included in the Fire Protection Plan and incorporated into alternative design. Impacts related to wildfire hazard would be similar to the proposed project.

The proposed project's evacuation plan would require revisions under this alternative to account for Newland Sierra Parkway as an additional route. Although this adjustment would be necessary, the routes would be similar to that of the proposed project (egress to the south via Mesa Rock Road, egress to the south on Sarver Lane, and egress to the west via Camino Mayor). The evacuation plan under this alternative would be subject to the same standards and County approval as for the proposed project. Evacuation would have similar impacts compared to the proposed project. Therefore, hazards and hazardous materials impacts would be similar to the proposed project.

Hydrology and Water Quality

For the majority of the project Site, impacts to hydrology and water quality would remain similar to the proposed project. The inclusion of Newland Sierra Parkway would increase the area both on site and off site that would be altered from the existing drainage pattern. Additionally, the segment of Deer Springs Road between Sarver Lane and Mesa Rock Road would still be improved as proposed under the project. Additionally, the segment of Deer Springs between Twin Oaks Valley Road and Sarver Lane, and the segment of Twin Oaks Valley Road between Buena Creek Road and Deer Springs Road, would require widening to six lanes under this alternative, increasing hydrology and water quality impacts compared to the project. Accordingly, adding a second four-lane road in addition to widening off-site roads would result in greater hydrology impacts. Newland Sierra Parkway would also introduce new impervious surfaces in an area that would be preserved as open space under the proposed project. Additionally, the 100 to 125 foot slope for Newland Sierra Parkway would increase stormwater runoff to off-site properties immediately to the south. Therefore, under this alternative, hydrology and water quality impacts would be greater than the proposed project.

Land Use and Planning

As the majority of the Site would be developed as planned under the proposed project, this alternative would also be consistent with most of the General Plan Guiding Principles, policies, and goals. Newland Sierra Parkway would cut across the southern portion of the project Site along slopes, and require additional acquisition of property, altering the character of these off-site properties. This alternative would require an amendment to the Mobility Element to add Newland Sierra Parkway and designate the new road as Route S12. Therefore, this alternative would result in similar land use impacts to the proposed project.

Mineral Resources

Under this alternative, the land use plan and the corresponding impacts to MRZ-2 area in the northwest portion of the project Site would be the same as the proposed project.

Noise

Development of Newland Sierra Parkway under this alternative likely would result in additional construction activity compared to the proposed project. This alternative would require an additional 1,456,100 cubic yards of cut, 5,652,200 cubic yards of fill, and 4,298,900 cubic yards of import, which would result in more grading-related activities, more construction generated noise, and more construction generated trips on the road network compared to the proposed project. Therefore, construction of this alternative would result in greater noise impacts than the proposed project.

Newland Sierra Parkway would be located in proximity to proposed noise-sensitive land uses (Town Center, Terraces, and Valley planning areas). The addition of a high-volume roadway that would be used by the majority of project-generated traffic, as well as traffic from the surrounding area, would result in new operational noise impacts at these noise-sensitive land uses, and likely would require additional noise-attenuating features.

This alternative would result in lower traffic volumes along the segment of Deer Springs Road between the existing Sarver Lane and Mesa Rock Road, resulting in decreased noise impacts along this road segment. However, as a result of the induced background traffic that would occur under this alternative (refer to the Transportation and Traffic section in Section 4.6.2 above), traffic volumes on the balance of the road network would be higher, resulting in greater operational trip-generated noise impacts overall. Therefore, operational trip-generated noise levels would be greater compared to the proposed project.

Paleontological Resources

Newland Sierra Parkway would be located on top of igneous and metamorphic bedrock, which underlies the majority of the project Site. This geologic formation has no potential to yield paleontological resources. Town Center, the Valley, Sierra Farms Park, and Sarver Lane (the same areas as the proposed project) would still be underlain by paleontologically sensitive geologic formations, and mitigation would still be required. Therefore, impacts to paleontological resources would be similar to the proposed project.

Parks and Recreation

The same park and recreational land uses and opportunities would be provided under this alternative as the proposed project. The same County Parkland Dedication Ordinance (PLDO) requirements and compliance would occur under this alternative when compared to the proposed project. Therefore, impacts to park and recreation would be the same as the proposed project.

Population and Housing

The same land uses are proposed under this alternative when compared to the proposed project, which would result in the same growth-inducing potential. However, compared to the project, this alternative would have greater growth inducing features with the expansion of off-site roadways to accommodate the higher traffic volumes induced by this alternative (specifically the widening of portions of Deer Springs Road and Twin Oaks Valley Road to six lanes south of the project Site, and the creation of two four lane roads through the project area. (See Transportation and Traffic section below.) Therefore, impacts to population and housing would be greater compared to the proposed project.

Public Services

This alternative would result in the same increase in population and demand for public services as the proposed project. This alternative would also pay the required public services fees and have project design features to aid in emergency response, similar to the proposed project. Primary Site access would be provided in the same location as the proposed project, which would not affect emergency travel times from DSFPD Station 12 on Mesa Rock Road. Overall, this alternative would result in similar impacts to public services as the proposed project.

Transportation and Traffic

Although this alternative would result in a different alignment of Newland Sierra Parkway compared to Newland Sierra Parkway Alternatives A and B, traffic impacts would be the same as those described under the other two alternatives. For a detailed discussion of the traffic modeling performed for the Newland Sierra Parkway Alternatives and the analysis of those modeling results, please refer to Appendix HH, Newland Sierra Parkway Feasibility Study, February 2017, and the Transportation and Traffic section under Section 4.6.2 above. For a comparison of the Newland Sierra Parkway Alternatives to the proposed project under the Existing Plus Project Plus Cumulative Project scenario, please refer to Appendix II, Newland Sierra Project Alternatives Traffic Analysis, May 2017.

As discussed above with respect to Newland Sierra Parkway Alternatives A and B, compared to the proposed project, the induced demand created by two four-lane roads under the Newland

Sierra Parkway Alternatives (in lieu of just one road under the proposed project) would result in greater impacts to the I-15/Deer Springs Road interchange, reduced impacts to Deer Springs Road between Mesa Rock Road and Sarver Lane, greater impacts to Deer Springs Road between Sarver Lane/Newland Sierra Parkway and Twin Oaks Valley Road, greater impacts to Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road (within the City of San Marcos), and greater impacts to Buena Creek Road and its intersections with Twin Oaks Valley Road, Monte Vista Drive, and S. Santa Fe Ave.

Compared to the proposed project, the higher traffic volumes resulting from the Newland Sierra Parkway Alternatives would require the widening of the segment of Deer Springs Road between Sarver Lane and Twin Oaks Valley Road and the segment of Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road to six lanes. Like the proposed project, the Newland Sierra Parkway Alternatives would result in the need for a new interchange at Deer Springs Road and I-15, although the Newland Sierra Parkway Alternatives would necessitate a larger, higher capacity interchange compared to the proposed project as a result of higher traffic volumes through the interchange. As Newland Sierra Parkway would traverse through the project Site, it would also require a number of intersections with the project's neighborhoods, reducing the effectiveness of the road as a Mobility Element road.

Additionally, this alternative would conflict with San Diego County General Plan Mobility Element Goal M-9 because it would build a new, four lane Major Road without maximizing the effective use of the existing transportation network.

In summary, Newland Sierra Parkway Alternative C would result in greater traffic impacts than the proposed project due to additional segment and intersection impacts and inconsistencies with the Mobility Element. Like the proposed Project, impacts to Caltrans and San Marcos facilities (the I-15 interchange, freeway mainlines, and Twin Oaks Valley Road), impacts to the intersection of Robelini Dr./S. Santa Fe Ave, and impacts to the segment of S. Santa Fe Ave. between Robelini Dr. and Buena Creek Rd. would remain significant and unavoidable.

Utilities and Service Systems

As this alternative does not include any land use changes compared to the project, this alternative would result in the same increase in demand for utilities and service systems on site as the proposed project. Demand and generation of water and wastewater on site would also be the same when compared to the proposed project. This alternative also would result in up to 125 feet of fill placed over an approximately 600-foot-long stretch of the San Diego County Water Authority's existing aqueduct southwest of the project Site. This amount of fill placed over the aqueduct would require a partial removal and reconstruction of the aqueduct with a reinforced design in the area subject to the additional fill. As a result, this alternative would result in

potential conflicts with utilities and service systems. Accordingly, under this alternative, impacts related to utilities and service systems would be greater than the proposed project.

Energy

The additional grading and construction impacts would result in an increase of energy consumption under this alternative as compared to the proposed project. As this alternative does not include any land use changes compared to the project, this alternative would result in the same on-site energy consumption from operations as the proposed project. Due to the increase in grading and construction required, energy impacts would be greater than the proposed project.

4.8.3 Relation to Project Objectives

Newland Sierra Parkway Alternative C would not meet all of the proposed project's objectives (see Section 4.2.1, Project Purpose and Objectives). By retaining the majority of the project's design, unit count and land uses, it would be generally consistent with Objectives 2, 3, 4, and 6, however, it would reduce attainment of Objectives 1 and 5. Related to Objective 1, due to the decrease in open space of approximately 11 acres and increase in disturbed area by approximately 33.5 acres, this alternative would reduce the attainment of preserving substantial open space in a permanent, managed preserve. Additionally, this alternative would bifurcate the southern block of preserve area resulting in a reduction in preserve connectivity due to the addition of a second, four lane major road. Due to the nature of the landform alteration required to implement this alternative, this alternative would also reduce attainment of integrating, maintaining, and preserving unique landscape features and distinct landforms along the I-15 corridor.

4.8.4 Feasibility

Deer Springs Road first appeared on U.S. Geological Survey Maps in 1901. The road was added to the County's Maintained Road System in 1951, became County Route S12 in 1961, and added to the County's Circulation/Mobility Element in 1967. In 1997, Deer Springs Road was added to the San Diego Association of Government's (SANDAG) Regional Arterial System (RAS). In 2011, the County updated the General Plan and classified Deer Springs Road as a six-lane Prime Arterial roadway in the Mobility Element. Neither the County's General Plan nor SANDAG's RAS anticipated two parallel Mobility Element roads in the Twin Oaks Valley area, making this alternative inconsistent with previous planning by SANDAG and the County.

Newland Sierra Parkway Alternative C would require design exceptions to the County's Public Road Standards, specifically an exception to accommodate a road grade of up to 9 percent in steepness for an approximately 7,000-foot-long section of the road, for a horizontal curve radius of 700 feet, and a non-standard/skewed intersection with Deer Springs Road. In contrast, the

County's road standards allow for a maximum road grade of 7 percent and a minimum curve radius of 1,200 feet for a road with a Major Road classification; and, thus, the design would not comply with the Public Road Standards. The design would increase the likelihood of speeding which could result in a public safety issue. Additionally, the steep grade and potential substandard design, in combination with the fact that available mitigating design features to control speed would be limited under the circumstances, could, effectively, prevent most trucks from using the road, despite it serving as Route S12 under this alternative.

This alternative also would result in up to 125 feet of fill placed over an approximately 600-foot-long stretch of the San Diego County Water Authority's existing aqueduct southwest of the project Site. This amount of fill placed over the aqueduct would require a partial removal and reconstruction of the aqueduct with a reinforced design in the area subject to the additional fill. The San Diego County Water Authority also must approve the placement of fill over this water transmission facility and the rebuilding of the aqueduct.

In summary, this alternative has implications for the project and the County's Mobility Element, some of which render this Alternative impractical, including: (a) 4,298,900 yards of dirt import over a 2-year period; (b) a redesign of the project with a highly visible 125-foot-tall fill slope impacting a large area of private property, and the related partial removal and reconstruction of a County Water Authority aqueduct; (c) a Major Road with a grade of 9 percent (28 percent steeper than allowed by the County's road standards for this classification); (d) the realignment, raising, and reconstruction of approximately 2,200 feet of the existing Deer Springs Road; (e) a road whose steepness would present an impediment to trucks despite serving as Route S12; and (f) the applicant's ability to acquire additional off-site properties or right-of-way for the Newland Sierra Parkway alignment.

4.8.5 Evaluation of Significant Impacts

Newland Sierra Parkway Alternative C does not reduce any impacts from the proposed project. Because this alternative does not reduce any impacts, it is not considered an alternative under CEQA; it is still provided in full to allow decision makers and the public to evaluate and understand the alternatives suggested by Golden Door Properties, LLC.

The Newland Sierra Parkway Alternative C would result in greater significant impacts than the proposed project in the following areas:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy

- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Population and Housing
- Transportation and Traffic
- Utilities and Utility Systems

4.9 Multi-Family Town Center Alternative

4.9.1 Multi-Family Town Center Alternative Description and Setting

During the public scoping process, Golden Door Properties, LLC asked that the EIR address a Multi-Family Town Center Alternative to the proposed project. This alternative is depicted in Figure 4-9. The Multi-Family Town Center Alternative would move all residential units to the southeastern corner of the project Site, clustered around the proposed commercial area (near the area currently designated as Village in the County's General Plan) to promote walkability. This alternative would be accessed by a single ingress/egress point near the Deer Springs Road/Mesa Rock Road intersection. A secondary access, which would generally follow the alignment of the proposed project's internal roadway to Sarver Lane, would serve as emergency access only. The comment letter received during the public scoping process requested that this alternative also provide a shuttle to Escondido Transit Center; this shuttle is already included in the proposed project and would be included under this alternative.

When compared to the proposed project, open space would increase by approximately 342 acres; disturbed area would decrease by approximately 342 acres; and grading would increase by approximately 16,931,000 cubic yards of cut and decrease by approximately 355,000 cubic yards of fill, resulting in approximately 17,266,000 cubic yards of exported material under this alternative. The residential unit count and commercial square footage would remain the same as the proposed project. However, all 2,135 units would be multi-family units, with no single-family units provided. Sarver Lane would not be improved as planned under the proposed project. Deer Springs Road, however, would be improved as proposed under the proposed project (under either Option A or Option B), due to traffic generated by this alternative.

4.9.2 Comparison of Significant Effects between Alternative and Proposed Project

Aesthetics

Under this alternative, approximately 342 acres would no longer be developed and would remain as open space. As such, for much of the northern and western portions of the project Site, changes to visual character and quality would no longer occur when compared to the proposed

project. However, with all development placed in the southeastern corner of the project Site, impacts to Key Views 1, 2, and 3 would be greater, as land uses would be more intense and more strongly contrast with the existing character of the area when compared to the proposed project. Development of this alternative would require substantially more grading (additional 16,931,000 cubic yards of cut, 158 percent more than the proposed project), which would cut into existing slopes and landforms to a greater degree when compared to the proposed project. The entire southeastern corner would be flattened to provide large graded pads to accommodate the intensity of development of this alternative. The southeastern portion of the project Site is the most visible portion from the I-15 corridor ("B" Design Review Area). This alternative would require structures of greater bulk, scale, form, and height when compared to the proposed project to accommodate all land uses in a smaller area. This would result in an inconsistency with the I-15 Corridor Scenic Preservation Guidelines (Site Design, Site Planning Standards, Policy 1). Despite an increase in open space, this alternative would result in greater significant impacts to visual character and consistency with applicable visual resources plans than the proposed project. Therefore, this alternative would result in greater aesthetic impacts.

Agricultural Resources

As with the proposed project, this alternative would require the widening of Deer Springs Road between the Twin Oaks Valley Road and Mesa Rock Road and the widening of Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road which would result in the same impacts to off-site agricultural resources as the proposed project. Like the project, this alternative would be required to comply with the County's PACE Program to mitigate off-site impacts.

Air Quality

Under the proposed project, grading would be balanced within the boundaries of the project and the improvements to Deer Springs Road and Sarver Lane immediately off site and, therefore, would not result in the need for soil import or export activity and associated off-site haul truck trips. Under the Multi-Family Town Center Alternative, grading would not be balanced, and approximately 17,266,000 cubic yards would be exported (refer to cut/fill quantities above). Exported material would be hauled off site, resulting in approximately 1,079,125 haul trucks (assuming the CalEEMod default 16-cubic-yard hauling capacity), or 2,158,250 one-way haul trips, during the construction phase that would not occur under the proposed project. CalEEMod also employs a 20-mile default haul distance for import and export trips. Therefore, the addition of these export haul trips would result in increased emissions during the grading phase when compared to the proposed project. Therefore, during construction, this alternative would result in greater air quality impacts when compared to the proposed project.

Although the same unit count is proposed under the Multi-Family Town Center Alternative, all units would be multi-family, which would result in lower trip generation. This alternative would result in 17,532 ADT, which would be 4,677 fewer trips when compared to the proposed project. Trip distribution would differ under this alternative because all traffic would ingress/egress at the southeastern corner of the project Site. Overall operational emissions would decrease when compared to the proposed project. However, due to construction, overall air quality impacts would be greater than the proposed project.

Biological Resources

Open space would increase by 342 acres under this alternative due to the consolidation of development in the southeastern portion of the project Site. This would result in an overall reduction of on-site impacts to vegetation communities and critical habitat (coastal sage scrub). The consolidation of development would create a larger block of open space, creating more points of available movement for wildlife and promoting conservation goals. However, the intensity and consolidation of development in the southeastern portion of the project would impact all habitat for coastal California gnatcatcher in this area of the Site, and would impact the coastal California gnatcatcher biological ladder along the I-15 corridor. Off-site impacts associated with improving Deer Springs Road would be the same under this alternative as the proposed project, however, overall, off-site biological impacts would be less under this alternative compared to the proposed project as Sarver Lane and Camino Mayor would not require improvements. Although this alternative would have greater impacts to coastal California gnatcatcher, a larger preserve would be achieved, avoiding potential biological impacts elsewhere within the project Site; and, therefore, impacts would be similar to the proposed project.

Cultural Resources

The reduction in the development footprint would reduce the need for cultural resources monitoring in many areas of the project Site, but the improvement of Deer Springs Road (due to traffic generation) would result in impacts similar to those proposed under the proposed project. Therefore, potentially significant impacts to cultural resources sites (CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822) would occur under this alternative. A portion of site CA-SDI-4558 would remain within the proposed development impact area (outside of the Deer Springs Road improvements). However, the proposed use would remain a natural park, as planned under the proposed project. Therefore, impacts to significant cultural resources would be similar to the proposed project.

Geology and Soils

As this alternative would be located within a portion of the same project, existing geologic conditions and hazards within these areas would be the same as under the proposed project. Many areas of potential rock fall hazards would no longer result in potential impacts, as development would avoid areas in the western and northern portions of the project Site. However, grading and slope alteration associated with placing all land uses in the southeastern portion of the project Site may result in new areas of rock fall hazard. Mitigation required for rock fall hazard under the proposed project would also be viable mitigation for any areas of potential new rock fall hazard areas associated with this alternative.

Greenhouse Gas Emissions

GHG emissions would increase during construction compared to emissions under the proposed project due to the increase in grading and the required export of approximately 17,266,000 cubic yards of material and the associated increase in haul truck trips under this alternative. The export haul truck trips would result in an increase of GHG emissions during construction. Therefore, during construction, this alternative would result in greater GHG emissions compared to the proposed project.

New project-generated trips would decrease under this alternative when compared to the proposed project, resulting in a decrease in mobile GHG emissions. Although trip distribution would differ, overall operational GHG emissions would decrease when compared to the proposed project. All multi-family units compared to a mix of single-family and multi-family units under the proposed project would contribute fewer GHG emissions associated with energy use, water demand, area sources, and solid waste generation. However, due to construction, overall GHG emissions impacts would be greater than the proposed project.

The project includes a combination of mitigation and project design features, including the purchase of carbon offsets, to fully offset its construction and operational GHG emissions. It is reasonable to assume this alternative would implement similar or equivalent mitigation and project design features to fully offset GHG emissions.

Hazards and Hazardous Materials

While some of the existing hazardous materials would be avoided (such as shot gun shells), potential impacts related to existing hazardous materials sites and contamination would remain similar to the proposed project, due to the existing gas station. Impacts associated with hazardous materials would less than significant with the incorporation of mitigation measures, similar when compared to the proposed project.

Although this alternative would be required to undergo approval by the County, DSFPD, and SMFPD, as well as comply with all applicable fire codes, site design would substantially affect emergency response and evacuation. This alternative would include numerous dead-ends that would require full accessibility by fire-fighting equipment and vehicles. Despite a secondary emergency access point, the single primary point of access under this alternative would present emergency and evacuation issues. During an evacuation scenario, fewer egress points would be available to residents of the project, increasing evacuation times and hazards to residents. Impacts related to wildfire and evacuation would be greater than the proposed project. Refer to Land Use and Planning for additional discussion specific to CCFC and General Plan fire policies. Therefore, hazards and hazardous materials impacts would be greater than the proposed project.

Hydrology and Water Quality

The Multi-Family Town Center Alternative would retain a greater area of the project Site as it exists today. Disturbed area would decrease by 342 acres, resulting in a reduced impervious footprint when compared to the proposed project. As such, drainage for the majority of the project Site would be unaltered. Construction and operation of this alternative would have similar sources of stormwater pollutants as the proposed project, and similar construction BMPs, source control facilities, and drainage management area facilities would be employed under this alternative to control for stormwater pollution and prevent flooding. Therefore, hydrology and water quality impacts would be reduced under this alternative compared to the project.

Land Use and Planning

As noted above, Golden Door Properties, LLC suggested this alternative during the public scoping process as a possible "Transit-Oriented Development" scenario. The land use plan described under this alternative (shown in Figure 4-9) follows typical patterns found in existing transit-oriented developments, but would be more densely clustered and located closer to commercial uses and parks with the intention of promoting walkability and reducing single-occupancy-vehicle trips. However, the key feature of transit-oriented development is the placement of residential and commercial uses in proximity to transit options such as a high-frequency bus line, trolley, or train. Although this alternative would provide a shuttle to the Escondido Transit Center (as would the proposed project), no transit options are available within walking distance of the project and the provision of transit would be within the authority of North County Transit District. Therefore, this alternative is not a transit-oriented development due to the absence of available transit options.

As reviewed by County Fire, this alternative proposes long looped roadways within many of the development areas, and proposes an alternative access road that traverses a great length through

native vegetation that would be used for emergency access only. As such, this project would not be in compliance with CCFC Sections 503.1.2 and 503.1.3 and General Plan Policies M-3.3 and S-3.5.

This alternative would only provide multi-family units, and as such, conflicts with General Plan Guiding Principles and Housing Element policies, including policies H-1.7 and H-1.8, that encourage the provision of a range of housing types to accommodate various needs of the population. Despite the preservation of a larger area of open space, this alternative would result in greater impacts to coastal California gnatcatcher and its habitat, a resource under the County RPO. Additionally, this alternative would result in greater visual impacts along I-15, resulting in potential inconsistency with the I-15 Corridor Scenic Preservation Guidelines (Site Design, Site Planning Standards, Policy 1). Overall, impacts to land use under this alternative would result in greater impacts when compared to the proposed project.

Mineral Resources

Under this alternative, no development would occur within MRZ-2 area of the project Site. Therefore, impacts to mineral resources would be avoided under this alternative. The alternative would reduce impacts to mineral resources when compared to the proposed project.

Noise

Construction of this alternative would require an additional 16,931,000 cubic yards of cut, which would result in more blasting activities when compared to the proposed project. Therefore, construction of this alternative would result in greater noise impacts when compared to the proposed project.

This alternative would result in greater traffic volumes along the segment of Deer Springs Road between Sarver Lane and Mesa Rock Road, resulting in increased noise impacts along this road segment. However, new project-generated trips would be less under this alternative compared to the proposed project, resulting in reduced traffic volumes on the balance of the road network and reduced operational trip-generated noise impacts overall. Therefore, operational trip-generated noise impacts would be less compared to the proposed project. Overall, noise impacts would be similar compared to the proposed project.

Paleontological Resources

Under this alternative, the Valley planning area, which is underlain by paleontologically sensitive soils, would not be developed. The remaining developed area under this alternative would result in similar impacts to paleontological resources as the proposed project. Therefore, this alternative would result in reduced impacts to paleontological resources when compared to the proposed project.

Parks and Recreation

Similar to the proposed project, this alternative would be subject to PLDO requirements. Therefore, this alternative would result in similar impacts to parks and recreation when compared to the proposed project.

Population and Housing

Unlike the proposed project, this alternative would not require acquiring existing residences along Sarver Lane. Although acquiring these residences under the proposed project would not result in a significant impact, the impact to displacement of existing homes would be reduced under this alternative when compared to the proposed project.

This alternative would have similar growth-inducing potential when compared to the proposed project, and would develop the same number of residential units. Therefore, this alternative would result in similar impacts when compared to the proposed project.

Public Services

This alternative would result in the same increase in population and demand for public services as the proposed project. This alternative also would pay the required public services fees and offer project design features to aid in emergency response, similar to the proposed project. Primary Site access would be provided in the same location as the proposed project, which would not affect emergency travel times from DSFPD Station 12 on Mesa Rock Road. Therefore, this alternative would result in similar impacts to public services when compared to the proposed project.

Transportation and Traffic

Under the Multifamily Town Center Alternative, development would be concentrated in the far southeastern portion of the project Site. This alternative would consist of 2,135 multifamily units, 81,000 square feet of retail, 10.3 acres of community parks, 24.3 acres of neighborhood parks, and a school site, combining all of these uses on 435 acres of the project. Compared to the proposed project, this alternative would generate 4,677 (21%) fewer ADTs, 333 (21%) fewer trips in the AM peak period, and 557 (27%) fewer trips in the PM peak period.

Compared to the proposed project, this alternative would result in greater impacts to Deer Springs Road between Mesa Rock Road and Sarver Lane, reduced impacts to Deer Springs Road between Sarver Lane and Twin Oaks Valley Road, reduced impacts to Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road (within the City of San Marcos), and reduced impacts to Buena Creek Road and its intersections with Twin Oaks Valley Road, Monte Vista Drive, and S. Santa Fe Avenue. This alternative would also not have any impacts to N.

Twin Oaks Valley Road or generate any traffic on Sarver Lane as both the Sarver Lane and Camino Mayor project access points would be eliminated by this alternative. However, because Sarver Lane would serve as an emergency access for this alternative, Sarver Lane would need to be improved to the County's Rural Residential Road standard.

Like the proposed project, this alternative would require a new interchange at Deer Springs Road and I-15, and impacts to Caltrans and San Marcos facilities (the I-15 interchange, freeway mainlines, and Twin Oaks Valley Road), impacts to the intersection of Robelini Dr./S. Santa Fe Avenue and impacts to the segment of S. Santa Fe Avenue between Robelini Drive and Buena Creek Road would remain significant and unavoidable.

Utilities and Service Systems

Although the same unit count would be developed under this alternative when compared to the proposed project, all units would be multi-family. Therefore, although demand and generation of water, wastewater, and solid waste would differ, it likely would not be substantially different. Therefore, this alternative would result in similar impacts compared to the proposed project.

Energy

The construction equipment fleet would remain similar to the proposed project; however, the grading duration would be decreased. Due to the amount of truck haul trips to export material from the Site, additional energy consumption would occur during construction compared to the proposed project. While the unit count would remain the same, the overall energy usage for an all multi-family development would be lower than the proposed project. Overall, energy impacts would be similar to the proposed project.

4.9.3 Relation to Project Objectives

The Multi-Family Town Center Alternative would meet project Objectives 1, 3, and 4 (see Section 4.2.1, Project Purpose and Objectives) by preserving substantial open space areas, constructing facilities concurrent with demand within existing service areas, and providing a diverse range of recreational opportunities. Although a larger open space area would be preserved, substantial landform alterations would be required for this alternative; therefore, it would meet project Objective 5, but to a lesser degree than the proposed project.

This alternative would not satisfy Objective 2 because all of the residential, interrelated neighborhoods would be removed and thereby eliminate all single-family and age-qualified residences. The "Village" designation in the General Plan for this project Site, however, would be satisfied with regard to a multi-family Town Center. In addition, this alternative would not satisfy Objective 6, which calls for the provision of a diverse range of housing opportunities. The

alternative would not provide for the construction of any single-family or age-qualified residential units. The project's objective of providing for a diverse range of housing opportunities is supported by a consumer survey of buyer preferences and demand over a consumer life stage (John Burns Real Estate Consulting 2016). The survey was used to inform the applicant of the variety of residential products to be proposed for each neighborhood. Of the consumers surveyed, an average of 80 percent indicated a preference for a traditional detached single-family home.

4.9.4 Feasibility

This alternative would result in a substantial increase in land use intensity at the southeastern portion of the project Site, resulting in various potential inconsistencies with the County General Plan and I-15 Scenic Preservation Guidelines. Similar to the proposed project, this alternative would require a General Plan Amendment. Additionally, the single point of access would inhibit adequate and safe emergency response from fire and medical service providers and evacuation, potentially increasing the risk to life and property. As discussed previously, this alternative would be in conflict with several CCFC and General Plan fire policies.

4.9.5 Evaluation of Significant Impacts

The Multi-Family Town Center Alternative would avoid, reduce, or substantially lessen significant impacts compared to the proposed project in the following areas:

- Hydrology and Water Quality
- Mineral Resources
- Paleontological Resources

The Multi-Family Town Center Alternative would result in greater significant impacts compared to the proposed project in the following areas:

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning

4.10 CDFW/USFWS Land Planning Alternative A

4.10.1 CDFW/USFWS Land Planning Alternative A Description and Setting

CDFW submitted a letter in response to the EIR NOP requesting that the EIR evaluate and compare a Land Planning Alternative A to the proposed project. USFWS also generally requested the same type of alternative. This alternative is depicted in Figure 4-10. Under this alternative, the Town Center, Terraces, and Hillside planning areas, along with associated access roadways, parks, and other improvements, would be removed and replaced with open space. The remainder of the planning areas (Valley, Mesa, Knoll, and Summit) would remain as proposed under the project. Both CDFW and USFWS suggest that this scaled-back alternative would minimize project impacts to the draft Pre-Approved Mitigation Area in the draft North County Multi-Species Conservation Plan; provide for a large, continuous block of open space in the eastern and northern portion of the Site; and maintain connectivity between on- and off-site areas designated as a draft Pre-Approved Mitigation Area and other conservation efforts outside the North County Multi-Species Conservation Plan planning area.

When compared to the proposed project, the CDFW/USFWS Land Planning Alternative A would eliminate the Village Town Center as shown in the proposed project, and thereby remove all commercial land uses to serve the Community and surrounding areas. In addition, the alternative would result in a reduction in the total number of residential units from 2,135 residential units under the proposed project to 1,353 residential units (896 single-family and 457 multi-family units). Open space would increase by approximately 237 acres; the disturbed area would decrease by approximately 237 acres; and grading would decrease by approximately 4,187,000 cubic yards of cut and decrease by approximately 3,737,000 cubic yards of fill, resulting in approximately 450,000 cubic yards of imported material. Deer Springs Road would be improved as proposed under the project (either under Option A or Option B).

4.10.2 Comparison of Significant Effects between Alternative and Proposed Project

Aesthetics

Under this alternative, the more visible portions of the proposed project (Town Center, Terraces, and Hillside planning areas) would no longer be developed. The remaining portions of the project Site to be developed under this alternative would be primarily located in the western portion of the project Site, which is less visible from public vantage points. A reduction in development would reduce overall impacts to visual resources. Additionally, less development would occur within the I-15 Scenic Corridor. Overall, more of the existing landform of the project Site would remain unaltered. Although the more visible portions of the project Site would

no longer be developed under this alternative, it would still result in a substantial visual change from the existing character of the project Site and surroundings. Therefore, this alternative would result in reduced aesthetic impacts compared to the proposed project.

Agricultural Resources

As with the proposed project, this alternative would require the widening of Deer Springs Road between the Twin Oaks Valley Road and Mesa Rock Road and the widening of Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road which would result in the same impacts to agricultural resources as the proposed project. Like the project, this alternative would be required to comply with the County's PACE Program to mitigate off-site impacts.

Air Quality

Construction emissions under the CDFW/USFWS Land Planning Alternative A would decrease compared to the proposed project due to the construction of fewer units, less cut and fill quantities, and less grading required; however, this alternative would include approximately 450,000 cubic yards of imported material. Imported material would be brought to the Site, resulting in approximately 28,125 haul trips (assuming the CalEEMod default 16-cubic-yard hauling capacity), or 56,250 one-way haul trips, during the construction phase that would not occur under the proposed project. CalEEMod also employs a 20-mile default haul distance for import and export trips. The addition of these import haul trips would result in an increase in emissions during the grading phase when compared to the proposed project; however, the decrease in overall grading and site disturbance, cut and fill, and unit construction likely would result in overall fewer emissions when compared to the proposed project.

During operation, this alternative would result in fewer units and fewer ADTs (12,317 total ADT, 9,892 fewer ADTs compared to the proposed project), thus resulting in lower operational emissions compared to the proposed project. Both operational and construction emissions would be reduced compared to the proposed project. Therefore, this alternative would result in reduced air quality impacts compared to the proposed project.

Biological Resources

The development footprint would be smaller with this alternative, resulting in a reduction in impacts to on-site vegetation; however, on-site impacts to critical habitat would not be reduced. This alternative would primarily result in benefits to wildlife movement and preserve design. With the elimination of the eastern and southeastern planning areas, a larger block of open space more consistent with County preservation goals would be available to wildlife for north/south movement. Reduction in impediments (internal roadways) would allow for more points of movement. This alternative would also preserve the coastal California gnatcatcher biological

ladder along the I-15 corridor that the proposed project would otherwise impact. Off-site improvements required for Deer Springs Road and Camino Mayor would be the same as the proposed project; however, improvements to Sarver Lane to meet the County's Community Collector road classification (refer to Transportation and Traffic below) would result in additional off-site impacts to biological resources. With an improved preserve design and avoidance of coastal California gnatcatcher habitat on site, overall impacts to biological resources under this alternative would be reduced compared to the proposed project.

Cultural Resources

The reduction in the development footprint may reduce the need for cultural resources monitoring in many areas of the project Site, but improvement of Deer Springs Road (same as the proposed project) would require the same monitoring as planned under the proposed project. Therefore, potentially significant impacts to cultural resources sites (CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822) would remain under this alternative. Therefore, impacts to significant cultural resources would be similar to the proposed project.

Geology and Soils

Elimination of several planning areas under this alternative would reduce the potential occurrence of geologic hazards. Less area would be used for development, thereby reducing the potential for the presence of geologic hazards (soil and surficial instability) and the need for soils testing. Rock fall hazard also would be reduced, as several rock fall hazard areas identified near the Town Center, Terraces, and Hillside planning areas would be avoided under this alternative. As this alternative would result in a reduction in development by removing three planning areas, overall geology and soils impacts would be reduced compared to the proposed project.

Greenhouse Gas Emissions

Similar to potential impacts to air quality, GHG emissions would decrease during construction compared to the proposed project, despite the need for construction truck trips, due to the construction of fewer units, less cut and fill quantities, and less grading required, resulting in reduced construction activity and less equipment required to complete the alternative.

During operation, this alternative would result in fewer units and fewer ADTs, thus resulting in lower operational GHG emissions compared to the proposed project. Fewer units during the operational phase would also contribute fewer GHG emissions associated with energy use, water demand, area sources, and solid waste generation. Overall, GHG emissions impacts would be reduced compared to the proposed project.

The project includes a combination of mitigation and project design features, including the purchase of carbon offsets, to fully offset its construction and operational GHG emissions. It is reasonable to assume this alternative would implement similar or equivalent mitigation and project design features to fully offset GHG emissions.

Hazards and Hazardous Materials

As the same Site would be used for this alternative, potential impacts related to existing hazardous materials sites and contamination would remain similar to the proposed project. Although construction of this alternative would likely require a shorter construction phase, hazardous material would still be handled, stored, and disposed of. Therefore, impacts associated with hazardous materials under this alternative would be similar to the proposed project.

Given the reduction in development, potential for wildfire hazard to affect structures and residents would be reduced. The elimination of several planning areas would not affect the need or provision of fire walls or FMZs for the proposed land uses. Fewer lots would require mitigation in the form of heat deflecting walls. Primary access to the Site would be located farther away from DSFPD Fire Station 12 (Sarver Lane instead of Deer Springs Road at Mesa Rock Road), increasing emergency travel times when compared to the proposed project. Portions of the Summit, Knoll, and Mesa planning areas would have a travel time greater than 5 minutes from Fire Station 12. This travel time would be inconsistent with Policy S-6.4 of the General Plan, which requires a travel time of 5 minutes or less. Impacts related to wildfire hazard would be greater than the proposed project. Refer to Land Use and Planning for additional discussion regarding compliance with CCFC and General Plan fire policies.

The evacuation plan under this alternative would be subject to the same standards and County approval as the proposed project. With a reduction in development (resulting in a reduction in resident population), the potential required time of evacuation likely would be reduced. Additionally, fewer residents would result in a reduction of traffic during an evacuation emergency. Evacuation impacts would have similar impacts as the proposed project. Therefore, this alternative would potentially result in greater impacts to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

This alternative would impact a smaller area of the project Site and avoid or reduce impacts to certain drainages impacted by the proposed project. Disturbed area would decrease by 237 acres, resulting in a reduced impervious footprint on site compared to the proposed project. As such, drainage for a larger portion of the project Site would be unaltered. Construction and operation of this alternative would have similar, but reduced, sources of stormwater pollutants as the

proposed project, and similar construction BMPs, source control facilities, and drainage management facilities would be employed under this alternative to control for stormwater pollution and flooding. This alternative would require the same off-site road improvements as the proposed project. Due to the decreased footprint, hydrology and water quality impacts would be reduced under this alternative compared to the project.

Land Use and Planning

Under this alternative, only residential units and parks, with associated roadway improvements, would be developed. This alternative lacks Community-serving commercial and school uses for project residents and the surrounding area. To accommodate trip distribution, Sarver Lane would require improvements, such as an increase in right-of-way and curb-to-curb width, beyond the requirements for the proposed project such that it would have potential impacts to additional biological resources and adjacent properties. With the exception of the above, this alternative would be consistent with most General Plan policies.

This alternative proposes the main entrance to the project Site be from Sarver Lane and the additional access to be from Camino Mayor, which connects to Twin Oaks Valley Road and eventually back to Deer Springs Road. The intersections of Sarver Lane and Twin Oaks Valley Road with Deer Spring Road are too close together to be considered remote. This would result in the alternative not being in compliance with CCFC Sections 503.1.2 and 503.1.3 and General Plan Policies M-3.3 and S-3.5. Moving the main entrance to the project to Sarver Lane would result in some of the project Site being farther than 5 minutes travel time from the nearest responding fire station, which is the GP standard for projects of this density. Portions of the Summit, Knoll, and Mesa planning areas would have a travel time greater than 5 minutes from Fire Station 12. This travel time would be inconsistent with Policy S-6.4 of the General Plan, which requires a travel time of 5 minutes or less. Overall, land use impacts would be greater than the proposed project.

Mineral Resources

Under this alternative, the land use plan and the corresponding impacts to MRZ-2 area in the northwest portion of the site would be the same as the proposed project.

Noise

Construction of this alternative would require a shorter timeline and reduced amount of cut and fill (4,187,000 cubic yards and 3,737,000 cubic yards, respectively). While import truck trips would be required under this alternative, it is not likely that the use and frequency of travel to and from the Site would result in additional noise impacts. The shorter construction phase and reduced development footprint would require fewer noise-generating construction activities, such

as blasting. Therefore, construction of this alternative would result in reduced noise impacts when compared to the proposed project.

This alternative would result in greater traffic volumes along the segment of Deer Springs Road between Sarver Lane and Mesa Rock Road, resulting in increased noise impacts along this road segment. However, new project-generated trips would be less under this alternative compared to the proposed project, resulting in reduced traffic volumes on the balance of the road network and reduced operational trip-generated noise impacts overall. Therefore, operational trip-generated noise impacts would be less compared to the proposed project.

Paleontological Resources

Under this alternative, the Town Center planning area would not be developed, which is underlain by paleontologically sensitive soils. The remaining developed area under this alternative would result in similar impacts to paleontological resources as the proposed project. Therefore, this alternative would result in reduced impacts to paleontological resources when compared to the proposed project.

Parks and Recreation

Similar to the proposed project, this alternative would be subject to PLDO requirements and, like the project, would comply by providing on-site public park acreage. Therefore, this alternative would result in similar impacts to parks and recreation when compared to the proposed project.

Population and Housing

This alternative would result in a smaller new population introduced to the area. Under this alternative, approximately 3,843 people would be introduced to the area, approximately 3,562 people more than under existing land use designations (2.84 persons per household; refer to Section 1.8 of this EIR). Under the proposed project, approximately 6,063 people would be introduced to the area, approximately 5,782 people more than under existing land use designations. However, this alternative would still exhibit similar growth-inducing attributes when compared to the proposed project. This alternative would introduce population growth beyond what is planned under the General Plan, and would expand transportation infrastructure that would increase accessibility to the area. However, because of the reduced population, this alternative would result in reduced impacts to population and housing when compared to the proposed project.

Public Services

A reduced population introduced to the area would result in a reduced demand for public services. However, a school site would not be provided because the Town Center would be

removed. This alternative would be required to pay public facility development impact fees and school fees equivalent to the reduced nature of development. With a reduced population, this alternative would result in reduced impacts to public services when compared to the proposed project.

Transportation and Traffic

Under the CDFW/USFWS Alternative A, development would be concentrated in the western half of the project Site. This alternative would consist of 1,353 total dwelling units, including 896 single family dwelling units and 457 multifamily dwelling units, 10.3 acres of community parks, and 16.3 acres of neighborhood parks developed on 540 acres of the project Site. This alternative would not include any commercial retail uses or a school site. Compared to the proposed project, this alternative would generate 9,892 (45%) fewer ADTs, 632 (39%) fewer trips in the AM peak period, and 824 (40%) fewer trips in the PM peak period.

Compared to the proposed project, CDFW/USFWS Alternative A would result in greater impacts to Deer Springs Road from Mesa Rock Road to Sarver Lane, reduced impacts on Deer Springs Road between Sarver Lane and Twin Oaks Valley Road, reduced impacts on North Twin Oaks Valley Road, reduced impacts to Twin Oaks Valley Road between Deer Springs Road and Buena Creek Road (within the City of San Marcos), and reduced impacts to Buena Creek Road and its intersections with Twin Oaks Valley Road, Monte Vista Drive, and S. Santa Fe Ave. Like the proposed project, this alternative would require a new interchange at Deer Springs Road and I-15. Additionally, as this alternative would result in significantly higher volumes along Sarver Lane, Sarver Lane would need to be improved to the Community Collector classification.

Like the proposed project, impacts to Caltrans and San Marcos facilities (the I-15 interchange, freeway mainlines, and Twin Oaks Valley Road), impacts to the intersection of Robelini Dr./S. Santa Fe Ave, and impacts to the segment of S. Santa Fe Ave. between Robelini Dr. and Buena Creek Rd. would remain significant and unavoidable.

Utilities and Service Systems

This alternative would result in a smaller increase in population and demand for utilities and service systems on site compared to the proposed project. Demand and generation of water and wastewater on site would be reduced compared to the proposed project. Therefore, this alternative would result in reduced impacts compared to the proposed project. Like the project, with mitigation, impacts to utilities and service systems would be reduced to less than significant

Energy

The addition of import haul trips could result in an increase of energy consumption during the grading phase when compared to the proposed project; however, the decrease in overall grading and site disturbance, cut and fill, and unit construction likely would result in overall reduced energy consumption when compared to the proposed project. Additionally, the reduced unit count would result in reduced long-term energy consumption. Overall, this alternative would result in reduced impacts compared to the proposed project.

4.10.3 Relation to Project Objectives

CDFW/USFWS Land Planning Alternative A would meet project Objectives 1, 3, 4, and 5 (see Section 4.2.1, Project Purpose and Objectives) by preserving substantial open space areas, constructing facilities concurrent with demand within existing service areas, providing diverse recreational opportunities, and preserving unique landscape features and distinct landforms along I-15. However, due to the removal of the Town Center and the elimination of three planning areas, which are interrelated with other neighborhoods, this alternative would not meet Objectives 2 and 6. Further, the project Site contains a Village designation, and under this alternative, elimination of the Town Center from the project would not be desirable from a General Plan or community benefits standpoint. In addition, under this alternative, eliminating the three planning areas from a project with interrelated neighborhoods would frustrate the Community from an overall land planning standpoint. Further, under CEQA (Public Resources Code, § 21159.26), a public agency may not reduce the proposed number of housing units as a project alternative for a particular significant effect on the environment if it determines there is another feasible project alternative that would provide a comparable level of mitigation — a factor for the County to consider in whether to approve the project or a project alternative. Moreover, this alternative would reduce the use of the electric bike-share program, bike lanes, and pedestrian features due to the change in internal circulation. Pass-by trips and other trip-reduction benefits also would be altered due to such changes in circulation. On balance, the alternative would not attain the project's underlying purpose to implement a new, mixed-use, interrelated planned community.

4.10.4 Feasibility

As CDFW/USFWS Land Planning Alternative A is a reduced version of the proposed project land use plan, it would likely be as feasible to develop as the proposed project. However, from a General Plan consistency and safety perspective, portions of the Summit, Knoll, and Mesa planning areas under this alternative would be inconsistent with Policy S-6.4 of the General Plan, which requires a travel time of 5 minutes or less for fire and medical emergencies, as well as CCFC Sections 503.1.2

and 503.1.3 and General Plan policies M-3.3 and S-3.5. This inconsistency would increase risk to life and structures during emergency fire and medical situations.

4.10.5 Evaluation of Significant Impacts

The CDFW/USFWS Land Planning Alternative A would avoid, reduce, or substantially lessen significant impacts compared to the proposed project in the following areas:

- Aesthetics
- Air Quality
- Biological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Paleontological Resources
- Population and Housing
- Public Services
- Utilities and Service Systems
- Energy

The CDFW/USFWS Land Planning Alternative A would result in greater significant impacts compared to the proposed project in the following areas:

- Hazards and Hazardous Materials
- Land Use
- Transportation and Traffic

4.11 CDFW Land Planning Alternative B

4.11.1 CDFW Land Planning Alternative B Description and Setting

During the public scoping process, CDFW requested that the EIR evaluate and compare a CDFW Land Planning Alternative B to the proposed project. The alternative is depicted in Figure 4-11. Under this alternative, the Terraces, Hillside, and the eastern portion of the Mesa planning areas, along with associated access roadways, parks, and other improvements, would instead be open space. The remainder of the planning areas (Town Center, Valley, Knoll, and Summit) would remain as under the proposed project. The Town Center planning area would not have direct access to the other planning areas. CDFW suggested this alternative to provide for a larger, contiguous block of open space in the eastern and northern portions of the property, to minimize edge effects to on-site biological open space areas, and to maintain connectivity between on- and off-site areas designated for conservation.