

CHAPTER 4 PROJECT ALTERNATIVES

4.1 Rationale for Alternative Selection

The California Environmental Quality Act (CEQA) requires the consideration of alternative development scenarios and the analysis of impacts associated with the alternatives. Comparing these alternatives to the project, the advantages of each alternative can be analyzed and evaluated. Section 15126.6 of the CEQA Guidelines requires that an environmental impact report (EIR) “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

The EIR analysis identified significant impacts to aesthetics, air quality, biological resources, cultural resources, geology/soils, greenhouse gas (GHG) emissions, hazards and hazardous materials, land use, mineral resources, noise, public services, traffic, and utilities. Mitigation measures were identified that would reduce all impacts to below a level of significance with the exception of short-term air quality, mineral resources, and cumulative traffic. A range of alternatives has been proposed that would reduce one or more impacts to the issue areas listed above.

CEQA Guidelines Section 15126.6 further states:

An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible (14 CCR 15126.6(a)).

The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the Lead Agency, but were rejected during the scoping process and briefly explain the reasons underlying the Lead Agency’s determination.

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (1) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (14 CCR 15126.6(c)).

As described in Chapter 1, Project Description, the project objectives are as follows:

1. Establish a master planned sustainable community that will provide housing opportunities for a variety of age groups, family sizes, and income ranges, that will be available to the public while promoting a safe, pleasant, and healthy living environment.

2. Contribute to improving the local jobs/housing imbalance in the Pala/Pauma Subregion by providing workforce housing that is in proximity to employment centers in the area, including the Pala Village Casino, Resort and Spa, other tribal casinos within the State Route (SR) 76 corridor.
3. Assist in the implementation of AB 32 and SB 375 to address global warming by reducing miles traveled through linking housing and employment in close proximity.
4. Preserving areas of sensitive habitat and critical corridor linkages on-site, along with providing meaningful regional open space for wildlife.
5. Establish land use compatibility with the existing and planned residential communities through cohesive land use/open space planning, comprehensive site planning, a variety of housing options and design guidelines.
6. Contribute to public safety and services by providing necessary public and private facilities, services, and infrastructure, in addition to providing funding of specific safety improvements in relation to SR 76.
7. Provide a community with convenient public and private active recreational facilities to encourage social gatherings and a healthy living environment.
8. Provide housing in varying densities and product types that will be close to the shopping, employment and transportation centers of the Pala Village Casino, Resort and Spa as well as to employment centers along the SR 76 Corridor in order to reduce required infrastructure and the length of automobile trips or a reduction of vehicle miles traveled (VMT), increase community livability, and preserve open space by compact development.

The specific alternative of “No Project” shall also be evaluated along with any impacts (14 CCR 15126.6(e)(1)). If the environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (14 CCR 15126(e)(2)).

An EIR need not evaluate the environmental effects of alternatives in the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project. The alternatives discussion is intended to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives as listed in Chapter 1, Project Description, and in this chapter of this Draft EIR.

Alternatives Considered But Rejected From Further Analysis

Alternate Location Alternative (Pala Canyon Development) – Rejected

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative project site location should be considered if development of another site is feasible and if development of another site would avoid or substantially lessen significant impacts of the project. CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in looking at an off-site alternative is “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location.” Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. CEQA Guidelines Section 15126.6(f)(1) also states that among the factors that may be taken into account when addressing the feasibility of alternative locations are whether the project proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). In an effort to identify an alternative location for the project, a selection criteria was developed to identify potential alternative project sites that would be large enough to accommodate the proposed uses and project objectives. When looking for the alternative sites, the following criteria were used:

- Alternative site had to be within the identified employment centers within the Pala/Pauma subregion.
- The alternative site can reasonably be acquired (or the site is already owned by the proponent).
- Alternative site had to feasibly accomplish most of the basic objectives of the project.
- General Plan (or Community Plan) land use designations, and availability of infrastructure.

With respect to an off-site location, there is no other similarly sized (513 acres) privately owned parcel, or group of contiguous parcels available for assembly that is available for development that would be in proximity to the employment centers that include the Pala Village Casino, Resort and Spa, other tribal casinos within the SR 76 corridor and that would provide the type of housing needed to help meet the imbalance between jobs and workforce housing in the Pala/Pauma Subregional Plan area. The availability of a large enough parcels that could provide the diversity of densities and lot sizes that would target the workforce housing needed for the currently underserved market area in the Pala/Pauma Subarea region, is an important factor of to meet project objectives 1, 2, 5 and 8. The project site was assembled in order to create a project site large enough in size and scale to meet the project objectives including accommodating a variety of housing types to serve the employment centers within the Pala/Pauma Subregional Plan area in a sustainably planned community.

There was only one available alternate location that was identified that could accommodate the project as designed, at a different site within the Pala/Pauma community. In 2006, a Plan Amendment Authorization (PAA 06-014) was requested by the owner of for the Pala Canyon Development located in Rice Canyon (Figure 4-1, PAA Alternative). That project proposed construction of 817 single-family and townhouse homes on the 419-acre parcel. The development was confined to 171 acres, with the remainder of the site providing recreational facilities (29 acres) and biological open space (219 acres). Compared with Warner Ranch, this alternative could result in greater impacts to agricultural resources, noise, land use, and potentially biological, aesthetic, and cultural resources. As the Pala Canyon development is approximately 2.5 miles west of the proposed project site and the Pala casino, resort and spa, and other tribal casinos within SR 76 corridor, it would not be as effective in reducing miles traveled though linking housing and employment for casino employees that would drive to work rather than walk from Warner Ranch (Objective 2, 3, 7, and 8), with the potential for more localized traffic and GHG emissions to result. Therefore, it was eliminated from further consideration in this EIR.

Phased Mineral Extraction Alternative – Rejected

According to the California Geological Survey, approximately 85 acres of the project site are within MRZ-2 lands (see Figure 2.9-1). As discussed in Section 2.9, Mineral Resources, of this EIR, MRZ-2 lands are areas where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence. Commercial grade aggregate may average around 12 feet in depth in these areas. This alternative would allow mining prior to project construction, yielding approximately 1.6 million cubic yards of material. The estimated value of this resource is \$16 million (minus extraction costs). It is anticipated that this would occur over 1 to 5 years, and would require a Major Use Permit and Reclamation Plan.

This alternative would potentially result in greater impacts to biological resources, air quality, hydrology/water quality, land use, noise, and traffic. In 2012, the proposed Liberty Quarry project on the San Diego/Riverside County boundary north of Warner Ranch was rejected by the Riverside County Board of Supervisors for these reasons. Due to the potential increase in impacts on the Warner Ranch property, this alternative is therefore rejected as well.

As discussed in Section 2.9, when site-specific studies were conducted for mineral resources, it was determined that approximately 60 acres of the property contained aggregate material that would be of commercial grade. The project is proposing to use these materials in project grading on site, as feasible.

Plan Authorization Amendment Alternative – Rejected

A previous Plan Authorization Amendment was approved for the Warner Ranch property on October 5, 2005, allowing a density of 2.33/dwelling units per acre (du/ac; a maximum of 1,196 dwelling units without consideration for other physical constraints and including a two-lane expansion of SR 76 from I-15 to the project site). This would result in a more intensive project than proposed, resulting in greater impacts to aesthetics, air quality greenhouse gases, biological resources, hydrology/water quality, land use, noise, traffic, and public services. Since 2005, County and Caltrans have determined that SR 76 should not be widened to four travel lanes. For these reasons, this alternative has been rejected.

Alternatives Selected For Further Analysis

This Draft EIR has incorporated a reasonable range of project alternatives that, collectively, attain a majority of the project objectives in a reasonable manner while reducing the severity of the significant impacts (before mitigation) identified under the proposed project.

The alternatives to the proposed project analyzed in this Draft EIR in Sections 4.2 through 4.5 are:

- **Alternative 1:** No Development
- **Alternative 2:** Estate Lots
- **Alternative 3:** Reduced Footprint
- **Alternative 4:** Reduced Density

4.2 No Development Alternative

4.2.1 No Development Alternative Description

The No Development Alternative would result in leaving the land in its current state (see Figure 1-26) without any discretionary permits, and only existing land uses with no development would occur.

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

Aesthetics

Changes to the existing visual character of the property, if they were to occur would be minimal, and existing conditions would remain. Impacts would be less than significant and less than the project's, which have been determined to be less than significant after imposing design and mitigation measures.

Agricultural Resources

The site presently supports a ranch house, equestrian facilities, and outbuildings. Under this alternative, the facilities, avocado and citrus groves, formerly used pasture areas would remain. The proposed project would remove the two southern groves and retain the two northern groves. According to the significance guidelines for agricultural resources, the on-site resources are not considered significant (Section 3.1, Agricultural Resources, and Appendix N). No impacts to agricultural resources would result from the No Development Alternative as compared to the project, which would result in less than significant impacts to agriculture resources.

Air Quality

Impacts to air quality, if they were to occur under the No Development Alternative, would be minimal because only existing land uses, without additional discretionary permits, would occur and emissions would be less than what is planned in the SIP or RAQS. Impacts to air quality from traffic, construction or operational activities would be less than significant and less than the project's, which has been determined to be significant, with mitigation to the extent feasible (during construction), but unavoidable.

Biological Resources

Impacts to biological resources, if they were to occur, would be less than significant because only existing land uses, without additional discretionary permits, would occur. There would be potential for limited expansion of the agricultural use of the property, but impacts would be less than significant and less than the project's, which has been determined to be less than significant after imposing design and mitigation measures including preservation and management.

Cultural Resources

Impacts to cultural resources would be less than significant because only existing land uses, without additional discretionary permits, would occur. The land would not be subject to the types of alteration that would typically significantly impact cultural resources. Impacts of this alternative would be less than the project's, which has been determined to be less than significant after imposing design and mitigation measures including preservation and management.

Energy

Similar to the proposed project, the No Development Alternative would not contribute to a cumulative impact to the wasteful or inefficient use of energy.

Greenhouse Gas Emissions

Impacts from GHG emissions, if they were to occur under the No Development Alternative, would be minimal because only existing land uses, without additional discretionary permits, would occur and emissions would be under screening criteria for GHG analysis. Cumulative impacts associated with greenhouse gasses would be less than the project's, which has been determined to be less than significant after imposing design and mitigation measures. However, it should be noted that range of affordability that could supply workforce housing close to employment centers within the Pala/Pauma Subregion and reduce vehicle miles traveled would not be afforded as it would with the project.

Geology/Soils

Two potentially significant impacts due geological or soil conditions were identified for the project: potentially compressible soils that could allow subsidence or settling, and liquefaction. Since only existing land uses, without additional discretionary permits, would occur, impacts would be less than significant. For the proposed project, these effects would be mitigated to less than significant through final engineering requirements developed from final soils and geology reports. Impacts from the alternative would be less than the project's, which has been determined to be less than significant after imposing design and mitigation measures.

Hazards/Hazardous Materials

Wildfire. Since only existing land uses, without additional discretionary permits, would occur, impacts from wildfire would be no greater than what exists. Under the No Project Alternative the threat of wildfires would still remain, but impacts would be less than the project's which has been determined to be less than significant after imposing design and mitigation measures.

Hazardous Materials. Since only existing land uses, without additional discretionary permits, would occur, impacts from hazardous materials would be no greater than what exists. Five potentially significant impacts due hazardous materials were identified for the project: possible presence of asbestos containing materials and possible presence of lead based paints in on-site structures that would be demolished, occurrence of organochloride pesticides and of arsenic above background levels in the orchard areas, possible occurrence of hydrocarbons in a small area associated with a diesel above ground storage tank, and the presence of 10 septic systems to be removed. Any impacts from asbestos or lead-based paint are associated with the demolition of the structures. The structures are assumed to be left as is under this alternative, so impacts would be less than significant. Continued application of herbicides and pesticides are assumed under this alternative. However, legally applied pesticides and herbicides would not contribute to those hazardous materials. Lastly, the septic systems would remain in place because there would be no

need for their removal. Impacts would be less than significant and less than the project's which has been determined to be less than significant after imposing design and mitigation measures.

Hydrology and Water Quality

All flow patterns of the mainstem of Gomez Creek and its tributaries and of Pala Creek would be maintained. Any potential for pollutants to enter the creek associated with project development would not occur. Impacts would be less than significant and less than the project's which has been determined to not be significant through compliance with the Watershed Protection Ordinance.

Land Use

There would be no change in or impacts to existing land use. Impacts of this alternative would be less than the project's, which would result in significant unmitigated impacts on the environment that are related to the project's location away from an established or planned village, as defined by the County's General Plan after imposing mitigation measures to the extent feasible.

Mineral Resources

At least some of the alluvium on site would be suitable for use in aggregate. The availability of this material would remain under this alternative, and impacts would be less than significant and less than the project's, which has been determined to be significant, with mitigation to the extent feasible (use of materials during construction), but unavoidable.

Noise

Since only existing land uses, without additional discretionary permits, would occur under this alternative, noise impacts would be less than significant and less than the project's, which has been determined to be less than significant after imposing design and mitigation measures including permanent and temporary noise barriers.

Population and Housing

Population and housing characteristics for this alternative would not change from the existing conditions so no impacts would occur. The project's impact has been determined to not be significant, but the No Project Alternative would result in fewer population-related impacts than the project.

Public Services

As only existing land uses, without additional discretionary permits, would occur under this alternative, the demand for all public services in the area would remain the same. There would be no change in response times from the police and fire departments; therefore there would be no need to construct a new fire station to service the site and surrounding communities. No additional students would be generated within the Fallbrook Union High School or the Bonsall Elementary School District. No school impact fees would be paid to the school district. Impacts would be less than significant and less than the project's, which has been determined to be which has been determined to be less than significant after imposing design and mitigation measures including provisions for added Sheriff and Fire services.

Recreation

No unexpected demand over what was included in the General Plan for recreational facilities would occur. Impacts would not be significant and less than the project's, which are not significant with inclusion of new public park facilities and a trail for community use in compliance with PLDO.

Transportation/Traffic

The amount of traffic would be minimal under this alternative because development would be related to existing land uses, without additional discretionary permits. Impacts would be less than significant and less than the project's, some of which have been determined to be less than significant after imposing design and mitigation measures including improvements to SR 76 and some of which would remain significant/unavoidable with mitigation to the extent feasible.

Utilities and Service Systems

Continued use of the five groundwater wells, septic systems, and existing fire response capabilities would be assumed with the possibility of a limited number of new systems based on the existing land uses, without additional discretionary permits. Impacts would be less than significant and less than the project's which have been determined to be less than significant after imposing design and mitigation measures including construction of new and expanded systems for water, sewage, and fire.

4.3 Estate Lots Alternative (Existing GP and Zoning)

4.3.1 Estate Lot Alternative Description

This alternative would require a Conservation Subdivision and would allow 20 lots in a slightly modified footprint compared to the proposed project, shown on Figure 4-2, Estate Lot Alternative. Lots would be a minimum of 8 acres to comply with the County's Groundwater Ordinance and

would require on-site septic systems. Both emergency vehicles and residents would have three entrances/exits onto SR 76. This alternative would not include the park or fire station.

4.3.2 Comparison of the Effects of the Estate Lot Alternative to the Project

Aesthetics

Changes to the visual character of the property would be minimal with the development of 20 new residences expected to occur with this alternative. The potentially significant impacts associated with cut slopes proposed with the project would likely be avoided. Impacts would be less than significant and less than the project's, which have been determined to be less than significant after imposing design and mitigation measures.

Agricultural Resources

The site has been used as a horse ranch for decades. In addition, there are four groves on the site; two citrus groves and two avocado groves. The proposed project would remove the horse ranch and the two southern groves and retain the two northern groves. Under this alternative, the two southern groves would be within Lots 1, 5 and 6, and within Lots 12, 13, and 14; the northern groves would be within Lots 1 and 8 (Figure 4-2). As with the project, it is unknown if the eventual owners of these lots would retain the groves or horse ranching. The larger lots would have the potential to retain and increase agricultural resources. According to the significance guidelines for agricultural resources, the on-site resources are not considered significant (Section 3.1 and Appendix N). However, loss of agricultural uses under the Estate Loss Alternative would be potentially less severe because more land would be available for agricultural use. Impacts to agricultural resources from the Estate Lot Alternative would be less than significant, but also less than the project's, which have been determined to be less than significant.

Air Quality

Impacts to air quality associated with 20 estate residences would result in reduced construction emissions and reduced operational traffic emissions. The amount of grading and associated temporary air impacts during this phase of development would be reduced, and short-term impacts would likely be less than significant. Daily traffic would be estimated at 240 ADT. Overall, impacts under this alternative would be less compared to the proposed project's, which have been determined to be significant, with mitigation to the extent feasible (during construction), but unavoidable.

Biological Resources

The footprint of this alternative is slightly different than the proposed project. This alternative would reduce overall impacts to 128.9 acres (as opposed to 154.3 acres under the proposed

project). The majority of the reduction is due to fewer impacts to southern cactus scrub and coastal sage scrub, which would also reduce impacts to the cactus wren (*Campylorhynchus brunneicapillus*) on site. Impacts of this alternative may be less than the project's, which have been determined to be less than significant with imposition of mitigation including preservation and management, but the mitigation for the alternative would be similar to what is required for the project after protection of RPO resources.

Cultural Resources

The Estate Lot Alternative has a slightly smaller footprint and less grading which would lessen the potential for impacts to undiscovered cultural resources, if present. Impacts of this alternative would be less than the project's, which have been determined to be less than significant after imposition of mitigation including preservation and management.

Energy

Similar to the proposed project, the Estate Lots Alternative would not contribute to a cumulative impact to the wasteful or inefficient use of energy.

Greenhouse Gas

The 20-lot development would be exempted from GHG studies and the impacts would be less than significant, but design features would still be required to meet current industry standards. Fewer dwelling units are proposed; thereby reducing traffic and operational emissions (electricity usage, natural gas usage, solid waste emissions, water usage, wastewater generation). The development footprint is also slightly smaller under this alternative, thus reducing the amount of grading and associated temporary air and GHG impacts during the construction phase of development. Compared to the project, impacts to greenhouse gasses associated with construction, traffic and operational emissions would be fewer as compared to the proposed project, which has been determined to be less than significant after imposing design and mitigation measures. However, it should be noted that range of affordability that could supply workforce housing close to employment centers within the Pala/Pauma Subregion and reduce vehicle miles traveled would not be afforded as it would with the project.

Geology/Soils

Two potentially significant impacts due to geological or soil conditions were identified for the project: potentially compressible soils which could allow subsidence or settling, and liquefaction. For the proposed project, these effects would be resolved through building design and structural engineering. Most of the lots located in this alternative are within the areas of potential subsidence and liquefaction. The same procedure would be followed with this

alternative. The reduction in units may allow for an easier resolution, should any of these potential impacts occur. Generally, impacts due to soil constraints would essentially be the same under this alternative as the proposed project, but would require the less mitigation because there would be less grading required.

Hazards/Hazardous Materials

Wildfire. The proposed project includes a fire station, a water storage tank, and hydrants. The project would also provide access to adjacent properties for fire-fighting vehicles, as project streets are required to be designed for such vehicles. The Estate Lot Alternative does not require the new fire station because it is within a 20-minute response time regional category (>SR4). Assuming the alternative would meet all other required elements of fire defensible development, the risk of wildfire would be similar to the project's which is also compliant with fire defensible regulations.

Hazardous Materials. Five potentially significant impacts due hazardous materials were identified for the project: possible presence of asbestos containing materials and possible presence of lead based paints in on-site structures that would be demolished, occurrence of organochloride pesticides and of arsenic above background levels, each at one sampling point in the orchard areas, possible occurrence of hydrocarbons in a small area associated with a diesel above ground storage tank. This alternative proposes twenty estate lots. Similar to the proposed project, the Estate Lot Alternative would be required to remediate these identified hazards at initial grading or with the initiation of a complete phase, and based on industry standards and regulations. Impacts would be similar to the project's, which has been determined to be significant and requiring mitigation.

Hydrology and Water Quality

All flow patterns of the mainstem of Gomez Creek and its tributaries would be maintained. A project under this Estate Lot Alternative would have less hardscape and more permeable area within the development envelope. No impacts would occur within the Pala Creek drainage. Each of the twenty lots would likely develop on its own schedule, with permitting of septic systems and erosion and runoff controls determined on an individual basis, as contrasted with the overall hydromodification, stormwater management, and drainage plans of the proposed project. The same industry standards and regulations would be applicable to development under this alternative as the proposed project. Impacts would be similar to the project's which has been determined to be less than significant but requiring design features to comply with the Watershed Protection Ordinance.

Land Use

This alternative would be more compatible with the general plan zoning. It would be compatible with lower-density rural residential development in the area. Impacts of this alternative would be less than the project's, which have been determined to be significant and unavoidable.

Mineral Resources

At least some of the alluvium on site would be suitable for use in aggregate. Under the proposed project approximately 60 acres of alluvium would be developed. A comparison of Figure 4-2 with Figure 2.9-3 shows the Estate Lot Alternative would impact the same areas of alluvium. The off-property alluvium would still be within the 49-acre off-site buffer, and the areas placed in biological open space would likely also be required to be in open space under this alternative. As with the project, the material would be used on approximately 40 acres as is feasible. Because development under this alternative would be by twenty individual owners and 8-acre lots, it is unlikely this material could feasibly be extracted and used on the project site, unless the development was done all at one time. The residential component of this alternative, like the project, would restrict future access and availability of this material. Furthermore, since the project's mitigation recovers only 1 percent of the resource, the impacts to mineral resources would still be considered similar, with or without mitigation for this alternative.

Noise

Construction-related noise impacts for 20 estate lots would be less than the project. Although the development footprint is slightly reduced by 25.5 acres, interior and exterior noise impacts generated by traffic along SR 76 could still occur along the site's southwestern boundary. Noise barriers could be required to mitigate noise under this alternative, as with the proposed project. Construction noise would not be significant for this alternative, though. The same mitigation would still be required for potential impacts to wildlife species if construction activities are anticipated during breeding season. Impacts under this alternative would be similar to the proposed project's, which have been determined to be less than significant after imposing mitigation including permanent and temporary noise barriers.

Population and Housing

Development under this alternative would also contribute to population growth in the overall area, but within the General Plan density that has been planned. It would provide 20 lots for housing for the area, with fewer options for the type and affordability of housing. Impacts to housing under this alternative would also be less than significant and therefore the same as the project.

Public Services

Impacts to public services would be reduced compared to the proposed project due to the decrease in dwelling units (20 homes vs. 780 homes). A new fire station would not be constructed under this alternative. Both emergency vehicles and residents would have three entrances/exits onto SR 76. There would be minimal impacts to schools and police services. Overall, impacts to public services would be less under this alternative because services would not have to be expanded and the alternative would be within the General Plan density.

Recreation

Development under this alternative would not result in the additional use of existing recreational facilities, as this alternative increases population size to within the General Plan density that has been planned. No new public parks or trails would be constructed under this alternative. Overall, impacts to recreation would be less under this alternative because the population increase would be less and the new park would not have to be built and staffed as the alternative would be within the General Plan density.

Transportation/Traffic

The amount of traffic generated by under this alternative would be less than under the proposed project. Under this alternative, approximately 240 trips per day would be generated. This total of 240 trips per day is in contrast to the approximately 6,327 trips per day projected for the proposed project. Signalization at the entry to the property from SR 76 would not be warranted under this alternative. Improvements to SR 76 along the property frontage proposed by the project would not be constructed under this alternative. Contributions to the Transportation Impact Fund would be less under this alternative than for the proposed project. Overall, traffic impacts would be less severe compared to the proposed project because there would be significantly less traffic on area roadways.

Utilities and Service Systems

Under this alternative, a water supply system or wells would be constructed, and each lot would require a separate septic system. The overall demand for water and wastewater treatment service and for solid waste disposal would be less under this alternative compared to the proposed project.

4.4 Reduced Footprint Alternative

4.4.1 Reduced Footprint Alternative Description

This alternative would have a smaller footprint than the proposed project and would consist of 350 two-story single-family residential units, a one-story commercial-retail building (23,000 square feet in size), fire station, public park, and a community center (Figure 4-3, Reduced Footprint Alternative). The park, fire station, and commercial area would be along the project's frontage. The setback from Gomez Creek would be increased and the western exit from the project site would be eliminated. Circulation would be modified in the western "lobe" to promote pedestrian traffic. Three at-will exits would be provided onto SR 76 with roads meeting public standards with right-turn only exits, and emergency vehicles would have access at these intersections. Cul-de-sacs would be limited to 800 feet in length.

4.4.2 Comparison of the Effects of the Reduced Footprint Alternative to the Project

Aesthetics

Under this alternative, the public park, fire station, and commercial area would be located along the project's frontage. All residential units would be two-story in height. The visual impacts of this alternative would likely be greater than those under the proposed project, because the commercial building would be more visible to motorists. However, the bulk and scale of the building would be less than the existing Pala Casino. Impacts would be similar to the project's, which has been determined to be less than significant with project design features and mitigation.

Agricultural Resources

Under the Reduced Footprint Alternative, the development footprint would be reduced by the elimination of the far northeast area of development included as part of the proposed project. There are no significant agricultural resources on the project site (Section 3.1 and Appendix N). The proposed project would remove the two southern groves and retain the two northern groves. The Reduced Footprint Alternative proposes to remove the same groves of trees, but portions of the horse ranch could remain. Impacts to farmland and agricultural resources would be similar for this alternative as for the proposed project, which has been determined to be less than significant. The larger common open space would have the potential to retain and increase agricultural resources. According to the significance guidelines for agricultural resources, the on-site resources are not considered significant (Section 3.1 and Appendix N). However, loss of agricultural uses under the Reduced Footprint Alternative would be potentially less because more land would be available for agricultural use.

Air Quality

Temporary or short-term air quality impacts associated with the grading phase of construction would be reduced in comparison to the proposed project, as the development footprint is smaller under this alternative. There would be an increase in operational emissions due to the commercial-retail aspect of this alternative. Air quality impacts would be reduced to acceptable levels though the implementation of design and regulatory measures, discussed in Section 2.2, Air Quality. Overall, air quality impacts under this alternative would be reduced in comparison to the proposed project.

Biological Resources

Under this alternative the amount of land disturbed would decrease from 154.3 acres to 98.3 acres. Impacts would primarily be reduced to southern cactus scrub and coastal sage scrub. The same mitigation measures would be required as the proposed project, but impact to the cactus wren would be reduced. Overall, impacts to biological resources would be less severe under this alternative compared to the project's which have been determined to be significant and requiring mitigation including preservation and management, but the mitigation for the alternative is likely to be similar to what is required for the project in consideration of RPO.

Cultural Resources

Impacts to cultural resources could potentially decrease because less land would be disturbed, but the same procedures and mitigation would still be required under this alternative. Impacts of this alternative would be less than the project's, which have been determined to be less than significant with mitigation including preservation and management.

Energy

Similar to the proposed project, the Reduced Footprint Alternative would not contribute to a cumulative impact to the wasteful or inefficient use of energy.

Greenhouse Gas

Temporary or short-term air quality and GHG impacts associated with the grading phase of construction would be less than significant, because the development footprint is smaller under this alternative. Cumulative impacts to GHG from project operations would be less under this alternative due to 430 fewer residential units and the addition of a modest amount of commercial-retail uses (23,000 sq. ft.). However, it should be noted that range of affordability that could supply workforce housing close to employment centers within the Pala/Pauma Subregion and reduce vehicle miles traveled would not be afforded as it would with the project.

Geology/Soils

Impacts to geology and soils would generally be comparable to those of the proposed project because they are site specific and depend on engineering remediation during grading.

Hazards/Hazardous Materials

Wildfire. Impacts associated with risk of wildfire would generally be comparable to those of the proposed project because the fire station and other applicable fire defensible regulations would be included as project features.

Hazardous Materials. Impacts associated with potential exposure to hazardous materials would generally be comparable to those of the proposed project because they are site specific and depend on remediation during site grading and construction.

Hydrology and Water Quality

All flow patterns of the mainstem of Gomez Creek and its tributaries would be maintained under this alternative. The development footprint is smaller compared to the project. However, preparation of a drainage study, a Stormwater Management Plan with acceptable Best Management Practices would still be required, the same as the proposed project. A project under this alternative would have similar impacts due to the strict regulations; but less hardscape and permeable area within the development envelope. Overall, impacts to hydrology and water quality would be similar to the proposed project.

Land Use

Implementation of this alternative would still require a GPA, Rezone, and SPA and would result in impacts on the environment that are related to this alternative's location away from an established or planned village, as defined by the County's General Plan. Land use impacts would remain similar to the proposed project which has been determined to be significant and unavoidable.

Mineral Resources

This alternative's impacts to mineral resources would be the same as under the proposed project, which would be significant and unmitigable. The residential component of this alternative, like the project, would restrict future access and availability of this material. Furthermore, since the project's mitigation can recover only 1 percent of the resource, the impacts to mineral resources would still be considered similar, with or without mitigation for this alternative.

Noise

The park, fire station, and commercial building would be along the project's frontage and provide noise shielding for the proposed two-story residences that would be located farther from SR 76. The alternative would also require incorporation of noise-reducing building materials to reduce interior noise to acceptable levels. Mitigation would still be required for potential impacts to wildlife species if construction activities are anticipated during breeding season, the same as the proposed project. Construction noise would likely be similar but have a shorter duration because less grading would be required. Overall, impacts to noise from this alternative would be similar to the proposed project.

Population and Housing

Development under this alternative would also contribute to population growth in the overall area, but at a lesser level as it proposes fewer dwelling units. It would provide housing for the area, with fewer options for type and affordability of housing. Similar to the project, there would be less than significant impacts to displacement of housing and displacement of people.

Public Services

Impacts to public services, which have been determined to be less than significant after imposing design and mitigation measures, are reduced under this alternative. A new fire station would still be constructed within the project footprint to provide adequate service to the project and surrounding areas. Developer fees would be paid to reduce impacts to school and police services. Similar to the project, there would be less than significant impacts.

Recreation

New on-site park facilities would be provided (including the community center), similar to the proposed project, and payment of in-lieu fees to mitigate the deficiency of public park facilities would still be required. Hiking trails would also be included under this alternative, the same as the proposed project. Overall, impacts to recreation would be similar to the proposed project.

Transportation/Traffic

The amount of traffic generated under this alternative would be less than under the proposed project. Under this alternative, approximately 5,760 trips per day would be generated (2900 for residential uses, 50 for the fire station, 50 for the park, and 2,760 for the commercial-retail uses). This is slightly less than the 6,327 trips per day projected for the proposed project. Signalization at the entry to the property from SR 76 would also be warranted under this alternative. Improvements to SR 76 along the property frontage proposed by the project would be done.

Mitigation for cumulative impacts of traffic on SR 76 east of I-15 would be developed with the Project Study Report, as with the proposed project, with each development project contributing its fair share. TIF contributions for this alternative would be less than for the proposed project. However, because there would approximately 565 fewer daily trips under this alternative compared to the project impacts would be slightly less severe.

Utilities and Service Systems

The water supply system and sewage disposal system would be constructed under this alternative, with solid waste services being similar to the proposed project. Generally impacts to utilities would be similar to the proposed project, but would be less severe because the number of new residents generated would be less compared to the project.

4.5 Reduced Density Alternative

4.5.1 Reduced Density Alternative Description

This alternative would occupy the same footprint as the proposed project, but the density would be reduced to 1.2 du/acre allowing 290 single-family units (37 percent fewer units), shown on Figure 4-4, Reduced Density Alternative. Neighborhoods would have more central parks and be more pedestrian-oriented. Cul-de-sacs would be limited to 800 linear feet. Three at-will exits would be provided onto SR 76 with roads meeting public standards with right-turn only exits, and emergency vehicles would have access at these intersections. The fire station and park would still be included along the project's frontage.

4.5.2 Comparison of the Effects of the Reduced Density Alternative to the Project

Aesthetics

Overall, this alternative would appear more "open," due to the reduced number of units and increased internal open space. The project's frontage would be similar to that of the proposed project. Generally, impacts to aesthetics would be similar to the proposed project, which have been determined to be less than significant after imposing design and mitigation measures.

Agricultural Resources

Impacts to agricultural resources would be similar to the proposed project because the footprint would be the same. Impacts to agricultural resources would be less than significant.

Air Quality

The number of dwelling units would be reduced by 37 percent under this alternative, resulting in a proportionate reduction in traffic and operational emissions. Temporary air quality impacts associated with the grading phase of construction would be the same as the proposed project because the same project footprint would be developed and the construction air quality impacts would be reduced to required levels through the implementation of design and regulatory measures discussed in Section 2.2. Impacts of this alternative would be less than the project's, which have been determined to be significant, with mitigation to the extent feasible (during construction), but unavoidable.

Biological Resources

Impacts would be approximately the same as under the proposed project because the same project footprint would be disturbed. Under this alternative the same mitigation measures would be required.

Cultural Resources

Impacts to cultural resources would be the same as for the proposed project because the same area would be disturbed. Under this alternative the same mitigation measures would be required.

Energy

Similar to the proposed project, the Reduced Density Alternative would not contribute to a cumulative impact to the wasteful or inefficient use of energy.

Greenhouse Gas

Cumulative impacts to GHG would be reduced under this alternative compared to the proposed project due to the construction and occupation of fewer homes, although construction-related impacts would be similar. Under this alternative the similar design features would be required. However, it should be noted that range of affordability that could supply workforce housing close to employment centers within the Pala/Pauma Subregion and reduce vehicle miles traveled would not be afforded as it would with the project.

Geology/Soils

Impacts would be approximately the same as under the proposed project because the same area would be disturbed and would be required to implement the same mitigation measures to address soil stability concerns. Under this alternative the same mitigation measures would be required.

Hazards/Hazardous Materials

Wildfire. Impacts associated with the risk of wildfires would be approximately the same as under the proposed project because the same project area would be developed and the fire station and other applicable fire defensible regulations would be included as project features.

Hazardous Materials. Impacts would be approximately the same as under the proposed project because the same project area would be developed.

Hydrology and Water Quality

A project under this alternative would likely have less hardscape and more permeable area within the development envelope. However, preparation of a drainage study, a Stormwater Management Plan with acceptable Best Management Practices would still be required, the same as the proposed project. Therefore, a project under this alternative would have similar impacts due to the strict regulations. Overall, impacts to hydrology and water quality would be similar to the proposed project.

Land Use

Implementation of this alternative would still require a GPA to Village designations (VR4.3 and VR7.3), Rezone, and SPA. Land use impacts would remain similar to the proposed project.

Mineral Resources

Impacts would be approximately the same as under the proposed project because the same area would be disturbed.

Noise

Impacts to noise would be approximately the same under this alternative as under the proposed project, although construction noise may be a shorter duration due to fewer homes being built. Under this alternative, similar mitigation measures would be required.

Population and Housing

Development under this alternative would also contribute to population growth in the overall area, but to a lesser degree because fewer dwelling units would be constructed. It would provide housing for the area, but with fewer options for the type and affordability of housing. Similar to the project, there would be less than significant impacts to displacement of housing and displacement of people.

Public Services

Impacts to public services would decrease under this alternative because there would be a smaller population. A new fire station would still be constructed within the project footprint to provide adequate service to the project and surrounding areas. Developer fees would be paid to reduce impacts to school services. Similar to the project, there would be less than significant impacts.

Recreation

New on-site park facilities would be provided (including the community center), similar to the proposed project, and there would be more room for back yard play areas. Hiking trails would also be included under this alternative, the same as the proposed project. Overall, impacts to recreation would be similar to the proposed project.

Transportation/Traffic

The amount of traffic generated under this alternative would be less than under the proposed project. Under this alternative, approximately 3,000 trips per day would be generated (2,900 for residential uses, 50 for the fire station, and 50 for the public park). This total of 3,000 trips per day is approximately 3,327 fewer trips compared to the 6,327 trips per day projected for the proposed project. Signalization at the entry to the property from SR 76 would also be warranted under this alternative. Improvements to SR 76 along the property frontage proposed by the project would be done. Mitigation for cumulative impacts of traffic on SR 76 east of I-15 would be required the same as the proposed project, with each development project contributing its fair share. TIF contributions for this alternative would be less than for the proposed project. Overall, the severity of traffic impacts would be less under this alternative because fewer daily trips and traffic would be generated compared to the project.

Utilities and Service Systems

The water supply system and sewage disposal system would be constructed under this alternative, with solid waste services being similar to the proposed project. Generally impacts to utilities would be similar to the proposed project, but would be less severe because the number of new residents generated would be less compared to the project.

Other Resource Topics

The water supply system and sewage disposal system would be constructed under this alternative, with solid waste services being similar to the proposed project. Generally impacts to

utilities would be similar to the proposed project, but would be less severe because the number of new residents generated would be less compared to the project.

4.6 Environmentally Superior Alternative

A summary of impacts of the alternatives compared to the proposed project by resource topic is included in Table 4-1, Summary of Analysis for Alternatives to the Proposed Project, pursuant to CEQA Guidelines Section 15126.6(D).

4.6.1 No Development Alternative

CEQA Guidelines require that an EIR identify the environmental superior alternative (14 CCR 15126.6 (e)(2)). If the environmentally superior alternative is the “No Project” Alternative, the EIR must identify an environmentally superior alternative from among the other alternatives. The No Project Alternative is the environmentally superior alternative. However, it would not meet any of the primary project objectives, particularly the provision of a variety of dwelling unit types to achieve a jobs/housing balance in the area. It also would not contribute to the area infrastructure, either by providing needed facilities (e.g., a new fire station) or payment of in-lieu fees to offset existing shortfalls in parks, law enforcement, and schools. For these reasons, it has been rejected.

4.6.2 Estate Lot Alternative

Impacts to agriculture, air quality, GHG, biology, cultural resources, quality, traffic, public services, and utilities would be less to those for the proposed project. Impacts to geology, hazards, minerals, noise, hydrology and population would be similar to the project. This alternative eliminates the need to construct and staff the public park and to construct the sewage disposal system and fire station. This alternative also eliminates a variety of housing products and types that would be affordable for the workforce in the area. The Estate Lot Alternative does not meet Project Objectives 1, 2, 3, 5 6, 7, and 8. In addition, this alternative could not be constructed without provision of new fire facilities under current County standards. The San Diego County Fire Authority, which manages CSA 135, has indicated that there are no services within the vicinity. For these reasons, it has been rejected.

4.6.3 Reduced Footprint Alternative

The primary benefit of this alternative is for biological resources, in that it would allow a larger setback adjacent to Gomez Creek. In Section 2.3, Biological Resources, of this EIR, Gomez Creek’s wetland functions and values were found to be adequately “buffered.” With the reduction of units (780 proposed with the project and 350 proposed with this alternative) impacts could be mitigated to below a level of significance with the exception of those to short-term air

quality, mineral resources, and cumulative traffic. However, this alternative would consist of 350 two-story single-family residential units and, therefore, would not provide multifamily units that are deemed as affordable to the workforce based on the County's Housing Element policies regarding affordable housing. This alternative does not meet a majority of the project objectives (Project Objectives 1, 2, 3 5, and 8) and thus it is rejected.

4.6.4 Reduced Density Alternative

This alternative would have more impacts than the Estate Lot or the Reduced Footprint alternatives, but impacts would be similar or slightly less than those of the proposed project because the project footprint would be similar. Impacts to aesthetics, agriculture, biology, cultural resources, hazards and hazardous materials, geology/soils, GHG emissions, land use, mineral resources, and utilities would be similar to those of the proposed project. Impacts to air quality, GHG emissions, public services and traffic would be less because fewer dwelling units would be built. Significant, unmitigable impacts to mineral resources and cumulative traffic would remain. However, this alternative would consist of 290 single-family units and does not include multifamily units that are deemed as affordable to the workforce based on the County's Housing Element policies regarding affordable housing. This alternative does not meet a majority of the project objectives (Project Objectives 1, 2, 3, 5, and 8) and thus it is rejected.

Table 4-1
Summary of Analysis for Alternatives to the Proposed Project

Issue Areas	Proposed Project	Alternatives to the Proposed Project			
		<i>No Development</i>	<i>Estate Lot</i>	<i>Reduced Footprint</i>	<i>Reduced Density</i>
2.1 Aesthetics	LTS	▼	▼	▲	—
2.2 Air Quality	SU	▼	▼	▼	▼
2.3 Biological Resources	LTS	▼	▼	▼	—
2.4 Cultural Resources	LTS	▼	▼	▼	—
2.5 Geology and Soils	LTS	▼	—	—	—
2.6 Greenhouse Gas Emissions	LTS	▼	▼	▼	▼
2.7 Hazards and Hazardous Materials	LTS	—	▲	—	—
2.8 Land Use	LTS	▼	▼	—	—
2.9 Mineral Resources	SU	▼	▲	—	—
2.10 Noise	LTS	▼	—	—	—
2.11 Transportation and Traffic	SU	▼	▼	▼	▼
2.12 Utilities and Service Systems	LTS	▼	▼	▼	—
3.1 Agricultural Resources	NS	▼	▼	—	—

Table 4-1
Summary of Analysis for Alternatives to the Proposed Project

Issue Areas	Proposed Project	Alternatives to the Proposed Project			
		<i>No Development</i>	<i>Estate Lot</i>	<i>Reduced Footprint</i>	<i>Reduced Density</i>
3.2 Hydrology and Water Quality	NS	▼	▲	—	▼
3.3 Population and Housing	NS	▼	▲	▼	▼
3.4 Recreation	NS	▼	▲	—	—
3.5 Energy	NS	▼	—	—	—
3.6 Public Services	NS	▼	▼	▼	▼

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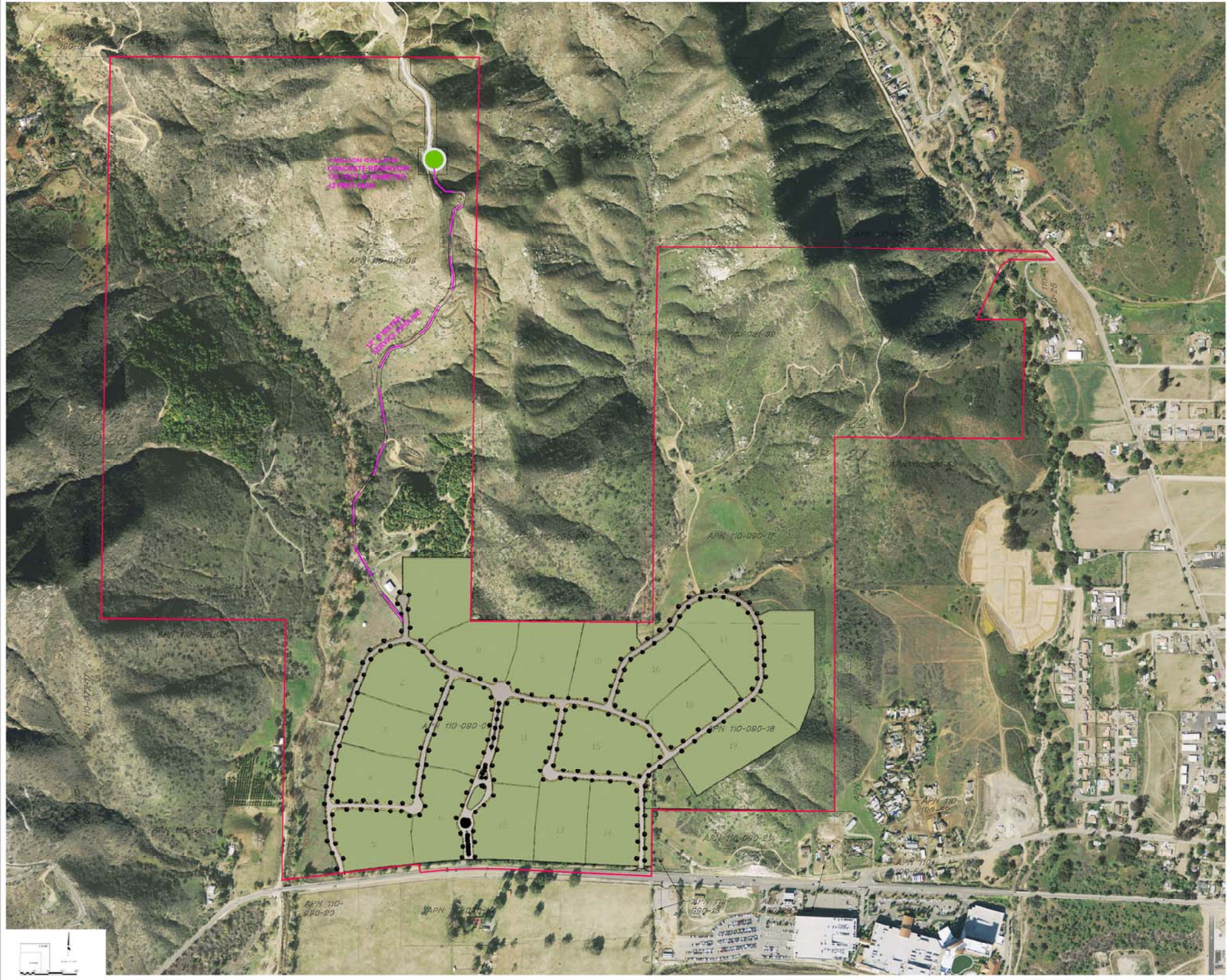
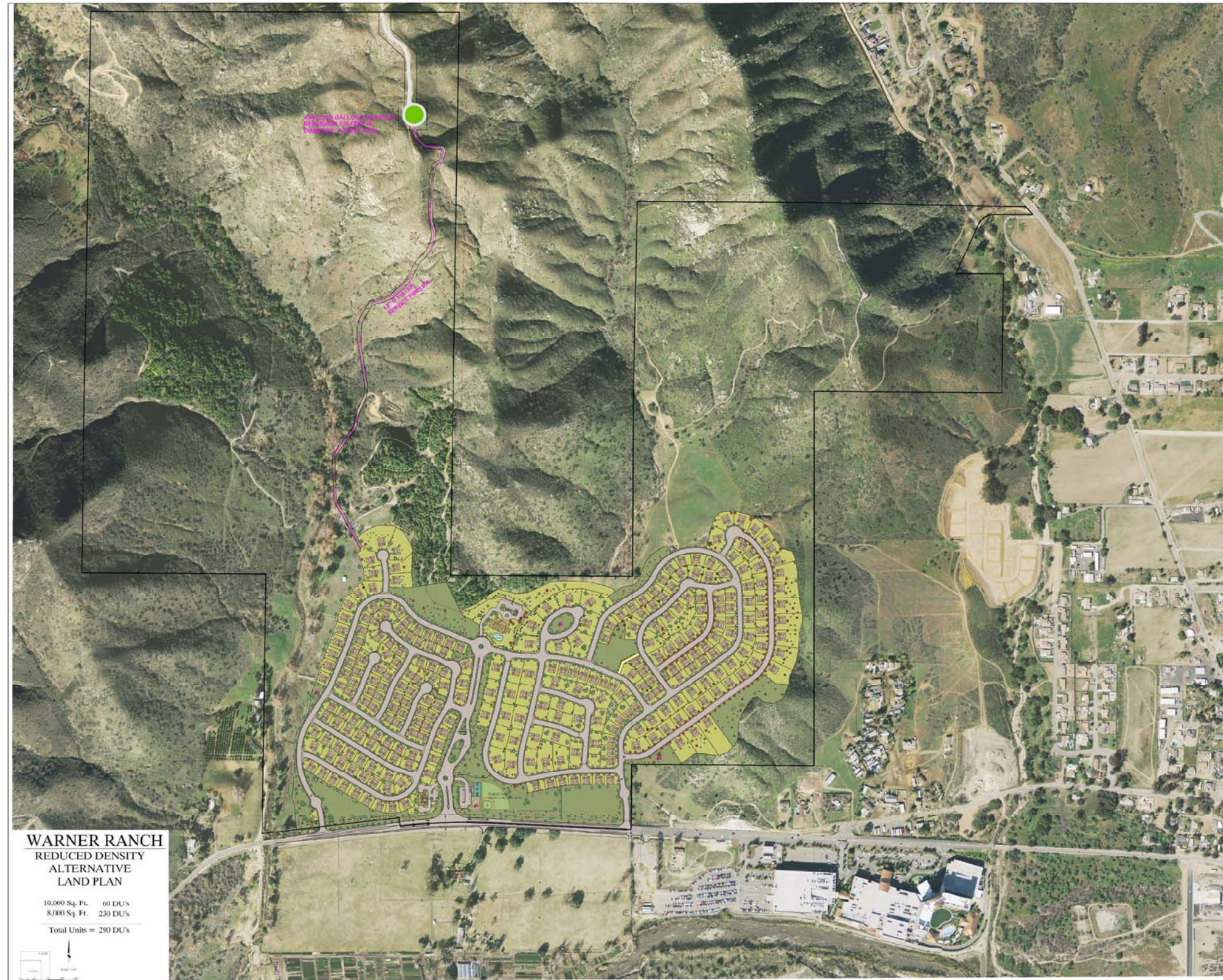


FIGURE 4-2
Estate Lot Alternative

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