

## CHAPTER 4.0 PROJECT ALTERNATIVES

### 4.1 Rationale for Alternative Selection

This section addresses alternatives to the proposed project, describes the rationale for their evaluation in the Draft EIR, evaluates the potential environmental impacts associated with each alternative, and compares the relative impacts of each alternative to those of the proposed project. In addition, this section analyzes the extent to which each alternative meets the project's objectives identified in Chapter 1, Project Description.

CEQA requires that an EIR consider a reasonable range of feasible alternatives (CEQA Guidelines, Section 15126.6(a)). According to the CEQA Guidelines, alternatives should be those that would attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project (CEQA Guidelines, Section 15126.6). The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines, Section 15126.6(f)).

CEQA also requires that the feasibility of alternatives be considered. Section 15126.6(f)(1) states that among the factors that may be taken into account in determining feasibility are: site suitability; economic viability; availability of infrastructure; general plan consistency; other plans and regulatory limitations; jurisdictional boundaries; and (when evaluating alternative project locations) whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site. Furthermore, an EIR need not consider an alternative whose effects could not be reasonably identified, whose implementation is remote or speculative, or that would not achieve the basic project objectives.

The alternatives addressed in this EIR were identified in consideration of the following factors:

- The extent to which the alternative could avoid or substantially lessen the identified significant environmental effects of the proposed project
- The extent to which the alternative could accomplish basic objectives of the proposed project
- The feasibility of the alternative
- The requirement of the CEQA Guidelines to consider a "no project" alternative

Pursuant to CEQA, the no project alternative evaluation assumes that the proposed project is not approved and that the existing conditions and any entitlements at the time of the Notice of Preparation was published remain, which

could reasonably be expected to occur in the foreseeable future if the proposed project were not approved (Section 15126.6(e)(3)(c)).

The proposed project includes three principal components:

- 1) Mining Component – Extraction of approximately 12.5 million tons of PCC quality construction aggregate (sand and gravel) over a 12-year period in the El Monte Valley on land that is zoned S82 - Extractive Use (intended for mining, quarrying, borrow pits and oil extraction). Mining activities would occur within approximately 228 acres. Extraction would begin in the eastern portion of the site and progress to the western portion in four phases.
- 2) Reclamation Plan (see Appendix J) - The Reclamation Plan includes the reclamation of mined lands to a usable condition for beneficial end uses, according to SMARA requirements. Reclamation of the project site would be continuous and follow the mining phases across the site from east to west. Successful reclamation would return the site to a beneficial end use of undeveloped land with recreational trail easements.
- 3) Revegetation Plan (see Appendix I) – The Revegetation Plan includes the restoration and creation of self-sustaining riparian and native upland habitat, and describes the methods of habitat restoration, performance standards, success criteria, monitoring, and potential remedial measures. Implementation of the Revegetation Plan would result in the restoration/creation of habitat that exceeds the minimum mitigation and reclamation plan requirements. Reclamation/revegetation would be completed four years after the proposed sand mining is complete.

The project would be completed in 16 years, i.e., mining and reclamation over the first 12 years with reclamation starting in year four and continuing for an additional four years after cessation of mining.

As described in Chapter 1, the objectives of the proposed project are as follows:

- 1) Recover and process PCC-grade construction aggregates in a safe and efficient manner.
- 2) Provide for return of mined areas to undeveloped land with recreational trail easements.
- 3) Provide 12.5 million tons of reliable, high-quality, locally produced aggregate product.
- 4) Reduce the County's dependence on imported aggregates, thereby reducing product cost, vehicle miles traveled, highway maintenance requirements, and associated vehicle emissions.
- 5) Restore native habitat following mining operations through the use of native species for revegetation.

- 6) Provide easements for recreational trails along the San Diego River Basin for local and regional use.

Following is a list of the project alternatives evaluated in this chapter that may offer environmental advantages over the proposed project and may be feasibly accomplished considering the economic, environmental, social, and technological considerations. Additional alternatives considered by rejected are included in Section 4.1.1.

- Alternative 1: No Project/No Development Alternative
- Alternative 2: Reduced Areal Extent Alternative
- Alternative 3: Altered Areal Extent Alternative

#### **4.1.1 Alternatives Considered but Rejected**

Alternatives may be eliminated from detailed consideration in an EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid or substantially reduce any significant environmental effects (CEQA Guidelines, Section 15126.6(c)). Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, also do not need to be considered (CEQA Guidelines, Section 15126.6(f)(3)). As allowed by CEQA, the lead agency may make an initial determination as to which alternatives are feasible and warrant further consideration and which are infeasible (CEQA Guidelines, Section 15126.6(f)(2)).

Accordingly, the No Project/Previously Approved Golf Course was analyzed and determined to not be a feasible alternative. Under the No Project/Previously Approved Golf Course, no sand extraction would occur and no reclamation would be required. Two 18-hole golf courses would be constructed, with a clubhouse, parking lot, practice area, and maintenance facilities. The golf courses would be operated for at least 50 years. This alternative was rejected from consideration because it would not address the need for construction-grade aggregate resources, specifically sand products, in San Diego County, and help meet the current and projected demand for construction aggregates within the market area. This alternative would not reduce the County's dependence on imported aggregates in the short-term thereby reducing product cost, vehicle miles traveled, highway maintenance requirements, and vehicle emissions.

The Reduced Footprint/Deeper Excavation Alternative, which was presented as the Project Description for the Notice of Preparation, was analyzed and determined to not be a feasible alternative. This alternative would extract 18-million tons of mineral resource over a 15-year period on 189 acres of land. Mining would be ongoing for 15 years and reclamation would commence four years after the start of mining and would continue over a 15-year period. Initial water production and make-up water sources were proposed to be provided by groundwater pumped from onsite wells. As the excavation reaches water table,

the well would be abandoned and water would be sourced directly from the pit. The plant will be capable of processing approximately 577 tons per hour and will operate up to 10 hours a day, five days a week. This alternative was rejected because it cannot be identified as a zero-net-groundwater-usage project, which is when the amount of groundwater used and returned to the ground is equal. By not being a zero-net-groundwater-usage project, potentially negative effects on groundwater levels would occur due to project demand and evaporation from an exposed water surface, and potentially negative effects on groundwater storage capacity in the basin would be anticipated.

A Reduced Annual Mining Production/Increased Mining Duration Alternative was also considered. Under this alternative, 12.5 million tons of construction aggregate would be extracted over a 15-year period on the project site. An average of 833,333 tons of aggregate extraction per year would occur under this alternative. The total amount of extraction under this alternative is the same as the proposed project and would occur over a longer period of time (15 years vs 12 years). The area proposed for mining, reclamation and restoration would be identical to the proposed project. As mining is completed in phases, the site would be restored to natural habitat, open space, and recreational trail easements as the end use on the property. Restoration activities would be the same as the proposed project but would extend the total project duration by three additional years. This alternative was rejected from consideration because it would not avoid or substantially reduce one or more impacts of the proposed project, and therefore would not meet CEQA requirements for an alternative.

## **4.2 Analysis of Alternative 1: No Project/No Development Alternative**

CEQA Section 15126.6(e)(1)(2) requires EIRs to evaluate a No Project Alternative to provide a comparison of the environmental impacts that would result if the proposed project is approved versus if it is not approved. The No Project Alternative should discuss the existing conditions at the time the NOP is published, and the circumstance under which the project does not proceed, taking into account what would reasonably be expected to occur in the foreseeable future by others.

### **4.2.1 Alternative Description and Setting**

The No Project/No Development Alternative assumes the proposed project would not occur. Under the No Project/No Development Alternative, the proponent would not mine or reclaim the project site nor include recreational trails. Under the No Project Alternative, the project site would remain undeveloped and in its current condition. When the prior Golf Course Project was approved by the County Board of Supervisors, the Board adopted Conditions of Approval for the project, (Applicant - El Monte Nature Preserve, LLC), to fulfill the mitigation requirements for the project.

In 2005, grading that had been underway on the El Monte project site for the previously approved Golf Course Project was halted and the Golf Course Project was not completed. As a result, 200.56 acres of the El Monte mine project site was disturbed by the grading activities, 91.86 acres of which are located within the currently proposed mine impact area and 108.7 acres which are located outside of the currently proposed mine impact area. As part of the entitlement process for the Golf Course Project, biological resource-related EIR mitigation measures and project conditions of approval were adopted and were required to be implemented to mitigate golf course-related grading impacts to onsite biological resources. The EIR mitigation measures and conditions of approval have not been implemented to date, and as a result, are now being included with the biological resource mitigation measures for the proposed mine project. Between 2005 and 2018, a portion of the impacted vegetation re-established itself through seed dispersal and recruitment.

The previously adopted Golf Course Project Final EIR mitigation measures and conditions of approval (as opposed to the proposed project's updated golf course impact mitigation requirements) would be required to be implemented under the No Project/No Development alternative. This includes the preparation, approval and implementation of a restoration/revegetation plan that incorporates the golf course Final EIR mitigation measures and conditions of approval. The project applicant would be required to implement these mitigation measures.

The No Project/No Development Alternative would likely result in the continued use of the project site as disturbed open space. Under the No Project/No Development Alternative, demand for aggregate resources would have to continue to be sourced from other existing and planned local and regional aggregate mine operations.

#### **4.2.2 Comparison of the Effects of the No Project/No Development Alternative (Alternative 1) to the Proposed Project**

The No Project/No Development Alternative would avoid all the significant and less than significant impacts associated with the proposed project. Some grading would need to occur to restore the riparian and upland areas affected by the previous Golf Course Project, but no additional grading beyond the restoration/revegetation grading or any structures would be constructed on the site. The site would remain undeveloped with much of the area containing disturbed habitats and non-native species.

The No Project/No Development Alternative would not meet the project objectives. Extraction and sale of aggregate resources on the proposed project site would not occur and the No Project/No Development Alternative would not provide a local source of PCC quality construction aggregate (sand and gravel). Habitat adjacent to the San Diego River would not be improved, and recreational uses (trails) would not be enhanced in the El Monte Valley.

### **4.3 Analysis of Alternative 2: Reduced Areal Extent Alternative**

Under Alternative 2, 10.3 million tons of construction aggregate would be extracted over a 12-year period on approximately 228 acres of the project site. Under Alternative 2, mining extent would be moved approximately 200 feet inward in the central portion of Phase 2 and Phase 3, further from homes located north and south of Willow Road and El Monte Road, as shown in Figure 4-1. In addition, Alternative 2 would relocate the ingress road further east along El Monte Road, away from existing homes adjacent to the southwest corner of the project site. Similar to the proposed project, as mining is completed in phases, the site would be restored to natural habitat, open space, and recreational trail easements as the end use on the property. Restoration activities would be the same as the proposed project.

#### **4.3.1 Comparison of the Effects of Alternative 2, Reduced Areal Extent Alternative, to the Proposed Project**

##### Aesthetics

The proposed project would result in changes to the existing landforms within the river bed and the valley floor that were determined to be significant and unmitigable during mining operations.

Alternative 2 would result in similar mining activities but with a narrower mining limit in Phase 2 and 3. Mining activities would occur farther away from homes north of Willow Road and south of El Monte Road. Therefore, aesthetic impacts would be lessened compared to the proposed project, however, the significance determination of significant and unavoidable would be much the same as the proposed project.

##### Agriculture/Forest Resources

The proposed project has potentially significant impacts from the site preparation, construction, excavation and reclamation activities related to noise and air quality that were also considered for potential effects on the Van Ommering Dairy Farm, which is located just north of the project site near the intersection of Willow Road and Dairy Road. However, these impacts have been determined to be less than significant with implementation of noise mitigation measures and air quality mitigation measures and design considerations. The project has been designed to minimize these effects on adjacent land uses, including the use of fencing and setbacks as buffers between mining phases and offsite land uses, including adjacent agricultural operations. These measures have been determined adequate to prevent incompatibility and impacts are therefore considered less than significant. The project site's existing zoning is consistent with the proposed uses. No conflicts with plans and policies related to agriculture have been identified.

Alternative 2 would require the same or similar noise and air quality mitigation measures, as the proposed project; therefore, potential impacts to agriculture and forest resources would remain less than significant.

### Air Quality

Construction and operational emissions would result from fugitive dust from project mining, processing and reclamation activities, as well as operation of heavy-duty construction equipment, vendor trips, haul trucks, and commuter trips. With the implementation of design considerations and mitigation measures, all project impacts would be reduced to less than significant levels.

Alternative 2 would result in similar mining activities as the proposed project, but with a narrower mining extent in Phase 2 and 3. While less material in total would be mined compared to the proposed project, Alternative 2 would have similar daily truck trips (and overall emissions) compared to the proposed project. Similar mitigation measures would be required to minimize air emissions associated with this alternative including dust control measures. As a result, air quality impacts would be similar to the proposed project.

### Biological Resources

Development activities associated with the proposed project would result in potentially significant direct and indirect impacts to special-status species, riparian habitat and sensitive natural communities, jurisdictional wetlands, and wildlife movement corridors. Implementation of proposed mitigation measures would result in less than significant impacts.

Alternative 2 would result in the same ground disturbing activities and would not result in a substantial reduction of impacts to biological resources. Total permanent and temporary impacts to vegetation communities and land cover types as a result of Alternative 2 are provided in Table 4.3-1 below. As compared with Table 2.3.2 Temporary and Permanent Project Impacts to Vegetation Communities for Alternative 2 are listed in Table 4.3.1 below. Impacts to Southern Willow Scrub (reduction of 0.12 acres), Tamarisk Scrub (reduction of 12.61 acres), Non-vegetated Channel (reduction of 0.11 acres), Diegan Coastal Sage Scrub (reduction of 0.59 acres), Non-Native Grassland (reduction of 11.47 acres), Eucalyptus Woodland (reduction of 0.31 acres), and Disturbed Habitat (reduction of 8.95 acres) are reduced under this alternative.

**Table 4.3-1: Impacts to Vegetation Communities and Land Cover Types (ACRES)**

<b>Habitat Type / Vegetation Community</b>	<b>Total Impacts</b>
<b>Riparian and Wetlands</b>	
Southern Cottonwood-willow Riparian Forest	0.00
Southern Willow Scrub	0.00
Tamarisk Scrub	29.20
Non-Vegetated Channel	0.25
<i>Subtotal</i>	<i>29.45</i>
<b>Uplands</b>	
Diegan Coastal Sage Scrub	3.02
Non-Native Grassland	75.08
Eucalyptus Woodland	0.99
<i>Subtotal</i>	<i>79.10</i>
<b>Other Cover Types</b>	
Disturbed Habitat	117.09
Developed	0.00
<i>Subtotal</i>	<i>117.09</i>
<b>Totals</b>	<b>225.64</b>

This Alternative would be required to implement the same mitigation measures for biological resources as the proposed project. Therefore, Alternative 2 would also have biological resources impacts that would be reduced to less than significant through the implementation of mitigation measures.

### Cultural Resources

The proposed project was determined to have potentially significant impacts to cultural resources. With the implementation of mitigation measures, potential impacts to cultural resources would be less than significant.

Alternative 2 would result in similar mining activities as the proposed project, but with a narrower mining extent in Phase 2 and 3. Potential impacts to cultural resources would be similar to the proposed project. The same mitigation measures required for the proposed project would be required for this alternative.

### Geology and Soils

The proposed project would not result in impacts to geology and soils resources, as the project does not involve placing people or structures in areas subject to elevated seismic risks.



Alternative 2 would also have less than significant impacts and incorporate the same design considerations as the proposed project.

### Greenhouse Gases

The project would result in emissions of GHGs throughout the life of the project. As specifically designed, the project would not exceed applicable thresholds for GHG emissions and would result in a less than significant impact with respect to the generation of GHGs.

Alternative 2 would result in similar mining activities as the proposed project. Annual GHG emissions would be the same as the proposed project. Impacts associated with Alternative 2 would also be considered less than significant.

### Hazards and Hazardous Materials

The proposed project was determined to result in a potentially significant impact related to vectors. That potential impact was determined to be less than significant with implementation of mitigation measure M-HZ-1 that requires the project to comply with a vector control plan.

Alternative 2 would also result in the same potential impacts that would be less than significant with implementation of the same mitigation measure.

### Hydrology and Water Quality

The proposed project was determined to have less than significant impacts on hydrology, drainage, and water quality.

Alternative 2 would implement the same best management practices, drainage improvements, and be subject to the same State Industrial Stormwater Permit requirements as the proposed project. Alternative 2 would not excavate below the groundwater table and would also not utilize groundwater. Therefore, Alternative 2 would also have less than significant impacts related to hydrology, drainage, and water quality.

### Land Use and Planning

The proposed project was determined to have a significant and unavoidable impact related to land use and planning, as the proposed project would not conform to the S Designator of the County's Zoning Ordinance.

Because Alternative 2 proposes a similar mining operation, it would also be inconsistent with the S Designator.

## Mineral Resources

Proposed project impacts to mineral resources would be significant and unavoidable as it would leave potentially mineable resources in place following reclamation and restoration. If additional mineral resources were extracted by mining into the groundwater table, potential impacts to groundwater levels in El Monte Valley are anticipated to be significant, unavoidable, and unacceptable. Alternative 2 would result in similar mining activities as the proposed project, but with a narrower mining extent in Phase 2 and 3. As Alternative 2 would not excavate below the groundwater table, potentially mineable resources would also be left in place following reclamation and restoration. Under Alternative 2, impacts to mineral resources would be similarly significant and unavoidable.

## Noise

The proposed project was determined to result in potentially significant impacts related to the exposure of offsite noise-sensitive receptors to noise levels exceeding the 75 dBA  $L_{eq}$  criteria for equipment operations. These potential impacts were determined to be less than significant with implementation of mitigation measures and project design features.

Similar to the proposed project, Alternative 2 could result in the potential exposure of offsite noise-sensitive receptors to noise levels exceeding the 75 dBA  $L_{eq}$  criteria for equipment operations noise at the project property boundary. However, Alternative 2 would relocate the ingress road further from residential homes on El Monte Road, further reducing noise from trucks turning into the project site near residential receptors. Similar to the proposed project, implementation of mitigation measures and project design features would be required to reduce equipment noise. Consequently, noise impacts under Alternative 2 would be similar compared to the proposed project. Impacts would be less than significant with mitigation and project design features similar to the proposed project.

## Population and Housing

The proposed project would not result in any impacts to population and housing.

Alternative 2 would also not result in impacts to population and housing.

## Public Services

The proposed project would result in less than significant impacts to public services.

Alternative 2 would also result in less than significant impacts to public services.

### Recreation

The proposed project would result in less than significant impacts to recreational facilities. The proposed project will be required to provide certain trails in accordance with the Community Trails Master Plan during the mining operation and as part of final reclamation and revegetation.

Under Alternative 2, potential impacts to recreational facilities would also be less than significant. Similar to the proposed project, this alternative would also include the construction of new multi-use trails throughout the project site.

### Traffic/Transportation

The proposed project was determined to have potentially significant direct and cumulative impacts that could be mitigated to less than significant. The impacts include: causing the average delay to increase at one intersection (Lake Jennings Park Road/El Monte Road/Julian Avenue) and one roadway segment (Lake Jennings Park Road between Blossom Valley Road and I-8); and significant cumulative impacts to two intersections (Lake Jennings Park Road/El Monte Road/Julian Avenue and Lake Jennings Park Road/I-8 Westbound Ramps) and one roadway segment (Lake Jennings Park Road, between Blossom Valley Road and I-8).

Alternative 2 would result in similar mining activities as the proposed project, and therefore would have similar truck trips compared to the proposed project. Overall impacts would be similar to the proposed project. Traffic impacts would remain less than significant with mitigation.

### Utilities and Service Systems

The proposed project would result in less than significant impacts to utilities and service systems.

Alternative 2 would also result in less than significant impacts to utilities and service systems as mining, reclamation, and revegetation activities would be similar to the proposed project.

## **4.4 Analysis of Alternative 3: Altered Areal Extent Alternative**

Under Alternative 3, 10.312.5 million tons of construction aggregate would be extracted over a 12-year period on approximately 228 acres of the project site, similar to the proposed project. Similar to Alternative 2, the mining extent of Alternative 3 would be moved approximately 200 feet inward in the central portion of Phase 2 and Phase 3, further away from homes located north and south of Willow Road and El Monte Road. To compensate for the narrower mining extent without increasing the depth of excavation, an additional area of

mining would occur on the eastern portion of the project site to the east and west of Dairy Road, as shown in Figure 4-2. In addition, similar to Alternative 2, Alternative 3 would relocate the ingress road further east along El Monte Road, away from existing homes adjacent to the southwest corner of the project site. Alternative 3 would locate the drop structure in the easternmost portion of Phase I, east of Dairy Road. Similar to the proposed project, as mining is completed in phases, the site would be restored to natural habitat, open space, and recreational trail easements as the end use on the property. Restoration activities would be the same as the proposed project.

#### **4.4.1 Comparison of the Effects of Alternative 3, Altered Areal Extent Alternative, to the Proposed Project**

##### Aesthetics

The proposed project would result in changes to the existing landforms within the river bed and the valley floor that were determined to be significant and unmitigable during mining operations.

Alternative 3 would result in similar mining activities with a narrower mining limit in Phase 2 and 3, but an extended mining area to the east that would be included in Phase I. Mining activities would occur farther away from homes along Willow Road and El Monte Road. While a new mining area would be added to the eastern portion of the project site, no residential homes are located in the eastern area where views would be impacted. Therefore, aesthetic impacts would be somewhat less than the proposed project, however, the significance determination of significant and unavoidable would be much the same as the proposed project.

##### Agriculture/Forest Resources

The proposed project has potentially significant impacts from the site preparation, construction, excavation and reclamation activities related to noise and air quality that were also be considered for potential effects on the Van Ommering Dairy Farm, which is located just north of the project site near the intersection of Willow Road and Dairy Road. However, these impacts have been determined to be less than significant with implementation of noise mitigation measures and air quality mitigation measures and design considerations. The project has been designed to minimize these effects on adjacent land uses, including the use of fencing and setbacks as buffers between mining phases and offsite land uses, including adjacent agricultural operations. These measures have been determined adequate to prevent incompatibility and impacts are therefore considered less than significant. The project site's existing zoning is consistent with the proposed uses. No conflicts with plans and policies related to agriculture have been identified.

Alternative 3 would require the same or similar noise and air quality mitigation measures, as the proposed project; therefore, potential impacts to agriculture and forest resources would remain less than significant.

### Air Quality

Construction and operational emissions would result from fugitive dust from project mining, processing and reclamation activities, as well as operation of heavy-duty construction equipment, vendor trips, haul trucks, and commuter trips. With the implementation of design considerations and mitigation measures, all project impacts would be reduced to less than significant levels.

Alternative 3 would result in similar mining activities (production rates and volumes) as the proposed project, but with an additional mining area to the east. Therefore, Alternative 3 would have similar truck trips (and overall emissions) compared to the proposed project. Similar mitigation measures would be required to minimize air emissions associated with this alternative including dust control measures. As a result, air quality impacts would also be reduced to less than significant with the implementation of mitigation measures and project design considerations.

### Biological Resources

Development activities associated with the proposed project would result in potentially significant direct and indirect impacts to special-status species, riparian habitat and sensitive natural communities, jurisdictional wetlands, and wildlife movement corridors. Implementation of proposed mitigation measures would result in less than significant impacts.

Alternative 3 would create a narrower mining extent in Phase 2 and Phase 3 similar to Alternative 2, but would include additional mining area to the east. Overall, Alternative 3 would result in similar areal extent of ground disturbing activities and would not result in a substantial reduction of impacts to biological resources compared to the proposed project. Total permanent and temporary impacts to vegetation communities and land cover types as a result of Alternative 3 are provided in Table 4.4-1 below. As compared with Table 2.3.2 Temporary and Permanent Project Impacts to Vegetation Communities, Alternative 3 would result in the impacts to habitat/vegetation communities as listed in Table 4.4.1 below. Impacts to Tamarisk Scrub (reduction of 5.26 acres), Southern Willow Scrub (reduction of 0.12 acres), Eucalyptus Woodland (reduction of 0.31 acres), disturbed habitat (reduction of 2.21 acres), and Non-Native Grassland (reduction of 10.48 acres) would be reduced, while impacts to Non-vegetated Channel (increase of 0.63 acres) and Diegan Coastal Sage Scrub (increase of 1.36 acres) would increase.

**Table 4.4-1: Impacts to Vegetation Communities and Land Cover Types (ACRES)**

<b>Habitat Type / Vegetation Community</b>	<b>Total Impacts</b>
<b>Riparian and Wetlands</b>	
Southern Cottonwood-willow Riparian Forest	0.00
Southern Willow Scrub	0.00
Tamarisk Scrub	36.55
Non-Vegetated Channel	0.99
<i>Subtotal</i>	<i>37.54</i>
<b>Uplands</b>	
Diegan Coastal Sage Scrub	4.97
Non-Native Grassland	76.07
Eucalyptus Woodland	0.99
<i>Subtotal</i>	<i>82.03</i>
<b>Other Cover Types</b>	
Disturbed Habitat	123.83
Developed	0.00
<i>Subtotal</i>	<i>123.83</i>
<b>Totals</b>	<b>243.41</b>

This Alternative would be required to implement the same mitigation measures for biological resources as the proposed project. Therefore, Alternative 3 would also have biological resources impacts that would be reduced to less than significant through the implementation of mitigation measures.

### Cultural Resources

The proposed project was determined to have potentially significant impacts to cultural resources. With the implementation of mitigation measures, potential impacts to cultural resources would be less than significant.

Alternative 3 would result in similar mining activities as the proposed project, but with a narrower mining extent in Phase 2 and 3 and additional mining area to the east. Alternative 3 would result in the same impacts as the proposed project. While there are new areas of ground disturbance compared to the proposed project, the same mitigation measures required for the proposed project would be required for this alternative. The significance determination of less than significant with mitigation would be similar to the proposed project.

### Geology and Soils

The proposed project would not result in impacts to geology and soils resources, as the project does not involve placing people or structures in areas subject to elevated seismic risks.

Alternative 3 would also have less than significant impacts and incorporate the same design considerations as the proposed project.

### Greenhouse Gases

The project would result in emissions of GHGs throughout the life of the project. As specifically designed, the project would not exceed applicable thresholds for GHG emissions and would result in a less than significant impact with respect to the generation of GHGs.

Alternative 3 would result in similar mining activities as the proposed project. Annual GHG emissions would be the same as the proposed project. Impacts associated with Alternative 3 would also be considered less than significant.

### Hazards and Hazardous Materials

The proposed project was determined to result in a potentially significant impact related to vectors. That potential impact was determined to be less than significant with implementation of mitigation measure M-HZ-1 that requires the project to comply with a vector control plan.

Alternative 3 would also result in the same potential impacts that would be less than significant with implementation of the same mitigation measure.

### Hydrology and Water Quality

The proposed project was determined to have less than significant impacts on hydrology, drainage, and water quality.

Alternative 3 would implement the same best management practices, drainage improvements, and be subject to the same State Industrial Stormwater Permit requirements as the proposed project. Alternative 3 would not excavate below the groundwater table and would also not utilize groundwater. Therefore, Alternative 3 would also have less than significant impacts related to hydrology, drainage, and water quality.

### Land Use and Planning

The proposed project was determined to have a significant and unavoidable impact related to land use and planning, as the proposed project would not conform to the S Designator of the County's Zoning Ordinance.

Because Alternative 3 proposes the same mining operation, it would also be inconsistent with the S Designator.

### Mineral Resources

Proposed project impacts to mineral resources would be significant and unavoidable as it would leave potentially mineable resources in place following reclamation and restoration. If additional mineral resources were extracted by mining into the groundwater table, potential impacts to groundwater levels in El Monte Valley are anticipated to be significant, unavoidable, and unacceptable.

Similar to the proposed project, Alternative 3 would leave potentially mineable resources in place following reclamation and restoration. Under Alternative 3, impacts to mineral resources would also be significant and unavoidable.

### Noise

The proposed project was determined to result in potentially significant impacts related to the exposure of offsite noise-sensitive receptors to noise levels exceeding the 75 dBA  $L_{eq}$  criteria for equipment operations noise at the project property boundary. These potential impacts were determined to be less than significant with implementation of mitigation measures.

Similar to the proposed project, Alternative 3 could result in the potential exposure of offsite noise-sensitive receptors to noise levels exceeding the 75 dBA  $L_{eq}$  criteria for equipment operations. While additional mining area would be added to the eastern portion of the project site, no residential homes are located in the eastern area, and therefore no new noise receptors would be impacted. In addition, Alternative 3 would relocate the ingress road further east on El Monte Road, reducing noise from trucks turning into the project site near residential receptors. Similar to the proposed project, implementation of mitigation measures and project design features would be required to reduce equipment noise. Consequently, noise impacts under Alternative 3 would be similar compared to the proposed project. Impacts would be less than significant with implementation of mitigation measures and project design features.



### Population and Housing

The proposed project would not result in any impacts to population and housing.

Alternative 3 would also not result in impacts to population and housing.

### Public Services

The proposed project would result in less than significant impacts to public services.

Alternative 3 would also result in less than significant impacts to public services.

### Recreation

The proposed project would result in less than significant impacts to recreational facilities. The proposed project will be required to provide certain trails in accordance with the Community Trails Master Plan during the mining operation and as part of final reclamation and revegetation.

Under Alternative 3, potential impacts to recreational facilities would also be less than significant and this alternative would also include the construction of new multi-use trails throughout the project site.

### Traffic/Transportation

The proposed project was determined to have potentially significant direct and cumulative impacts that could be mitigated to less than significant. The impacts include: causing the average delay to increase at one intersection (Lake Jennings Park Road/El Monte Road/Julian Avenue) and one roadway segment (Lake Jennings Park Road between Blossom Valley Road and I-8); and significant cumulative impacts to two intersections (Lake Jennings Park Road/El Monte Road/Julian Avenue and Lake Jennings Park Road/I-8 Westbound Ramps) and one roadway segment (Lake Jennings Park Road, between Blossom Valley Road and I-8).

While Alternative 3 would result in additional mining area in the eastern portion of the project site, a similar amount of material would be mined compared to the proposed project, and therefore Alternative 3 would have similar truck trips compared to the proposed project. Overall traffic impacts would be similar to the proposed project and would remain less than significant with mitigation.

### Utilities and Service Systems

The proposed project would result in less than significant impacts to utilities and service systems.

Alternative 3 would also result in less than significant impacts to utilities and service systems as mining, reclamation, and revegetation activities would be similar to the proposed project.

#### **4.5 Analysis of Alternative Location Alternative**

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative location should be considered if development of another site is feasible and if development of another site would avoid or substantially lessen one or more significant impact of the proposed project. Factors that may be considered when identifying an alternative site include the size of the site, its location, the General Plan (or Community Plan) land use designations, and availability of infrastructure. CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in looking at an offsite alternative is “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location.”

##### **4.5.1 Alternative Description and Setting**

In order to find a comparable alternate project site which would satisfy the Project’s objectives, a review and analysis of Geographic Information Systems (GIS) data was conducted. The aim of the GIS review was to identify another site zoned as S82 and of similar acreage as the project site within boundaries of the County of San Diego. The alternate project site would need to be zoned as S82 to demonstrate that mineral resources are available and intended for recovery. In addition, the alternate project site needed to be similar in acreage as the project site in order to achieve Project Objective No. 3, which aims to provide 12.5 million tons of reliable, high-quality, locally produced aggregate product. If the alternate project site could not produce the same amount of aggregate as the proposed project, the project could be economically infeasible to implement on that site. Based on the review and analysis of the GIS data, no parcels zoned S82 were identified within the County that meet the basic criteria required to implement the project. However, one potential parcel designated MRZ-2 and consisting of approximately 200 acres within the County was considered for an alternative site. However, this parcel was rejected as an alternative project site as it is zoned as Open Space/Conservation and would have restrictions that would not allow it to be a source of PCC-grade construction aggregate. No other similar undeveloped properties were identified with S82 zoning, similar acreage, or available for construction aggregate development in the County. Therefore, no feasible alternative locations were determined to exist for the proposed project.

#### **4.6 Environmentally Superior Alternative**

CEQA requires that an EIR identify the environmentally superior alternative of a project other than the No Project Alternative (CEQA Guidelines Section 15126.6(e)(2)). Table 4-2 compares the impacts of the No Project/No Development Alternative, Alternative 2: Reduced Areal Extent Alternative, and Alternative 3: Altered Areal Extent Alternative. The No Project/No Development Alternative would avoid all construction and operational impacts associated with the proposed project, but would not meet any of the project objectives.

Alternative 3 would meet all of the project objectives, and lessen the impact to aesthetics during construction by moving mining limits farther away from residential homes, Willow Road, and El Monte Road.

Alternative 2 would meet all of the project objectives, and lessen the impact to aesthetics during construction by moving mining limits farther away from residential homes along Willow Road and El Monte Road. In addition, while biological resource impacts would result in a similar significance determination as Alternative 3 (less than significant with implementation of mitigation measures), Alternative 2 would have less impacted acreages of vegetation communities and land cover types compared to Alternative 3. As result, Alternative 2 would be considered the environmentally superior alternative to the proposed project because it would result in fewer adverse environmental impacts.

**Table 4-1: Ability of Project Alternatives to Meet Project Objectives**

<b>Objectives</b>	<b>Alternative 1: No Project/ No Development Alternative</b>	<b>Alternative 2: Reduced Areal Extent Alternative</b>	<b>Alternative 3: Altered Areal Extent Alternative</b>
1) Recover and process PCC-grade construction aggregates in a safe and efficient manner.	NO	YES	YES
2) Provide for return of mined areas to undeveloped land with recreational trail easements.	NO	YES	YES
3) Provide 12.5 million tons of reliable, high-quality, locally produced aggregate product.	NO	YES	YES
4) Reduce the County's dependence on imported aggregates, thereby reducing product cost, vehicle miles traveled, highway maintenance requirements, and associated vehicle emissions.	NO	YES	YES
5) Restore native habitat following mining operations through the use of native species for revegetation.	NO	YES	YES
6) Provide easements for recreational trails along the San Diego River Basin for local and regional use.	NO	YES	YES

Source: ESA, 2016

**Table 4-2: Comparison of Alternatives to the Proposed Project**

Potential Impacts	Proposed Project Impacts	Alternative 1: No Project Alternative	Alternative 2: Reduced Areal Extent Alternative	Alternative 3: Altered Areal Extent Alternative
Aesthetics	SU	LESSER (LTS) ▼ ▼	SIMILAR (SU) ▼	SIMILAR (SU) ▼
Agriculture/Forest Resources	LTS	LESSER (NI) ▼ ▼	SIMILAR (LTS) =	SIMILAR (LTS) =
Air Quality	LTSM	LESSER (LTS) ▼ ▼	SIMILAR (LTSM) =	SIMILAR (LTSM) =
Biology	LTSM	SIMILAR (LTSM) =	SIMILAR (LTSM) =	SIMILAR (LTSM) =
Cultural Resources	LTSM	LESSER (LTS) ▼ ▼	SIMILAR (LTSM) =	SIMILAR (LTSM) =
Geology, Soils, Faulting, and Seismicity	LTS	SIMILAR (LTS) =	SIMILAR (LTS) =	SIMILAR (LTS) =
Greenhouse Gases	LTS	SIMILAR (LTS) ▼	SIMILAR (LTS) =	SIMILAR (LTS) =
Hazardous Materials	LTSM	LESSER (LTS) ▼ ▼	SIMILAR (LTSM) =	SIMILAR (LTSM) =
Hydrology and Water Quality	LTS	LESSER (NI) ▼ ▼	SIMILAR (LTS) =	SIMILAR (LTS) =
Land Use	SU	LESSER (LTS) ▼ ▼	SIMILAR (SU) =	SIMILAR (SU) =
Mineral Resources	SU	LESSER (NI) ▼ ▼	SIMILAR (SU) =	SIMILAR (SU) =
Noise	LTSM	LESSER (LTS) ▼ ▼	SIMILAR (LTSM) =	SIMILAR (LTSM) =
Population and Housing	LTS	LESSER (NI) ▼ ▼	SIMILAR (LTS) =	SIMILAR (LTS) =
Public Services	LTS	LESSER (NI) ▼ ▼	SIMILAR (LTS) =	SIMILAR (LTS) =
Recreation	LTS	LESSER (NI) ▼ ▼	SIMILAR (LTS) =	SIMILAR (LTS) =
Traffic	LTSM	LESSER (NI) ▼ ▼	SIMILAR (LTSM) =	SIMILAR (LTSM) =
Utilities	LTS	LESSER (NI) ▼ ▼	SIMILAR (LTS) =	SIMILAR (LTS) =

SU- Significant Unavoidable

LTSM- Less than Significant with Mitigation

LTS- Less than Significant

NI – No Impact

▲ ▲ Alternative would result in greater issue area impacts when compared to the proposed project and the difference would be significant.

▲ Alternative would result in greater issue area impacts when compared to the proposed project; however, this difference would be negligible and would not change the significance conclusion.

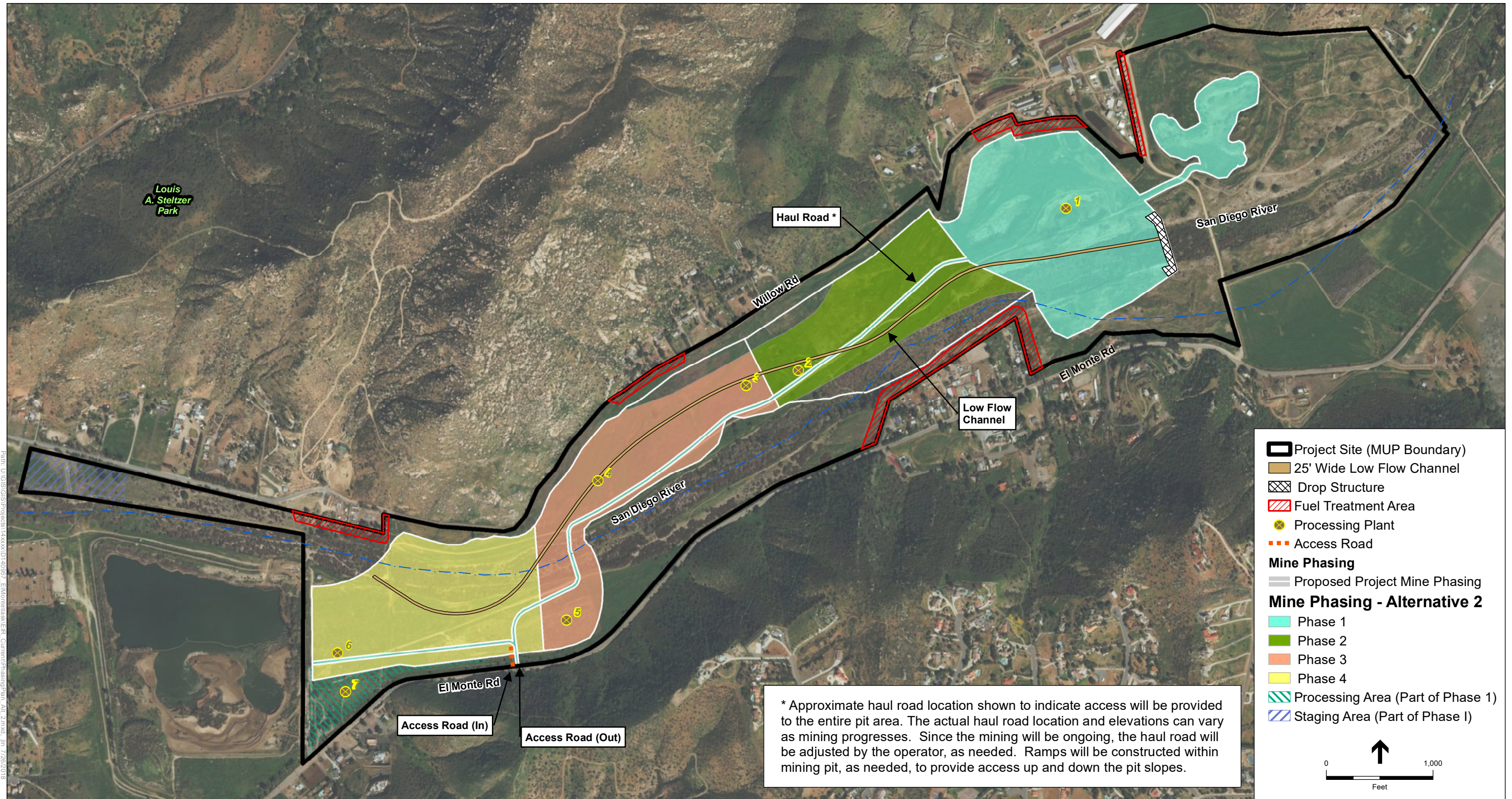
= Alternative would result in similar issue area impacts when compared to the proposed project.

▼ Alternative would result in reduced issue area impacts when compared to project; however, this difference would be negligible and would not change the significance conclusion.

▼ ▼ Alternative would result in reduced issue area impacts when compared to the proposed project and the difference would be significant.

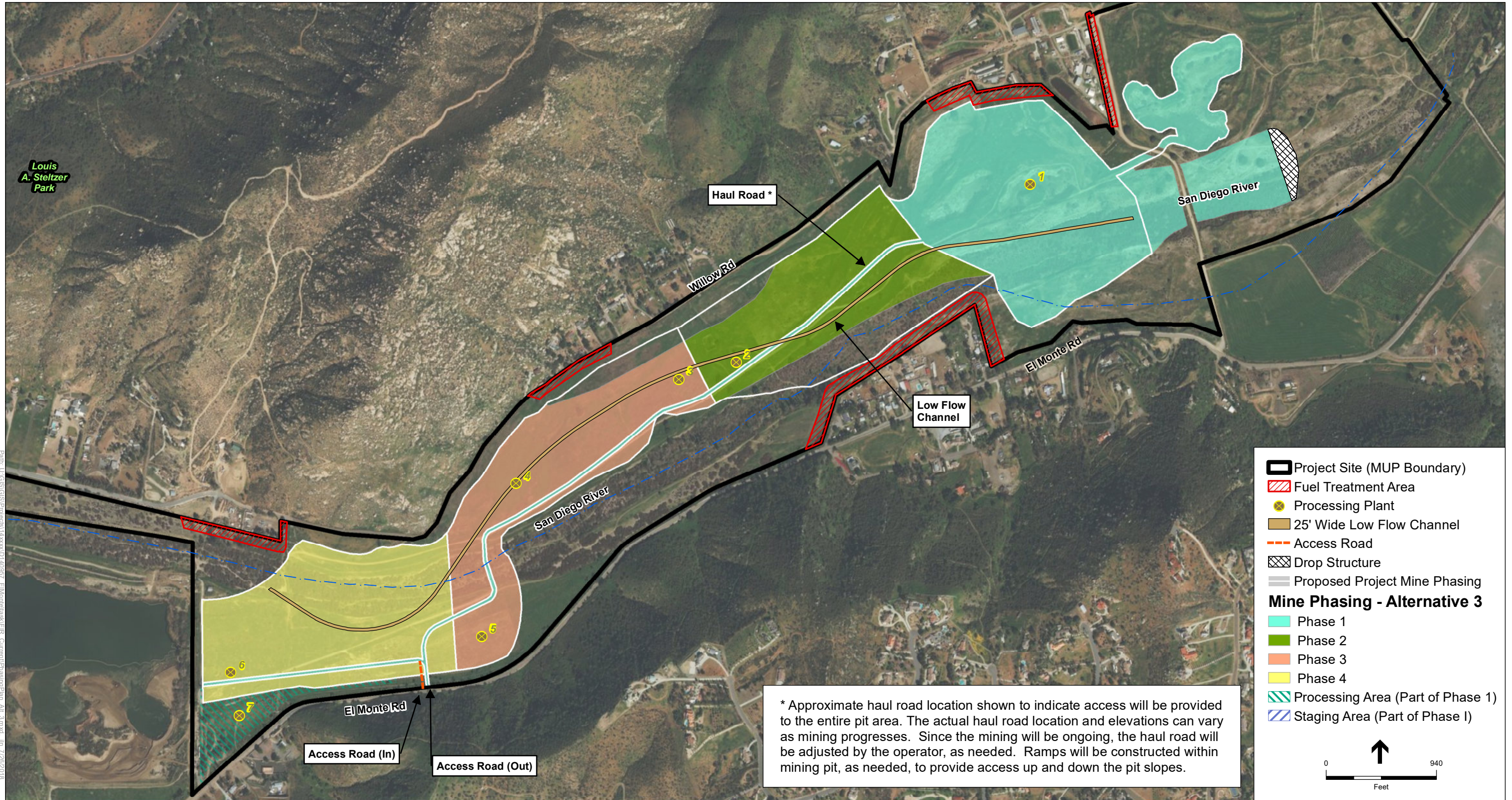
Source: ESA 2018

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\* Approximate haul road location shown to indicate access will be provided to the entire pit area. The actual haul road location and elevations can vary as mining progresses. Since the mining will be ongoing, the haul road will be adjusted by the operator, as needed. Ramps will be constructed within mining pit, as needed, to provide access up and down the pit slopes.

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Path: U:\GIS\Projects\140957\_ElMonteSandMining\CurrentPhasingPlan\_Alt3.mxd, In: 7/26/2018