyards

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Impacts on-site and off-site due to construction related vibration caused by vibratory roller equipment	n/a	LESS; Less than Significant	64% fewer primary dwelling units requiring pad soil compaction will lessen the impact greatly.
Cumulative noise impacts to exterior off-site outdoor use areas	n/a	SIMILAR; Less than Significant	

Paleontological Resources

The Valiano Vineyards alternative would lessen impacts to paleontological resources

The effects of the Valiano Vineyards alternative on paleontological resources would be less than those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified two significant paleontological resource impacts of the Proposed Project and one less than significant impacts. Both of the significant impacts were determined to be mitigatable, and the impacts of the Valiano Vineyards alternative would be less than those of the Proposed Project for both of the significant impacts. The impact found to be less than significant would be similarly less than significant under the Valiano Vineyards alternative, and the impact would be lessened under the alternative. With less impact for the two significant impacts and the less than significant impact, the Valiano Vineyards alternative would lessen the significant paleontological resource impacts of development compared to those of the Proposed Project, and is, therefore, environmentally superior.

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
PALEONTOLOGICAL RESOURCES			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
None			



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
On-site impacts to paleontological resources	Paleontological monitoring and report	LESS; Significant Mitigatable	Less impact potential due to less grading
Off-site impacts to paleontological resources	Paleontological monitoring and report	LESS; Significant Mitigatable	Less impact potential due to less grading
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Cumulative impacts on paleontological resources	n/a	LESS; Less than Significant	Less impact potential due to less grading

Transportation/Traffic

The Valiano Vineyards alternative would substantially lessen transportation/traffic impacts

The transportation/traffic effects of the Valiano Vineyards alternative would be much less than those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified four significant transportation/traffic impacts of the Proposed Project and five less than significant impacts. Of the four significant impacts, one was determined to be unmitigatable and three were determined to be mitigatable. The impacts of the Valiano Vineyards alternative would be less than those of the Proposed Project for all of these impacts. The unmitigatable impact, while lessened, would also be unmitigatable in the Valiano Vineyards alternative. The five less than significant transportation/traffic impacts of the Proposed Project would also be less than significant in the Valiano Vineyards alternative, and the effect of four of these impacts would be less for the Valiano Vineyards alternative than for the Proposed Project. For these reasons, it is evident the Valiano Vineyards alternative would substantially lessen the significant transportation/traffic impacts of the Proposed Project, and is, therefore, environmentally superior.

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
TRANSPORTATION/TRAFFIC			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
Cumulative impacts to Auto Park	None	LESS; Significant Unmitigatable	The Valiano Vineyards alternative would generate a total of 1,234 ADT, which is 64% less than the 3,462 ADT that would be generated by the Proposed Project. The



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Way/Mission Road – LOS D/D during AM and PM peak periods			reduced ADT level would lessen the impact compared to that of the Proposed Project.
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
Direct and cumulative impacts to Country Club Dr. from Auto Park Way to Hill Valley Dr. - LOS F	Restriping to “split” phasing and parking prohibition	LESS; Significant Mitigatable	The Valiano Vineyards alternative would generate a total of 1,234 ADT, which is 64% less than the 3,462 ADT that would be generated by the Proposed Project. The reduced ADT level would lessen the impact compared to that of the Proposed Project.
Direct and cumulative impacts to Country Club Dr. from Hill Valley Dr. to Kauana Loa Dr. – LOS F	Applicant shall pay the appropriate TIF amount	LESS; Significant Mitigatable	The Valiano Vineyards alternative would generate a total of 1,234 ADT, which is 64% less than the 3,462 ADT that would be generated by the Proposed Project. The reduced ADT level would lessen the impact compared to that of the Proposed Project.
Cumulative impacts to Auto Park Way/Country Club Dr. – LOS D during AM peak period	Restriping to “split” phasing and parking prohibition	LESS; Significant Mitigatable	The Valiano Vineyards alternative would generate a total of 1,234 ADT, which is 64% less than the 3,462 ADT that would be generated by the Proposed Project. The reduced ADT level would lessen the impact compared to that of the Proposed Project.
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Impacts to Valley Parkway/9 th Av & Valley Parkway/I-15 SB ramps – LOS D/D AM/PM peak hrs.	n/a	LESS; Less than Significant	The Valiano Vineyards alternative would generate a total of 1,234 ADT, which is 64% less than the 3,462 ADT that would be generated by the Proposed Project. The reduced ADT level would lessen the impact compared to that of the Proposed Project.
Impacts to unsignalized intersections	n/a	LESS; Less than Significant	The Valiano Vineyards alternative would generate a total of 1,234 ADT, which is 64% less than the 3,462 ADT that would be generated by the Proposed Project. The reduced ADT level would lessen the impact compared to that of the Proposed Project.



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Impacts to pedestrian, equestrian, and bicyclist safety	n/a	LESS; Less than Significant	The Valiano Vineyards alternative would generate a total of 1,234 ADT, which is 64% less than the 3,462 ADT that would be generated by the Proposed Project. The reduced ADT level would lessen the impact compared to that of the Proposed Project.
Impacts to alternative transportation	n/a	SIMILAR; Less than Significant	
Impacts associated with traffic hazards due to existing transportation design features	n/a	LESS; Less than Significant	The Valiano Vineyards alternative would generate a total of 1,234 ADT, which is 64% less than the 3,462 ADT that would be generated by the Proposed Project. The reduced ADT level would lessen the impact compared to that of the Proposed Project.

Hazards and Hazardous Materials

The Valiano Vineyards alternative would substantially lessen hazard & hazardous materials impacts

The hazards and hazardous materials effects of the Valiano Vineyards alternative would be much less than those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified five significant hazard and hazardous materials impacts of the Proposed Project and eight less than significant impacts. All five significant impacts were determined to be mitigatable. The impacts of the Valiano Vineyards alternative for four of these five impacts would be similarly significant mitigatable, and one would be reduced to less than significant. The eight less than significant hazards and hazardous materials impacts of the Proposed Project would also be less than significant in the Valiano Vineyards alternative. Additionally, the impact of four of the eight less than significant impacts summarized below would be less for the Valiano Vineyards alternative than for the Proposed Project. For these reasons, it can be reasonably concluded the Valiano Vineyards alternative would substantially lessen the significant hazards and hazardous materials impacts of the Proposed Project, and is, therefore, environmentally superior.

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
HAZARDS AND HAZARDOUS MATERIALS			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
None			



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
Impacts related to soils contaminated with gasoline range organics and petroleum hydrocarbons	Monitoring, testing, removal and proper disposal	SIMILAR; Significant Mitigatable	
Impacts related to demolition of structures potentially containing asbestos and/or lead paint	ACM and LBP survey; determination of safety requirements; proper disposal	SIMILAR; Significant Mitigatable	
Impacts related to conflicts with FPP due to lack of access to off-site APNs for fuel modification	Complete City of San Marcos Grant of Easement forms	LESS; Less than Significant	No fuel modification would be required on APNs 232-491-01-00, 232-491-42-00 or 232-492-02-00 because no dense housing would be located near these neighboring properties in the Valiano Vineyards alternative
Impacts related to fire service maximum travel time	Harmony Grove Fire Station in operation or approved alternate mitigation	SIMILAR; Significant Mitigatable	
Vector populations impacts due to equestrian facility, WTWRF and wet weather storage pond	DEH manure management and fly/vector control plan enforced by DEH	SIMILAR; Significant Mitigatable	



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Impacts associated with airport hazards	n/a	SIMILAR; Less than Significant	
Impacts associated with groundwater contamination	n/a	SIMILAR; Less than Significant	
Impacts related to hazardous waste associated with on-site WTWRF	n/a	LESS; Less than Significant	The WTWRF would be sized to serve only 96 primary dwelling units in the Valiano Vineyards alternative, compared to 326 in the Proposed Project, proportionally lessening the potential impact of hazardous waste associated with a WTWRF.
Impacts related to hazardous waste associated with on-site WTWRF and agricultural uses	n/a	SIMILAR; Less than Significant	
Impacts associated with wildland fire hazards	n/a	LESS; Less than Significant	The potential hazardous impact of wildland fire will be proportionally lessened with 64% fewer homes in the Valiano Vineyards alternative compared to the number in the Proposed Project. Additionally, the impact on the evacuation routes and surrounding area of evacuating Valiano residents in the event of a wildfire would be greatly reduced.
Impacts associated with emergency response	n/a	LESS; Less than Significant	Impacts to emergency response would be lessened with fewer dwelling units and residents. Also, in the event of an emergency evacuation, the impact of evacuating Valiano residents to area road congestion would be lessened and would present less of an impediment to emergency responders accessing the area.
Cumulative impacts from hazardous	n/a	SIMILAR; Less than Significant	



Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
materials			
Cumulative impacts from wildland fire hazards	n/a	LESS; Less than Significant	In the event of an emergency evacuation, the cumulative impact to area road congestion of evacuating Valiano, Harmony Grove Village, Harmony Grove Village South as well as other area residents in Eden Valley, Harmony Grove and Elfin Forest would be greatly lessened and would present less of an impediment to emergency responders accessing the area.

Geology and Soils

The Valiano Vineyards alternative would substantially lessen geology and soils related impacts

The geology and soils related effects of the Valiano Vineyards alternative would be less than those of the Proposed Project. The Valiano Project Draft Environmental Impact Report identified three significant geology and soils impacts of the Proposed Project and three less than significant impacts. All three of the significant impacts were determined to be mitigatable, and the impacts of the Valiano Vineyards alternative would be less than the Proposed Project for two of the significant impacts. The three impacts found to be less than significant would be similarly less than significant under the Valiano Vineyards alternative. With less impact for two of the three significant impacts, the Valiano Vineyards alternative would lessen the significant geology and soils related impacts of development compared to those of the Proposed Project, and is, therefore, environmentally superior.

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
GEOLOGY AND SOILS			
Significant Unmitigatable Impact of Proposed Project vs. Valiano Vineyards			
None			
Significant Mitigatable Impacts of Proposed Project vs. Valiano Vineyards			
Seismically induced settlement hazards	Site specific expert investigation, recommendation and remediation	LESS; Significant Mitigatable	Less impact potential due to less grading with little or no blasting
Seismically induced surface slope instability and rockfall	Site specific expert investigation, recommendation and remediation	LESS; Significant Mitigatable	Less impact potential due to less grading with little or no blasting and no residential development on steep slopes.



Valiano Vineyards

Proposed Project Impact	Mitigation	Valiano Vineyards Impact	Comment
hazards			
Impacts from expansive soils	Site specific expert investigation, recommendation and remediation	SIMILAR; Significant Mitigatable	
Less Than Significant Impacts of Proposed Project vs. Valiano Vineyards			
Impacts associated with seismic ground rupture	n/a	SIMILAR; Less than Significant	
Seismic ground acceleration hazards	n/a	SIMILAR; Less than Significant	
Cumulative geologic hazard impacts	n/a	SIMILAR; Less than Significant	



Valiano Vineyards

Community Support and Endorsements

The Valiano Vineyards alternative has been prepared by members of the Eden Valley, Harmony Grove and Elfin Forest communities which surround the Plan area. The community has a long tradition of active engagement in land use issues and has worked diligently with the County of San Diego over the years to advocate for a balanced approach to growth to provide needed housing while ensuring public safety and preserving the heritage of the community. The alternative is offered in this positive spirit of cooperation and is unanimously endorsed by Board resolution of the two community organizations representing residents of the area, Friends of Eden Valley for Responsible Development and The Elfin Forest Harmony Grove Town Council.