5.0 ALTERNATIVES

5.1 Rationale For Alternative Selection

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The Project was determined to result in potentially significant and unmitigated direct and/or cumulative impacts for greenhouse gas emissions, land use (related to transportation impacts), and transportation/ traffic. The Project was also determined to have significant (or potentially significant) direct, indirect and/or cumulative but mitigated impacts to air quality, biological resources, cultural resources, and noise.

Section 15126.6(f) of the CEQA Guidelines states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The State CEQA Guidelines provide several factors that should be considered in regard to the feasibility of an alternative. Those factors include: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site (if an off-site alternative is evaluated).

This EIR analyzes a total of four alternatives; the No Project/No Development Alternative, as well as a total of three full development alternatives, are evaluated in Subsections 4.3 through 4.5 of this chapter, and briefly summarized below.

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

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

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

In the case of the Project described in this EIR, both types of No Project Alternative apply and are discussed. The first No Project Alternative is the circumstance under which the Project does not proceed. The second No Project Alternative is addressed as the General Plan Consistent alternative described below. The No Project/No Development Alternative allows retention of the site as it currently exists and thereby avoids both construction-period and long-term unmitigable or unmitigated impacts (i.e., to greenhouse gas emissions, land use, and transportation/traffic) associated with development of the Project.

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would be consistent with the General Plan and would not include a Density Bonus Permit for Affordable housing. This Alternative would allow for development across the entire Project site and would impact steep slopes and sensitive biological resources, to a greater extent than the Project. Under the Project, steep slopes and most of the sensitive biological resources would be preserved within open space easements.

The Property Specific Request (PSR) Alternative was included to disclose the impacts that would occur if the PSR plan for the site were to be implemented on-site instead of the Project. The PSR Alternative evaluates development of 364 multi-family dwelling units and would not include a Density Bonus Permit for Affordable housing. This Alternative assumes development would occur in the same development footprint as the Project, and that clustering of development to avoid impacts to biological resources would occur.

The Reduced Development Alternative was included to disclose the impacts that would occur if the Project's development footprint and dwelling unit number were reduced by 20%. While residential uses would continue to be developed on-site, the reduced development area would reduce physical impacts and would potentially reduce impacts due to the number of dwelling units proposed as part of the Project. Under this alternative, the Project site would be developed with 61 dwelling units (a reduction of 15 dwelling units as compared to the 76 units proposed by the Project), within a development area of 16.78 acres (a reduction of 4.2 acres as compared to the 20.98 development area proposed by the Project). Given the reduced density that would occur under this Alternative, a Density Bonus Permit would not be pursued.

These alternatives represent a reasonable range of alternatives, as defined in the State CEQA Guidelines, because they present feasible alternate development patterns that would reduce significant impacts associated with the Project. These alternatives are compared to the impacts of the Project (with an overview of Project and alternative impacts provided in Table 4-1, *Comparison of Project and Alternative Impacts*, and are assessed relative to their ability to meet the basic objectives of the Project.

5.1.1 Project Objectives

The underlying purpose of the Project is to accommodate a portion of the projected population growth and housing needs in San Diego County by developing a residential community, consistent with the General Plan land use designation in a manner that is sensitive to the environment and complementary of surrounding land uses. As described in Subchapter 1.1 of this EIR, the Project includes the following overall objectives.

- To efficiently develop an underutilized property with residential uses consistent with the site's General Plan land use designation.
- To establish a residential development in the unincorporated community of San Dieguito, San Diego County in a manner that is sensitive to the environment and complementary of surrounding land uses.
- To develop a residential community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration to minimize alterations to natural landforms where practical.
- To increase and diversify the available housing supply in unincorporated San Diego County by providing residential homes that will be marketable within the evolving economic profiles of nearby communities.
- To provide on-site park space for use by Project residents and trail access for use by Project residents and residents of surrounding communities.
- To ensure compatibility of design between on-site land uses and surrounding properties.

- To establish development phasing that results in a logical, coordinated buildout of a new residential community.

5.1.2 Alternatives Considered but Rejected from Further Study

Alternative Location

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative project site location should be considered if development of another site is feasible, and if development of another site would avoid or substantially lessen significant impacts of the proposed project. Factors that may be considered when identifying an alternative site location 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 off-site alternative is "…whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." Further, CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternative locations are whether the project proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

An effort was made to identify an alternative location for the Project. The selection criteria were developed to identify potential alternative project sites that would be fairly easy to acquire, and large enough to accommodate the proposed uses. When looking for the alternative sites, the following criteria were used:

- Alternative site had to be within the identified market area
- Land had to be privately owned
- Alternative site had to feasibly accomplish most of the basic objectives of the project

The Project objectives require that the Project be sited in an area within San Dieguito, San Diego County in a manner that is sensitive to the environment and complementary of surrounding land uses and consistent with the site's General Plan land use designation.

No other similarly sized, undeveloped, property was known to be available for development within the County zoned for single-family residential uses within San Dieguito. Specific to the San Dieguito area, given the residential nature of the area and high vehicle miles traveled (VMT), if a property were to become available, development would be likely to result in impacts similar to those identified for the Project. This includes the issues of aesthetics, biological resources, cultural resources, greenhouse gas emissions, noise, and transportation/traffic.

Therefore, an alternative location was considered but rejected because: (1) it is unlikely that an alternative site in the County would substantially reduce significant environmental effects relative to the Project given the size of the parcel and type of development; and (2) the property was purchased with the intention of developing the site with residential uses, consistent with the General Plan land use designation. Therefore, the need for additional evaluation of an off-site alternative was rejected from further consideration.

Mixed-Use Project

As described in Section 1.0, *Project Description, Location, and Environmental Setting*, the Project site is zoned Rural Residential (RR) and Open Space (S80). The purpose of the RR zones is to provide appropriate regulations for the development of single dwelling units. Based on the current zoning, it is appropriate to consider an alternative that involves residential development at the Project site. Therefore, a Mixed-Use Project Alternative would involve development of the Project site with residential and commercial mixed uses.

The Project includes development of 76 single-family dwelling units and is consistent with the General Plan and zoning designations for the site, which allow for single-family development. Development of a mixed-use development project would not be consistent with the existing General Plan and zoning designations for the site. Therefore, the Mixed-Use Project Alternative is not viable for analysis as mixed-uses are not allowed on-site.

As noted previously, an alternative can be eliminated from detailed consideration in an EIR based on failure to meet most of the basic project objectives and the inability to avoid significant environmental impacts. The Mixed-Use Project Alternative would not meet the Project's objectives to design a residential development in a manner that is sensitive to the environment and complementary and compatible with surrounding land uses. Additionally, it is unlikely that a mixed-use development on-site would meet the Project's objectives for that takes environmental opportunities into consideration as effectively as the Project, due to the additional roadway and parking area that would be needed for the mixed-use component. Furthermore, the Mixed-Use Project Alternative would not avoid the Project's significant impact related to conflicting with transportation plans and would likely not avoid the Project's significant environmental impact related to greenhouse gas emissions. The Mixed-Use Project Alternative would have the potential to reduce the Project's VMT-related significant impacts; however, given the Project's location in a high VMT area, including a mixed-use component may not reduce impacts to below a level of significant.

Further analysis of a Mixed-Use Project Alternative is not required in this EIR.

5.2 Analysis of the No Project/No Development Alternative

5.2.1 No Project/No Development Alternative Description and Setting

Under the No Project/No Development Alternative, the Project site would remain in its current condition. The native and non-native habitat throughout the site would remain intact. The above-ground transmission line that currently bisects the property, the informal dirt trails would continue to exist. The Project residential uses would not be constructed; nor would supporting infrastructure such as improved road elements, and other utility upgrades. In addition, the Project-proposed public trail parking and connection and HOA-maintained landscaped areas would not be created.

5.2.2 Comparison of the Effects of No Project/No Development Alternative to the Project

The anticipated environmental effects resulting from the No Project/No Development Alternative are described below, along with comparisons of these impacts to the Project (refer to Table 4-1).

Biological Resources

The No Project/No Development Alternative would avoid the significant direct impacts to biological resources identified for the Project. In summary, specific biological impacts identified for the Project, which would be avoided by this alternative include loss of sensitive habitat, impacts to sensitive plant and animal species, impacts to non-wetland waters of the State, and displacement of nesting migratory birds during their breeding season. It should be noted that under the No Project/No Development Alternative, no on- or off-site preservation of biological resources would occur. The No Project/No Development Alternative would be expected to generally retain biological resources in their existing condition; therefore, there would be no direct impacts and overall impacts to biological resources associated with this alternative would be less than with the Project.

Cultural Resources

As discussed in detail in Subsection 2.2, no known significant impacts would occur within the Project site. As a result, no known impacts associated with the Project would occur. Unknown subsurface resources could be present, but because no grading activities (which might uncover unknown resources) at all would occur on the Project site with the No Project/No Development Alternative, no significant impacts to cultural resources would occur. When compared to the Project, impacts to cultural resources could be less under this alternative.

Global Climate Change

The elimination of development on, or new uses of, the Project site would result in no new greenhouse gas (GHG) emissions impacts. The site would remain empty and would therefore not have homes placed upon it. As discussed in detail in Subsection 2.3, implementation of the Project would result in significant and unavoidable impacts due to GHG emissions. Under the No Project/No Development Alternative, no significant impacts due to global climate change would occur. When compared to the Project, impacts due to global climate change would be less under this alternative and the Project's significant and avoidable impact would not occur.

Land Use Planning

Under the No Project/No Development Alternative, the Project site would remain undeveloped. However, this alternative would potentially increase land use inconsistencies by not realizing the full vision for the area as outlined in the General Plan. This would occur because the alternative would not effectively fulfill policies for residential development on-site compared to the Project. Significant land use impacts are anticipated with the Project as a result of conflict with City of San Marcos General Plan Policy M.1-4, and none would occur under this alternative.

Noise

The lack of current activities on the site results in a lack of site-generated noise that could affect off-site sensitive noise receptors. Accordingly, no significant noise effects would occur as a result of the No Project/No Development Alternative. This alternative would therefore avoid the potentially significant but mitigable construction noise impacts to the adjacent Loma San Marcos development and operational noise impacts identified for the site, relative to unshielded HVAC mechanical systems,

and noise impacts to homes facing or adjacent to San Elijo Road. When compared to the Project, impacts to noise would be less under this alternative.

Tribal Cultural Resources

Under the No Project/No Development Alternative, no development would occur on the Project site. There are no tribal cultural resources on-site and no impacts to such resources would result from implementation of the Project or this alternative.

Transportation

No existing trips are associated with this disturbed, but undeveloped, parcel, and therefore no significant transportation/traffic impacts would occur with implementation of the No Project/No Development Alternative. This alternative would thus avoid the conservatively identified significant (but unmitigated) direct and cumulative transportation impacts within the City of San Marcos. Furthermore, this alternative would avoid the significant and unavoidable VMT impacts that would occur with implementation of the Project. When compared to the Project, impacts to transportation/traffic would be less under this alternative.

Aesthetics and Visual Resources

Under the No Project/No Development Alternative, the Project site would continue to appear as a disturbed, but primarily undeveloped, area. The Project's less-than-significant aesthetic impacts would not occur. When compared to the Project, impacts to aesthetics would be less under this alternative.

Agricultural Resources

Under the No Project/No Development Alternative, the Project site would continue to appear as a disturbed, but primarily undeveloped, area. As described in Subsection 3.2, no agricultural uses occur on-site, the Project site does not contain designated Farmland, and is not zoned for agricultural uses. Development under the Project would not result in any significant impacts to agricultural resources. The Project's less-than-significant agricultural resources impacts would not occur. When compared to the Project, impacts to agricultural resources would be less under this alternative.

Air Quality

The elimination of development on, or new uses of, the Project site would result in no new air quality impacts. As discussed in Subsection 3.3, the Project would result in less than significant air quality impacts. When compared to the Project, impacts to air quality would be less under this alternative.

Energy Use

The No Project/No Development Alternative would not consume any energy as the site would remain undeveloped. As discussed in Subsection 3.4, the Project would result in less than significant impacts due to energy use. When compared to the Project, impacts to air quality would be less under this alternative.

Geology, Soils, and Paleontological Resources

The No Project/No Development Alternative would not result in any development on-site or related grading, and there would be no associated impacts related to geology, soils, or paleontological resources. However, the Project site would remain subject to existing geologic hazards under this alternative (e.g., seismic ground shaking). The potential geology, soils, and paleontological resource impacts resulting from the Project in Subsection 3.5 would be avoided with this alternative; however, these Project impacts would be less than significant with adherence to applicable regulatory/industry standards and recommendations in the site-specific geotechnical investigation. Therefore, this alternative would not avoid any significant impacts related to geology, soils, and paleontological resources, since the Project's impacts are less than significant.

Hazards and Hazardous Materials

As the No Project/No Development Alternative would not result in any development on site, the alternative would not result in potential impacts related to health and safety. With adherence to applicable regulatory requirements, the Project would pose a less than significant hazard to the public or the environment related to health and safety. Therefore, this alternative would not avoid any significant impacts related to health and safety since the Project's impacts are less than significant.

Hydrology and Water Quality

As the No Project/No Development Alternative would not result in any development, existing hydrology and drainage patterns of the Project site would remain the same. The Project would include the installation of a storm drain and water quality system which would discharge to the same locations as existing conditions, retaining existing drainage patterns. Moreover, the 100-year flow rates with the Project would be less than existing conditions and hydrology impacts would be less than significant. Therefore, this alternative would not avoid any significant hydrology impacts resulting from the Project since the Project's impacts are less than significant.

Mineral Resources

Under the No Project/No Development Alternative, no development would occur on-site. As discussed in Subsection 3.8, the Project does not contain any mineral resources and is not designated as an area with significant mineral resources and impacts were determined to be less than significant. The Project's less-than-significant impacts to mineral resources would not occur. When compared to the Project, impacts to mineral resources would be similar to the Project.

Population and Housing

The No Project/No Development Alternative would not include any land uses that would increase population; thus, no impact would occur. Impacts related to population and housing would be less than significant for the Project, which includes the development of residential uses, consistent with the General Plan. Therefore, this alternative would not avoid any significant impacts from the Project related to population and housing since the Project's impacts are less than significant.

Public Services

No development would occur under the No Project/No Development Alternative that would increase population, resulting in a need to expand public services and facilities. Impacts related to demand for these services also would be less than significant for the Project and there would be no need for new or expanded public facilities and no associated physical impacts associated with implementation of such facilities. Therefore, this alternative would not avoid any significant impacts from the Project related to public services and facilities since the Project's impacts are less than significant.

Recreation

No development would occur under the No Project/No Development Alternative that would increase population, resulting in a need to expand recreation facilities. Impacts related to demand for recreation facilities also would be less than significant for the Project and there would be no need for new or expanded recreation facilities and no associated physical impacts associated with implementation of such facilities. Therefore, this alternative would not avoid any significant impacts from the Project related to public services and facilities since the Project's impacts are less than significant.

Utilities and Service Systems

As the No Project/No Development Alternative would not include development on the Project site, it would not result in demand for water, sewer, or solid waste disposal services. The Project's impacts to public utilities and generation of solid waste would be less than significant with adherence to regulatory requirements. Therefore, this alternative would not avoid any significant impacts from the Project related to public utilities since the Project's impacts are less than significant.

Wildfire

The Project site is within an area designated as a Very High Fire Hazard Severity Zone (VHFHSZ). As the No Project/No Development Alternative would not implement development on the Project site, it would not impair implementation of, or physically interfere with, an adopted emergency response or emergency evacuation plan or increase any risks related to wildfire. The Project would result in development within the Project site, but consistent with the existing development on site, would comply with regulations addressing development in a VHFHSZ, including but not limited to requirements associated with brush management, and building design/materials, water supply, and emergency/fire access. Impacts related to wildfire also would be less than significant under this alternative and with the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to wildfire since the Project's impacts are less than significant.

5.2.3 Summary of No Project/No Development Alternative Analysis

The No Project/No Development Alternative would avoid the Project's significant GHG, land use (related to transportation impacts), and transportation impacts. Because there would be no construction activities under this alternative, this alternative would have reduced impacts related to air quality, biological resources, cultural resources, tribal cultural resources, and noise. However, the Project's impacts related to these topical issues would be less than significant with adherence to Mitigation Measures, applicable regulatory requirements, and/or compliance with the County's standard conditions. This alternative would have similar impacts to the Project (no impacts or less than

significant impacts) with regard to aesthetics and visual resources, agricultural resources, air quality, energy use, geology~~, and~~ soils, and paleontological resources, hazards and hazardous materials, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire. This alternative would be less effective than the Project with regard to fulfilling the goals and policies of the General Plan and San Dieguito Community Plan related to increasing residential development. This alternative would not result in impacts to hydrology/drainage; however, the Project would reduce the amount of runoff from the Project site compared to existing conditions.

The No Project/No Development Alternative would not: efficiently develop an underutilized property with residential uses consistent with the site's General Plan land use designation; establish a residential development in the unincorporated community of San Dieguito, San Diego County in a manner that is sensitive to the environment and complementary of surrounding land uses; residential community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration; increase and diversify the available housing supply in unincorporated San Diego County; provide on-site park space for use by Project residents and trail access; ensure compatibility of design between on-site land uses and surrounding properties; or establish development phasing that results in a logical, coordinated buildout of a new residential community. It would, therefore, not meet any of the basic Project objectives listed above in Section 5.1.1.

5.3 Analysis of ~~No Project/~~Development Pursuant to Existing Land Use Alternative

5.3.1 ~~No Project/~~Development Pursuant to Existing Land Use Alternative Description and Setting

Under the ~~No Project/~~No Development Pursuant to Existing Land Use Alternative, the Project site would be developed with 63 dwelling units across the entire 89.23-acre Project site pursuant to the existing General Plan and zoning designations. This Alternative would include development across the entire Project site and would not include any clustering of development to avoid sensitive biological resources, as is proposed under the Project and an Administrative Permit that would allow for clustering of the development. The Project includes a Density Bonus Permit, which includes development of seven Affordable dwelling units on-site in exchange for a density bonus on-site. Under this Alternative, a Density Bonus Permit would not be proposed; therefore, the seven Affordable dwelling units proposed as part of the Project would not be included under the analysis of this Alternative.

5.3.2 Comparison of the Effects of the ~~No Project/~~Development Pursuant to Existing Land Use Alternative to the Project

The anticipated environmental effects resulting from the ~~No Project/~~Development Pursuant to Existing Land Use Alternative are described below, along with comparisons of these impacts to the Project (refer to Table 4-1).

Biological Resources

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would not cluster development of the site to avoid sensitive biological resources; thus, significant direct impacts to biological resources would be increased as compared to the Project. Under this alternative, impacts to sensitive habitat, sensitive plant and animal species, non-wetland waters of the State, and displacement of nesting migratory birds during their breeding season would be increased due to greater impacts on-

site. Therefore, this alternative would increase impacts as compared to the Project and would not avoid any significant impacts to biological resources, since the Project's impacts are less than significant.

Cultural Resources

As discussed in detail in Subsection 2.2, no known significant impacts to cultural resources would occur within the Project site. As a result, no known impacts associated with the Project would occur. The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would increase the area of impact to the entire 89.23-acre Project site. Thus, if surface cultural resources are found in the expanded impact area, impacts would be increased as compared to the Project. Unknown subsurface resources could also be present on-site and could occur both with the Project and this alternative. However, when compared to the Project, impacts to cultural resources would be increased under this alternative due to the increased impact area.

Global Climate Change

Under the ~~No Project/~~ Development Pursuant to Existing Land Use Alternative, GHG emissions would be increased compared to the Project primarily due to the increase in construction area. Operationally, GHG emissions under this alternative would be reduced compared to the Project due to the reduction in the number of dwelling units and reductions in trip generation. As discussed in detail in Subsection 2.3, implementation of the Project would result in significant and unavoidable impacts due to GHG emissions. Although impacts would be reduced under the ~~No Project/~~Development Pursuant to Existing Land Use Alternative as compared to the Project, impacts would remain significant and unavoidable due to the number of dwelling units and associated trip generation. When compared to the Project, impacts due to global climate change would be reduced slightly under alternative; however, impacts would remain significant and unavoidable. This alternative would not avoid any significant impacts related to GHG emissions.

Land Use Planning

Under the ~~No Project/~~Development Pursuant to Existing Land Use Alternative, the Project site would be developed with 63 dwelling units in accordance with the County of San Diego General Plan. Development on-site would be consistent with the existing land use designation and zoning for the site. Although the amount of development under this alternative would be less than with the Project, this alternative would not conflict with General Plan policies. Consistent with the Project, this alternative would not involve any land uses that would conflict with local and regional planning programs relevant to development at the Project site. Significant land use impacts are anticipated with the Project as a result of conflict with City of San Marcos General Plan Policy M.1-4, and impacts would continue to be significant and unavoidable under this alternative. Therefore, this alternative would not avoid any significant land use or planning impacts.

Noise

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would have increased construction activities compared to the Project, with increased construction activities on the western and southern portions of the Project site. However, the construction-related noise levels would be similar to those associated with construction of the Project and would be less than significant. Similar to the Project, operational activities associated with this alternative have the potential to generate noise,

and it is expected that noise from on-site operations under this alternative would be similar to noise generated by the Project and would be less than significant. Due to the slight reduction in trip generation, this alternative would generate slightly less traffic-related noise on off-site roadways; however, the Project's impacts were determined to be less than significant. This alternative would therefore have similar potentially significant but mitigable construction noise impacts to the adjacent Loma San Marcos development and operational noise impacts identified for the site, relative to unshielded HVAC mechanical systems, and noise impacts to homes facing or adjacent to San Elijo Road. Therefore, this alternative would not avoid any significant noise impacts since the Project's impacts are less than significant.

Tribal Cultural Resources

Under the ~~No Project/~~Development Pursuant to Existing Land Use Alternative, development would occur on the entire Project site. The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would increase the area of impact to the entire 89.23-acre Project site. Thus, if tribal cultural resources are found in the expanded impact area, impacts would be increased as compared to the Project. Unknown subsurface resources could also be present on-site and could occur both with the Project and this alternative. However, when compared to the Project, impacts to cultural resources would be increased under this alternative due to the increased impact area.

Transportation

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative includes development of the Project site with 63 dwelling units. Although trip generation would be slightly reduced as compared to the Project, the conservatively identified significant (but unmitigated) direct and cumulative transportation impacts within the City of San Marcos would continue to occur under this alternative. Furthermore, this alternative would not avoid the significant and unavoidable VMT impacts that would occur with implementation of the Project. When compared to the Project, impacts to transportation would be reduced; however, impacts would remain significant and unavoidable. Therefore, this alternative would not avoid any significant transportation impacts.

Aesthetics and Visual Resources

Under the ~~No Project/~~Development Pursuant to Existing Land Use Alternative, the Project site would be developed with 63 dwelling units over the entire Project site, which would alter the visual character of the site. This alternative would introduce new development in the western and southern portions of the Project site, which is currently undeveloped and would remain undeveloped with implementation of the Project. However, similar to the Project, this alternative would not introduce architectural features that would detract from the existing visual character of the area. The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would include grading and development on the entire Project site, and the slopes and vegetation would be disturbed, resulting in an impact due to the removal of features that contribute to the visual character of the community. Similar to the Project, this alternative would have no impact on designated public scenic views. Therefore, this alternative would not avoid any significant impacts from the Project related to visual effects and neighborhood character since the Project's impacts are less than significant. When compared to the Project, impacts to aesthetics would be less under this alternative, but would be increased due to the impacts to slopes and trees that would remain undisturbed with implementation of the Project.

Agricultural Resources

Under the ~~No Project/~~ Development Pursuant to Existing Land Use Alternative, the entire Project site would be developed with 63 dwelling units. As described in Subsection 3.2, no agricultural uses occur on-site, the Project site does not contain designated Farmland, and is not zoned for agricultural uses. Development under the Project would not result in any significant impacts to agricultural resources. When compared to the Project, impacts to agricultural resources would be similar under this alternative.

Air Quality

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would involve construction on the entire Project site and the development of 63 dwelling units. The amount of grading activities would be increased as compared to the Project. Therefore, this alternative would result in increased construction-related air pollutant emissions compared to the Project, which would result in potentially significant air quality impacts during construction. Both the Project and the alternative would involve an increase in residential uses at the Project site; however, air pollutant emissions resulting from this alternative would be reduced compared to the Project due to the reduction in dwelling units on the site and associated reduction in trip generation. Any operations at the Project site under this alternative or with the Project would be conducted in adherence to applicable regulations and would have less than significant impacts to sensitive receptors. Similar to the Project, development under this alternative would be consistent with the Regional Air Quality Strategy (RAQS) and would not result in any emissions that would violate any air quality standards or increase emissions of any criteria pollutants. Furthermore, under both the Project and this alternative, sensitive receptors would not be subject to substantial pollutant concentrations, nor would significant odors be generated. When compared to the Project, impacts to air quality would be less under this alternative due to the reduced number of dwelling units proposed. As impacts would be less than significant under this Project and the ~~No Project/~~Development Pursuant to Existing Land Use Alternative, this alternative would not avoid any significant air quality impacts.

Energy Use

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would result in increased energy use associated with the construction and operation of 63 dwelling units on-site. The increase in energy use would be reduced as compared to the Project due to the overall reduction in development intensity under this alternative. The Project would comply with applicable regulations for energy conservation and would not result in any significant energy impacts. This alternative and the Project would result in similar less than significant energy impacts. Therefore, this alternative would not avoid any significant impacts related to energy since the Project's impacts are less than significant.

Geology, Soils, and Paleontological Resources

The Project site is subject to seismic ground shaking, and the ~~No Project/~~Development Pursuant to Existing Land Use Alternative would involve construction of 63 dwelling units on an undeveloped site. The dwelling units would be implemented in accordance with existing building standards and other building regulations. Therefore, this alternative would have similar less than significant impacts as the Project related to seismic ground shaking. With adherence to state and local building code

requirements, adherence to regulatory requirements, and adherence to recommendations outlined in the site-specific geotechnical report, the Project and this alternative would not result in any significant impacts associated with geology, soils, or paleontological resources. Further, development at the Project site would be subject to the same geotechnical constraints and similar recommendations to address these constraints. As with the Project, potential impacts related to geology, soils, and paleontological resources would be less than significant with this alternative. Therefore, this alternative would not avoid any significant impacts related to geology, soils, and paleontological resources since the Project's impacts are less than significant.

Hazards and Hazardous Materials

With adherence to applicable regulations, the Project would have no impact or a less than significant impact related to hazards and hazardous materials. As with the Project, the ~~No Project/~~Development Pursuant to Existing Land Use Alternative would operate in compliance with applicable regulations and would have a less than significant impact related to transport, use and disposal of hazardous materials; and, release of hazardous materials and hazardous emissions. Additionally, consistent with the Project, this alternative would have no impact or a less than significant impact related to emissions near a school, its location on a hazardous materials site, emergency response/evacuation, and wildland fires. Therefore, this alternative would not avoid any significant impacts related to hazards and hazardous materials since the Project's impacts are less than significant.

Hydrology and Water Quality

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would result in development of 63 dwelling units on the Project site. Therefore, existing hydrology and drainage patterns at the Project site would be modified similar to the Project under this alternative. The Project would include the installation of a storm drain and water quality system which would discharge to the same locations as existing conditions, retaining existing drainage patterns. Moreover, the 100-year flow rates with the Project would be less than existing conditions and hydrology impacts would be less than significant. Therefore, this alternative would not avoid any significant hydrology impacts resulting from the Project since the Project's impacts are less than significant.

Mineral Resources

Under the ~~No Project/~~Development Pursuant to Existing Land Use Alternative, the Project site would be developed with 63 dwelling units. As discussed in Subsection 3.8, the Project does not contain any mineral resources and is not designated as an area with significant mineral resources and impacts were determined to be less than significant. When compared to the Project, impacts to mineral resources would be similar to the Project. Therefore, this alternative would not avoid any significant mineral resources impacts resulting from the Project since the Project's impacts are less than significant.

Population and Housing

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would develop the Project site with 63 dwelling units, which would increase population on-site. Impacts related to population and housing would be less than significant for the Project, which includes the development of residential uses, consistent with the General Plan. When compared to the Project, impacts to population and housing would be similar to the Project. Therefore, this alternative would not avoid any significant

impacts from the Project related to population and housing since the Project's impacts are less than significant.

Public Services

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would develop the Project site with 63 dwelling units, which would increase population on-site, resulting in a need to expand public services and facilities. Impacts related to demand for these services also would be less than significant for the Project and there would be no need for new or expanded public facilities and no associated physical impacts associated with implementation of such facilities. When compared to the Project, impacts to public services would be similar to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to public services since the Project's impacts are less than significant.

Recreation

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would develop the Project site with 63 dwelling units, which would increase population on-site, resulting in a need to expand recreation facilities. Impacts related to demand for recreation facilities also would be less than significant for the Project and there would be no need for new or expanded recreation facilities and no associated physical impacts associated with implementation of such facilities. When compared to the Project, impacts to recreation would be similar to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to recreation since the Project's impacts are less than significant.

Utilities and Service Systems

As the ~~No Project/~~Development Pursuant to Existing Land Use Alternative would include development of 63 dwelling units on the Project site, it would result in demand for water, sewer, and solid waste disposal services. The Project's impacts on public utilities and generation of solid waste would be less than significant with adherence to regulatory requirements. When compared to the Project, impacts to utilities and service systems would be similar to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to utilities and service systems since the Project's impacts are less than significant.

Wildfire

The Project site is within an area designated as a VHFHSZ. The ~~No Project/~~ Development Pursuant to Existing Land Use Alternative would implement development on the Project site and would not impair implementation of, or physically interfere with, an adopted emergency response or emergency evacuation plan or increase any risks related to wildfire. Both the Project and this alternative would be required to comply with regulations addressing development in a VHFHSZ, including but not limited to requirements associated with brush management, and building design/materials, water supply, and emergency/fire access. Impacts related to wildfire also would be less than significant under this alternative and with the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to wildfire since the Project's impacts are less than significant.

5.3.3 Summary of ~~No Project/~~Development Pursuant to Existing Land Use Alternative Analysis

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would have reduced impacts to global climate change and land use; however, impacts under this alternative would remain significant and unavoidable. This Alternative would result in reduced impacts to noise. However, the Project's impacts related to this topical issue would be less than significant with adherence to Mitigation Measures, applicable regulatory requirements, and/or compliance with the County's standard conditions. This alternative would have similar impacts to the Project (no impacts or less than significant impacts) regarding agricultural resources, air quality, energy use, geology, soils, and paleontological resources, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire. Finally, this Alternative would result in increase impacts to biological resources, cultural resources, tribal cultural resources, transportation, and aesthetics and visual resources.

The ~~No Project/~~Development Pursuant to Existing Land Use Alternative would not develop a residential community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration to minimize alterations to natural landforms where practical; provide on-site park space for use by Project residents and trail access for use by Project residents and residents of surrounding communities; ensure compatibility of design between on-site land uses and surrounding properties; or establish development phasing that results in a logical, coordinated buildout of a new residential community. Therefore, this alternative does not meet all of the overall objectives for the Project listed above in Section 5.1.1.

5.4 Analysis of the Property Specific Request (PSR) Alternative

5.4.1 PSR Alternative Description and Setting

In 2018, the County considered a General Plan Amendment and zoning changes to allow for increased density on certain properties, which were known as "Property Specific Requests (PSRs)." On September 12, 2018, the PSR General Plan Amendment was put on hold due to litigation against the County's 2018 Climate Action Plan (CAP). The PSR General Plan Amendment and Rezone was formally discontinued by the County on February 25, 2021. Although the PSR was discontinued by the County, the PSR Alternative evaluates development of the Project site if the PSR were implemented by the County. Under the PSR Alternative, the Project site would be developed with 364 multi-family dwelling units by changing the General Plan designation from Semi-Rural to Village and zoning designation from SR-1 to a combination of General Commercial (with mixed use zoning at two dwelling units per acres) VR-10.9, and SR-0.5. This Alternative assumes development would occur in the same development footprint as the Project, and that clustering of development to avoid impacts to biological resources would occur. The Project includes a Density Bonus Permit, which includes development of seven Affordable dwelling units on-site in exchange for a density bonus on-site. Under this Alternative, a Density Bonus Permit would not be proposed; therefore, the seven Affordable dwelling units proposed as part of the Project would not be included under the analysis of this Alternative.

5.4.2 Comparison of the Effects of the PSR Alternative to the Project

The anticipated environmental effects resulting from the PSR Alternative are described below, along with comparisons of these impacts to the Project (refer to Table 4-1).

Biological Resources

The PSR Alternative would continue to cluster development of the site to avoid sensitive biological resources; thus, significant direct impacts to biological resources would be the same as compared to the Project. Under this alternative, impacts to sensitive habitat, sensitive plant and animal species, non-wetland waters of the State, and displacement of nesting migratory birds during their breeding season would have similar less-than-significant impacts as the Project. Therefore, this alternative would have the same impacts as compared to the Project and would not avoid any significant impacts to biological resources, since the Project's impacts are less than significant.

Cultural Resources

As discussed in detail in Subsection 2.2, no known significant impacts to cultural resources would occur within the Project site. As a result, no known impacts associated with the Project would occur. The PSR Alternative would impact the same area as the Project and would have the same impacts as the Project to known cultural resources. Unknown subsurface resources could also be present on-site and could occur both with the Project and this alternative. However, when compared to the Project, impacts to cultural resources would be similar under this alternative.

Global Climate Change

Under the PSR Alternative, GHG emissions would be increased compared to the Project primarily due to the increase in construction. Operationally, GHG emissions under this alternative would be increased compared to the Project due to the increase in the number of dwelling units and increases in trip generation. As discussed in detail in Subsection 2.3, implementation of the Project would result in significant and unavoidable impacts due to GHG emissions. Under the PSR Alternative, impacts would remain significant and unavoidable due to the increased number of dwelling units and associated trip generation. When compared to the Project, impacts due to global climate change would be increased under alternative and impacts would remain significant and unavoidable. This alternative would not avoid any significant impacts related to GHG emissions.

Land Use Planning

Under the PSR Alternative, the Project site would be developed with 364 dwelling units and a General Plan Amendment and Zone Reclassification would be required for implementation. With a General Plan Amendment and Zone Reclassification, development on-site would be consistent with the land use designation and zoning for the site. This alternative would not conflict with General Plan policies related to increasing density and housing in the County. However, because trip generation would be increased as compared to the Project, the conservatively identified significant (but unmitigated) direct and cumulative impacts due to conflict with City of San Marcos General Plan Policy M.1-4 would continue to occur under this alternative and would potentially be increased due to the increased number of trips on San Marcos roadways. This Alternative would include land uses that would conflict with local and regional planning programs relevant to development at the Project site due to the increased number of dwelling units proposed. However, as the increase in dwelling units would be incremental and population forecasts for the region would not be exceeded, it is anticipated impacts would be less than significant. Significant land use impacts are anticipated with the Project as a result of conflict with City of San Marcos General Plan Policy M.1-4, and impacts would be potentially increased under this alternative. Therefore, this alternative would not avoid any significant land use or planning impacts.

Noise

The PSR Alternative would have increased construction activities compared to the Project. However, the construction-related noise levels would be similar to those associated with construction of the Project and would be less than significant. Similar to the Project, operational activities associated with this alternative have the potential to generate noise, and it is expected that noise from on-site operations under this alternative would be similar to noise generated by the Project and would be less than significant. Due to the increase in trip generation, this alternative would generate more traffic-related noise on off-site roadways. This alternative would therefore have similar potentially significant but mitigable construction noise impacts to the adjacent Loma San Marcos development and operational noise impacts identified for the site, relative to unshielded HVAC mechanical systems, and noise impacts to homes facing or adjacent to San Elijo Road. Therefore, this alternative would not avoid any significant noise impacts since the Project's impacts are less than significant.

Tribal Cultural Resources

Under the PSR Alternative, development would occur on the same impact area as the Project. As a result, no known impacts associated with the Project would occur. The PSR Alternative would impact the same area as the Project and would have the same impacts as the Project to known tribal cultural resources. Unknown subsurface resources could also be present on-site and could occur both with the Project and this alternative. However, when compared to the Project, impacts to tribal cultural resources would be similar under this alternative. ~~However, there are no tribal cultural resources on-site and no impacts to such resources would result from implementation of the Project or this alternative.~~

Transportation

The PSR Alternative includes development of the Project site with 364 dwelling units. Although trip generation would be increased as compared to the Project, the conservatively identified significant (but unmitigated) direct and cumulative transportation impacts within the City of San Marcos would continue to occur under this alternative and would potentially be increased due to the increased number of trips on San Marcos roadways. Furthermore, while increasing density reduces VMT, this alternative would not avoid the significant and unavoidable VMT impacts that would occur with implementation of the Project. When compared to the Project, impacts to transportation would be increased on local roadways and potentially reduced for VMT; however, impacts would remain significant and unavoidable. Therefore, this alternative would not avoid any significant transportation impacts.

Aesthetics and Visual Resources

Under the PSR Alternative, the Project site would be developed with 364 dwelling units, which would alter the visual character of the site. This alternative would introduce new multi-story development on the Project site, which is currently undeveloped. However, similar to the Project, this alternative would not introduce architectural features that would detract from the existing visual character of the area. The PSR Alternative would include grading and development on the same impact area as the Project, and the slopes and vegetation would be preserved similar to the Project, resulting in a less-than-significant impact due to the removal of features that contribute to the visual character of the community. Similar to the Project, this alternative would have no impact on designated public scenic views. Therefore, this alternative would not avoid any significant impacts from the Project related to

visual effects and neighborhood character since the Project's impacts are less than significant. When compared to the Project, impacts to aesthetics would be similar under this alternative.

Agricultural Resources

Under the PSR Alternative, the Project site would be developed with 364 dwelling units. As described in Subsection 3.2, no agricultural uses occur on-site, the Project site does not contain designated Farmland, and is not zoned for agricultural uses. Development under the Project would not result in any significant impacts to agricultural resources. When compared to the Project, impacts to agricultural resources would be similar under this alternative.

Air Quality

The PSR Alternative would involve construction on the Project site and the development of 364 dwelling units. The amount of grading activities would be the same as compared to the Project. Therefore, this alternative would result in increased construction-related air pollutant emissions compared to the Project due to the increased density. Both the Project and the alternative would involve an increase in residential uses at the Project site; however, air pollutant emissions resulting from this alternative would be increased compared to the Project due to the increase in dwelling units on the site and associated increase in trip generation. Any operations at the Project site under this alternative or with the Project would be conducted in adherence to applicable regulations and would have less than significant impacts to sensitive receptors. Similar to the Project, development under this alternative would be consistent with the Regional Air Quality Strategy (RAQS) and would not result in any emissions that would violate any air quality standards or increase emissions of any criteria pollutants. Furthermore, under both the Project and this alternative, sensitive receptors would not be subject to substantial pollutant concentrations, nor would significant odors be generated. When compared to the Project, impacts to air quality would be increased under this alternative due to the increased number of dwelling units proposed. As impacts would be less than significant under this Project and the PSR Alternative, this alternative would not avoid any significant air quality impacts.

Energy Use

The PSR Alternative would result in increased energy use associated with the construction and operation of 364 dwelling units on-site. The increase in energy use would be increased as compared to the Project due to the increase in development intensity under this alternative. The Project would comply with applicable regulations for energy conservation and would not result in any significant energy impacts. This alternative and the Project would result in similar less than significant energy impacts. Therefore, this alternative would not avoid any significant impacts related to energy since the Project's impacts are less than significant.

Geology, ~~and~~ Soils, and Paleontological Resources

The Project site is subject to seismic ground shaking, and the PSR Alternative would involve construction of 364 dwelling units on an undeveloped site. The dwelling units would be implemented in accordance with existing building standards and other building regulations. Therefore, this alternative would have similar less than significant impacts as the Project related to seismic ground shaking. With adherence to state and local building code requirements, adherence to regulatory

requirements, and adherence to recommendations outlined in the site-specific geotechnical report, the Project and this alternative would not result in any significant impacts associated with geology, soils, or paleontological resources. Further, development at the Project site would be subject to the same geotechnical constraints and similar recommendations to address these constraints. As with the Project, potential impacts related to geology, soils, and paleontological resources would be less than significant with this alternative. Therefore, this alternative would not avoid any significant impacts related to geology, soils, and paleontological resources since the Project's impacts are less than significant.

Hazards and Hazardous Materials

With adherence to applicable regulations, the Project would have no impact or a less than significant impact related to hazards and hazardous materials. As with the Project, the PSR Alternative would operate in compliance with applicable regulations and would have a less than significant impact related to transport, use and disposal of hazardous materials; and release of hazardous materials and hazardous emissions. Additionally, consistent with the Project, this alternative would have no impact or a less than significant impact related to emissions near a school, its location on a hazardous materials site, emergency response/evacuation, and wildland fires. Therefore, this alternative would not avoid any significant impacts related to hazards and hazardous materials since the Project's impacts are less than significant.

Hydrology and Water Quality

The PSR Alternative would result in development of 364 dwelling units on the Project site. Therefore, existing hydrology and drainage patterns at the Project site would be modified similar to the Project under this alternative. The Project would include the installation of a storm drain and water quality system which would discharge to the same locations as existing conditions, retaining existing drainage patterns. Moreover, the 100-year flow rates with the Project would be less than existing conditions and hydrology impacts would be less than significant. Therefore, this alternative would not avoid any significant hydrology impacts resulting from the Project since the Project's impacts are less than significant.

Mineral Resources

Under the PSR Alternative, the Project site would be developed with 364 dwelling units. As discussed in Subsection 3.8, the Project does not contain any mineral resources and is not designated as an area with significant mineral resources and impacts were determined to be less than significant. When compared to the Project, impacts to mineral resources would be similar to the Project. Therefore, this alternative would not avoid any significant mineral resources impacts resulting from the Project since the Project's impacts are less than significant.

Population and Housing

The PSR Alternative would develop the Project site with 364 dwelling units, which would increase population on-site. Impacts related to population and housing would be less than significant for the Project, which includes the development of residential uses, consistent with the General Plan. When compared to the Project, impacts to population and housing would be increased compared to the Project. However, the incremental increase in population would be anticipated to be less than

significant. Therefore, this alternative would not avoid any significant impacts from the Project related to population and housing since the Project's impacts are less than significant.

Public Services

The PSR Alternative would develop the Project site with 364 dwelling units, which would increase population on-site, resulting in a need to expand public services and facilities. The PSR Alternative would be required to pay impact fees to ensure adequate service would be provided under this alternative and impacts would be less than significant. Impacts related to demand for these services also would be less than significant for the Project and there would be no need for new or expanded public facilities and no associated physical impacts associated with implementation of such facilities. When compared to the Project, impacts to public services would be increased compared to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to public services since the Project's impacts are less than significant.

Recreation

The PSR Alternative would develop the Project site with 364 dwelling units, which would increase population on-site, resulting in a need to expand recreation facilities. The 364 dwelling units would be required to be consistent with the Parkland Dedication Ordinance (PLDO) which may require construction of additional public on-site recreational facilities. Impacts related to demand for recreation facilities also would be less than significant for the Project and there would be no need for new or expanded recreation facilities and no associated physical impacts associated with implementation of such facilities. When compared to the Project, impacts to recreation would be increased compared to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to recreation since the Project's impacts are less than significant.

Utilities and Service Systems

As the PSR Alternative would include development of 364 dwelling units on the Project site, it would result in demand for water, sewer, and solid waste disposal services. The Project's impacts on public utilities and generation of solid waste would be less than significant with adherence to regulatory requirements. When compared to the Project, impacts to utilities and service systems would be would be increased compared to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to utilities and service systems since the Project's impacts are less than significant.

Wildfire

The Project site is within an area designated as a VHFHSZ. The PSR Alternative would implement development on the Project site and would not impair implementation of, or physically interfere with, an adopted emergency response or emergency evacuation plan or increase any risks related to wildfire. Both the Project and this alternative would be required to comply with regulations addressing development in a VHFHSZ, including but not limited to requirements associated with brush management, and building design/materials, water supply, and emergency/fire access. Impacts related to wildfire also would be less than significant under this alternative and with the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to wildfire since the Project's impacts are less than significant.

5.4.3 Summary of the Property Specific Request (PSR) Alternative

The PSR Alternative would have reduced impacts to global climate change and land use; however, impacts under this alternative would remain significant and unavoidable. Additionally, this alternative would result in increased impacts to the Project's significant and unavoidable transportation impacts. The PSR Alternative would result in similar significant and mitigatable to cultural and tribal cultural resources. This Alternative would also result in reduced impacts to noise. However, the Project's impacts related to these topical issues would be less than significant with adherence to Mitigation Measures, applicable regulatory requirements, and/or compliance with the County's standard conditions. This alternative would have similar impacts to the Project (no impacts or less than significant impacts) to aesthetics and visual resources, agricultural resources, air quality, energy use, geology, soils, and paleontological resources, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, and wildfire. This Alternative would result in increased impacts as compared to the Project's impacts in regard to public services, recreation, and utilities and service systems.

The PSR Alternative would not efficiently develop an underutilized property with residential uses consistent with the site's General Plan land use designation, establish a residential development in the unincorporated community of San Dieguito in a manner that is sensitive to the environment and complementary of surrounding land uses, ensure compatibility of design between on-site land uses and surrounding properties, or provide on-site park space for use by Project residents and trail access for use by Project residents and residents of surrounding communities. Therefore, the PSR Alternative would not meet all of the overall objectives for the Project listed above in Section 5.1.1.

5.5 Analysis of the Reduced Development Area Alternative

5.5.1 Reduced Development Area Alternative Description and Setting

Under the Reduced Development Area Alternative, the Project's development footprint and dwelling unit number would be reduced by 20%. Under this alternative, the Project site would be developed with 61 dwelling units (a reduction of 15 dwelling units as compared to the 76 units proposed by the Project), within a development area of 16.78 acres (a reduction of 4.2 acres as compared to the 20.98 development area proposed by the Project). While residential uses would continue to be developed on-site, the reduced development area would reduce physical impacts and would potentially reduce impacts due to the number of dwelling units proposed as part of the Project. Given the reduced density that would occur under this Alternative, a Density Bonus Permit would not be pursued.

5.5.2 Comparison of the Effects of the Reduced Development Area Alternative to the Project

The anticipated environmental effects resulting from the Reduced Development Area Alternative are described below, along with comparisons of these impacts to the Project (refer to Table 4-1).

Biological Resources

The Reduced Development Area Alternative would cluster development of the site to avoid sensitive biological resources and would reduce the impact area by 20%; thus, significant direct impacts to biological resources would be reduced as compared to the Project. Under this alternative, impacts to sensitive habitat, sensitive plant and animal species, non-wetland waters of the State, and displacement of nesting migratory birds during their breeding season would be reduced due to the reduced impact area on-site. Therefore, this alternative would reduce impacts as compared to the Project and would

not avoid any significant impacts to biological resources, since the Project's impacts are less than significant.

Cultural Resources

As discussed in detail in Subsection 2.2, no known significant impacts to cultural resources would occur within the Project site. As a result, no known impacts associated with the Project would occur. The Reduced Development Area Alternative would reduce the area of impact by 20% to 16.78 acres as compared to the Project. Unknown subsurface resources could also be present on-site and could occur both with the Project and this alternative. However, when compared to the Project, impacts to cultural resources would be decreased ~~increased~~ under this alternative due to the decreased ~~increased~~ impact area.

Global Climate Change

Under the Reduced Development Area Alternative, GHG emissions would be reduced compared to the Project primarily due to the 20% reduction in construction area and dwelling unit count. Operationally, GHG emissions under this alternative would be reduced compared to the Project due to the reduction in the number of dwelling units and reductions in trip generation. As discussed in detail in Subsection 2.3, implementation of the Project would result in significant and unavoidable impacts due to GHG emissions. Although impacts would be reduced under the Reduced Development Area Alternative as compared to the Project, impacts would remain significant and unavoidable due to the number of dwelling units and associated trip generation. When compared to the Project, impacts due to global climate change would be reduced slightly under alternative; however, impacts would remain significant and unavoidable. This alternative would not avoid any significant impacts related to GHG emissions.

Land Use Planning

Under the Reduced Development Area Alternative, the Project site would be developed with 61 dwelling units in accordance with the County of San Diego General Plan. Development on-site would be consistent with the existing land use designation and zoning for the site. Although the amount of development under this alternative would be less than with the Project, this alternative would not conflict with General Plan policies. Consistent with the Project, this alternative would not involve any land uses that would conflict with local and regional planning programs relevant to development at the Project site. Significant land use impacts are anticipated with the Project as a result of conflict with City of San Marcos General Plan Policy M.1-4, and impacts would similarly be significant and unavoidable under this alternative. Therefore, this alternative would not avoid any significant land use or planning impacts.

Noise

The Reduced Development Area Alternative would have reduced construction activities compared to the Project. The construction-related noise levels would be reduced as compared to those associated with construction of the Project and would be less than significant. Similar to the Project, operational activities associated with this alternative have the potential to generate noise, and it is expected that noise from on-site operations under this alternative would be slightly reduced to noise generated by the Project and would be less than significant. Due to the slight reduction in trip generation, this

alternative would generate slightly less traffic-related noise on off-site roadways; however, the Project's impacts were determined to be less than significant. This alternative would therefore have similar potentially significant but mitigable construction noise impacts to the adjacent Loma San Marcos development and operational noise impacts identified for the site, relative to unshielded HVAC mechanical systems, and noise impacts to homes facing or adjacent to San Elijo Road. Therefore, this alternative would not avoid any significant noise impacts since the Project's impacts are less than significant.

Tribal Cultural Resources

Under the Reduced Development Area Alternative, development would occur on 16.78 acres of the Project site. The Reduced Development Area Alternative would reduce the area of impact by 20% to 16.78 acres as compared to the Project. Unknown subsurface resources could also be present on-site and could occur both with the Project and this alternative. However, when compared to the Project, impacts to tribal cultural resources would be reduced under this alternative due to the decreased impact area. ~~However, there are no tribal cultural resources on site and no impacts to such resources would result from implementation of the Project or this alternative.~~

Transportation

The Reduced Development Area Alternative includes development of the Project site with 61 dwelling units. Although trip generation would be slightly reduced as compared to the Project, the conservatively identified significant (but unmitigated) direct and cumulative transportation impacts within the City of San Marcos would continue to occur under this alternative. Furthermore, this alternative would not avoid the significant and unavoidable VMT impacts that would occur with implementation of the Project. When compared to the Project, impacts to transportation would be reduced; however, impacts would remain significant and unavoidable. Therefore, this alternative would not avoid any significant transportation impacts.

Aesthetics and Visual Resources

Under the Reduced Development Area Alternative, the Project site would be developed with 61 dwelling units, which would alter the visual character of the site. However, similar to the Project, this alternative would not introduce architectural features that would detract from the existing visual character of the area. The Reduced Development Area Alternative would include grading and development on 16.78 acres of the Project site, and the slopes and vegetation would be preserved similar to the Project, resulting in a less-than-significant impact due to the removal of features that contribute to the visual character of the community. Similar to the Project, this alternative would have no impact on designated public scenic views. Therefore, this alternative would not avoid any significant impacts from the Project related to visual effects and neighborhood character since the Project's impacts are less than significant. When compared to the Project, impacts to aesthetics would be similar under this alternative.

Agricultural Resources

Under the Reduced Development Area Alternative, the entire Project site would be developed with 61 dwelling units. As described in Subsection 3.2, no agricultural uses occur on-site, the Project site does not contain designated Farmland, and is not zoned for agricultural uses. Development under the Project

would not result in any significant impacts to agricultural resources. When compared to the Project, impacts to agricultural resources would be similar under this alternative.

Air Quality

The Reduced Development Area would involve construction on the entire Project site and the development of 61 dwelling units. The amount of grading activities would be decreased by 20% as compared to the Project. Therefore, this alternative would result in decreased construction-related air pollutant emissions compared to the Project, which would result in potentially significant air quality impacts during construction. Both the Project and the alternative would involve an increase in residential uses at the Project site; however, air pollutant emissions resulting from this alternative would be reduced compared to the Project due to the reduction in dwelling units on the site and associated reduction in trip generation. Any operations at the Project site under this alternative or with the Project would be conducted in adherence to applicable regulations and would have less than significant impacts to sensitive receptors. Similar to the Project, development under this alternative would be consistent with the Regional Air Quality Strategy (RAQS) and would not result in any emissions that would violate any air quality standards or increase emissions of any criteria pollutants. Furthermore, under both the Project and this alternative, sensitive receptors would not be subject to substantial pollutant concentrations, nor would significant odors be generated. When compared to the Project, impacts to air quality would be less under this alternative due to the reduced number of dwelling units proposed. As impacts would be less than significant under this Project and the Reduced Development Area Alternative, this alternative would not avoid any significant air quality impacts.

Energy Use

The Reduced Development Area Alternative would result in increased energy use associated with the construction and operation of 61 dwelling units on-site. The increase in energy use would be reduced as compared to the Project due to the 20% reduction in development intensity under this alternative. The Project would comply with applicable regulations for energy conservation and would not result in any significant energy impacts. This alternative and the Project would result in similar less than significant energy impacts. Therefore, this alternative would not avoid any significant impacts related to energy since the Project's impacts are less than significant.

Geology, Soils, and Paleontological Resources

The Project site is subject to seismic ground shaking, and the Reduced Development Area Alternative would involve construction of 61 dwelling units on an undeveloped site. The dwelling units would be implemented in accordance with existing building standards and other building regulations. Therefore, this alternative would have similar less than significant impacts as the Project related to seismic ground shaking. With adherence to state and local building code requirements, adherence to regulatory requirements, and adherence to recommendations outlined in the site-specific geotechnical report, the Project and this alternative would not result in any significant impacts associated with geology, soils, or paleontological resources. Further, development at the Project site would be subject to the same geotechnical constraints and similar recommendations to address these constraints. As with the Project, potential impacts related to geology, soils, and paleontological resources would be less than significant with this alternative. Therefore, this alternative would not avoid any significant impacts related to geology, soils, and paleontological resources since the Project's impacts are less than significant.

Hazards and Hazardous Materials

With adherence to applicable regulations, the Project would have no impact or a less than significant impact related to hazards and hazardous materials. As with the Project, the Reduced Development Area Alternative would operate in compliance with applicable regulations and would have a less than significant impact related to transport, use and disposal of hazardous materials; and, release of hazardous materials and hazardous emissions. Additionally, consistent with the Project, this alternative would have no impact or a less than significant impact related to emissions near a school, its location on a hazardous materials site, emergency response/evacuation, and wildland fires. Therefore, this alternative would not avoid any significant impacts related to hazards and hazardous materials since the Project's impacts are less than significant.

Hydrology and Water Quality

The Reduced Development Area Alternative would result in development of 61 dwelling units on the Project site. Therefore, existing hydrology and drainage patterns at the Project site would be modified similar to the Project under this alternative. The Project would include the installation of a storm drain and water quality system which would discharge to the same locations as existing conditions, retaining existing drainage patterns. Moreover, the 100-year flow rates with the Project would be less than existing conditions and hydrology impacts would be less than significant. Therefore, this alternative would not avoid any significant hydrology impacts resulting from the Project since the Project's impacts are less than significant.

Mineral Resources

Under the Reduced Development Area Alternative, the Project site would be developed with 61 dwelling units. As discussed in Subsection 3.8, the Project does not contain any mineral resources and is not designated as an area with significant mineral resources and impacts were determined to be less than significant. When compared to the Project, impacts to mineral resources would be similar to the Project. Therefore, this alternative would not avoid any significant mineral resources impacts resulting from the Project since the Project's impacts are less than significant.

Population and Housing

The Reduced Development Area Alternative would develop the Project site with 61 dwelling units, which would increase population on-site. Impacts related to population and housing would be less than significant for the Project, which includes the development of residential uses, consistent with the General Plan. When compared to the Project, impacts to population and housing would be similar to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to population and housing since the Project's impacts are less than significant.

Public Services

The Reduced Development Area Alternative would develop the Project site with 61 dwelling units, which would increase population on-site, resulting in a need to expand public services and facilities. Impacts related to demand for these services also would be less than significant for the Project and there would be no need for new or expanded public facilities and no associated physical impacts associated with implementation of such facilities. When compared to the Project, impacts to public

services would be slightly reduced as compared to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to public services since the Project's impacts are less than significant.

Recreation

The Reduced Development Area Alternative would develop the Project site with 61 dwelling units, which would increase population on-site, resulting in a need to expand recreation facilities. Impacts related to demand for recreation facilities also would be less than significant for the Project and there would be no need for new or expanded recreation facilities and no associated physical impacts associated with implementation of such facilities. When compared to the Project, impacts to recreation would be slightly reduced as compared to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to recreation since the Project's impacts are less than significant.

Utilities and Service Systems

As the Reduced Development Area Alternative would include development of 61 dwelling units on the Project site, it would result in demand for water, sewer, and solid waste disposal services. The Project's impacts on public utilities and generation of solid waste would be less than significant with adherence to regulatory requirements. When compared to the Project, impacts to utilities and service systems would be slightly reduced as compared to the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to utilities and service systems since the Project's impacts are less than significant.

Wildfire

The Project site is within an area designated as a VHFHSZ. The Reduced Development Area Alternative would implement development on the Project site and would not impair implementation of, or physically interfere with, an adopted emergency response or emergency evacuation plan or increase any risks related to wildfire. Both the Project and this alternative would be required to comply with regulations addressing development in a VHFHSZ, including but not limited to requirements associated with brush management, and building design/materials, water supply, and emergency/fire access. Impacts related to wildfire also would be less than significant under this alternative and with the Project. Therefore, this alternative would not avoid any significant impacts from the Project related to wildfire since the Project's impacts are less than significant.

5.5.3 Summary of Reduced Development Area Alternative Analysis

The Reduced Development Area Alternative would have reduced impacts on global climate change and transportation; however, impacts under this alternative would remain significant and unavoidable. This Alternative would result in reduced impacts to biological resources, cultural resources, tribal cultural resources, and noise. However, the Project's impacts related to these topical issues would be less than significant with adherence to Mitigation Measures, applicable regulatory requirements, and/or compliance with the County's standard conditions. This Alternative would result in reduced, but still significant and unmitigable impacts to land use. Finally, the Reduced Development Alternative would result in similar impacts to the Project (no impact or less than significant impact) for the issue areas of aesthetics and visual resources, agricultural resources, air quality, energy use, geology, soils, and

paleontological resources, hazards and hazardous materials, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfires.

The Reduced Development Alternative would not efficiently develop an underutilized property with residential uses consistent with the site's General Plan land use designation or provide on-site park space for use by Project residents and trail access for use by Project residents and residents of surrounding communities. This Alternative would not increase and diversify the available housing supply in unincorporated San Diego County by providing residential homes that would be marketable within the evolving economic profiles of nearby communities at the level of the Project. Therefore, this alternative does not meet all of the overall objectives for the Project listed above in Section 5.1.1.

5.6 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, another environmentally superior alternative must be identified.

Based on the analysis presented in Subsections 2.1 through 2.6 of this EIR, the Project would result in potentially significant impacts related to GHG emissions, land use (related to transportation), and transportation and Project-level mitigation measures are required to reduce this potentially significant impact to a less than significant level. For all other topics, the Project, which would be implemented in compliance with applicable regulations and the City's standard conditions, would result in no impact or a less than significant impact. The Project would not result in any significant and unavoidable impacts; therefore, no alternative is needed to reduce or avoid such impacts. Therefore, for purposes of this discussion, for an alternative to be superior to the Project, it would need to reduce VMT impacts.

Table 4-1 provides a comparison of the overall environmental impacts for the described alternatives. The No Project/No Development Alternative is identified as the environmentally superior alternative. The No Project Alternative does not meet the objectives of the Project as outlined in Section 4.1.1.

Of the remaining alternatives, the environmentally superior alternative is the PSR Alternative. This alternative would reduce the Project's significant impacts related to GHG emissions, land use (due to transportation), and transportation. Impacts related to the following topical issues would be similar to the Project: land use, transportation, biological resources, energy, geology and soils, health and safety, historical resources, hydrology, paleontological resources, population and housing, tribal cultural resources, water quality, and wildfire. This alternative would meet most of the Project objectives, but not to the same extent as the Project, due primarily to the increased density on-site.

5.7 Summary of Alternatives

Table 4-1, below, summarizes the potential impacts identified for alternatives in comparison with those identified for the Project. The table addresses each of the full-build alternatives (i.e., those alternatives that would result in substantially different development patterns and uses as a whole for the Project property).

Table 5-1 Comparison of Project and Alternative Impacts

Environmental Topic	Proposed Project	No Project/No Development	~~No Project/~~Development Pursuant to Existing Land Use Alternative	PSR	Reduced Development Area
Biological Resources	SM	Less	More	Less	Less
Cultural Resources	SM	Less	More	Less	Less
Global Climate Change	SU	Less	Less	More	More
Land Use	SU	Less	Less	More	Less
Noise	SM	Less	Less	Less	Less
Tribal Cultural Resources	SM	Less	More	Less	Less
Transportation	SU	Less	More	More	More
Aesthetics and Visual Resources	N	Less	More	Less	Less
Agricultural Resources	N	Less	Less	Less	Less
Air Quality	N	Less	Less	Less	Less
Energy Use	N	Less	Less	Less	Less
Geology, Soils, and Paleontological Resources	N	Less	Less	Less	Less
Hazards and Hazardous Materials	N	Less	Less	Less	Less
Hydrology and Water Quality	N	Less	Less	Less	Less
Mineral Resources	N	Less	Less	Less	Less
Population and Housing	N	Less	Less	Less	Less
Public Services	N	Less	Less	More	Less
Recreation	N	Less	Less	More	Less
Utilities and Service Systems	N	Less	Less	More	Less
Wildfire	N	Less	Less	Less	Less

SM = significant but mitigable impacts; SU = significant and unmitigated impacts; N = no significant impacts